

April 28, 2023

Phil Andrews
Chief Executive Officer
USA Fencing
210 USA Cycling Point, Suite 120
Colorado Springs, CO 80907

Dear Mr. Andrews:

Please find enclosed the U.S. Center for SafeSport's 2023 Final Event Audit Report and Risk Assessment Report of USA Fencing. No sooner than seven (7) days from today, the audit report will be posted in the Audit & Compliance section at www.uscenterforsafesport.org. Please accept our appreciation for your attentiveness and all the time and effort it took to prepare for this audit.

We strive for the audit process to be productive and beneficial and hope that you found it to be so. If you have any additional questions, concerns or suggestions, please do not hesitate to reach out.

Best Regards,



Hannah Hinton
Vice President, Organizational Development and Compliance

Enclosure

cc:

David Arias
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Holly Shick
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Selected Center Staff Members

2023 EVENT AUDIT REPORT

AUDIT AND COMPLIANCE
DEPARTMENT

NGB NAME:

USA Fencing

EVENT NAME:

2023 Fencing Junior Olympics

EVENT SITE:

Colorado Convention Center, Denver, CO

EVENT DATE:

February 17, 2023 – February 20, 2023

BACKGROUND AND AUDIT PURPOSE

The U.S. Center for SafeSport (the Center) is working to build a sport community in which everyone can work and learn together in an atmosphere free of emotional, physical, and sexual abuse and misconduct. Federal law 36 U.S.C. §220541 authorizes the Center to develop and enforce abuse prevention policies and procedures that the U.S. Olympic & Paralympic Committee (USOPC) and its National Governing Bodies (NGBs) must implement.

In accordance with that law, the Center has been granted authority to annually complete regular and random audits of NGBs and the USOPC. The Center objectively evaluates adherence and level of compliance to the requirements set forth in the SafeSport Code and the Minor Athlete Abuse Prevention Policies (MAAPP).

AUDIT SCOPE

This 2023 audit is based on Event Audit Standards articulated in the U.S. Center for SafeSport Audit and Compliance Manual.

The audit covered the following areas:

- > **EDUCATION AND TRAINING**
- > **COMMUNICATION AND REPORTING**
- > **QUALITY CONTROL**
- > **RESPONSE & RESOLUTION**
- > **MAAPP RISK ASSESSMENT**

AUDIT METHODOLOGY

During the audit, the Center:

- Reviewed policies and procedures
- Evaluated processes
- Administered implementation fidelity testing
- Conducted on-site inspections
- Interviewed individuals at the event site

SCORING SUMMARY

STANDARD	SCORE
EDUCATION AND TRAINING	IMPLEMENTED
COMMUNICATION AND REPORTING	IMPLEMENTED
QUALITY CONTROL SYSTEM	IMPLEMENTED
RESPONSE & RESOLUTION	IMPLEMENTED

AUDIT AREA: EDUCATION AND TRAINING

REQUIREMENTS:

1. Organization representative or Event Director must provide to the Center a list of all individuals who will be at the event and are in a role that would require them to complete SafeSport training; these roles include (but are not limited to) event staff, adult athletes, adults having regular contact with or authority over amateur athletes who are minors, coaches, referees/officials, volunteers, medical staff, contractors, or others. The list must also include all NGB board and staff members, **regardless of whether they were at the event**. Organization must ensure that:
 - a. those at the event required to be SafeSport Trained are current in their training within the previous 12 months
 - b. the list provided is inclusive of all individuals at the event who should be SafeSport Trained
 - c. training is current for NGB board and staff.
2. Organization must provide copy of a direct communication (email or newsletter), sent to membership annually (every 12 months), that offers training for parents and Minor Athletes regarding prevention and reporting of child abuse.

SCORE:

Implemented

RATIONALE:

Requirement No. 1(a) is satisfied. Of the 110 individuals randomly selected for testing, 110 (100%) of the individuals were current in their SafeSport training within the previous 12 months or appropriately marked as ineligible to participate in the event.

Requirement No. 1(b) is satisfied. USA Fencing requires the following categories of individuals to be SafeSport trained: event official (referees), staff, volunteers, vendors, armorers, and sports medicine staff. Of the 10 names randomly selected for testing, 9 (90%) were properly included on the list of Adult Participants required to complete the Center's SafeSport training.

Requirement No. 1(c) is partially satisfied. One board member did not have current SafeSport training. USA Fencing indicated this board member has been unresponsive and has not participated throughout the duration of their term. USA Fencing has notified the board member that they will not be reappointed when their term comes to an end. This finding did not impact the score.

Requirement No. 2 is satisfied. USA Fencing sent a newsletter via email to the entire membership on September 2, 2022, which offered training for both parents and Minor Athletes regarding prevention and reporting of child abuse.

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response required.

AUDIT AREA: **COMMUNICATION AND REPORTING**

REQUIREMENTS:

1. Organization representative or Event Director must provide copy of a direct communication (either by email, newsletter, hard copy, or other electronic medium) made available to all event participants, including day-of registrants. Communication must include:
 - a. 2022 MAAPP requirements (either full policy or summary)
 - b. protocol for reporting all concerns involving alleged or suspected sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP.
2. Provide the Organization's written protocol for communicating—for all sanctioned events, to all event participants within the Organization—Center-approved Education and Training Policy and Required Prevention Policies and reporting protocols for all concerns involving alleged sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP.
3. Provide proof of communication of Quality Control System sent to all event directors of sanctioned events within current membership cycle.

SCORE:

Implemented

RATIONALE:

Requirement No. 1 is satisfied. USA Fencing sent a newsletter via email to their athlete participants on February 14, 2023, and Officials/Staff on February 10, 2023, which included information regarding the MAAPP and reporting protocols for alleged or suspected sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP. Additionally, USA Fencing communicated the MAAPP and reporting mechanism to its entire membership via newsletter on September 22, 2022. In order to participate in a USA Fencing event, event participants must be members of USA Fencing.

Requirement No. 2 is satisfied. USA Fencing has a written protocol, for all sanctioned events, for communicating to all event participants within the Organization, the Center-approved Education & Training Policy and Required Prevention Policies as well as the reporting protocols for all concerns involving alleged sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP. This written protocol is located within USA Fencing's Athlete Safety Procedures for USA Fencing Regional Events (QCS) document.

Requirement No. 3 is satisfied. USA Fencing provided proof of communication of their Quality Control System being sent to all event directors of sanctioned events for the current membership cycle on July 29, 2022, via email.

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response required.

AUDIT AREA: **QUALITY CONTROL SYSTEM**

REQUIREMENTS:

1. Organization or Event Director must implement a Quality Control System to ensure that individuals on the Organizational Exclusion List are unable to participate in any event, program, activity, or competition authorized by, organized by, or under the auspices of the Organization. The Quality Control System must also ensure that individuals who are required to be but are not SafeSport Trained are either prevented from participating or are in a role that does not include regular contact with or authority over amateur athletes who are minors.
2. The Quality Control System must include the Organization's written implementation protocol—clear action steps to effectuate policies—pertaining to all participant registration and onsite check-in. This written protocol must include and address the following:
 - a. One-day/short-term memberships
 - b. Day-of/on-site participant registration/substitutions (of athletes, staff, volunteers, vendors, coaches, officials, etc.)
 - c. Oversight procedures by the Organization when their staff is not on site at sanctioned events

SCORE:

Implemented

RATIONALE:

Requirement No. 1 is satisfied. USA Fencing has a protocol within their Quality Control System (QCS) ensuring that individuals on the Organizational Exclusion List (OEL) are unable to participate in any event, program, activity, or competition authorized by USA Fencing or under the auspices of USA Fencing. USA Fencing requires all participants to be USA Fencing members. Individuals on the OEL are manually updated in the tournament database as ineligible for membership. Coaches and officials are cross-checked through check-in protocols to ensure valid membership and requirements are met. USA Fencing requires all individuals who have regular contact and/or authority over minor athletes to have current SafeSport training. Additionally, all individuals must be entered into the tournament database to ensure education and training requirements are met.

Requirements No. 2(a-b) are satisfied. While at this particular event USA Fencing did not allow for one-day/short-term memberships or day-of participant registration/substitutions. USA Fencing does have a written protocol within their QCS for these instances. USA Fencing requires any day-of participants to be entered into the USA Fencing Tournament Database. If the individual is listed on the banned/suspended list, they are prevented from obtaining valid membership through USA Fencing and flagged as such in the database. Additionally, USA Fencing has a day-of script for tournament directors to provide a copy of the MAAPP and reporting protocol via QR code.

Requirement No. 2(c) is satisfied. Using their USA Fencing Tournament Database, USA Fencing staff is able to pull the participant list for a sanctioned event at any time. Additionally, USA Fencing staff processes and reviews bids for sanctioned tournaments. Sanctioned tournaments must go through a bid process in which certain standards must be met, including SafeSport compliance.

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response required.

AUDIT AREA: **RESPONSE & RESOLUTION**

REQUIREMENTS

(Summarized here: see Appendix B for full requirements effective Jan. 1, 2023):

1. Organization must provide its Response & Resolution policies to the Center.
2. Organization must post Center-specified Response & Resolution policy elements—and corresponding details—to its public website no later than Jan 1, 2023. These elements include:
 - a. Reporting Mechanism
 - b. Referral of Reports to the Center
 - c. Jurisdiction Notifications
 - d. Mandatory Reporting
 - e. Prohibition of Retaliation
 - f. Response & Resolution of Reported Allegations
 - g. No Interference
3. Organization must ensure:
 - a. policies include language preventing Organization from interfering with any Center investigation.
 - b. requests from the Center are responded to within 72 hours
 - c. Organization has an assigned contact person responsible for replying to requests from the Center
4. Organization must provide the Center its written policy for collecting Data of Matters Addressed by the Organization, encompassing all elements listed in Appendix B Section 5.
 - a. Policy must also include Organization’s protocol to collect such data from LAOs, if applicable

SCORE:

Implemented

RATIONALE:

Requirement No. 1 is satisfied. USA Fencing had their Response and Resolution standards posted on their website by January 1, 2023 (December 31, 2022).

Requirement No. 2(a) is satisfied. USA Fencing has a reporting form available on its website enabling individuals to report all concerns involving alleged sexual, physical, emotional misconduct or violations of the MAAPP. Specifically, the reporting form does not have costs/fees or other financial barriers associated with submitting the report. The form allows a report to be made anonymously, as well as clearly defines respective jurisdictional authority of the Center and USA Fencing.

Requirement No. 2(b) is partially satisfied. Although the USA Fencing policy does stipulate that reports received that are the Center’s exclusive jurisdiction must be sent “immediately to the Center”, the language does not explicitly state that the report must be sent to the Center within 24 hours. This finding did not impact the score.

Requirements No. 2(c, d, e, and g) are satisfied.

Requirement No. 2(f) is satisfied. USA Fencing has a policy that clearly lays out how USA Fencing will respond to and resolve reported allegations of abuse and misconduct that fall within its jurisdiction. USA Fencing has a tracking system that includes tracking reported allegations within USA Fencing, how allegations were responded to, and their respective outcome via an Excel spreadsheet. Additionally, the policy explicitly identifies the USA Fencing Athlete Safety Manager (“the Manager”) as the designated representative for USA Fencing who ensures the Response and Resolution policy is being followed.

Requirement No. 3(a) is satisfied. USA Fencing’s FenceSafe Handbook has policies that include language preventing USA Fencing from interfering with any Center investigations.

Requirements No. 3(b and c) are satisfied. Within USA Fencing’s FenceSafe Handbook, they explicitly state the Manager (or their designee) shall be responsible for responding to all requests for information from the Center within 72 hours.

AUDIT AREA: **RESPONSE & RESOLUTION**

Requirement No. 4(a) is satisfied. Within USA Fencing's FenceSafe Handbook, a policy to submit to the Center "Data of Matters Addressed by the Organization" is detailed in section I, specifically requiring reports of emotional or physical misconduct made to USA Fencing or its Local Affiliated Organizations (LAOs), reports to USA Fencing or its LAOs that a participant violated the MAAPP, or reports to USA Fencing or its LAOs that a participant engaged in retaliation to be submitted annually to the Center.

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response required.

AUDIT AREA: **RISK ASSESSMENT**

REQUIREMENTS:

During the Event Audit, the auditor also conducts a MAAPP Risk Assessment, which includes on-site observations, interviews of select individuals at the event and review of policies and procedures relative to the implementation of the 2022 MAAPP Required Prevention Policies. The Assessment focuses on:

1. General Observations
 - a. Event space/Event layout
 - b. Communications to participants
 - c. Credentialing system
2. Required Prevention Policies
 - a. How NGB has attended to the seven (7) prevention policies within the 2022 MAAPP.
3. Response and Resolution
 - a. Specific policy items NGB is required to have posted publicly.
 - b. How NGB addresses and tracks reports of misconduct that are not in the Center's jurisdiction.

This section of the Audit Report details areas observed during the audit that were related to the Risk Assessment and were found to reflect increased risk to athlete safety and well-being.

RATIONALE:

There are no qualifying findings observed during the two-day event audit applicable to this section of the report.

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response required.

NOT IMPLEMENTED

A finding of this type indicates a minimal reduction in risk to Minor Athletes and reveals what is determined to be a poor environment of safety and well-being for Minor Athletes. This can result from, but is not limited to, the following:

- Complete absence of policies and/or relevant and supporting documentation where required
- Complete absence of communication to Adult Participants regarding specific policy/requirements
- Complete absence of reporting and oversight structure for Required Prevention Policy violations
- Less than 70% compliance on Education & Training requirements
- Failure to identify or track two or more categories of individuals required to be SafeSport trained
- Failure to check against two or more categories of individuals in Organization's Quality Control System at event

PARTIALLY IMPLEMENTED

A finding of this type indicates a moderate reduction in risk to Minor Athletes and reveals what is determined to be a limited environment of safety and well-being for Minor Athletes. This can result from, but is not limited to, the following:

- Presence of policies but missing relevant and supporting documentation
- Presence of policies that do not meet the mandatory minimum requirements of the MAAPP
- Not adequately or consistently providing communication to Adult Participants regarding policy/requirements
- Lack of an adequate reporting and oversight structure for Required Prevention Policy violations.
- Above 70% and below 90% compliance on Education & Training requirements
- Failure to identify or track one or more categories of individuals required to be SafeSport trained
- Failure to check against one category of individuals in the Organization's Quality Control System at event

IMPLEMENTED

A finding of this type indicates a significant reduction in risk to Minor Athletes and reveals what is determined to be a satisfactory environment of safety and well-being for Minor Athletes. This can result from, but is not limited to, the following:

- Presence of policies and all relevant and supporting documentation provided where required
- Adequate and consistent communication to Adult Participants
- Adequate reporting and oversight structure for Required Prevention Policy violations
- 90% or higher compliance on Education & Training requirements
- Adequate tracking and inclusion of all individuals in all required categories in the Organization's Quality Control System at event

- 1) Organization's Response & Resolution standards must be posted on Organization's website no later than January 1, 2023.
- 2) Organization's Internal Response & Resolution Policies and Process:
 - a. **Reporting Mechanism:** The Organization must have a mechanism on their public website (such as a form or contact info for an athlete safety liaison) enabling individuals to report all concerns involving alleged sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP. The mechanism must:
 - i. Have no associated costs, fees, or other financial barriers attached to submitting a report
 - ii. Provide the option to report anonymously
 - iii. Clearly define for end users and provide online reporting mechanisms for the respective jurisdictional authority of the Center and the Organization (i.e., the Center has exclusive jurisdiction over allegations of sexual misconduct) and include a link to the Center's reporting portal (at uscenterforsafesport.org/report-a-concern)
 - b. **Referral of Report to the Center:** Any report received by the Organization of an allegation that falls within the Center's exclusive jurisdiction must be referred by the Organization directly to the Center immediately and no later than within 24 hours.
 - c. **Jurisdiction Notification:** The Organization must promptly inform an identified reporting party of its jurisdictional determination regarding their report to the Organization, communicating that the matter either is being referred to the Center, is being addressed by the Organization, or is being referred to a local affiliated organization.
 - d. **Mandatory Reporting:** The Organization must have a mandatory reporting policy that comports with the mandatory reporting of child abuse provisions in the SafeSport Code, including mandatory reports to law enforcement, compliance with any other applicable reporting requirements under state law, and mandatory reports to the Center.
 - e. **Prohibition of Retaliation:** The Organization must have a policy expressly prohibiting retaliation before, during, and after the process (whether led by the Organization or by the Center) of resolving an abuse or misconduct allegation.
 - f. **Response and Resolution of Reported Allegations:** The Organization must establish a policy that clearly states how the Organization and its local affiliated organizations will respond to and resolve reported allegations of abuse and misconduct that fall within its jurisdiction, as well as those over which the Center declines jurisdiction. It should include:
 - i. A mechanism/system for tracking reported allegations within the Organization's (or its local affiliated organization's) jurisdiction, reflecting how allegations were responded to, and their respective outcomes
 - ii. The designation of a representative at the Organization who ensures the Response and Resolution policy is being followed
 - g. **No Interference:** The Organization shall not interfere in, attempt to interfere in, or attempt to influence the outcome of, any Center investigation.
- 3) **Responsiveness to Requests from the Center:** The Organization must have a designated representative(s) and an established policy to respond to requests from the Center within 72 hours for:
 - a. The eligibility status of a Participant
 - b. The existence of Organization-imposed temporary measures or safety plans

4) Policy to Enforce Sanctions and Temporary Measures:

The Organization must have a Quality Control System meeting U.S. Center for SafeSport standards that prohibits individuals with sanctions or temporary measures (issued by the Center or the Organization) from participating in any event, program, activity, or competition authorized by, organized by, or under the auspices of the Organization. The Quality Control System also must ensure that individuals who are required to be but are not SafeSport Trained are either prevented from participating or are in a role that does not include regular contact or authority over amateur athletes who are minors.

5) Policy to submit to the Center “Data of Matters Addressed by the Organization”

The Organization must annually submit to the Center data regarding:

- a. Reports of emotional or physical misconduct made to the Organization or its local affiliated organizations
 - i. Total reported incidents of alleged emotional misconduct
 - ii. Total reported incidents of alleged physical misconduct
 - iii. Total number of investigations of alleged emotional misconduct
 - iv. Total number of investigations of alleged physical misconduct
 - v. Total number of violations for emotional misconduct adjudicated by the Organization, separated by cases adjudicated by NGB and cases adjudicated by its LAOs
 - vi. Total number of violations for physical misconduct adjudicated by the Organization, separated by cases adjudicated by NGB and cases adjudicated by its LAOs
- b. Reports to the Organization or its local affiliated organizations that a Participant violated the Minor Athlete Abuse Prevention Policies (MAAPP)
 - i. Total reported incidents of alleged violations of the MAAPP, by policy type
 - ii. Total number of investigations of alleged violations of the MAAPP
 - iii. Total number of violations of the MAAPP, separated by cases adjudicated by NGB and cases adjudicated by its LAO
- c. Reports to the Organization or its local affiliated organization that a Participant engaged in retaliation
 - i. Total reported incidents of alleged retaliation
 - ii. Total number of investigations of alleged retaliation
 - iii. Total number of violations of retaliation policy separated by cases adjudicated by NGB and cases adjudicated by its LAOs