

April 12, 2024

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 2024 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
Nicole Deal
Meara Gonzalez
Sarah Hirshland
Kat Holmes
Christina Pachuta
Holly Shick
Laurel Travis
Amanda Vaughn
Selected Center Staff Members

2024 EVENT AUDIT REPORT

NGB NAME:	USA Fencing
EVENT SITE:	Tigard, OR
EVENT DATE:	February 3, 2024

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 2024 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 a copy of a direct communication (email or newsletter), sent to all Adult Participants 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 is satisfied. The testing of individuals randomly selected in the below Requirements Nos. 1(a), 1(b), and 1(c), revealed an average of 97.43%.

Requirement No. 1 (a) is satisfied. Of the 10 individuals randomly selected for testing, 10 (100%) were properly included in the list of individuals who were required to be SafeSport trained.

Requirement No. 1(b) is satisfied. Of the 5 individuals randomly selected for testing, 5 (100%) were properly included on the list of individuals who were required to be SafeSport trained.

Requirement No. 1(c) is satisfied. Of the 13 USA Fencing Board and Staff members randomly selected for testing 12 (92.31%) were current with their annual SafeSport training.

Requirement No. 2 is satisfied. USA Fencing provided evidence of a newsletter that was emailed to their membership on October 6, 2023. This communication offered the Center's Minor Athlete and parent training.

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 or Event Director must provide a 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:
 - a. must include MAAPP requirements (either full policy or summary)
 - b. must also detail reporting protocols and explicitly state how to report each of: suspected sexual misconduct, emotional misconduct, physical misconduct and violations of the MAAPP
2. Provide Organization's written protocol for communicating - to all participants within the Organization's events, programs, activities or competitions authorized by, organized by or under the auspices of the Organization - the Center-approved MAAPP and reporting protocols for all concerns involving suspected 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 all of the Organization's events, programs, activities or competitions authorized by, organized by or under the auspices of the Organization.

SCORE:

IMPLEMENTED

RATIONALE:

Requirement Nos. 1(a) and (b) are satisfied. On January 25, 2024, and January 29, 2024, the event organizer communicated the MAAPP and reporting protocol to all event participants (but the communication did not include all coaches). The email included links to USA Fencing's MAAPP and provided a hyperlink to USA Fencing's reporting page. The reporting page includes a link to the Center's reporting page to report sexual misconduct and a USA Fencing reporting form which includes how an individual may report physical, or emotional misconduct as well as violations of the MAAPP.

USA Fencing's QCS policy requires that all day-of coaches/participants receive communication of the MAAPP and reporting protocol via a QR code on site. However, this did not occur at this event. All coaches, because they are required to be members, receive monthly communication via newsletter of FenceSafe information which includes communication of the MAAPP and reporting protocol. USA fencing provided proof of this newsletter being sent. The following categories are considered members of USA Fencing: coaches, officials, athletes, and club leadership.

Requirement No. 2 is satisfied. USA Fencing provided a written protocol that details how event directors should communicate the USA Fencing Center-approved MAAPP and reporting protocol to all event participants.

Requirement No. 3 is satisfied. USA Fencing provided documentation that their 'Athlete Safety Procedures for USA Fencing Regional Events' (Quality Control System) policy was sent to event organizers via email.

USA Fencing staff will process and review any bids for sanctioned tournaments. Once a sanctioned event is approved and standards are met, including SafeSport compliance, USA Fencing sends a resource email to the event director which includes the USA Fencing Quality Control System.

CORRECTIVE ACTIONS:

1. USA Fencing must either a) update its written policy to include language and attending protocols that ensure event directors require on site at check-in that all day-of coaches/day-of participants scan the QR code with the MAAPP and reporting protocol, or b) update its written policy to include a different, clear form of communication in which all coaches and all day-of participants receive the communication of the MAAPP and reporting protocol.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: Christina Pachuta

DEADLINE: April 30, 2024

CORRECTIVE PLAN:

1. USA Fencing has updated their QCS (end of Section 2) to require all event organizers to display a MAAPP Poster which notifies all Participants that the MAAPP is in place and enforceable at the event and includes a QR Code to view the full MAAPP. Our updated QCS can be found here: <https://www.usafencing.org/regional-bid-packet>

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 (OEL) 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 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 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 participant registration/substitutions (athletes, staff, volunteers, vendors, coaches, officials etc.)
 - c. Oversight procedures by the Organization when the staff is not on site at events, programs, activities, or competitions authorized by, organized by or under the auspices of the Organization.

SCORE:

IMPLEMENTED

RATIONALE:

Requirement No. 1 is satisfied. USA Fencing's 'Athlete Safety Procedures for USA Fencing Regional Events' (Quality Control System) policy includes a written protocol for event organizers to follow and verify SafeSport training for all required individuals, prior to the event, using the USA Fencing Tournament Database.

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. Within the written protocol is a link to the USA Fencing Ineligible and Suspended list via their website. Additionally, USA Fencing staff marks any individual on the OEL as ineligible for membership which in turn prevents participation, as USA Fencing membership is required for all participants.

Requirement No. 2(a) is not applicable. USA Fencing does not have one-day/short-term memberships.

Requirement No. 2(b) is satisfied. USA Fencing only allows day-of participant registration/substitutions for coaches or officials. USA Fencing has 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 OEL, 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 the USA Fencing Tournament Database, USA Fencing staff has the ability to pull a list of participants for a sanctioned event at any time. USA Fencing also requires their sanctioned tournaments to be processed and reviewed pre-event by staff for approval. Approval also requires that tournament directors/events meet a certain number of standards, to include 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 AND RESOLUTION

REQUIREMENTS:

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. 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. Requests from the Center are responded to within 72 hours
 - b. 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 and annually submitting to the Center, 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 and submit to the Center such data from LAOs, if applicable

SCORE:

IMPLEMENTED

RATIONALE:

Requirement No. 1 is satisfied. USA Fencing provided its Response and Resolution policies.

Requirement No. 2 is satisfied. USA Fencing has posted to its public website the Center-specified Response and Resolution policies.

Requirement Nos. 2(a-g) are satisfied. USA Fencing provided its written policy which addresses all the corresponding elements listed in Appendix B Section 2.

Requirement Nos. 3(a and b) are satisfied. USA Fencing provided its written policy stating the Athlete Safety and Compliance Manager will be responsible for responding to requests from the Center within 72 hours. Auditor reviewed findings of this standard that occurred between February 17, 2023 (USA Fencing’s 2023 audit date) through the current audit date. Of the 45 requests made from the Center within this time period, 45 were responded to by USA Fencing within 72 hours.

Requirement No. 4 is satisfied. USA Fencing provided its written policy for collecting Data of Matters addressed by USA Fencing which includes all elements listed in Appendix B Section 5. USA Fencing is managing the data within their internal database/tracking mechanism.

Requirement No. 4(a) is not applicable. USA Fencing does not allow Local Affiliated Organizations (LAOs) to respond to or resolve allegations. All reports of allegations are reported to and resolved by USA Fencing directly.

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 could include items that were found to reflect increased or mitigated risk to athlete safety and well-being.

RATIONALE:

There were no qualifying findings observed during the single-day 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.

APPENDIX A: SCORING GUIDE

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
- Failure to identify or track two or more categories of individuals required to be trained
- Failure to check against two or more categories of individuals in Organization's Quality Control System at an event
- Less than 70% compliance on Education & Training requirements

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
- Failure to identify one or more categories of individuals required to be trained
- Failure to check against one category of individuals in the Organization's Quality Control System at an event
- Above 70% and below 90% compliance on Education & Training requirements

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
- Adequate tracking and inclusion of all individuals in all required categories in the Organization's Quality Control System at event
- 90% or higher compliance on Education & Training requirements

APPENDIX B: RESPONSE AND RESOLUTION STANDARDS

- 1) Organization's Response & Resolution standards must be posted on Organization's website.
- 2) Organization's Internal Response & Resolution Policies and Process:
 - a. Reporting Mechanism: The Organization must have a mechanism on its public website (such as a form or contact info for an athlete safety liaison) enabling individuals to report all concerns involving suspected 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 LAOs 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 LAO's) jurisdiction, reflecting how allegations were responded to, and their respective outcome
 - 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 LAOs
 - 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 LAOs 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 LAOs
- 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