

2021 ADMINISTRATIVE AUDIT REPORT

AUDIT AND COMPLIANCE DEPARTMENT NGB NAME: American Canoe Association

ADMINISTRATIVE AUDIT SITE: Virtual

ADMINISTRATIVE AUDIT DATE: June 2, 2021

BACKGROUND AND AUDIT PURPOSE

The U.S. Center for SafeSport (hereinafter "the Center") is committed to building a sport community where participants can work and learn together in an atmosphere free of emotional, physical, and sexual misconduct. Federal law authorized the Center to develop training to prevent abuse and policies and procedures for implementation by National Governing Bodies (NGBs) and Paralympic Sports Organizations to prevent abuse.

In accordance with 36 U.S. Code §220541, the Center has been granted authority to complete regular and random audits of the NGBs recognized by the U.S. Olympic & Paralympic Committee. The Center will objectively evaluate adherence and level of compliance to the requirements set forth in the U.S. Center for SafeSport Code and the Minor Athlete Abuse Prevention Policies ("the MAAPP").

AUDIT SCOPE

The scope of this 2021 audit is based on the Administrative Audit Standards released to NGBs/USOPC on January 19, 2021. The requirements for each section of the audit are included in Appendix A.

The Audit covered the following areas:

- > EDUCATION AND TRAINING
- > COMMUNICATION AND REPORTING
- > QUALITY CONTROL

AUDIT METHODOLOGY

The Center adhered to the following audit protocol:

- *reviewed policies and procedures
- *evaluated processes

*administered implementation fidelity testing *conducted interviews with various individuals responsible for compliance with the Center's requirements.

AUDIT SUMMARY

Based on the audit methodology performed, the Center made findings as to whether the standards in Appendix A were met for Education and Training, Communication and Reporting and Quality Control (each using scoring guidelines in Appendix B).

SCORING SUMMARY

STANDARD	SCORE
EDUCATION AND TRAINING	NOT IMPLEMENTED
COMMUNICATION AND REPORTING	PARTIALLY IMPLEMENTED
QUALITY CONTROL	IMPLEMENTED

REQUIREMENTS:

1. NGB must identify all Applicable Adults (Adult Participants in 2022) required to complete the Center's Core SafeSport training and provide list to the Center.

2. NGB must track and require all above Applicable Adults to complete training on an annual basis.

3. Mark in NGB database or membership system any Applicable Adult who has not completed the required training as not in good standing.

4. NGB offered, gave and tracked annually (with parental consent) training to minor athletes. NGB provided the Center with a description of the training and how it was offered.

SCORE:	Not Implemented	
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RATIONALE:

American Canoe Association (ACA) satisfied Requirement No. 4.

ACA did not satisfy Requirements Nos. 1, 2, or 3. Of the 13 selections tested for fulfillment, 9 (69%) had satisfactorily completed training. 11 of 20 selections for completeness testing (55%) were included on the list of individuals required to be trained that was provided by the ACA. Additionally, it was determined that 2 groups of individuals had not completed training. The two groups that were not trained were the Certified Instructors and the Competition Individuals.

CORRECTIVE ACTIONS:

ACA must require and track that staff and Board are SafeSport trained on an annual basis regardless of whether they are participating in ACA activities.

ACA must identify, require, and track all individuals required to be SafeSport trained; including Certified Instructors and Competition Individuals who are adults and have regular contact with or authority over amateur athletes who are minors. Included with the Competition Individual category are all adult members of ACA who participate with a local Paddle America club and have regular contact with or authority over amateur athletes who are minors.

MANAGEMENT RESPONSE

PROCESS OWNER/RESPONSIBLE INDIVIDUAL:

Stanton Collins

ANTICIPATED TIMELINE: 2021-10-15

CORRECTIVE PLAN:

The ACA has taken steps to ensure all staff and board members are current on SafeSport training. Additionally, the ACA will require all staff and Board members to take training – regardless of current training status – every February beginning February of 2022. With these actions, the ACA will prevent training lapses in the future.

The ACA will be expanding the group of participants who will be tracked for testing. This will include all members who have regular contact and/or authority over minors. When renewing memberships, we will require all members to describe their roles and will be selected to be included in testing groups based on the renewal questionnaire. All members will be sent communication to explain the policy and help members self-identify and take training prior to renewal if required.

To make these large administrative changes, the ACA will be building a new API that will make it possible to keep track of the additional member trainings. Once the API is fully integrated the ACA will have access to a member database that automatically displays what members require training and show their current training status.

REQUIREMENTS:

1. NGB must communicate each MAAPP Required Prevention Policy by posting to NGB's website.

2. NGB must communicate Education and Training policy by posting it to NGB's website.

3. NGB must provide most recent direct communication (must be within last year) of the NGB's MAAPP that was sent to all members via either email or newsletter

4. NGB must provide most recent direct communication (must be within last year) of the Education and Training policy that was sent to all members via either email or newsletter
5. NGB must have public-facing reporting mechanism allowing individuals to report all concerns involving alleged physical misconduct, emotional misconduct, sexual misconduct, or violations of the MAAPP.

6. NGB must provide most recent direct communication (must be within last year) of the reporting mechanism, to include alleged MAAPP violations, to all Applicable Adults in the membership either via email or newsletter.

SCORE:

Partially implemented

RATIONALE:

ACA satisfied Requirement Nos. 1, 2, 3, 4, and 6.

ACA did not satisfy Requirement No. 5. The reporting policy included in the SafeSport Handbook does not explicitly include MAAPP violations as those to be reported, nor does the reporting form online include them as a category that may be selected. The main SafeSport page on the ACA website does include the ability to report MAAPP violations. However, as MAAPP violations were not included in the SafeSport Handbook communicated to all members, the requirements were not satisfied.

The reporting policy was not explicitly mentioned in the email to all members. It was included in the SafeSport Handbook linked in the email regarding the MAAPP. This finding does not impact the audit score.

CORRECTIVE ACTIONS:

ACA must update its SafeSport Handbook and online reporting form to explicitly include reporting procedures for violations of the MAAPP.

ACA must include explicit mention of the reporting policy within the direct communication of the policy to all members.

MANAGEMENT RESPONSE

PROCESS OWNER/RESPONSIBLE INDIVIDUAL:

Stanton Collins

ANTICIPATED TIMELINE:

2021-07-22

CORRECTIVE PLAN:

ACA SafeSport Handbook language updated to include explicit mention of MAAPP violations in reporting procedures.

Communication has been sent to ACA membership that reiterates SafeSport policy and explicitly mentions reporting policy and where to find more information regarding reporting.

REQUIREMENTS:

1. NGB must provide documentation of their Quality Control System to be used at events/competitions

2. The Quality Control System must include the following:

a. Written policy and procedure to ensure adults who have not completed the Center's Core SafeSport training are notable to have regular contact and/or authority over minor athletes (this includes walk-ups, day-of registrants, replacement referees/officials etc.).

b. Written policy and procedure to ensure individuals who have been suspended and/or banned by the NGB and the U.S. Center for SafeSport are not able to participate in the event or competition.

c. Oversight and monitoring protocol by NGB including post event/competition review to ensure individuals who should be precluded from participating in the event/competition are not able to participate in future events/competitions.

RATIONALE:

ACA satisfied all requirements.

CORRECTIVE ACTIONS:

No Corrective Action Required

MANAGEMENT RESPONSE

PROCESS OWNER/RESPONSIBLE INDIVIDUAL:

ANTICIPATED TIMELINE:

CORRECTIVE PLAN:

1. EDUCATION AND TRAINING

1. Identify all Applicable Adults (Adult Participants in 2022) in organization required to complete U.S. Center for SafeSport Training (e.g., coaches, NGB board members, volunteers, adult athletes who have regular contact with minor athletes, officials).

2. Track all above Applicable Adults in a database or spreadsheet and provide the list to the Center.

3. Mark any Applicable Adult who has not completed the required training in Organization database or membership system as not in good standing.

4. Annually offer and give training to minor athletes, with parental consent, regarding prevention and reporting of child abuse. Get parental consent prior to any minor completing the training. And track the following:

- A description of the training.
- The date the training was offered and given.
- A description of how the training was offered and given.

2. COMMUNICATION AND REPORTING

- 1. Provide communication of each of the Required Prevention Policy requirements by posting the policy to Organization's website.
- 2. Provide communication of Education and Training policy by posting the policy to Organization's website.

3. Provide most recent direct communication (must be within last year) of the NGB's MAAPP that was sent to all members via either email or newsletter.

4. Provide most recent direct communication (must be within last year) of Education and Training policy and requirements sent to all Applicable Adults via email or newsletter.

5. The Organization must have a public-facing mechanism allowing individuals to report all concerns involving alleged physical misconduct, emotional misconduct, sexual misconduct, or violations of the Minor Athlete Abuse Prevention Policies (MAAPP).

6. Provide most recent direct communication (must be within the last year) of the reporting mechanism, to include alleged MAAPP policy violations, to all Applicable Adults in the membership via either email or newsletter.

3. QUALITY CONTROL SYSTEM

1. Provide documentation of a Quality Control System Protocol that ensures suspended or banned individuals (either by the Cen- ter or the NGB/USOPC) and individuals who are not SafeSport-trained cannot register for or participate in an Organization's event/ competition.

2. Quality Control System Protocol must include:

• Organization policies and procedures addressing participant registration, staffing and volunteers (e.g., requirement to cross-reference Center's Disciplinary Database prior to registration, manual list sent to competition organizers of those who are suspended or have not taken the Center's training, or give access to certain individuals running competition);

• Policies and protocols in place to minimize the risk for individuals to slip through the cracks (1-day/short-term memberships, volunteers, on-site registration, last minute referee substitutions, etc.); and

• Oversight and monitoring by Organization even if not on-site at an event (e.g., required to send list of participants to Organization if registration is not done through the Organization) and back-end oversight to catch individuals who should not participate (assuming registration is not done through the Organization on the front end).

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 be a result of, but not limited to the following:

- > Complete absence of policies and/or relevant and supporting documentation where required.
- > Complete absence of communication to Applicable Adults regarding specific policy/requirements.
- > Complete absence of reporting and oversight structure for Required Prevention Policy violations.
- > 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 be a result of, but 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 Applicable Adults regarding policy/requirements.
- > Lack of an adequate reporting and oversight structure for Required Prevention Policy violations.
- > Between 70% and 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 be a result of, but not limited to the following:

- > Presence of policies and all relevant and supporting documentation provided where required.
- > Adequate and consistent communication to Applicable Adults.
- > Adequate reporting and oversight structure for Required Prevention Policy violations.
- > 90% or higher compliance on Education & Training requirements.