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 Event Audit Standards released to NGBs/USOPC on January 23, 2020. 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 on-site inspections and
* conducted interviews with various individuals at the site of the competition.

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).

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AUDIT AREA: EDUCATION AND TRAINING

REQUIREMENTS:
1. NGB must identify all adults at event required to complete the Center’s Core SafeSport training.
2. NGB must provide a list of above adults to the Center.
3. NGB must ensure that all adults required to satisfy the Center’s core SafeSport training requirements did so prior to the event/competition.

SCORE: Implemented

RATIONALE:
Requirement No. 1 is satisfied. Of the 5 individuals selected for testing, 5 (100%) were included from the list of individuals required to be trained.

Requirement No. 2 is satisfied.

Requirement No. 3 is satisfied. Of the 12 individuals selected for testing, 12 (100%) had properly completed training prior to the event.

CORRECTIVE ACTIONS:
No Corrective Action required.

MANAGEMENT RESPONSE

PROCESS OWNER/RESPONSIBLE INDIVIDUAL: --

ANTICIPATED TIMELINE: --

CORRECTIVE PLAN:
No Management Response required.
AUDIT AREA: **COMMUNICATION AND REPORTING**

**REQUIREMENTS:**

1. NGB must communicate Reporting protocol and MAAPP requirements to the event director within 30 days prior to the event/competition.
2. Event organizer (whether NGB or an Event Director) must communicate MAAPP requirements and Reporting protocol for MAAPP violations to all event/competition participants within 30 days prior to the event/competition. Day-of registrants must also be informed of MAAPP requirements and Reporting protocol of violations of the MAAPP during the event registration process.

**SCORE:** Implemented

**RATIONALE:**

Requirement No. 1 is not applicable, as USAA was responsible for the operation of, and was present at the event.

Requirement No. 2 is satisfied. USAA communicated the MAAPP requirements and reporting protocol for MAAPP violations to competitors on June 28, 2021, which was within 30 days prior to the event. USAA communicated the MAAPP and reporting protocol for MAAPP violations to all other event participants on June 29, 2021, or upon check-in, which was within 30 days prior to the event.

**CORRECTIVE ACTIONS:**

No Corrective Action required.

**MANAGEMENT RESPONSE**

**PROCESS OWNER/RESPONSIBLE INDIVIDUAL:** --

**ANTICIPATED TIMELINE:** --

**CORRECTIVE PLAN:**

No Management Response required.
AUDIT AREA: QUALITY CONTROL

REQUIREMENTS:
1. NGB must establish a quality control system for their sanctioned 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 not able 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.

SCORE: Partially Implemented

RATIONALE:
Requirement No. 1 is satisfied.

Requirement No. 2(a) is partially satisfied. USAA has a written policy and protocol to ensure all event personnel who have not completed the Center’s Core SafeSport training are not able to have regular contact and/or authority over minor athletes. The policy and protocol includes tracking SafeSport training through the USAA membership platform in addition to utilizing a detailed event tracking spreadsheet.

It is USAA’s protocol to provide coaching credentials at events to track coaches event participation. In an attempt to limit participation due to Covid-19, USAA did not offer coaching credentials at the event. USAA has written policy that states that coaches are required to be SafeSport trained prior to the event or competition but lacked protocol at this event to ensure that coaches participating in the event who have not completed the Center’s Core SafeSport training are not able to have regular contact and/or authority over minor athletes.

Requirement 2(b) is partially satisfied. USAA has written policy and protocol to ensure that all athletes and event personnel who have been banned and/or suspended are prevented participating in the competition. The policy and protocol include tracking banned and suspended individuals through the USAA membership platform in addition to utilizing a detailed event tracking spreadsheet.

USAA has written policy that states that coaches who are banned and/or suspended are not able to participate at events or competitions but lacked protocol at this event to ensure that coaches who have been banned and/or suspended are prevented from participating at the event.

In review of the Athlete Safety Procedures for USA Archery Event Organizers, it is noted that adults who have regular contact over minor athlete are required to be SafeSport trained. The Center’s minimum education and training policy requires that adults who have regular contact and/or authority over minor athletes must complete the Center’s SafeSport training before regular contact or authority begins.

Requirement No. 2(c) is satisfied.
CORRECTIVE ACTIONS:

USAA must implement effective protocol at all USAA sanctioned events or competitions to ensure that coaches who (a) have not completed the Center’s SafeSport training are prevented from having regular contact and/or authority over minor athletes at event or competitions; and (b) have been suspended and/or banned by USAA are not able to participate in the event or competition.

USAA must update its Athlete Safety Procedures for USA Archery Event Organizers to include adults who have authority over minor athletes must complete the Center’s SafeSport training before authority over minor athletes at the event or competition begins.

MANAGEMENT RESPONSE

PROCESS OWNER/RESPONSIBLE INDIVIDUAL:

Mary Emmons

ANTICIPATED TIMELINE:

2021-10-15

CORRECTIVE PLAN:

USA Archery did not offer premium seating and/or coach credentials at this specific event due to COVID19 capacity limitations, however, all non-official coach interactions if occurring in the spectator area were observable and interruptible. Since coach credentials were not officially offered, USA Archery did not view non-credentialed spectators who were also coaches as “official” coaches, however, athletes at times did walk to the fence line to receive advice from non-credentialed coaches in the spectator area. USA Archery will continue to provide coach credentials and/or premium seating at events ongoing. A coach credential requires a current membership, U.S. Center for SafeSport Training and USA Archery Background Screen. Individuals who obtain a coach credential are also checked against the organizational exclusion list. These updates will be made by October 15, 2021.

The USA Archery Athlete Safety Procedures for Event Organizers Policy has been updated to reflect the changes requested by the USCSS to specify that Adults who have regular contact or authority over minor athletes must complete the Center’s SafeSport training before event or competition begins. Additionally, the definition for regular contact was updated. If these edits are supported by the USCSS, USAA will move this policy to the USAA Board of Directors for adoption and implement accordingly.
1. EDUCATION AND TRAINING
Auditor will request a list of all individuals specific to the NGB/USOPC who are required to take training (adult participants, coaches, referees/officials, volunteers, medical staff, contractors, etc.). All individuals with regular contact and/or authority over minor athletes must be SafeSport Trained prior to any event.

2. COMMUNICATION AND REPORTING
A minimum of one direct communication to event/competition organizers must be distributed no earlier than 30 days prior to the event/competition informing participants of the MAAPP requirements and be sent in the same manner as playing rules, code of conduct, etc. Communication must also include protocol for reporting suspected or alleged MAAPP violations.

3. QUALITY CONTROL SYSTEM
Auditor will evaluate the NGB/USOPC quality control system in place to ensure that suspended/banned individuals (either by the Center or the NGB/USOPC) and individuals who are not SafeSport Trained are unable to register or participate in the event/competition (testing based on credentialed, registered participants, not spectators).

Quality Control System must include:
> NGB/USOPC policies and procedures pertaining to participant registration, and 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 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 NGB/USOPC even if not on-site (e.g., required to send list of participants to NGB/USOPC if registration is not done through NGB/USOPC) and back-end oversight to catch individuals who should not participate (assuming registration is not done through NGB/USOPC 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.