

ADMINISTRATIVE AUDIT REPORT

AUDIT AND COMPLIANCE DEPARTMENT

NGB NAME:

United States Olympic & Paralympic Committee

ADMINISTRATIVE AUDIT SITE:

Virtual

ADMINISTRATIVE AUDIT DATE:

September 24, 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 (hereinafter “the MAAPP”).

AUDIT SCOPE

The scope of this 2021 audit is based on the Audit Standards released to NGB/USOPC on January 19, 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 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	IMPLEMENTED
COMMUNICATION AND REPORTING	IMPLEMENTED
QUALITY CONTROL	IMPLEMENTED

AUDIT AREA: **EDUCATION AND TRAINING**

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:

Implemented

RATIONALE:

The United States Olympic and Paralympic Committee (USOPC) satisfied all requirements in this section. Of the 29 selected for testing, 29 (100%) had either completed training or were properly marked as not having completed training and not in good standing.

Of the 31 selected to test whether the lists identified all Applicable Adults required to complete training, 29 (93.55%) were included on the list or properly excluded from the list. The two individuals who were not on the list that should have been, were members of the Mental Health Registry.

CORRECTIVE ACTIONS:

USOPC must update its process to ensure proper tracking of individuals on the Mental Health Registry required to complete training.

MANAGEMENT RESPONSE

PROCESS OWNER/RESPONSIBLE INDIVIDUAL:

Lacey Staehs

ANTICIPATED TIMELINE:

December 1, 2021

CORRECTIVE PLAN:

Members of USOPC's Security & Athlete Safety Office met with the Associate Director of Mental Health Services and a USPOPC Health Care Services Provider/Clinic Lead. The Associate Director of Mental Health Services reviews credentials and applications as well as provides approval and renewal to all providers on the Mental Health Registry during the two application deadlines (December 1st and June 1st). The USPOPC Health Care Services Provider/Clinic Lead tracks SafeSport compliance for the Mental Health Registry. Moving forward, The Associate Director of Mental Health Services will communicate all approvals, renewals, and removals to the registry by including the USPOPC Health Care Services Provider/Clinic Lead on communications of final approval for all applications as well as any update or removal communications; therefore, the USPOPC Health Care Services Provider/Clinic Lead will know when someone is added or removed from the Mental Health Registry.

AUDIT AREA: **EDUCATION AND TRAINING**

The USPOPC Health Care Services Provider/Clinic Lead will continue to track SafeSport Training compliance for individuals on the Mental Health Registry. They will inform the Associate Director of Mental Health Services if anyone falls out of compliance with training. Additionally, the USPOPC Health Care Services Provider/Clinic Lead reviews the adjudication log weekly, so if any Mental Health Registry provider is identified, an immediate email and phone communication will occur to the Associate Director of Mental Health Services to ensure prompt removal of the provider from the registry.

AUDIT AREA: **COMMUNICATION AND REPORTING**

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:

Implemented

RATIONALE:

The USOPC satisfied all requirements in this section. The USOPC has all required policies posted to their website and communications were sent the week of 7/12/21 to the necessary individuals. The communications were sent via email and included the USOPC's MAAPP, Education and Training Policy, and Reporting Policy in one email.

CORRECTIVE ACTIONS:

No corrective actions required.

MANAGEMENT RESPONSE

PROCESS OWNER/RESPONSIBLE INDIVIDUAL:

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ANTICIPATED TIMELINE:

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CORRECTIVE PLAN:

No Management Response required.

AUDIT AREA: **QUALITY CONTROL SYSTEM**

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.

SCORE:

Implemented

RATIONALE:

The USOPC satisfied all requirements in this section. The USOPC has a written policy for a Quality Control System which prevents individuals from participating in an event if an individual is on the banned/suspended list or if an individual is required to complete training but has not done so. Additionally, the policy provided for oversight by the USOPC when third parties are operating an event. The USOPC works with the local organizing committee running the event and creates a chart showing the responsibilities under the Quality Control System and which party (USOPC or local organizing committee) will be expected to handle each responsibility.

CORRECTIVE ACTIONS:

No corrective actions required.

MANAGEMENT RESPONSE

PROCESS OWNER/RESPONSIBLE INDIVIDUAL:

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ANTICIPATED TIMELINE:

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CORRECTIVE PLAN:

No Management Response required.

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 Center 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.