

# 2021 ADMINISTRATIVE AUDIT REPORT

## AUDIT AND COMPLIANCE DEPARTMENT

**NGB NAME:**

USA Wheelchair Rugby

**ADMINISTRATIVE AUDIT SITE:**

Virtual

**ADMINISTRATIVE AUDIT DATE:**

December 13, 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 articulated in memorandum sent from the Center to NGBs/USOPC on January 19, 2021.

**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	PARTIALLY IMPLEMENTED
COMMUNICATION AND REPORTING	PARTIALLY 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 and the date the training was offered.

### SCORE:

Partially Implemented

### RATIONALE:

Requirement No. 1 is satisfied. Of the 10 individuals selected for testing, 9 (90%) were properly included, or properly excluded, from their list of Applicable Adults required to complete the Center's SafeSport training.

Requirement No. 2 is partially satisfied. USA Wheelchair Rugby ("USAWR") allowed all board member's SafeSport training to lapse for up to ten months.

Requirement No. 3 is satisfied. Of the 10 individuals selected for testing, 9 (90%) had completed training or were properly marked in their membership system as not in good standing.

Requirement No. 4 is satisfied.

### CORRECTIVE ACTIONS:

USAWR must implement effective procedures to ensure that board members complete their SafeSport training on an annual basis.

### MANAGEMENT RESPONSE

PROCESS OWNER/RESPONSIBLE INDIVIDUAL: Jen Allred

ANTICIPATED TIMELINE: 2022-3-31

### CORRECTIVE PLAN:

We have requested to Rosemary Davis that the Center assist us in offering an annual training for our Board at our October meeting each year. This will get all of our Board members on the same training schedule. This is also the month that new members join (if applicable). If we are not able to conduct this type of training with the Center we will provide an opportunity for the Board to complete their training at the conclusion of the October Board meeting each year. This process will be tracked through our Quality Control System. We have also recently purchased an LMS system and will work with our new training coordinator to identify the best way to integrate training into that system as well.

## 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 via either email or newsletter.

### **SCORE:**

Partially Implemented

### **RATIONALE:**

Requirements Nos. 1, 2, and 5 are satisfied.

Requirements Nos. 3, 4, and 6 are partially satisfied. USA Wheelchair Rugby communicated their MAAPP, education and training policies, and their reporting mechanism which included a mechanism to report violations of the MAAPP via e-mail to their board on December 6, 2021. USAWR communicated their MAAPP, education and training policies, and their reporting mechanism which included a mechanism to report violations of the MAAPP via e-mail to their athletes and select staff on November 18, 2021. USAWR did not communicate the MAAPP or reporting protocol to all of their 2021 staff/contractors. USAWR updated their annual staff/contractor letter to include their MAAPP, education and training policies, and reporting mechanism which includes a mechanism to report violations of the MAAPP to be sent to all of their 2022 staff/contractors.

### **CORRECTIVE ACTIONS:**

USAWR must provide to the Center documentation that the updated staff/contractor letter was sent out to their 2022 staff/contractors.

### **MANAGEMENT RESPONSE**

PROCESS OWNER/RESPONSIBLE INDIVIDUAL: Jen Allred

ANTICIPATED TIMELINE: 2022-3-31

### **CORRECTIVE PLAN:**

We have issued one 2022 agreement and will issue the additional ones in Feb/March 2022. Those agreements now include a link to the appropriate information and a hard copy of the letter and linked documents will be provided.

## 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 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:**

Implemented

### **RATIONALE:**

Requirement No. 1 is satisfied.

Requirement No. 2(a) is satisfied. USAWR has written policy and procedure to ensure adults, including any day of or last-minute substitutions, who have not completed the Center's SafeSport training are not able participate in the event. The policy and procedures include the utilization of an excel tracking sheeting created for each event to ensure compliance with the training requirements.

Requirement No. 2(b) is satisfied. USAWR has written policy and procedure to ensure individuals, including any day of or last-minute substitutions, who have been banned and/or suspended by the USAWR or the Center are not able to participate in the event or competition. The policy and protocol includes checking the Center's Disciplinary Database ("CDD") in addition to utilizing the detailed event tracking spreadsheet for ensuring all event participants have been checked against the CDD.

Requirement No. 2(c) is satisfied.

### **CORRECTIVE ACTIONS:**

No Corrective Action required.

### **MANAGEMENT RESPONSE**

PROCESS OWNER/RESPONSIBLE INDIVIDUAL: N/A

ANTICIPATED TIMELINE: N/A

### **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.