

2022 ADMINISTRATIVE AUDIT REPORT

AUDIT AND COMPLIANCE DEPARTMENT

NGB/PSO NAME:

USA Shooting

ADMINISTRATIVE AUDIT SITE:

Virtual

ADMINISTRATIVE AUDIT DATE:

March 11th, 2022

BACKGROUND AND AUDIT PURPOSE

The U.S. Center for SafeSport (the Center) is committed to building a sport community in which individuals 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) and Paralympic Sports Organizations (PSOs) must implement.

In accordance with that law, the Center has been granted authority to complete regular and random audits of NGBs, PSOs, and the USOPC. The Center objectively evaluates adherence and level of compliance to the requirements set forth in the SafeSport Code (the Code) and the Minor Athlete Abuse Prevention Policies (MAAPP).

AUDIT SCOPE

This 2022 audit is based on Administrative Audit Standards articulated in the Audit and Compliance Manual released by the Center on Jan. 11, 2022.

The audit covered the following areas:

1. EDUCATION AND TRAINING
2. COMMUNICATION AND REPORTING
3. QUALITY CONTROL
4. LOCAL AFFILIATED ORGANIZATIONS

AUDIT METHODOLOGY

During the audit, the Center:

- a) Reviewed policies and procedures
- b) Evaluated processes
- c) Administered implementation fidelity testing
- d) Interviewed individuals responsible for compliance with Center requirements

AUDIT SUMMARY

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

SCORING SUMMARY

STANDARD	SCORE
EDUCATION AND TRAINING	PARTIALLY IMPLEMENTED
COMMUNICATION AND REPORTING	IMPLEMENTED
QUALITY CONTROL SYSTEM	IMPLEMENTED
LOCAL AFFILIATED ORGANIZATIONS	IMPLEMENTED

AUDIT AREA: EDUCATION AND TRAINING

REQUIREMENTS:

1. Identify all Adult Participants in the organization required to annually (every 12 months) complete U.S. Center for SafeSport training.
2. Track all above Adult Participants in a database or spreadsheet and provide the list to the Center.
3. Mark any Adult Participant who has not completed the required training in Organization database or membership system as “not in good standing” and show proof of automated process or written policy that ensures these individuals are prevented from participation or from having regular contact or authority over amateur athletes who are minors. Staff and board members must be trained annually (every 12 months) regardless of participation or activity.
4. Annually (every 12 months) offer and give training to Minor Athletes regarding prevention and reporting of child abuse. Ensure these trainings are communicated to Minor Athletes by either email or newsletter. Get parental consent prior to their completion of training. Track the following:
 - a. A description of the training
 - b. The date the training was offered and given
 - c. A description of how the training was offered and given
5. Annually (every 12 months) offer and give training to parents regarding prevention and reporting of child abuse. Ensure these trainings are communicated to parents by either email or newsletter. Track the following:
 - a. A description of the training
 - b. The date the training was offered and given
 - c. A description of how the training was offered and given

SCORE:

Partially Implemented

RATIONALE:

Requirement No. 1 is partially satisfied. Out of 12 individuals randomly selected for testing, 10 (83.3%) were found to either be properly included or excluded from the list that USA Shooting (USAS) provided the auditor.

Requirement No. 2 is satisfied.

Requirement No. 3 is satisfied. Out of 14 individuals randomly selected for testing, 13 (92.8%) properly completed training. One board member lapsed their annual training cycle and participated in board meetings. This individual lapsed during USAS' transition to their new membership platform at which time the training was unavailable.

Requirement No. 4 is satisfied. In order to bypass issues with data transition into their new membership system, USAS utilized a third-party application to ensure members received the communications of the minor athlete training on March 15th, 2022.

Requirement No. 5 is satisfied. Parent training was offered within the past year as an option in the old membership platform prior to USAS' transition to their new membership system. The training was offered automatically whenever a member renewed their membership, or a new member registered for membership.

CORRECTIVE ACTIONS:

1. USAS must update its 'USA Shooting SafeSport Policy' document to include a written protocol to ensure identification and proper tracking of all member categories, as indicated in USAS' MAAPP policy (page 26), including but not limited to national team adult athletes, USAS Board members, and USAS management, required to be SafeSport trained annually.

AUDIT AREA: **EDUCATION AND TRAINING**

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: Breanne Orey

PROJECTED DEADLINE: April 27th, 2022

CORRECTIVE PLAN:

Added 2 sections to the policy regarding on-boarding new applicable participants and verifying existing applicable participants.

AUDIT AREA: **COMMUNICATION AND REPORTING**

REQUIREMENTS:

1. Post the Organization's 2022 Center-approved MAAPP: Minor Athlete Abuse Prevention Policies (to include the Education & Training Policy and the Required Prevention Policies) on Organization website no later than January 1, 2022.
2. Provide direct communication of the Organization's 2022 Center-approved MAAPP Education and Training Policy and Required Prevention Policies to all members and Adult Participants no later than January 1, 2022, by either email or newsletter, and thereafter at least every new NGB membership cycle.
3. Have a mechanism on the Organization's public website (e.g., a form, link, or contact info for an athlete safety liaison) enabling individuals to report all concerns involving alleged sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP.
4. Provide direct communication of the reporting mechanism in requirement #3 (separate from link to Organization's full Athlete Safety policy) to all members and Adult Participants no later than January 1, 2022, by either email or newsletter, and thereafter at least every new NGB membership cycle.
5. Provide the Organization's written protocol for communicating the Quality Control System (see Standard #3) to all sanctioned event directors of the Organization.
6. Provide the Organization's written protocol for communicating to all event participants within the Organization, the Center-approved Education and Training Policy and Required Prevention Policies and reporting protocols for all concerns involving alleged sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP.

SCORE:

Implemented

RATIONALE:

Requirement No. 1 is satisfied. USAS posted the 2022 Center-approved Minor Athlete Abuse Prevention Policies (MAAPP), which includes the Education and Training policy and the Prevention policies, to its website on December 20, 2021.

Requirement No. 2 is satisfied. USAS provided direct communication of the MAAPP to all members on December 20, 2021.

Requirement No. 3 is satisfied. USAS has a public-facing reporting mechanism posted on its website to report MAAPP or 'Code' violations. The reporting mechanism includes a link to the Center's portal. The mechanism also includes a procedure to report directly to USAS.

Requirement No. 4 is satisfied. USAS provided direct communication of the reporting policy to all members on December 20, 2021. USAS has a plan to send this communication, through quarterly emails, to all new and existing members.

Requirement No. 5 is satisfied. USAS provided the written protocol, located within its QCS document, for communicating the Quality Control System (QCS) to all USAS staff who will/may assist with operating an event.

Requirement No. 6 is satisfied. USAS has written procedures regarding the required protocol for communicating to all event participants the MAAPP and the reporting protocol of how to report alleged sexual, physical, emotional misconduct and violations of the MAAPP.

CORRECTIVE ACTIONS:

No Corrective Actions required.

AUDIT AREA: **COMMUNICATION AND REPORTING**

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

PROJECTED DEADLINE: N/A

CORRECTIVE PLAN:

No Management Response required.

AUDIT AREA: **QUALITY CONTROL SYSTEM**

REQUIREMENTS:

1. Organization must implement a Quality Control System to ensure that individuals on the Organizational Exclusion List 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 or authority over amateur athletes who are minors.
2. 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 (of athletes, volunteers, coaches, officials, etc.)
 - c. On-site registration/participation (of athletes, volunteers, coaches, officials, etc.)
 - d. Last-minute substitutions (of personnel such as referees, volunteers, etc.)
 - e. Oversight procedures by the Organization when their staff is not on-site at sanctioned events

SCORE:

Implemented

RATIONALE:

Requirement No. 1 is satisfied. USAS implements its Quality Control System (QCS) for all sanctioned events to ensure that (a) individuals on the Organizational Exclusion list (OEL) and (b) individuals required to be but are not SafeSport Trained are prevented from participating in the event.

Requirement No. 2a is not applicable. USAS does not allow one-day/short term memberships.

Requirement Nos. 2b and 2c are satisfied. USAS has a written policy and procedure to ensure day-of/on-site registrants who are required to be but are not SafeSport Trained are prevented from participating in the event. This procedure prevents these individuals from obtaining a credential necessary to participate in the event. Additionally, USAS has a written procedure to ensure individuals included on the OEL are unable to participate in the event. The procedure requires that USAS cross-check all day-of participants against the list of individuals included on USAS' OEL at the registration desk.

Requirement No. 2d is satisfied. USAS utilizes their Same-Day Registrant policy and procedures to ensure that last-minute substitutions have (a) properly completed SafeSport training and (b) are not included on the OEL.

Requirement No. 2e is not applicable. USAS staff are on site to ensure the QCS is implemented at all USAS sanctioned events.

CORRECTIVE ACTIONS:

No Corrective Actions required.

AUDIT AREA: **QUALITY CONTROL SYSTEM**

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

PROJECTED DEADLINE: N/A

CORRECTIVE PLAN:

No Management Response required.

AUDIT AREA: LOCAL AFFILIATED ORGANIZATIONS

REQUIREMENTS:

1. Organization must provide direct communication of the 2022 Center-approved MAAPP (to include the Education & Training Policy and Required Prevention Policies) sent to all LAOs, by email or newsletter, by January 1, 2022, and thereafter at least every new NGB membership cycle.
2. Organization's 2022 Center-approved Education & Training Policy and Required Prevention Policies must require LAOs to adhere to at least the minimum requirements of the NGB's MAAPP.

SCORE:

Implemented

RATIONALE:

Requirement No. 1 is satisfied. USAS provided direct communication of the 2022 Center-Approved MAAPP (which included the Education and Training Policy and Required Prevention Policies) sent to all LAOs on December 20th, 2021. USAS also has a plan to communicate to the MAAPP to LAOs thereafter.

Requirement No. 2 is satisfied. USAS' 2022 Center-approved MAAPP requires LAOs to adhere to at least the minimum requirements of USAS' MAAPP.

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

PROJECTED DEADLINE: N/A

CORRECTIVE PLAN:

No Management Response required.

1. EDUCATION AND TRAINING

1. Identify all Adult Participants in the organization required to annually (every 12 months) complete U.S. Center for SafeSport training (e.g., adult athletes who have regular contact with amateur athletes who are minors, coaches, board members, employees, interns, volunteers, officials).
2. Track all above Adult Participants in a database or spreadsheet and provide the list to the Center.
3. Mark any Adult Participant who has not completed the required training in Organization database or membership system as “not in good standing” and show proof of automated process or written policy that ensures these individuals are prevented from participation or from having regular contact or authority over amateur athletes who are minors. Staff and board members must be trained annually (every 12 months) regardless of participation or activity.
4. Annually (every 12 months) offer and give training to Minor Athletes regarding prevention and reporting of child abuse. Ensure these trainings are communicated to Minor Athletes by either email or newsletter. Get parental consent prior to their completion of training. Track the following:
 - a. A description of the training
 - b. The date the training was offered and given
 - c. A description of how the training was offered and given
5. Annually (every 12 months) offer and give training to parents regarding prevention and reporting of child abuse. Ensure these trainings are communicated to parents by either email or newsletter. Track the following:
 - a. A description of the training
 - b. The date the training was offered and given
 - c. A description of how the training was offered and given

2. COMMUNICATION AND REPORTING

1. Post the Organization’s 2022 Center-approved MAAPP: Minor Athlete Abuse Prevention Policies (to include the Education & Training Policy and the Required Prevention Policies) on Organization website no later than January 1, 2022.
2. Provide direct communication of the Organization’s 2022 Center-approved MAAPP Education and Training Policy and Required Prevention Policies to all members and Adult Participants no later than January 1, 2022 by either email or newsletter, and thereafter at least every new NGB membership cycle.
3. Have a mechanism on the Organization’s public website (e.g., a form, link, or contact info for an athlete safety liaison) enabling individuals to report all concerns involving alleged sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP.
4. Provide direct communication of the reporting mechanism in requirement #3 (separate from link to Organization’s full Athlete Safety policy) to all members and Adult Participants no later than January 1, 2022 by either email or newsletter, and thereafter at least every new NGB membership cycle.
5. Provide the Organization’s written protocol for communicating the Quality Control System (see Standard #3) to all sanctioned event directors of the Organization.
6. Provide the Organization’s written protocol for communicating, to all event participants within the Organization, the Center-approved Education and Training Policy and Required Prevention Policies and reporting protocols for all concerns involving alleged sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP.

3. QUALITY CONTROL SYSTEM

1. Organization must implement a Quality Control System to ensure that individuals on the Organizational Exclusion List 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 or authority over amateur athletes who are minors.
2. 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 (of athletes, volunteers, coaches, officials, etc.)
 - c. On-site registration/participation (of athletes, volunteers, coaches, officials, etc.)
 - d. Last-minute substitutions (of personnel such as referees, volunteers, etc.)
 - e. Oversight procedures by the Organization when their staff is not on-site at sanctioned events

4. LOCAL AFFILIATED ORGANIZATIONS

1. Organization must provide direct communication of the 2022 Center-approved MAAPP (to include the Education & Training Policy and Required Prevention Policies) sent to all LAOs, by email or newsletter, by January 1, 2022, and thereafter at least every new NGB membership cycle.
2. Organization's 2022 Center-approved Education & Training Policy and Required Prevention Policies must require LAOs to adhere to at least the minimum requirements of the NGB's MAAPP.

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:

1. Complete absence of policies and/or relevant and supporting documentation where required
2. Complete absence of communication to Adult Participants regarding specific policy/requirements
3. Complete absence of reporting and oversight structure for Required Prevention Policy violations
4. 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:

1. Presence of policies but missing relevant and supporting documentation
2. Presence of policies that do not meet the mandatory minimum requirements of the MAAPP
3. Not adequately or consistently providing communication to Adult Participants regarding policy/requirements
4. Lack of an adequate reporting and oversight structure for Required Prevention Policy violations
5. 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:

1. Presence of policies and all relevant and supporting documentation provided where required
2. Adequate and consistent communication to Adult Participants
3. Adequate reporting and oversight structure for Required Prevention Policy violations
4. 90% or higher compliance on Education & Training requirements