



2022 ADMINISTRATIVE AUDIT REPORT

AUDIT AND COMPLIANCE DEPARTMENT

NGB/PSO NAME:

US Sailing

ADMINISTRATIVE AUDIT SITE:

Virtual

ADMINISTRATIVE AUDIT DATE:

March 15, 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:

- > EDUCATION AND TRAINING
- > COMMUNICATION AND REPORTING
- > QUALITY CONTROL
- > LOCAL AFFILIATED ORGANIZATIONS

AUDIT METHODOLOGY

During the audit, the Center:

- Reviewed policies and procedures
- Evaluated processes
- Administered implementation fidelity testing
- 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	IMPLEMENTED
COMMUNICATION AND REPORTING	PARTIALLY 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:

Implemented

RATIONALE:

Requirement No. 1 is satisfied. Out of 29 individuals randomly selected for testing, 27 (93.10%) 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 80 individuals randomly selected for testing, 78 (97.50%) properly completed training or were marked as “not in good standing” within USS membership system.

Requirement No. 4 is satisfied. USS offered Minor Athlete training via newsletter to all members on March 9th, 2022.

Requirement No. 5 is satisfied. USAS offered parent training via newsletter to all members on March 9th, 2022.

CORRECTIVE ACTIONS:

No Corrective Actions required.

AUDIT AREA: **EDUCATION AND TRAINING**

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

PROJECTED DEADLINE: N/A

CORRECTIVE PLAN:

No Management Response required.

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:

Partially Implemented

RATIONALE:

Requirement No. 1 is satisfied. USS 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 29th, 2021.

Requirement No. 2 is satisfied. USS provided direct communication of the MAAPP to all members on December 29th, 2021.

Requirement No. 3 is partially satisfied. USS has a public-facing reporting mechanism posted on its website. The reporting mechanism includes a link that directs individuals to the Center's portal. However, the mechanism does not include a procedure to report to USS alleged violations of the MAAPP or alleged physical and emotional misconduct.

Requirement No. 4 is partially satisfied. USS provided direct communication of the reporting policy to all members on December 30th, 2021. However, the communication does not include ways to report alleged MAAPP violations or alleged physical and emotional misconduct.

Requirement No. 5 is satisfied. USS provided the written protocol, located within its QCS document, for communicating the Quality Control System (QCS) to all event committee chairs, on-site event organizers, and regatta officials.

Requirement No. 6 is satisfied. USS 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.

AUDIT AREA: **COMMUNICATION AND REPORTING**

CORRECTIVE ACTIONS:

1. USS must update its public-facing reporting mechanism to explicitly include ways to report to USS alleged MAAPP violations and alleged emotional and physical misconduct.
2. USS must send an updated direct communication, in the form of an email or newsletter, informing all members of the procedures to report to USS alleged MAAPP violations and alleged emotional and physical misconduct.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: Justin Sterk

PROJECTED DEADLINE: May 26, 2022

CORRECTIVE PLAN:

1. US Sailing will add a reporting button on our website directing users to report physical and emotional misconduct and MAAPP violations as required herein.
2. US Sailing will send an updated direct communication to membership informing our members of this change and providing direction on proper reporting channels as required herein.

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. USS implements a 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.

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

Requirement No. 2b is not applicable. USS does not allow day-of registration. USS requires SafeSport Training for event committee chairs, all race officials, volunteer medical professionals, coaches, instructors, event organizers and regatta officials and on-site USS staff and Board members, prior to the event. Additionally, prior to the event and/or during event check-in, USS cross-checks all event participants against the OEL. The QCS policy requires that competitors register prior to the event start date, and explicitly states that such a protocol “prevents Event-day Competitor registration”. However, there is no language in the policy that explicitly states that such a protocol will prevent possible day-of registration for all other event participants. This finding does not impact the audit score.

Requirement No. 2c. is satisfied. Outside of pre-event registration, USS allows for on-site registration only for last-minute substitutions of officials (see Requirement No. 2d).

Requirement No. 2d is satisfied. USS has a written procedure within its Quality Control System for when last-minute substitutions may occur. The procedure requires any event participant who serves in a role that includes regular contact or authority over Minor Athletes and arrives at on-site check-in, are required to first complete the mandatory SafeSport training prior to participating in the event. Upon check-in, these individuals are cross-checked against USS’ OEL.

Requirement No. 2e is satisfied. USS has a written procedure to ensure that event organizers/regatta officials cross-check all event participants against USS’ OEL. USS requires that the designated official submits to USS a final list of all Event Participants for verification that no Event Participant is listed on the Organization Exclusion List. Additionally, during check-in, event organizers/regatta officials ensure all individuals, including last-minute substitutions, complete the mandatory SafeSport training prior to regular contact or authority over Minor Athletes.

AUDIT AREA: **QUALITY CONTROL SYSTEM**

CORRECTIVE ACTIONS:

1. USS must update its QCS policy, for all sanctioned events, to either a) include protocols to ensure day-of registrants required to but are not SafeSport trained are prevented from participation or b) state that day-of registration/participation for all event participants is not permitted.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: Justin Sterk

PROJECTED DEADLINE: May 26, 2022

CORRECTIVE PLAN:

US Sailing will update its Center approved QCS policy to state that (a) day of registration/participation for Adult Participants required to take SafeSport training is not permitted and (b) day of registration for other event participants is permitted as long as the event chair ensures the individual is provided all required information regarding the MAAPP and for reporting misconduct and is checked against US Sailing's organizational exclusion list.

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. USS provided communication of the MAAPP (to include the Education and Training Policy and Required Prevention Policies) to all LAOs by email on December 29th, 2021.

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

- Complete absence of policies and/or relevant and supporting documentation where required
- Complete absence of communication to Adult Participants 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 result from, but is 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 Adult Participants regarding policy/requirements
- Lack of an adequate reporting and oversight structure for Required Prevention Policy violations
- 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:

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