

# 2022 ADMINISTRATIVE AUDIT REPORT

## AUDIT AND COMPLIANCE DEPARTMENT

**NGB/PSO NAME:**

USA Bobsled and Skeleton

**ADMINISTRATIVE AUDIT SITE:**

Virtual

**ADMINISTRATIVE AUDIT DATE:**

July 8, 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 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	IMPLEMENTED
QUALITY CONTROL SYSTEM	IMPLEMENTED
LOCAL AFFILIATED ORGANIZATIONS	NOT APPLICABLE

### 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 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 23 individuals randomly selected for testing, 23 (100%) were found to either be properly included or excluded from the list that USA Bobsled and Skeleton (USABS) provided for the audit.

Requirement No. 2 is satisfied.

Requirement No. 3 is satisfied. Out of 21 individuals randomly selected for testing, 21 (100%) properly completed training or were properly marked as inactive within USABS' membership database.

Requirement No. 4 is satisfied. USABS offered training to Minor Athletes via direct email upon membership confirmation during its last membership cycle, which began July 1, 2021, and ended June 30, 2022. When a minor athlete registers as a Junior Member, they receive an email from USABS informing them of the age-appropriate training.

Requirement No. 5 is satisfied. USABS offered parent training to its membership via direct email on July 7, 2021; the audit took place on July 8, 2022. USABS included a link to register for one of the Center's MAAPP training webinars. Additionally, an automated email is provided to Junior Athlete members and their parents upon registration. Within the email, USABS offers 'age-appropriate training'. The link included in the email directs users to the Center's course catalog, including the parent training. However, there is no language within the template email informing users about the Center's parent training course offering. This finding does not impact the audit score.

AUDIT AREA: **EDUCATION AND TRAINING**

**CORRECTIVE ACTIONS:**

1. USABS must update its 'Membership confirmation email' sent to Junior Athlete members and their parents to explicitly offer free parent training and send communication of free parent training to all parents of currently registered Junior members by September 1, 2022, and annually thereafter.

**MANAGEMENT RESPONSE**

RESPONSIBLE INDIVIDUAL: Morgan Tracey

PROJECTED DEADLINE: September 1, 2022

**CORRECTIVE PLAN:**

USA Bobsled and Skeleton updated its 'Membership confirmation email' sent to Jr Athlete members and their parents to explicitly offer parent training. We also sent parent training communication to all parents of currently registered Junior members before September 1, 2022.

## 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 (to include the Education & Training Policy and the 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. USABS' MAAPP was posted to their website prior to Jan. 1, 2022 (on May 1, 2021).

Requirement No. 2 is satisfied. USABS provided direct communication of the MAAPP to all members and Adult Participants via email on April 23<sup>rd</sup> and May 13<sup>th</sup> of 2021.

Requirement No. 3 is satisfied. USABS has public reporting procedures posted on its Athlete Safety webpage to report alleged sexual misconduct, emotional misconduct, physical misconduct, or violations of the MAAPP. The reporting information includes a link to the Center's portal and the toll-free number for the Center. The information also includes procedures about how to report directly to USABS via email.

Requirement No. 4 is satisfied. USABS provided direct communication of the reporting procedures to all members and Adult Participants via email on May 13, 2021.

Requirement No. 5 is satisfied. USABS has a written protocol that requires the Quality Control System policy be emailed to event organizers within two weeks prior to any sanctioned event.

Requirement No. 6 is satisfied. USABS includes in its Quality Control Policy the required protocol for communicating to all event participants and Adult Participants at all sanctioned events the MAAPP and the reporting protocol for all concerns involving alleged sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP.

AUDIT AREA: **COMMUNICATION AND REPORTING**

**CORRECTIVE ACTIONS:**

No Corrective Action required.

**MANAGEMENT RESPONSE**

RESPONSIBLE INDIVIDUAL: N/A

PROJECTED DEADLINE: N/A

CORRECTIVE PLAN:

No Management Response required.

**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. USA Bobsled and Skeleton (USABS) implements a Quality Control System (QCS) policy for all sanctioned events to ensure that (a) individuals on the Organizational Exclusion list (OEL) are prevented from participating in the event and (b) individuals required to be but are not SafeSport trained are prevented from participating in the event. The QCS policy requires that event participants who are unable to fulfill the event registration eligibility requirements (which include verified SafeSport training, background check, and cross-check against OEL and the Center’s Adjudication log) will not be allowed to register for, or participate in, the event.

Requirement Nos. 2a, 2b, 2c, and 2d are satisfied. USABS allows for trial memberships, day-of participant registration, on-site registration, and last-minute registration. The written procedures require all registrants to complete the Center’s training prior to participation, which may be offered on site. Additionally, all registrants are cross-checked against the OEL. USABS staff will have internet access at USABS events and will be able to access both the Center’s Adjudication Log and the USABS membership database (Sport80). The database contains all member participant information necessary to evaluate current compliance with the athlete safety registration eligibility found in the QCS policy.

Requirement No. 2e is satisfied. USAB staff is on site for all events. However, if the event is run by an event director, the USABS policy states that USABS will email the event director a list of all ineligible participants, a list of participants with temporary measures, and the event roster of all eligible event participants. Additionally, the policy states that the event director must email the USABS Operations Coordinator post-event, attesting that all event protocols within the QCS document were followed, that the event director has reported any known allegations of violations of the U.S. Center for SafeSport Code and/or USABS MAAPP, and has confirmed the final event participant roster.

**CORRECTIVE ACTIONS:**

No Corrective Action 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:

Not Applicable

### RATIONALE:

Requirement Nos. 1 and 2 are not applicable, as USAB is certified as not having any Local Affiliated Organizations.

### 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
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  - 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