

2022 ADMINISTRATIVE AUDIT REPORT

AUDIT AND COMPLIANCE DEPARTMENT

NGB/PSO NAME:

American Canoe Association

ADMINISTRATIVE AUDIT SITE:

Virtual

ADMINISTRATIVE AUDIT DATE:

October 18, 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	IMPLEMENTED

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:

Requirements No. 1 is satisfied.

Requirement No. 2 is satisfied. Of the 29 names randomly selected for testing, 29 (100%) were properly included on or properly excluded from the list of Adult Participants required to complete the Center’s SafeSport training.

Requirement No. 3 is satisfied. Of the 28 names selected randomly for testing, 28 (100%), had completed training or were marked appropriately in their membership system.

Requirements No. 4 is satisfied. American Canoe Association (ACA) offered the Center’s minor athlete training within their ‘ACA MAAPP SafeSport Nationals 2022’ email on July 22, 2021. ACA plans to continue to send this communication via email to its members at the beginning of each year (January) and will continue to offer their training via their electronic bulletin board that gets sent out randomly throughout the year.

Requirement No. 5 is satisfied. American Canoe Association offered the Center’s parent training via email communication on July 22, 2021. ACA plans to continue sending their parent communications via email annually (January) as well as through their bulletin board notification.

CORRECTIVE ACTIONS:

1. American Canoe Association must offer Minor Athlete training regarding prevention and reporting of child abuse, requiring parental consent, to their minor athletes via email or newsletter by December 22, 2022.
2. American Canoe Association must offer parent training regarding prevention and reporting of child abuse, to parents of minor athletes via email or newsletter by December 22, 2022.

AUDIT AREA: **EDUCATION AND TRAINING**

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: Beth Spilman and Nate Humberston

PROJECTED DEADLINE: December 22, 2022

CORRECTIVE PLAN:

1. Minor Athlete SafeSport training offered through membership email.
2. Parent SafeSport training offered through membership email.

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. American Canoe Association (ACA) had their Center-approved MAAPP posted on their website by January 1, 2022 (on December 31, 2021).

Requirement No. 2 is satisfied. American Canoe Association communicated their Center-approved MAAPP and Education & Training Policy and the Required Prevention Policies to all members via emailed newsletter on December 31, 2021.

Requirement No. 3 is satisfied. American Canoe Association has a reporting mechanism on their public website enabling individuals to report all concerns involving alleged sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP.

Requirement No. 4 is satisfied. American Canoe Association communicated the reporting mechanism to all members via email on December 31, 2021. In the email was a direct link to ACA's reporting page, which once clicked on has a direct link to the Center's reporting web page.

Requirement No. 5 is satisfied. American Canoe Association provided a written protocol within their quality control system that demonstrated they communicate their Quality Control System to all sanctioned ACA executive directors or the ACA Athlete Safety Compliance Manager (ASCM) by email prior to the start of all sanctioned events.

Requirement No. 6 is satisfied. American Canoe Association provided a written protocol that demonstrated they communicate their Center-approved Education and Training Policy, required Prevention Policies, and Reporting Protocols to all sanctioned event participants directly via email, telephone, on-line meetings and in-person meetings. ACA stated they intend to hold several townhall-type meetings prior to all sanctioned events.

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.

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. American Canoe Association's (ACA) Quality Control System (QCS) ensures individuals on the Organizational Exclusion List (OEL) are unable to participate in any sanctioned event. ACA's QCS also ensures that individuals who are required to be but are not SafeSport Trained are prevented from participating except for in a role that does not have regular contact with or authority over Minor Athletes.

Requirement No. 2(a) is not applicable. American Canoe Association does not allow one-day/short term memberships.

Requirement Nos. 2(b), (c) and (d) are satisfied. American Canoe Association has a policy for day-of, on-site and last-minute substitution registrations and participation (volunteers only). ACA's policy states: "ACA will diligently try to minimize same-day volunteer registrations. However, if a situation arises that makes it necessary to allow a same-day volunteer participant, the below process will be followed. This process also applies to last-minute substitutions. The participant must still register via the ACA or LOC's event registration system. The participant's name must be checked against the Organization Exclusion List which will be provided to the event organizer and is also accessible via the ACA website. The participant will be placed into a role that does not require SafeSport training. If this is absolutely unavoidable, then the participant must take the training before they are allowed to fill any role which requires Safe Sport training to participate. The participant will be given the Center's MAAPP-at-a-Glance handout as well as the ACA's full reporting policy detailing where individuals can report alleged violations of the MAAPP as well as sexual, emotional, and physical misconduct. The participant will be asked to sign a document to affirm receipt of this information".

Requirement No. 2(e) is satisfied. American Canoe Association staff is on site for all sanctioned events. However, if registration is done through a Local Organizing Committee's (LOC) registration system, ACA will require the LOC to provide a spreadsheet of registrants both 21 days and 7 days prior to the event. ACA's ASCM will then manually check to confirm that Adult Participants required to be trained have completed SafeSport training. If not done so, the ASCM will inform the Adult Participant that they will be unable to participate in the event until SafeSport training is completed.

AUDIT AREA: **QUALITY CONTROL SYSTEM**

CORRECTIVE ACTIONS:

No Corrective Action required

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. American Canoe Association provided their communication of the 2022 Center-approved MAAPP (including their Education & Training Policy and Required Prevent Policies) which was sent to all of their LAO administrators on December 31, 2021.

Requirement No.2 is satisfied. American Canoe Association requires in their 2022 Center-approved Education & Training Policy and Required Prevention Policies that LAO administrators must adhere to the minimum standards of the MAAPP.

CORRECTIVE ACTIONS:

No Corrective Action 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