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 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 and the Minor Athlete Abuse Prevention Policies (MAAPP).

AUDIT SCOPE
This 2022 audit is based on Event 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

AUDIT METHODOLOGY
During the audit, the Center:
- Reviewed policies and procedures
- Evaluated processes
- Administered implementation fidelity testing
- Conducted on-site inspections
- Interviewed individuals at the event site

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, and Quality Control (applying scoring guidelines in Appendix B).

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REQUIREMENTS:

1. Organizations must provide to the Center a list of all individuals who will be at the event who are in a role that would require them to take SafeSport training (all staff, adult athletes with regular contact or authority over amateur athletes who are minors, coaches, referees/officials, volunteers, medical staff, contractors, etc.). The auditor will perform testing on this list to verify:
   a. those at the event who should be SafeSport Trained are trained every 12 months
   b. the list provided is inclusive of all individuals at the event who should be SafeSport Trained

SCORE: Implemented

RATIONALE:

Requirement No. 1a. is satisfied. Of the 39 individuals randomly selected for testing, 37 (94.87%) properly completed the Center’s SafeSport training requirements prior to the event/competition.

Requirement No. 1b. is satisfied. Of the 12 individuals randomly selected for testing from the list provided by American Canoe Association (ACA), 11 (91.67%) were found to be properly included. The one individual not found to be included on the list was a coach member.

CORRECTIVE ACTIONS:

No Corrective Action required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

PROJECTED DEADLINE: N/A

CORRECTIVE PLAN:

No Management Response is Required.
AUDIT AREA: COMMUNICATION AND REPORTING

REQUIREMENTS:

1. Organization or Event Director must provide direct communication (by either email or newsletter) sent to all participants, including day-of registrants, informing participants of the MAAPP requirements within 30 days prior to the event. Communication must also include protocol for reporting all concerns involving alleged or suspected sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP.

2. Provide the Organization’s written protocol for communicating to all event participants within the Organization, 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) provided direct email communication of the MAAPP and reporting policy to all event participants within 30 days prior to the event. ACA sent a communication on July 25 to its entire membership, which included coaches, officials, judges, athletes, NGB staff, and pre-registered volunteers.

Volunteers who registered the same day received a hard copy of the Center’s MAAPP-at-a-Glance resource. Additionally, these individuals were either directed to review ACA’s signage of the reporting policy or received a hard copy of ACA’s reporting document. The reporting document ACA utilized for same-day volunteers included language about how to report a SafeSport violation. The document did not explicitly mention that individuals were able to report emotional misconduct, physical misconduct, sexual misconduct, or violations of ACA’s MAAPP policy. This finding does not impact the audit score.

Requirement No. 2 is satisfied. ACA includes within its Quality Control System (QCS) policy, written procedures for communicating to all event participants the Center-approved MAAPP (which include the Education and Training Policies and the Required Prevention Policies) and reporting protocols for all concerns involving alleged sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP. The QCS states that ‘for events managed by an LOC, ACA will collaborate with the LOC to communicate with the event registrants. Otherwise, ACA will directly communicate with event registrants.’ Also, ACA holds townhall-type meetings prior to events to share important information to include information about SafeSport. The QCS also states that ‘information about the MAAPP and reporting mechanisms are included in at least one of the ACA event bulletins, but this information will also be emailed directly to all event participants.’

CORRECTIVE ACTIONS:

1. ACA must update its policy to state that same-day volunteers who did not pre-register will receive the full reporting policy detailing where individuals can report alleged violations of the MAAPP as well as sexual, emotional, and physical misconduct.
AUDIT AREA: COMMUNICATION AND REPORTING

<table>
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<th>MANAGEMENT RESPONSE</th>
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<td>RESPONSIBLE INDIVIDUAL: Beth Spillman</td>
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<td>PROJECTED DEADLINE: October 9, 2022</td>
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<td>CORRECTIVE PLAN:</td>
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<tr>
<td>QCS policy updated to state that same-day volunteers who did not pre-register will receive the full reporting policy detailing where individuals can report alleged violations of the MAAPP as well as sexual, emotional, and physical misconduct.</td>
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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 with or authority over amateur athletes who are minors.

2. The 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: Partially Implemented

RATIONALE:

Requirement No. 1 is partially satisfied. American Canoe Association (ACA) has a Quality Control System (QCS) policy to ensure that individuals on the Organization’s Exclusion List (OEL) are unable to participate in any sanctioned event/competition. The QCS procedure requires that all staff, athletes, officials, medical staff, volunteers, and coaches register for the event using ACA’s registration system. During the registration process, the Athlete Safety and Compliance Manager (ASCM) manually compiles a list of all registrants until registration is closed. Once registration is closed, the ASCM cross-checks the names of all registrants against the OEL. However, the previously mentioned procedure does not identify all coaches. The procedure utilized at the event required club team rosters to be submitted by an individual who is the club team’s ‘point of contact’. Occasionally, the point of contact can be a coach. However, submission of a team’s roster only identifies athletes registering to participate in the event, not all coaches from the club attending the event. After registration concluded, ACA identified club coaches present during event check-in and the town-hall type meeting. However, ACA did not identify all coaches at the event, therefore not all coaches at the event were cross-checked against the OEL.

The QCS policy also requires ACA to ensure that coaches, officials and judges, adult athletes, and event staff who are required to be but are not SafeSport Trained are prevented from participating in the event. During registration, the ASCM identifies the above-mentioned Adult Participants and tracks them within the registration spreadsheet. Once the list is compiled, the ASCM checks the Center’s Learning Management System database to confirm which individuals completed SafeSport Training. ACA will notify any Adult Participant required to be trained but is not that they must do so in order to participate in the event. However, ACA did not identify all coaches at the event, therefore not all coaches at the event were confirmed to have completed Safe Sport training.

Requirement No. 2a is not applicable. ACA does not allow one-day/short-term memberships.
AUDIT AREA: QUALITY CONTROL SYSTEM

Requirements Nos 2b, and 2c are satisfied. ACA’s policy includes a written procedure for day-of/on-site participant registration and last-minute substitutions. ACA only allows same-day registrations for volunteers. The policy requires these volunteers to register through ACA’s registration platform (Signup Genius is specifically utilized for volunteers). A manual cross-check against the OEL is conducted by ACA. Additionally, if a volunteer is required to fulfill a role that has regular contact or authority over Minor Athletes, ACA will manually verify the individual has completed the Center’s training prior to serving in the specific role. The procedure utilized at the event matched the written procedure within the QCS policy.

Requirement No. 2d is satisfied. Last-minute substitutions are required to register for the event. Once the individual registers, ACA will manually check to confirm that the individual has completed SafeSport Training (if necessary) and will manually cross-check the name against the OEL.

Requirement No. 2e is satisfied. ACA 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 and check to ensure that all event participants are not included on the OEL. If found on the OEL or SafeSport training is not complete, the ASCM will inform the Adult Participant that they will be unable to participate.

CORRECTIVE ACTIONS:

1. ACA must update its QCS policy to include written procedures ensuring that all coaches, including all head coaches and all assistant coaches, at all ACA sanctioned events are a) checked against the banned and suspended list and anyone on the list is prevented from participation and b) checked for current SafeSport training and if not current are prevented from participation.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: Beth Spillman

PROJECTED DEADLINE: November 9, 2022

CORRECTIVE PLAN:

The QCS specifies that all coaches participating in the event are required to pre-register and will be checked against the OEL and for current SafeSport training. If on the OEL or not current with SafeSport training, a coach will be prevented from participating in the event.

The QCS has been updated to include this additional measure: Attendance at the event’s Coaches Meeting will be verified to ensure that all coaches present appear on the list of participants. All coaches participating in the event must be checked against the banned and suspended list and be prevented from participating if found on this list. Coaches must also be checked for current SafeSport training and be prevented from participating if not current.
1. EDUCATION AND TRAINING

Organization must provide to the Center a list of all individuals who will be at the event who are in a role that would require them to take SafeSport training (all staff, adult athletes with regular contact or authority over amateur athletes who are minors, coaches, referees/officials, volunteers, medical staff, contractors, etc.).

The auditor will perform testing on this list to verify:

a. those at the event who should be SafeSport Trained are trained every 12 months
b. the list provided is inclusive of all individuals at the event who should be SafeSport Trained

2. COMMUNICATION AND REPORTING

1. Organization or Event Director must provide direct communication (by either email or newsletter) sent to all participants, including day-of registrants, informing participants of the MAAPP requirements within 30 days prior to the event. Communication must also include protocol for reporting all concerns involving alleged or suspected sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP.

2. Provide the Organization’s written protocol for communicating, to all event participants within the Organization, 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. The 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
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