

2023 EVENT AUDIT REPORT

AUDIT AND COMPLIANCE
DEPARTMENT

NGB NAME:

USA Archery

EVENT NAME:

2023 JOAD Target Nationals

EVENT SITE:

James W. Cownie Soccer Park

EVENT DATE:

July 11-12, 2023

BACKGROUND AND AUDIT PURPOSE

The U.S. Center for SafeSport (the Center) is working to build a sport community in which everyone 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) must implement.

In accordance with that law, the Center has been granted authority to annually complete regular and random audits of NGBs 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 2023 audit is based on Event Audit Standards articulated in the U.S. Center for SafeSport Audit and Compliance Manual.

The audit covered the following areas:

- > **EDUCATION AND TRAINING**
- > **COMMUNICATION AND REPORTING**
- > **QUALITY CONTROL**
- > **RESPONSE & RESOLUTION**
- > **MAAPP RISK ASSESSMENT**

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

SCORING SUMMARY

STANDARD	SCORE
EDUCATION AND TRAINING	IMPLEMENTED
COMMUNICATION AND REPORTING	IMPLEMENTED
QUALITY CONTROL SYSTEM	IMPLEMENTED
RESPONSE & RESOLUTION	IMPLEMENTED

AUDIT AREA: EDUCATION AND TRAINING

REQUIREMENTS:

1. Organization representative or Event Director must provide to the Center a list of all individuals who will be at the event and are in a role that would require them to complete SafeSport training; these roles include (but are not limited to) event staff, adult athletes, adults having regular contact with or authority over amateur athletes who are minors, coaches, referees/officials, volunteers, medical staff, contractors, or others. The list must also include all NGB board and staff members, **regardless of whether they were at the event**. Organization must ensure that:
 - a. those at the event required to be SafeSport Trained are current in their training within the previous 12 months
 - b. the list provided is inclusive of all individuals at the event who should be SafeSport Trained
 - c. training is current for NGB board and staff
2. Organization must provide copy of a direct communication (email or newsletter), sent to membership annually (every 12 months), that offers training for parents and Minor Athletes regarding prevention and reporting of child abuse.

SCORE:

Implemented

RATIONALE:

Requirement No. 1(a) is satisfied. Of the 29 individuals randomly selected for testing, 29 (100%) had completed the Center's training requirements within the previous 12 months prior to the event.

USA Archery goes above and beyond the Center's minimum training requirements by requiring that field crew members and some of their vendors complete SafeSport training.

Requirement No. 1(b) is satisfied. Of the 10 individuals randomly selected for testing, 10 (100%) were properly included on the list provided to the Center of individuals required to complete the Center's training requirements. All categories of individuals required to be trained for the event were checked for training. The categories included coaches, officials, staff, media, scoring team, arrow agents, vendors, and field crew.

Requirement No. 1(c) is satisfied. Of the 11 board and staff members randomly selected for testing, 11 (100%) had current training.

Requirement No. 2 is satisfied. USA Archery (USAA) provided evidence of a newsletter that was emailed to membership on April 29, 2023, which offered the Center's prevention and reporting of child abuse training to Minor Athletes and parents.

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response required.

AUDIT AREA: **COMMUNICATION AND REPORTING**

REQUIREMENTS:

1. Organization representative or Event Director must provide copy of a direct communication (either by email, newsletter, hard copy, or other electronic medium) made available to all event participants, including day-of registrants. Communication must include:
 - a. 2022 MAAPP requirements (either full policy or summary)
 - b. 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—for all sanctioned events, 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. Provide proof of communication of Quality Control System sent to all event directors of sanctioned events within current membership cycle.

SCORE:

Implemented

RATIONALE:

Requirement Nos. 1(a) and (b) are satisfied. USA Archery (USAA) communicated the most current MAAPP and reporting protocol on June 29, 2023, to all coaches and athletes via one email and in a separate email to event personnel. Both emails included links to the full MAAPP, and in the body of the email, a summary of policy highlights and reporting protocol which clearly instructed how an individual can report sexual, physical, or emotional misconduct as well as violations of the MAAPP. Additional coaches registered for the event between June 29 and July 11, 2023, and USAA communicated the MAAPP and reporting protocol to these coaches on July 11, 2023.

USAA communicated the MAAPP via a QR Code and the reporting protocol verbally to the pre-planned and day-of vendors.

USAA communicated the MAAPP and reporting protocol to day-of volunteers and two arrow agents verbally instead of via email, hard copy or other electronic medium.

After the audit, USAA sent an email to the tournament director regarding the use of printed materials and QR codes for communicating the MAAPP and reporting mechanism, as well as the 'event organizer resources' USAA has created to facilitate compliant events. In addition, USAA updated their internal event planning tool with information related to communicating to day-of participants.

In addition to these communications, USAA also includes the MAAPP and the reporting protocol within the event program, event webpage, and within the email that is automatically sent to a participant upon payment of an event registration fee. Further, MAAPP and reporting-related signage was located around the event venue.

Requirement No. 2 is satisfied. USAA provided a written protocol that details how to communicate USAA's Center-approved Education and Training Policy, Required Prevention Policies, and reporting protocol to all event participants and last-minute/day-of participants as described in Requirement No. 1 above. USAA's written protocol provides many resources for an event organizer to utilize for communicating the MAAPP and reporting protocol including scripts, sample email language, links to full policies, event-related signage, policy one-pagers, and QR codes.

Requirement No. 3 is satisfied. USAA provided documentation that they communicate USAA's Quality Control System policies (Athlete Safety Procedures for Event Organizers) to event organizers through a link to the policies within the online event sanctioning process. The event organizer must check a box that states that they have reviewed and agree to adhere to the Athlete Safety Procedures for Event Organizers.

AUDIT AREA: COMMUNICATION AND REPORTING

(Requirement No. 3 continued) The policies are also linked within the Event Sanction Terms and Conditions, which the event organizer must review and agree to adhere to as an additional step within the online event sanctioning process. Further, in April 2023, USAA emailed event organizers and club leaders the Athlete Safety Procedures for Event Organizers. Within the email USAA offered sessions that club leaders and event organizers could attend to discuss the policies and MAAPP compliance.

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response required.

AUDIT AREA: **QUALITY CONTROL SYSTEM**

REQUIREMENTS:

1. Organization or Event Director 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 must also 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/on-site participant registration/substitutions (of athletes, staff, volunteers, vendors, coaches, officials, etc.)
 - c. Oversight procedures by the Organization when their staff is not on site at sanctioned events

SCORE:

Implemented

RATIONALE:

Requirement No. 1 is satisfied. USA Archery's Athlete Safety Procedures for Event Organizers (QCS) document includes a written protocol for event organizers to follow to verify SafeSport training for required individuals prior to an event by using USAA's membership management system, Sport:80. The Quality Control System also includes access to USAA's Organizational Exclusion List for event organizers to utilize to ensure that individuals on the Organizational Exclusion List (OEL) are unable to participate in the event. The QCS requires that event organizers track event personnel compliance checks within an event personnel tracking spreadsheet that is provided to event organizers. This protocol was followed at the audited event.

Requirement No. 2(a) is satisfied. USAA offers a variety of temporary memberships that may be eligible for participation in sanctioned events. As detailed in USAA's written QCS, a valid membership (temporary or otherwise) ensures that individuals are not banned and/or suspended by USAA or the Center. Further, SafeSport training is required per an Adult Participant's role instead of via a specific membership type.

Requirement No. 2(b) is satisfied. USAA's Quality Control System encompasses a protocol for day-of participation/registration, should it occur. This protocol was followed at the audited event for volunteers and vendors who arrived on site the day of the event.

Requirement No. 2(c) is satisfied. USAA's policy states that USAA and/or the US Center for SafeSport may audit any USAA sanctioned event at any time to verify compliance either in person or through a request for compliance information. The policy also requires that event organizers maintain an event personnel tracking spreadsheet and must send the spreadsheet at the end of each event to USAA staff for oversight purposes. Further, the policy requires that MAAPP and reporting-related communications be saved and provided to USAA upon request. In addition, USAA has created and shared with event organizers a packet of SafeSport-related resources to help facilitate compliance with participant eligibility, MAAPP compliance, and communication of the MAAPP and reporting protocol. USAA demonstrated that they have received event personnel tracking tool spreadsheets from event organizers.

CORRECTIVE ACTIONS:

No Corrective Actions required.

AUDIT AREA: **QUALITY CONTROL SYSTEM**

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response required.

AUDIT AREA: **RESPONSE & RESOLUTION**

REQUIREMENTS:

(Summarized here: see Appendix B for full requirements effective Jan. 1, 2023):

1. Organization must provide its Response & Resolution policies to the Center.
2. Organization must post Center-specified Response & Resolution policy elements—and corresponding details—to its public website no later than Jan, 1, 2023. These elements include:
 - a. Reporting Mechanism
 - b. Referral of Reports to the Center
 - c. Jurisdiction Notifications
 - d. Mandatory Reporting
 - e. Prohibition of Retaliation
 - f. Response & Resolution of Reported Allegations
 - g. No Interference
3. Organization must ensure:
 - a. policies include language preventing Organization from interfering with any Center investigation.
 - b. requests from the Center are responded to within 72 hours
 - c. Organization has an assigned contact person responsible for replying to requests from the Center
4. Organization must provide the Center its written policy for collecting Data of Matters Addressed by the Organization, encompassing all elements listed in Appendix B Section 5.
 - a. Policy must also include Organization’s protocol to collect such data from LAOs, if applicable

SCORE:

Implemented

RATIONALE:

Requirement No. 1 is satisfied. USAA provided its Response and Resolution policies.

Requirement No. 2 is satisfied. USAA posted to its public website the Center-specific Response & Resolution policies by the January 1, 2023, deadline.

Requirement Nos. 2(a-c and e-g) are satisfied. USAA provided its written policy which addresses all the corresponding elements listed in Appendix B Section 2.

Requirement No. 2(d) is satisfied. USAA provided its written policy which addresses mandatory reporting including all the corresponding elements listed in Appendix B Section 2. USAA updated its policy during the audit to explicitly state that reports to the Center should be made “immediately”.

Requirement No. 3(a) is satisfied. USAA provided its written policy which includes language stating that USAA will not interfere with any Center investigation.

Requirement Nos. 3(b) and 3(c) are satisfied. USAA provided its written policy stating USAA will respond to requests from the Center within 72 hours. USAA updated its policy during the audit to explicitly state that the USAA Safe Sport and Compliance Administrator will be responsible for responding to these requests. USAA updated the policy on its website during the audit. Auditor reviewed findings of this standard that occurred between January 1, 2023 and the audit date. All requests made from the Center within this time period were responded to by USAA within 72 hours.

Requirement No. 4 is satisfied. USAA provided its written policy for collecting Data of Matters Addressed by the USAA, and it encompasses all elements listed in Appendix B Section 5. USAA will be managing the data within its internal database.

AUDIT AREA: RESPONSE & RESOLUTION

Requirement No. 4(a) is not applicable as USAA does not allow LAOs to respond to or resolve allegations. All reports of allegations are reported to and resolved by USAA directly. Individuals participating at the LAO must report all allegations of sexual misconduct to the Center and to law enforcement and physical misconduct, emotional misconduct, and violations of the MAAPP to USAA.

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response required.

AUDIT AREA: **RISK ASSESSMENT**

REQUIREMENTS:

During the Event Audit, the auditor also conducts a MAAPP Risk Assessment, which includes on-site observations, interviews of select individuals at the event and review of policies and procedures relative to the implementation of the 2022 MAAPP Required Prevention Policies. The Assessment focuses on:

1. General Observations
 - a. Event space/Event layout
 - b. Communications to participants
 - c. Credentialing system
2. Required Prevention Policies
 - a. How NGB has attended to the seven (7) prevention policies within the 2022 MAAPP
3. Response and Resolution
 - a. Specific policy items NGB is required to have posted publicly
 - b. How NGB addresses and tracks reports of misconduct that are not in the Center's jurisdiction

This section of the Audit Report details areas observed during the audit that were related to the Risk Assessment and were found to reflect increased risk to athlete safety and well-being.

RATIONALE:

There were no qualifying findings observed during the two-day event audit applicable to this section of the report.

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response required.

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
- Failure to identify or track two or more categories of individuals required to be SafeSport trained
- Failure to check against two or more categories of individuals in Organization's Quality Control System at event

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
- Failure to identify or track one or more categories of individuals required to be SafeSport trained
- Failure to check against one category of individuals in the Organization's Quality Control System at event

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
- Adequate tracking and inclusion of all individuals in all required categories in the Organization's Quality Control System at event

- 1) Organization's Response & Resolution standards must be posted on Organization's website no later than January 1, 2023.
- 2) Organization's Internal Response & Resolution Policies and Process:
 - a. **Reporting Mechanism:** The Organization must have a mechanism on their public website (such as a form 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. The mechanism must:
 - i. Have no associated costs, fees, or other financial barriers attached to submitting a report
 - ii. Provide the option to report anonymously
 - iii. Clearly define for end users and provide online reporting mechanisms for the respective jurisdictional authority of the Center and the Organization (i.e., the Center has exclusive jurisdiction over allegations of sexual misconduct) and include a link to the Center's reporting portal (at uscenterforsafesport.org/report-a-concern)
 - b. **Referral of Report to the Center:** Any report received by the Organization of an allegation that falls within the Center's exclusive jurisdiction must be referred by the Organization directly to the Center immediately and no later than within 24 hours.
 - c. **Jurisdiction Notification:** The Organization must promptly inform an identified reporting party of its jurisdictional determination regarding their report to the Organization, communicating that the matter either is being referred to the Center, is being addressed by the Organization, or is being referred to a local affiliated organization.
 - d. **Mandatory Reporting:** The Organization must have a mandatory reporting policy that comports with the mandatory reporting of child abuse provisions in the SafeSport Code, including mandatory reports to law enforcement, compliance with any other applicable reporting requirements under state law, and mandatory reports to the Center.
 - e. **Prohibition of Retaliation:** The Organization must have a policy expressly prohibiting retaliation before, during, and after the process (whether led by the Organization or by the Center) of resolving an abuse or misconduct allegation.
 - f. **Response and Resolution of Reported Allegations:** The Organization must establish a policy that clearly states how the Organization and its local affiliated organizations will respond to and resolve reported allegations of abuse and misconduct that fall within its jurisdiction, as well as those over which the Center declines jurisdiction. It should include:
 - i. A mechanism/system for tracking reported allegations within the Organization's (or its local affiliated organization's) jurisdiction, reflecting how allegations were responded to, and their respective outcomes
 - ii. The designation of a representative at the Organization who ensures the Response and Resolution policy is being followed
 - g. **No Interference:** The Organization shall not interfere in, attempt to interfere in, or attempt to influence the outcome of, any Center investigation.
- 3) **Responsiveness to Requests from the Center:** The Organization must have a designated representative(s) and an established policy to respond to requests from the Center within 72 hours for:
 - a. The eligibility status of a Participant
 - b. The existence of Organization-imposed temporary measures or safety plans

4) Policy to Enforce Sanctions and Temporary Measures:

The Organization must have a Quality Control System meeting U.S. Center for SafeSport standards that prohibits individuals with sanctions or temporary measures (issued by the Center or the Organization) from participating 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.

5) Policy to submit to the Center “Data of Matters Addressed by the Organization”

The Organization must annually submit to the Center data regarding:

- a. Reports of emotional or physical misconduct made to the Organization or its local affiliated organizations
 - i. Total reported incidents of alleged emotional misconduct
 - ii. Total reported incidents of alleged physical misconduct
 - iii. Total number of investigations of alleged emotional misconduct
 - iv. Total number of investigations of alleged physical misconduct
 - v. Total number of violations for emotional misconduct adjudicated by the Organization, separated by cases adjudicated by NGB and cases adjudicated by its LAOs
 - vi. Total number of violations for physical misconduct adjudicated by the Organization, separated by cases adjudicated by NGB and cases adjudicated by its LAOs
- b. Reports to the Organization or its local affiliated organizations that a Participant violated the Minor Athlete Abuse Prevention Policies (MAAPP)
 - i. Total reported incidents of alleged violations of the MAAPP, by policy type
 - ii. Total number of investigations of alleged violations of the MAAPP
 - iii. Total number of violations of the MAAPP, separated by cases adjudicated by NGB and cases adjudicated by its LAO
- c. Reports to the Organization or its local affiliated organization that a Participant engaged in retaliation
 - i. Total reported incidents of alleged retaliation
 - ii. Total number of investigations of alleged retaliation
 - iii. Total number of violations of retaliation policy separated by cases adjudicated by NGB and cases adjudicated by its LAOs