

# 2023 EVENT AUDIT REPORT

**AUDIT AND COMPLIANCE  
DEPARTMENT**

**NGB NAME:**  
USA Hockey

**EVENT NAME:**  
2023 Girls 16/17 BioSteel Player Development Camp

**EVENT SITE:**  
Miami University of Ohio, Oxford, Ohio

**EVENT DATE:**  
June 24 – 25, 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 22 individuals randomly selected for testing, 22 (100%) were current in their SafeSport training within the previous 12 months.

Requirement No. 1(b) is satisfied. Of the 10 individuals randomly selected for testing, 10 (100%) were properly included on USA Hockey's list of those at the event required to be SafeSport trained. USA Hockey required the following categories of individuals to be SafeSport trained: Coaches, Athletic Trainers, Event Director, Equipment Managers, Team leads, Operations and USA Hockey staff.

Requirement No. 1(c) is satisfied. Of the 21 board and staff members randomly selected for testing, 21 (100%) were current in their SafeSport training within the previous 12 months.

Requirement No. 2 is satisfied. USA Hockey provided parent training via email to their entire membership on March 10, 2023, and Minor Athlete training via email to the entire membership on March 15, 2023.

### 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 No. 1 is satisfied. USA Hockey sent an email to all event participants on June 16, 2023. This communication included information regarding the MAAPP and reporting protocols for alleged or suspected sexual, physical, emotional misconduct, or violations of the MAAPP. USA Hockey did not have any day-of registrants at this event.

Requirement No. 2 is satisfied. USA Hockey has a written protocol, for all sanctioned events, for communicating to all event participants within the Organization, the Center-approved Education & Training Policy and Required Prevention Policies as well as the reporting protocols for all concerns involving alleged sexual, physical, and emotional misconduct, or violations of the MAAPP. This written protocol is located with the USA Hockey Event Communication Protocol, Communication Schedule, and Quality Control System (QCS) documents.

Requirement No. 3 is satisfied. USA Hockey provided proof of communication of Quality Control System sent, via email newsletter, to all event directors of sanctioned events for the current membership cycle on April 11, 2022.

### **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 Hockey has a protocol within their Quality Control System (QCS) ensuring that individuals on the Organizational Exclusion List (OEL) are unable to participate in any event, program, activity, or competition authorized by USA Hockey. USA Hockey requires all participants to be manually checked against the OEL. USA Hockey also utilizes the Center's Centralized Disciplinary Database (CDD) and i-Sight program (which includes checking for Administrative Holds) to ensure their internal OEL is current. USA Hockey's membership database automatically checks and ensures that all individuals required to be SafeSport trained are trained. USA Hockey's membership database prevents participation if membership requirements are not met. The membership database automatically prevents individuals listed on the OEL from completing membership and thus prevents participation at an event.

Requirement No. 2(a) is not applicable. USA Hockey does not allow one-day/short term memberships.

Requirement No. 2(b) is satisfied. There was no day-of registration at this event. However, the USA Hockey QCS outlines protocols for events that do allow day-of/on-site or last-minute substitutions. Those protocols stipulate that tournament hosts must verify, through the USA Hockey membership system, that such individuals have current registration with USA Hockey, current SafeSport training (if applicable) and a current background check. Tournament hosts are also required to check names against the OEL using USA Hockey's database.

Requirement No. 2(c) is satisfied. USA Hockey has language within their QCS regarding oversight procedures when their staff is not on site at sanctioned events. All local/affiliate programs must sign an agreement confirming they will comply with the rules and regulations set forth by USA Hockey. Each affiliate organization has a dedicated SafeSport Coordinator. Additionally, at any time, USA Hockey has the ability to pull memberships, rosters and reports using their membership system.

### **CORRECTIVE ACTIONS:**

No Corrective Actions required.

AUDIT AREA: **QUALITY CONTROL SYSTEM**

<b>MANAGEMENT RESPONSE</b>
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. USA Hockey had their Response and Resolution standards posted on their website by January 1, 2023 (December 30, 2022).

Requirement No. 2(a) is satisfied. USA Hockey has a reporting form available on its website enabling individuals to report all concerns involving alleged sexual, physical, emotional misconduct or violations of the USA Hockey Safe Sport Handbook, which includes the MAAPP. The reporting form does not have cost/fees or other financial barriers associated with submitting the report, and allows a report to be made anonymously, however this is not written within the USA Hockey policy. The policy does clearly define respective jurisdictional authority of the Center and USA Hockey.

Requirement No. 2(b, c, d, e, f, and g) are satisfied. USA Hockey provided its written policy in which these items are addressed in accordance with the requirements in Appendix B, Section 2. Items may be found in USA Hockey’s Safe Sport Program Handbook and Response and Resolution of SafeSport matters document.

Requirement No. 3(a) is satisfied. USA Hockey’s Safe Sport Program Handbook has policies that include language preventing USA Hockey from interfering with any Center investigations.

Requirement Nos. 3(b and c) are satisfied. Within USA Hockey’s Safe Sport Program Handbook, it explicitly states the Safe Sport Compliance Team shall be responsible for responding to all requests for information from the Center within 72 hours. Auditor reviewed findings of this standard that occurred between January 1, 2023, and the audit date. Of the 502 requests made from the Center to USA Hockey during this time period, 435 were responded to within 72 hours or were appropriately justified for exceeding 72 hours.

## AUDIT AREA: **RESPONSE & RESOLUTION**

Requirement No. 4(a) is satisfied. Within USA Hockey’s Response and Resolution document, there is a policy to submit to the Center “Data of Matters Addressed by the Organization”. The policy states that USA Hockey will collect and submit annually to the Center all reports made to USA Hockey of alleged MAAPP violations, alleged emotional misconduct, alleged physical misconduct, or alleged retaliation.” The policy also includes a protocol for collecting data from their Local Affiliated Organizations (LAOs).

### **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](https://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