

2023 EVENT AUDIT REPORT

AUDIT AND COMPLIANCE
DEPARTMENT

NGB NAME:
American Canoe Association

EVENT NAME:
2023 Sprint Nationals

EVENT SITE:
Nathan Benderson Park

EVENT DATE:
July 31 - August 1, 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	PARTIALLY IMPLEMENTED
QUALITY CONTROL SYSTEM	PARTIALLY IMPLEMENTED
RESPONSE & RESOLUTION	IMPLEMENTED

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 25 individuals randomly selected for testing, 24 (96%) had completed the Center’s training requirements within the previous 12 months prior to the event. One coach at the event selected for testing, who was not pre-registered for the event, did not have valid SafeSport training for the event. This issue is detailed in the Quality Control System section of this Audit Report.

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, and adult athletes.

Requirement No. 1(c) is satisfied. Of the 11 board and staff members randomly selected for testing, 11 (100%) had current training. Two staff members and one board member had unjustified lapses in training ranging from four to nine months.

Requirement No. 2 is satisfied. American Canoe Association (ACA) provided evidence of a newsletter that was emailed to membership on December 6, 2022, which offered the Center's prevention and reporting of child abuse training to Minor Athletes and parents.

CORRECTIVE ACTIONS:

1. American Canoe Association must (a) develop and implement a written protocol to ensure that board and staff members complete training on an annual basis (every 12 months) and (b) provide a report of board member and staff training on January 31, 2024.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: Beth Spilman

DEADLINE: November 15, 2023 & January 31, 2024

CORRECTIVE PLAN:

1. The Athlete Safety and Compliance Manager (ASCM) will review all board and staff member training expiration dates on the first and fifteenth of every month. Emails will be sent to those who need to complete SafeSport training at least three weeks prior to the expiration date of the training and will be followed up in three-day intervals. This allows ample time for the training to be completed. This will be tracked in the spreadsheet that tracks board and staff certifications and background checks, in a sheet entitled SafeSport Communications.

If an individual's training has not been completed and there are fewer than five business days until their certification expires, the ASCM will contact the individual by phone. If this is unsuccessful, then the ASCM will ask the Executive Director to get in contact with the individual.

ACA will submit a report to the Center of their board and staff member training on January 31, 2024.

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:

Partially Implemented

RATIONALE:

Requirement Nos. 1(a) and (b) are partially satisfied. American Canoe Association (ACA) communicated the ACA MAAPP and reporting protocol on July 17, 2023, to all athletes and on July 29, 2023, to all coaches and officials. A venue staff member communicated to all volunteers the MAAPP and reporting protocol on July 31, 2023. All the emails included a link to the full MAAPP and a link to the MAAPP-at-a-glance in addition to a link to ACA's reporting website which included detailed instruction for how to report sexual, physical, and emotional misconduct and violations of the MAAPP. ACA includes the same links within the event registration form which all pre-registered athletes, coaches, and officials completed prior to the event.

The venue event staff did not receive a direct communication of the MAAPP and reporting protocol. Coaches who did not pre-register for the event were allowed to register on site to receive a wristband to attend the coaches meeting. In addition, as detailed in the Quality Control System section of this Audit Report, other coaches who did not attend the coaches meeting were on site and identified throughout the event by ACA. The coaches who did not pre-register for the event did not receive a direct communication of the MAAPP or reporting protocol. In the coaches meeting, an ACA staff member discussed aspects of the MAAPP requirements and mentioned on-site contacts to report misconduct. Additionally, ACA posted MAAPP-related signage around the event venue.

Requirement No. 2 is partially satisfied. ACA provided a written protocol that details how to communicate ACA's MAAPP and reporting protocol to all event participants and day-of participants/substitutions for volunteers. ACA's policy states that the MAAPP and reporting mechanism will be included on the registration form but not directly emailed to pre-registered individuals. ACA's policy states that ACA does not allow same-day registration for event staff, athletes, coaches, officials, and medical staff. However, coaches were allowed to obtain a credential on site to attend the coach's meeting at the event and coaches who did not pre-register or attend the coaches meeting for the event were identified on site by ACA. The written protocol does not ensure that event participants (pre-registered event participants or on-site coach registrants) receive direct communication of the MAAPP and reporting protocol.

Requirement No. 3 is satisfied. ACA provided documentation that they communicated ACA's Quality Control System policies to the staff who operate national level ACA events.

AUDIT AREA: **COMMUNICATION AND REPORTING**

CORRECTIVE ACTIONS:

1. American Canoe Association must (a) update its written policy to ensure that all event participants receive the MAAPP and protocol for reporting all concerns involving alleged or suspected sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP and (b) demonstrate evidence of its implementation by December 1, 2023. The written policy must include a protocol addressing the following:
 - i. A direct communication for pre-registered event participants
 - ii. A direct communication for on-site registrations, including but not limited to coaches.
 - iii. A direct communication for venue staff

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: Beth Spilman

DEADLINE: November 15, 2023 & December 1, 2023

CORRECTIVE PLAN:

1. When registration for an event is complete and has been closed (between 14 to seven days prior to an event) the ASCM will send an email out to all registered participants detailing the MAAP and the reporting protocol for all alleged or suspected sexual misconduct, physical misconduct, emotional misconduct, and violations of the MAAPP. This has been updated in the QCS.
2. On-site registrations will follow the protocol in the QCS. The MAAPP and reporting protocols will be explained to individuals by the staff member registering them. This step must happen before a participant is considered registered.
3. The event director should have a meeting with the ASCM and organizing head of the venue no later than a month prior to the event. The ASCM will go over the MAAPP and reporting protocol, the importance of them, and the need for the venue staff to follow them. In this meeting the ASCM will request a list of the staff venue and their emails. A week prior to the event, the ASCM will send an email to all event staff with the MAAPP and how to report protocol.

Email templates and the updated QCS have been provided to the Center.

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:

Partially Implemented

RATIONALE:

Requirement No. 1 is satisfied. American Canoe Association (ACA) has a Quality Control System (QCS) policy to ensure that individuals on the Organizational Exclusion List (OEL) are unable to participate in any sanctioned event/competition. The QCS protocol requires that all staff, athletes, officials, medical staff, volunteers, and coaches register for the event using ACA's registration system or the Local Organizing Committee's (LOC) registration system and ACA will manually check the list of event participants to ensure that no event participants are banned and/or suspended. ACA also utilizes the event participant lists to manually check for valid SafeSport training (via the Center's Learning Management System) and, prior to the event, will communicate with all event participants who need to complete training.

Requirement No. 2(a) is not applicable. ACA does offer any short-term or one-day memberships.

Requirement No. 2(b) is partially satisfied. ACA's Quality Control System encompasses a protocol for on-site participation/registration for volunteers. The QCS specifically states ACA does not allow same-day registrations for event staff, athletes, coaches, officials, and medical staff. However, there was on-site registration for coaches. Coaches who were not pre-registered for the event and who wanted to attend the coaches' meeting, were checked for SafeSport training and against ACA's Organizational Exclusion List (OEL). In addition, there were coaches at the event who did not attend the coaches meeting and did not pre-register for the event. ACA identified coaches known to them that were onsite and as they were identified, ACA staff checked for SafeSport training and against ACA's OEL. ACA instructed coaches to complete SafeSport training, however, as stated in the Education and Training section of this Audit Report, one coach selected for testing had expired SafeSport training. ACA does not have a written protocol to address coaches who have not pre-registered for the event to ensure that they have not been banned or suspended by ACA or the Center and do not have regular contact with and/or authority over Minor Athletes if their SafeSport training is not valid.

Requirement No. 2(c) is satisfied. ACA staff is on site for all sanctioned events. 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 Athlete Safety Compliance Manager (ASCM) will then manually check to confirm that Adult Participants required to be trained have completed SafeSport training. If training is not current, 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**

(Requirement No. 2(c) is continued) At the audited event, ACA managed the registration for athletes, coaches, officials, and certain volunteers. The LOC managed the registration for other volunteers. Volunteers coordinated by the LOC were not placed in roles where they would have regular contact with or authority over Minor Athletes and therefore were not required to be SafeSport trained. The LOC provided lists of the volunteers to ACA to check against the Organizational Exclusion List as the lists were updated.

CORRECTIVE ACTIONS:

1. American Canoe Association must update its written Quality Control System to include the protocol to ensure that coaches who have not pre-registered for the event have valid SafeSport training (or are prevented from having regular contact with and/or authority over Minor Athletes) and are not banned and/or suspended by the Center or ACA.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: Beth Spilman

DEADLINE: November 15, 2023

CORRECTIVE PLAN:

1. The QCS has been updated. The process for coaches to register day of the event will follow the process already in place for same day volunteer registration.

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. ACA provided its Response and Resolution policies.

Requirement No. 2 is satisfied. ACA posted to its public website the Center-specific Response & Resolution policies by the January 1, 2023, deadline (on December 20, 2022).

Requirement No. 2(a) is partially satisfied. ACA has a public-facing website which includes a mechanism for allowing individuals to report (without a fee) all concerns involving alleged sexual misconduct, physical misconduct, emotional misconduct, and violations of the MAAPP and allows a reporter the option to report anonymously. ACA’s website clearly defines for end users that the Center has exclusive jurisdiction over allegations of sexual misconduct and includes a link to the Center’s reporting portal but does not clearly define ACA’s jurisdiction.

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

Requirement No. 2(f) is satisfied. ACA provided its written policy which addresses how the ACA will respond to and resolve reported allegations of abuse and misconduct that fall within its jurisdiction. During the audit, ACA updated its policy to address how ACA’s Local Affiliated Organizations (LAOs) will respond to and resolve allegations of abuse and misconduct.

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

AUDIT AREA: **RESPONSE & RESOLUTION**

Requirement Nos. 3(b) and 3(c) are satisfied. ACA provided its written policy stating that the Athlete and Safety Compliance Manager and the Executive Director will be responsible for responding to requests from the Center within 72 hours. Auditor reviewed findings of this standard that occurred between January 1, 2023, and the audit date. Of the 6 requests made from the Center to ACA during this time period, all requests were responded to within 72 hours.

Requirement Nos. 4 and 4(a) are satisfied. ACA provided its written policy for collecting Data of Matters Addressed by the ACA, and it encompasses all elements listed in Appendix B Section 5. ACA will be managing the data within its internal spreadsheet and will provide a spreadsheet for each LAO to complete and turn back to ACA for submitting to the Center.

CORRECTIVE ACTIONS:

1. American Canoe Association must update its public-facing reporting website to clearly define ACA's jurisdiction over reports of misconduct.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: Beth Spilman

DEADLINE: November 15, 2023

CORRECTIVE PLAN:

1. Under the heading To Report Emotional or Physical Misconduct on the ACA website "If SafeSport declines jurisdiction of a complaint, the ACA will then take on jurisdiction of this case and will follow the ACA Response and Resolution policy" has been added.

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