

2024 EVENT AUDIT REPORT

NGB NAME:	US Biathlon Association
EVENT SITE:	Midway, UT
EVENT DATE:	June 18, 2024

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 2024 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 a copy of a direct communication (email or newsletter), sent to all Adult Participants 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 is satisfied. The testing of individuals randomly selected in the below Requirement Nos. 1(a),1(b), and 1(c), revealed an average of 96.97%.

Requirement No. 1(a) is satisfied. Of the 5 individuals randomly selected for testing, 5 (100%) properly completed the Center's training within the previous 12 months prior to the event.

Requirement No. 1(b) is satisfied. Of the 3 individuals randomly selected for testing, 3 (100%) were properly included in the list of individuals who were required to be SafeSport Trained.

Requirement No. 1(c) is partially satisfied. Of the 11 staff and board members randomly selected for testing, 10 (90.91%) were current with their annual SafeSport training. Three board members and one staff member had lapses in training ranging from one month to one year.

Requirement No. 2 is satisfied. US Biathlon provided evidence of a newsletter emailed to members in January 2023 and proof of a scheduled newsletter to be sent in August 2024, which offered/will offer the Center's prevention and reporting of child abuse training to Minor Athletes and parents.

CORRECTIVE ACTIONS:

1. US Biathlon must show proof that the board member with expired training has renewed their SafeSport certification by August 30, 2024.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: Sara Studebaker-Hall

DEADLINE: August 30, 2024

CORRECTIVE PLAN:

1. The board member in question has completed training as of July 29, 2024.

AUDIT AREA: COMMUNICATION AND REPORTING

REQUIREMENTS:

1. Organization or Event Director must provide a 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:
 - a. must include MAAPP requirements (either full policy or summary)
 - b. must also detail reporting protocols and explicitly state how to report each of: suspected sexual misconduct, emotional misconduct, physical misconduct and violations of the MAAPP
2. Provide Organization's written protocol for communicating - to all participants within the Organization's events, programs, activities or competitions authorized by, organized by or under the auspices of the Organization - the Center-approved MAAPP and reporting protocols for all concerns involving suspected 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 all of the Organization's events, programs, activities or competitions authorized by, organized by or under the auspices of the Organization.

SCORE:

IMPLEMENTED

RATIONALE:

Requirement Nos. 1(a) and (b) are satisfied. On June 3, 2024, US Biathlon Association (USBA) communicated to all event participants a PDF attachment of the MAAPP and included information in the email for reporting a "SafeSport concern" to the Center and US Biathlon. The email further detailed that the US Center for SafeSport has exclusive jurisdiction over allegations regarding sexual misconduct. The email included a link to an online reporting form for submitting reports to US Biathlon and a link to US Biathlon's SafeSport page. Both the attached MAAPP and the linked SafeSport page included more detailed information for reporting alleged sexual misconduct, physical misconduct, emotional misconduct, and MAAPP violations. There were no day-of or last-minute participants.

Requirement No. 2 is satisfied. USBA provided a written protocol that requires that all event participants be communicated the MAAPP and reporting protocols and includes the requirement to communicate the MAAPP and reporting protocol to all day-of/last-minute participants.

Requirement No. 3 is satisfied. USBA is involved in the operation of all national level sanctioned events and regional camps, often in conjunction with a local organizing committee ("LOC"). These LOCs also operate USBA-sanctioned regional championships without a high level of involvement from USBA. On June 3, 2024, USBA provided documentation that they communicated USBA's Quality Control System policy to the LOCs involved in USBA-sanctioned events and USBA event-related staff for upcoming summer and fall events. Winter events will receive the Quality Control System in a future communication.

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 (OEL) 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/substitutions (athletes, staff, volunteers, vendors, coaches, officials etc.)
 - c. Oversight procedures by the Organization when the staff is not on site at events, programs, activities or competitions authorized by, organized by or under the auspices of the Organization

SCORE:

IMPLEMENTED

RATIONALE:

Requirement No. 1 is satisfied. US Biathlon Association (USBA) staff directly operates all regional camps and is involved with all national-level sanctioned events in conjunction with the Local Organizing Committee ("LOC"). LOCs may also operate USBA-sanctioned events without USBA's direct involvement. USBA's Quality Control System ("QCS") requires that the LOC send the list of event participants to US Biathlon staff prior to the event. US Biathlon staff is responsible for checking that list against USBA's Organizational Exclusion List, as well as ensuring necessary SafeSport training is completed by coaches and officials. For the audited event, the policy was followed as the event organizer (a USBA staff member), communicated the list of participants to a separate USBA staff member who checked for SafeSport training for all participants who required training for the event. At the time of the audit, USBA did not have any participants who had been banned or suspended from the Center or USBA.

Recently, a new system has been developed where all USBA members have access to a "membership status checker". The status checker allows an event organizer to search each member participant for a valid membership. If an individual has a valid membership, this means they have valid SafeSport training (if their membership type requires it) and has not been banned and/or suspended by USBA or the Center. Event organizers are now being instructed to utilize this tool, however, USBA's QCS policy has not yet been updated to reflect the new protocol.

US Biathlon also has a supplementary LOC Procedures guide that includes protocols for SafeSport-related compliance checks.

Requirement No. 2(a) is satisfied. USBA allows for one-day or short-term memberships. The one-day memberships are strictly for individuals who want to try competitive biathlon, participate in a clinic, or compete in a race, so no SafeSport training is required for this membership type. Coaches and officials are not allowed to utilize this membership type in USBA-sanctioned events. These one-day/short-term memberships would be included in the event participant lists sent to USBA and would be included in the “membership status checker”. There were no one-day/short-term memberships utilized for the audited event.

Requirement No. 2(b) is satisfied. USBA’s QCS includes a protocol for day-of participant registration. Event staff are required to maintain a list of these participants and, in conjunction with USBA staff, ensure any Adult Participants who are required to complete training are SafeSport compliant and check all participants against the USBA’s Organization Exclusion List. There were no day-of registrations for the audited event.

Requirement No. 2(c) is satisfied. USBA’s oversight protocol includes the requirement for the LOC to provide a list of all event participants to USBA for SafeSport-related compliance checks. In addition, for any day-of participation, USBA requires that these individuals sign an acknowledgement form attesting that they received and read the MAAPP. Event organizers must be able to produce this signature page to US Biathlon staff upon request. US Biathlon staff has been highly involved with event organizers prior to and at the event for many USBA-sanctioned events, including the audited event. Moving forward, since USBA will no longer require the submission of participant lists, there will not be an oversight mechanism in place for when USBA staff is not onsite at the event.

CORRECTIVE ACTIONS:

1. US Biathlon must:
 - a. Update its Quality Control System and LOC Procedures document to include the “membership status checker” protocol.
 - b. Update its Quality Control System and LOC Procedures document to include a protocol for oversight procedures when USBA staff is not onsite at USBA-sanctioned events such as an event-director record retention policy, random audits, submission of an attestation checklist, etc.
 - c. Communicate the updated Quality Control System to all sanctioned event organizers.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: Sara Studebaker-Hall

DEADLINE: September 30, 2024

CORRECTIVE PLAN:

1. U.S. Biathlon will complete the required changes, and migrate the QCS and LOC Procedures documents into one document for simplicity. After approval from the Center, US Biathlon will communicate the updated QCS to all sanctioned event organizers

AUDIT AREA: RESPONSE AND RESOLUTION

REQUIREMENTS:

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. 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. Requests from the Center are responded to within 72 hours
 - b. 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 and annually submitting to the Center, 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 and submit to the Center such data from LAOs, if applicable

SCORE:

IMPLEMENTED

RATIONALE:

Requirement No. 1 is satisfied. US Biathlon Association (“USBA”) provided its Response and Resolution policies.

Requirement No. 2 is satisfied. US Biathlon Association has posted to its public website the Center-specific Response and Resolution policies.

Requirement Nos. 2(a-g) are satisfied. US Biathlon Association provided its written policy which addresses all the corresponding elements listed in Appendix B Section 2.

Requirement No. 3(a) is satisfied. Auditor reviewed findings of this standard that occurred between the Organization’s 2023 audit and this audit date, June 18, 2024. All three requests made from the Center to USBA during this time period were responded to within 72 hours.

Requirement No. 3(b) is satisfied. US Biathlon Association provided its written policy stating that the Director of Operations will respond to requests from the Center within 72 hours.

Requirement Nos. 4 and 4(a) are satisfied. US Biathlon Association provided its written policy for collecting Data of Matters Addressed by the USBA, and it encompasses all elements listed in Appendix B Section 5. USBA member clubs must report data to USBA and USBA will track the reports and submit the data to the Center.

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response required.

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 could include items that were found to reflect increased or mitigated risk to athlete safety and well-being.

RATIONALE:

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

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response required.

APPENDIX A: SCORING GUIDE

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
- Failure to identify or track two or more categories of individuals required to be trained
- Failure to check against two or more categories of individuals in Organization's Quality Control System at an event
- 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
- Failure to identify one or more categories of individuals required to be trained
- Failure to check against one category of individuals in the Organization's Quality Control System at an event
- 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
- Adequate tracking and inclusion of all individuals in all required categories in the Organization's Quality Control System at event
- 90% or higher compliance on Education & Training requirements

APPENDIX B: RESPONSE AND RESOLUTION STANDARDS

- 1) Organization's Response & Resolution standards must be posted on Organization's website.
- 2) Organization's Internal Response & Resolution Policies and Process:
 - a. Reporting Mechanism: The Organization must have a mechanism on its public website (such as a form or contact info for an athlete safety liaison) enabling individuals to report all concerns involving suspected 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 LAOs 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 LAO's) jurisdiction, reflecting how allegations were responded to, and their respective outcome
 - 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 LAOs
 - 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 LAOs 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 LAOs
- 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