

2024 ADMINISTRATIVE AUDIT REPORT

NGB NAME:	USA Bobsled and Skeleton
EVENT SITE:	Virtual
EVENT DATE:	October 15, 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 Administrative Audit Standards articulated in the Audit and Compliance Manual.

The audit covered the following areas:

- **EDUCATION AND TRAINING**
- **COMMUNICATION AND REPORTING**
- **QUALITY CONTROL**
- **LOCAL AFFILIATED ORGANIZATIONS**
- **RESPONSE & RESOLUTION**

AUDIT METHODOLOGY

During the audit, the Center:

- Reviewed policies and procedures
- Evaluated processes
- Administered implementation fidelity testing
- Interviewed individuals responsible for compliance with Center requirements

SCORING SUMMARY

STANDARD	SCORE
EDUCATION AND TRAINING	IMPLEMENTED
COMMUNICATION AND REPORTING	IMPLEMENTED
QUALITY CONTROL SYSTEM	IMPLEMENTED
LOCAL AFFILIATED ORGANIZATIONS	NOT APPLICABLE
RESPONSE & RESOLUTION	IMPLEMENTED

AUDIT AREA: EDUCATION AND TRAINING

REQUIREMENTS:

1. Identify and track all Adult Participants in the Organization required to annually (every 12 months) complete U.S. Center for 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.
2. Mark any Adult Participant who has not completed the required training in the Organization's database or membership system as "not in good standing" and show proof of automated process or written policy that ensures these individuals are prevented from participation or from having regular contact with or authority over amateur athletes who are minors.
3. Staff and board members must be trained annually (every 12 months) regardless of participation or activity.
4. Organization must provide a 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:

The testing of individuals randomly selected in the below Requirement Nos. 1, 2, and 3 revealed an average of 96.30%.

Requirement No. 1 is satisfied. Of the 7 individuals randomly selected for testing, 7 (100%) were properly included in the list of individuals who were required to be SafeSport Trained.

Requirement No. 2 is satisfied. Of the 31 individuals randomly selected for testing, 31 (100%) properly completed the Center's training within the previous 12 months. USA Bobsled Skeleton (USABS) requires the following categories to be SafeSport trained: volunteers who have regular contact with or authority over Minor Athletes, staff, board, adult athletes (regardless of whether they have regular contact with or authority over Minor Athletes), committee members, personal care assistants, officials, and contractors.

Requirement No. 3 is partially satisfied. Of the 9 staff and board members randomly selected for testing, 8 (88.89%) were current with their annual SafeSport training. Also, two board members had lapsed training between 2022 and the audit date.

Requirement No. 4 is satisfied. USABS sent an email communicating the Center's free parent and Minor Athlete training directly to all members on April 29, 2024. This communication was within 12 months of the previous January 31, 2023 communication.

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response is required.

AUDIT AREA: COMMUNICATION AND REPORTING

REQUIREMENTS:

1. Provide direct communication of the Organization's Center approved MAAPP to all members and Adult Participants within current membership cycle.
2. Provide direct communication of the reporting mechanism noted in 2(a) of Appendix B (page 10) - and separate from link to Organization's full Athlete Safety Policy - to all members and Adult Participants within current membership cycle.
3. Provide proof of communication of Quality Control System sent to all event directors of all of Organization's events, programs, activities or competitions authorized by, organized by or under the auspices of the Organization.

SCORE:

IMPLEMENTED

RATIONALE:

Requirement. No. 1 is satisfied. USA Bobsled Skeleton (USABS) provided proof that on September 25, 2024, their Center-approved 2025 MAAPP was communicated via email to all members and Adult Participants within the current membership cycle.

Requirement No. 2 is satisfied. USABS provided proof that on September 25, 2024, a direct communication of the compliant reporting mechanism was sent via email to all members and Adult Participants. USABS also has an anonymous reporting form that enables users to report directly to USABS anonymously.

Requirement No. 3 is satisfied. USABS does not have separate sanctioned event directors, but events are handled internally and the USABS Operations Manager and Compliance and Membership Services Manager are responsible for implementing the quality control system policy. Additionally, all USABS staff are given access to the quality control system policy.

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response is required.

AUDIT AREA: QUALITY CONTROL SYSTEM

REQUIREMENTS:

1. Organization 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 or authority over amateur athletes who are minors.
2. 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 (of athletes, staff, volunteers, vendors, coaches, officials, etc.)
 - c. Oversight procedures by the Organization when their 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. USA Bobsled/Skeleton (USABS) implements a Quality Control System (QCS) policy for all sanctioned events to ensure that individuals on the Organizational Exclusion List (OEL) are prevented from participating in the event. The policy requires that USABS conduct a cross-check of all event participants against the OEL and the adjudication log two weeks prior to the event. USABS also implements a QCS policy for all sanctioned events to ensure that individuals required to be but are not SafeSport trained are prevented from participating in the event. The QCS policy requires that event participants who are unable to fulfill the event registration eligibility requirements (which include verified SafeSport training, background check, and a cross-check against the OEL and the Center's adjudication log) will not be allowed to register for, or participate in, the event. USABS staff manually checks memberships within Sport:80 - the USABS membership system - to ensure all the eligibility requirements are met. Additionally, if an individual is included on the USABS OEL or the Center's adjudication log, the member's profile will not be in good standing in Sport:80 and they would not be able to register for an event.

Requirement Nos. 2(a-c) are satisfied. The above protocols are utilized to ensure that short-term memberships and late registration requests are verified to have current SafeSport Training and are cross-checked against the OEL prior to the event. The policy also requires that late registrants are manually cross-checked by USABS staff against the Center's Centralized Disciplinary Database. Lastly, USABS is on-site for all owned events and has sufficient written protocols to ensure oversight if an event is ever sanctioned by USABS and run by an external event director.

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response is required.

AUDIT AREA: LOCAL AFFILIATED ORGANIZATIONS

REQUIREMENTS:

1. Organization must provide direct communication of the Organization's 2022 MAAPP (to include the Education & Training Policy and Required Prevention Policies) sent to all LAOs, LAO members, staff and board by email or newsletter, within the Organization's current membership cycle.

SCORE:

NOT APPLICABLE

RATIONALE:

USA Bobsled and Skeleton has certified with the Center that they do not have Local Affiliated Organizations.

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response is required.

AUDIT AREA: RESPONSE & 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 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 Bobsled and Skeleton (USABS) provided its Response and Resolution policies.

Requirement No. 2 is satisfied. USABS has posted to its public website the Center-specific Response & Resolution policies.

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

Requirement Nos. 3a and b are satisfied. The USABS policy states that “Requests will be answered within 72 hours for the eligibility status of the participant and the existence of USABS-imposed temporary measure or safety plans” and that the USABS Director of Operations and Compliance is the designated person to ensure this policy is followed. Auditor reviewed findings of the 72-hour standard that occurred between July 25, 2023 (USABS’ 2023 audit date) and this audit date. The one request made from the Center within this time period was responded to by USABS within 72 hours.

Requirement No. 4 is satisfied. USABS has a policy to submit Data of Matters Addressed by USABS annually to the Center, encompassing all elements listed in Appendix B, Section 5. USABS has certified with the Center that they do not have Local Affiliated Organizations.

CORRECTIVE ACTIONS:

No Corrective Actions required.

MANAGEMENT RESPONSE

RESPONSIBLE INDIVIDUAL: N/A

DEADLINE: N/A

CORRECTIVE PLAN: No Management Response is 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
- 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

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 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:
 - a. 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