



United States Olympic Committee

United States Olympic Committee SafeSport Audit of United States Association of Blind Athletes

October 2017

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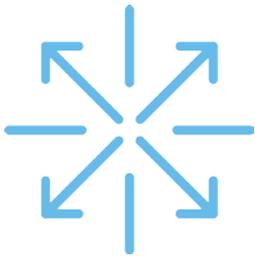


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USOC SafeSport Audit of United States Association of Blind Athletes

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¹ To consider the report in its entirety, please refer also to the detailed management response that will appear here [[Governance Documents](#)] within 90 days of the date of this report.



Executive Summary

Summary Observations

It shall be the policy of the United States Olympic Committee (USOC) that each National Governing Body (NGBs) adopt a Minimum Standards Policy for Athlete Safety Programs (Athlete Safety Standards) by December 31, 2013².

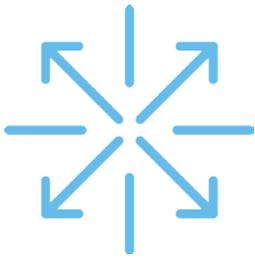
We noted the following opportunities to enhance the design of United States Association of Blind Athletes (USABA) compliance with the Athlete Safety Standards:

- > **Athlete Safety Standards - Prohibited Conduct** – USABA's SafeSport-related documentation and administrative materials does not specifically define bullying, hazing, harassment (including sexual harassment), emotional misconduct, physical misconduct or sexual misconduct (including child sexual abuse) and does not prohibit bullying, hazing, harassment (including sexual harassment) or emotional misconduct.
- > **Athlete Safety Standards - Criminal Background Checks and Education and Training Policy Requirements** – USABA's SafeSport-related documentation and administrative materials does not specifically require applicable individuals to complete SafeSport education and training requirements. The Code of Conduct and Member Agreement does state that, "If I am a coach or staff member, I will complete United States Olympic Committee (USOC) Safe Sport Program training and will comply with the full spirit and intent of the program;" however, there is no other specific requirement documented in their SafeSport-related documentation and administrative materials.
- > **Athlete Safety Standards - SafeSport Policy** – USABA does not currently have a formal, documented SafeSport policy to provide guidance on SafeSport requirements as required by the Athlete Safety Standards. There are some areas of their website and related documentation that contains elements of SafeSport-specific requirements, but there is no formal, documented SafeSport policy.
- > **Athlete Safety Standards - Criminal Background Checks and Education and Training Testing** – Two individuals selected for testing (20% of the selected individuals) did not have criminal background checks conducted during the testing period (i.e., May 1, 2016 through April 30, 2017); however, evidence was provided that the criminal background check were completed prior to issuing the audit report.

Background and Approach

USOC engaged Baker Tilly Virchow Krause (Baker Tilly), to assist the USOC in the completion of SafeSport audits, to assess compliance with SafeSport policies and

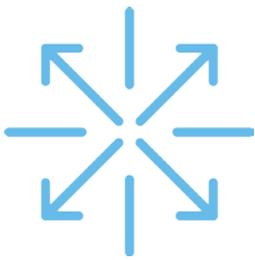
² Effective June 20, 2017 the USOC replaced the Athlete Safety Standards with the NGB Athlete Safety Policy. Due to the timing of this audit, fieldwork was performed in accordance with the Athlete Safety Standards.



procedures at the USOC and all of its NGBs and High Performance Management Organizations (HPMOs).

Baker Tilly performed a review of USABA to evaluate compliance with the Athlete Safety Standards. The following activities were performed for this review of USABA:

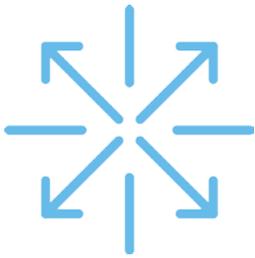
- > Developed and executed an audit program that included:
 - Holding a virtual entrance meeting to discuss and document USABA's SafeSport program and processes.
 - Selecting a sample of ten from the required individuals to ensure a background check was performed and education and training was completed. See **Appendix A** for a list of documents reviewed.
 - Reviewing USABA's athlete safety policy and determining whether the following was addressed:
 - Required misconduct is prohibited and defined;
 - Reporting procedures are documented; and
 - The grievance process is documented and complies with Athlete Safety Standards.
 - Identifying which individuals are required to undergo a criminal background check and complete education and training.
- > Conducted a virtual exit meeting, if requested, following delivery of the draft report, to discuss audit findings and recommendation(s) with USABA. See **Appendix B** for a list of individuals interviewed.
- > Identified specific observations and recommendations regarding opportunities to enhance compliance with Athlete Safety Standards. Observations include the following attributes: criteria, condition, cause, effect, and recommendation, as set out in the International Professional Practices Framework (IPPF) Standards and Practice Advisory 2410-1.



Detailed Report

The tables below represent opportunities to enhance the design and effectiveness of USABA's compliance with the Athlete Safety Standards.

1. Athlete Safety Standards - Prohibited Conduct	
Criteria	The Athlete Safety Standards requires that each NGB/HPMO shall adopt an athlete safety program that prohibits and defines the following misconduct: Bullying, Hazing, Harassment (including sexual harassment), Emotional Misconduct, Physical Misconduct, and Sexual Misconduct (including child sexual abuse).
Condition	USABA's SafeSport-related documentation and administrative materials does not specifically define bullying, hazing, harassment (including sexual harassment), emotional misconduct, physical misconduct or sexual misconduct (including child sexual abuse) and does not prohibit bullying, hazing, harassment (including sexual harassment) or emotional misconduct.
Cause	USABA may not have reviewed and updated its SafeSport-related documentation and administrative materials to include all of the requirements in the Athlete Safety Standards.
Effect	USABA must be in compliance with the Athlete Safety Standards to be a member in good standing. Noncompliance with the Athlete Safety Standards can result in disciplinary action by the USOC including withdrawal of high performance funding. Additionally, stakeholders (e.g., coaches, staff, officials, volunteers, etc.) may not be aware of the specific requirements of the Athlete Safety Standards and could be out of compliance with the requirements and/or may not aware of the prohibited conduct. Also, athletes may have contact with stakeholders who are not aware of SafeSport misconduct and the potential impact to athletes' well-being.
Recommendation	USABA must update all applicable SafeSport-related documentation and administrative materials to define and specifically prohibit the six types of prohibited misconduct identified in the Athlete Safety Standards. Compliance with these requirements must be completed within 90 days of receipt of the final audit report.
Management response	USABA concurs with the recommendation. Prior to this audit, USABA was not aware of the requirement to create an independent athlete safety policy. In response to this audit report, USABA created an athlete safety policy. A draft of that policy document was submitted under separate cover for review

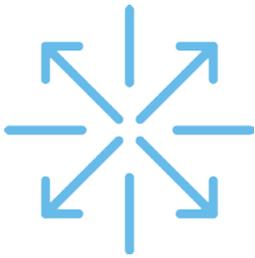


1. Athlete Safety Standards - Prohibited Conduct

	to ensure the document meets program meets program requirements.
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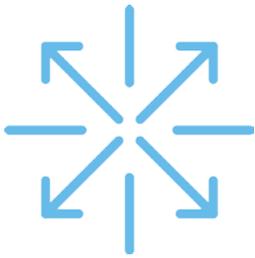
2. Athlete Safety Standards - Criminal Background Checks and Education and Training Policy Requirements

Criteria	The Athlete Safety Standards states each NGB/HPMO shall require criminal background checks and education and training for those individuals it formally authorizes, approves, or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes.
Condition	USABA's SafeSport-related documentation and administrative materials does not specifically require applicable individuals to complete SafeSport education and training requirements. The Code of Conduct and Member Agreement does state that, "If I am a coach or staff member, I will complete United States Olympic Committee (USOC) Safe Sport Program training and will comply with the full spirit and intent of the program;" however, there is no other specific requirement documented in their SafeSport-related documentation and administrative materials.
Cause	USABA may not have updated its SafeSport-related documentation and administrative materials to align with requirements in the Athlete Safety Standards.
Effect	USABA may not be in compliance with the Athlete Safety Standards. USABA must be in compliance with the Athlete Safety Standards to be a member in good standing. Noncompliance with the Athlete Safety Standards can result in disciplinary action by the USOC including withdrawal of high performance funding. Additionally, stakeholders (e.g., coaches, staff, officials, volunteers, etc.) may not know that criminal background checks and education and training requirements apply to them or be informed of SafeSport initiatives and the related misconduct areas. Also, athletes may have contact with individuals who are unaware of SafeSport misconduct and the potential impact to athletes' well-being and/or have contact with individuals who have a criminal history, which could put athletes at SafeSport-related misconduct risk.
Recommendation	USABA's SafeSport policy must require that individuals it formally authorizes, approves, or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes complete criminal background checks and education and training requirements in a timely manner and before they have contact with athletes to provide assurance that they are educated on the



2. Athlete Safety Standards - Criminal Background Checks and Education and Training Policy Requirements	
	requirements of the Athlete Safety Standards. Compliance with these requirements must be completed within 90 days of receipt of the final audit report.
Management response	USABA concurs with the recommendation. Prior to this audit, USABA was not aware of the requirement to create an independent athlete safety policy. In response to this audit report, USABA created an athlete safety policy. A draft of that policy document was submitted under separate cover for review to ensure the document meets program meets program requirements.

3. Athlete Safety Standards – SafeSport Policy	
Criteria	It shall be the policy of the USOC that each NGB adopt an athlete safety program by December 31, 2013. The athlete safety program shall include, at a minimum, the requirements set forth in the Athlete Safety Standards.
Condition	USABA does not currently have a formal, documented SafeSport policy to provide guidance on SafeSport requirements as required by the Athlete Safety Standards. There are some areas of their website and related documentation that contains elements of SafeSport-specific requirements, but there is no formal, documented SafeSport policy.
Cause	USABA has not adopted Athlete Safety Standards as required by the USOC as of December 31, 2013.
Effect	USABA may not be aware of the specific requirements of the Athlete Safety Standards. USABA must be in compliance with the Athlete Safety Standards to be a member in good standing. Noncompliance with the Athlete Safety Standards can result in disciplinary action by the USOC including withdrawal of high performance funding. Additionally, athletes may not be informed about SafeSport misconduct, its impact, and how to report misconduct, if necessary.
Recommendation	USABA must formally create and/or update their SafeSport-related content to document a formal SafeSport policy that can be made available to all stakeholders, which complies with the Athlete Safety Standards. Compliance with these requirements must be completed within 90 days of receipt of the final audit report.

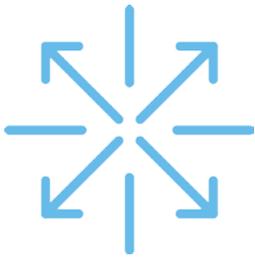


3. Athlete Safety Standards – SafeSport Policy

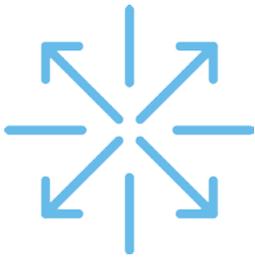
Management response	USABA concurs with the recommendation. Prior to this audit, USABA was not aware of the requirement to create an independent athlete safety policy. In response to this audit report, USABA created an athlete safety policy. A draft of that policy document was submitted under separate cover for review to ensure the document meets program requirements.
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4. Athlete Safety Standards - Criminal Background Checks and Education and Training Testing

Criteria	The Athlete Safety Standards state each NGB/HPMO shall require criminal background checks and education and training for those individuals it formally authorizes, approves, or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes.
Condition	Two individuals selected for testing (20% of the selected individuals) did not have criminal background checks conducted during the testing period (i.e., May 1, 2016 through April 30, 2017); however, evidence was provided that the criminal background check were completed prior to issuing the audit report.
Cause	USABA may not be consistently tracking and monitoring compliance with the criminal background checks and education and training requirements of the Athlete Safety Standards.
Effect	Individuals USABA formally authorizes, approves or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes may not be in compliance with the Athlete Safety Standards because they have not completed criminal background checks and/or education and training prior to having contact with athletes. USABA must be in compliance with the Athlete Safety Standards to be a member in good standing. Noncompliance with the Athlete Safety Standards can result in disciplinary action by the USOC including withdrawal of high performance funding. Also, athletes may have contact with individuals who are unaware of SafeSport misconduct and the potential impact to athletes' well-being and/or have contact with individuals who have a criminal history, which could put athletes at SafeSport-related misconduct risk.
Recommendation	USABA must require that individuals it formally authorizes, approves, or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes complete criminal background checks and education and training requirements in a timely



4. Athlete Safety Standards - Criminal Background Checks and Education and Training Testing	
	<p>manner and before they have contact with athletes to provide assurance that they are educated on the requirements of the Athlete Safety Standards. The NGB/HPMO must consistently track and verify criminal background checks and education and training requirements are met for all Required Individuals. Compliance with these requirements must be completed within 90 days of receipt of the final audit report.</p> <p>USABA should review the testing results and require all necessary individuals to complete the necessary requirements (i.e., criminal background check and/or education and training).</p>
Management response	<p>USABA concurs with the recommendation. Prior to this audit, USABA was not aware of the requirement to create an independent athlete safety policy. In response to this audit report, USABA created an athlete safety policy. A draft of that policy document was submitted under separate cover for review to ensure the document meets program meets program requirements.</p>



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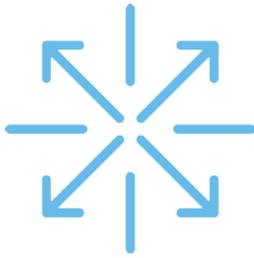
Report Appendices



Appendix A: Documents Reviewed

We reviewed the following documents:

- > Athlete Safety Standards Program Questionnaire
- > Population listing of "required individuals" (i.e., covered individuals defined by the NGB who are required to undergo background check and training)
- > US Association of Blind Athletes Grievance Complaint and Appeal Procedures
- > US Association of Blind Athletes Code of Conduct and Membership Agreement



Appendix B: Personnel Interviewed

We interviewed the following personnel:

- > Mark Lucas, Executive Director