



# United States Olympic Committee

## United States Olympic Committee SafeSport Audit of USA Bobsled & Skeleton

October 2017

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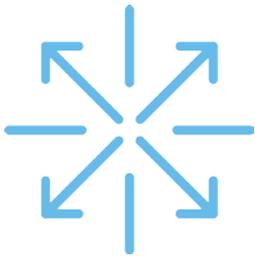


**BAKER TILLY**

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United States Olympic Committee  
USOC SafeSport Audit of USA Bobsled & Skeleton

# United States Olympic Committee SafeSport Audit of USA Bobsled & Skeleton<sup>1</sup>

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<sup>1</sup> 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

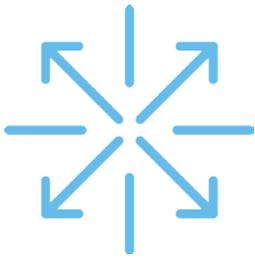
### Summary Observations

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, 2013<sup>2</sup>.

We noted the following opportunities to enhance the design of USA Bobsled & Skeleton's (USABS) compliance with the Athlete Safety Standards:

- > **Athlete Safety Standards - Criminal Background Checks and Education and Training Testing** – Requiring criminal background checks and education and training is not consistently enforced by USABS. The following exceptions were identified during our testing:
  - Six individuals selected for testing (60% 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 two of the individuals had completed the criminal background checks prior to issuing the audit report.
  - Two individuals selected for testing (20% of the selected individuals) did not complete education and training requirements during the testing period (i.e., May 1, 2016 through April 30, 2017); however, evidence was provided that the education and training requirements were completed prior to issuing the audit report.
- > **Athlete Safety Standards - Criminal Background Checks and Education and Training Policy Requirements** – USABS's policy only explicitly requires SafeSport training and criminal background checks for Staff Members and Volunteers.

The SafeSport Policy states that "Staff members and/or volunteers must successfully complete the training on an annual basis." Further, the SafeSport Policy states that in the hiring process that, "All applicants will be asked to undergo a criminal background check that complies with the Fair Credit Reporting Act before providing services for USABS," but "Criminal background checks will be refreshed every two years or as otherwise required by law, for staff members and/or volunteers who are 18 years of age or older and perform services for USABS."
- > **Athlete Safety Standards - Application of the SafeSport Policy (Minors)** – USABS's SafeSport Policy states that, "Those staff members and/or volunteers who are required to take awareness training will take athlete awareness training every two years for one day before they have contact with minor athletes." USA Bobsled and Skeleton's application of this policy is inconsistent with the requirements listed in the Athlete Safety Standards and may be focused too narrowly on minors. The Athlete Safety Standards do not limit these activities to include only minors.



## Background and Approach

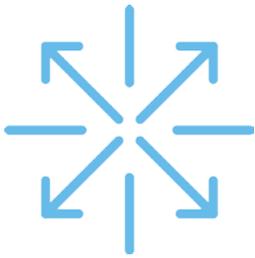
USOC engaged Baker Tilly Virchow Krause (Baker Tilly), to assist the USOC in the completion of SafeSport audits, to assess compliance with SafeSport policies and procedures at the USOC and all of its NGBs and High Performance Management Organizations (HPMOs).

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

- > Developed and executed an audit program that included:
  - Holding a virtual entrance meeting to discuss and document USABS's SafeSport program and processes.
  - Selecting a sample of 10 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 USABS'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 USABS. 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.

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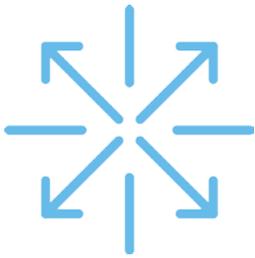
<sup>1</sup> Effective June 20, 2017 the USOC replaced the Athlete Safety Standards with the NGB Athlete Safety Policy. Due to the timing of this audit, fieldwork was performed in accordance with the Athlete Safety Standards.



# Detailed Report

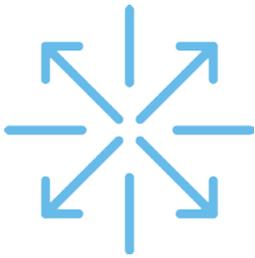
The table below represents opportunities to enhance the design and effectiveness of USABS's compliance with the Athlete Safety Standards.

1. Athlete Safety Standards - Criminal Background Checks and Education and Training Testing	
<b>Criteria</b>	The Athlete Safety Standards state the 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.
<b>Condition</b>	<p>Requiring criminal background checks and education and training is not consistently enforced by USABS. The following exceptions were identified during our testing:</p> <ol style="list-style-type: none"> <li>1. Six individuals selected for testing (60% 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 two of the individuals had completed the criminal background checks prior to issuing the audit report.</li> <li>2. Two individuals selected for testing (20% of the selected individuals) did not complete education and training requirements during the testing period (i.e., May 1, 2016 through April 30, 2017); however, evidence was provided that the education and training requirements were completed prior to issuing the audit report.</li> </ol>
<b>Cause</b>	USABA may not be consistently tracking and monitoring compliance with the criminal background checks and education and training requirements of the Athlete Safety Standards.
<b>Effect</b>	Individuals USABS 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 SafeSport program because they have not completed criminal background checks and/or education and training prior to having contact with athletes. USABS 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



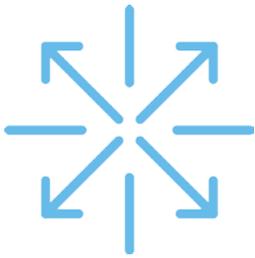
**1. Athlete Safety Standards - Criminal Background Checks and Education and Training Testing**

	<p>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.</p>
<p><b>Recommendation</b></p>	<p>USABS 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 requirements of the Athlete Safety Standards. The USABS 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>USABS 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>
<p><b>Management Action Plan</b></p>	<p>We agree with the condition and recommendation and will respond to the USOC with a detailed plan to ensure compliance with the current NGB Athlete Safety Policy. Our plan will be submitted to the USOC within the 90 day timeline referenced above.</p>



**2. Athlete Safety Standards - Criminal Background Checks and Education and Training Policy Requirements**

<p><b>Criteria</b></p>	<p>The Athlete Safety Standards state USABS 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.</p>
<p><b>Condition</b></p>	<p>USABS's policy only explicitly requires SafeSport training and criminal background checks for Staff Members and Volunteers.</p> <p>The SafeSport Policy states that "Staff members and/or volunteers must successfully complete the training on an annual basis." Further, the SafeSport Policy states that in the hiring process that, "All applicants will be asked to undergo a criminal background check that complies with the Fair Credit Reporting Act before providing services for USABS," but "Criminal background checks will be refreshed every two years or as otherwise required by law, for staff members and/or volunteers who are 18 years of age or older and perform services for USABS."</p>
<p><b>Cause</b></p>	<p>USABA may not have updated its SafeSport-related documentation and administrative materials to align with requirements in the Athlete Safety Standards.</p>
<p><b>Effect</b></p>	<p>USABS may not be in compliance with the Athlete Safety Standards. USABS 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.</p> <p>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.</p>

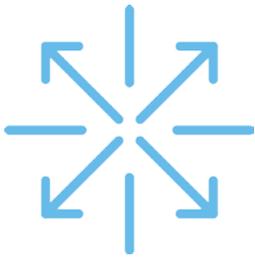


**2. Athlete Safety Standards - Criminal Background Checks and Education and Training Policy Requirements**

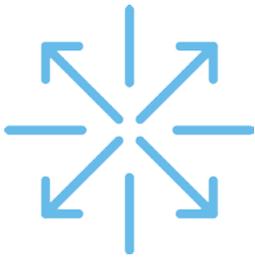
<p><b>Recommendation</b></p>	<p>USABS's SafeSport policy must require that individuals it formally authorizes, approves, or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes complete criminal background checks and education and training requirements in a timely manner and before they have contact with athletes to provide assurance that they are educated on the requirements of the Athlete Safety Standards. Compliance with these requirements must be completed within 90 days of receipt of the final audit report.</p> <p>USABS 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>
<p><b>Management Action Plan</b></p>	<p>We agree with the condition and recommendation and will respond to the USOC with a detailed plan to ensure compliance with the current NGB Athlete Safety Policy. Our plan will be submitted to the USOC within the 90 day timeline referenced above.</p>

**3. Athlete Safety Standards - Application of the SafeSport Policy (Minors)**

<p><b>Criteria</b></p>	<p>The Athlete Safety Standards state USABS 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.</p>
<p><b>Condition</b></p>	<p>USABS SafeSport Policy states that, "Those staff members and/or volunteers who are required to take awareness training will take athlete awareness training every two years for one day before they have contact with minor athletes." USABS and Skeleton's application of this policy is inconsistent with the requirements listed in the Athlete Safety Standards and may be focused too narrowly on minors. The Athlete Safety Standards do not limit these activities to include only minors.</p>



<b>3. Athlete Safety Standards - Application of the SafeSport Policy (Minors)</b>	
<b>Cause</b>	USABS may not have updated its SafeSport-related documentation and administrative materials to align with requirements in the Athlete Safety Standards.
<b>Effect</b>	<p>USABS may not be in compliance with the Athlete Safety Standards. USABS 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.</p> <p>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.</p>
<b>Recommendation</b>	USABS 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 requirements of the Athlete Safety Standards. Compliance with these requirements must be completed within 90 days of receipt of the final audit report.
<b>Management Action Plan</b>	We agree with the condition and recommendation and will respond to the USOC with a detailed plan to ensure compliance with the current NGB Athlete Safety Policy. Our plan will be submitted to the USOC within the 90 day timeline referenced above.



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## Report Appendices

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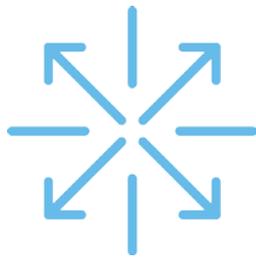


## Appendix A: Documents Reviewed

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We reviewed the following documents:

- > Athlete Safety Standards Program Questionnaire
- > Bylaws of the United States Bobsled and Skeleton Federation, Inc.
- > Population listing of “required individuals”(i.e., covered individuals required to undergo background check and training)
- > USA Bobsled / Skeleton SafeSport Policy



## Appendix B: Personnel Interviewed

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We interviewed the following personnel:

- > Darrin Steele, Chief Executive Officer
- > Ashley Walden, Director of Internal Operations