



United States Olympic Committee

United States Olympic Committee SafeSport Audit of USA Luge

October 2017

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Contents

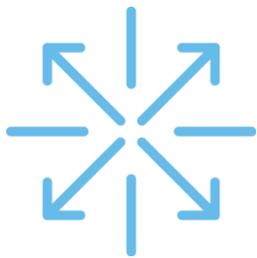
UNITED STATES OLYMPIC COMMITTEE SAFESPORT AUDIT OF USA LUGE	3
EXECUTIVE SUMMARY	4
SUMMARY OBSERVATIONS	4
BACKGROUND AND APPROACH	4
DETAILED REPORT	6
REPORT APPENDICES	10
APPENDIX A: DOCUMENTS REVIEWED	11
APPENDIX B: PERSONNEL INTERVIEWED	12



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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.

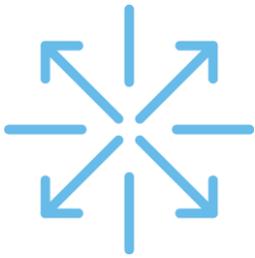
We noted the following opportunities to enhance the design of USA Luge compliance with the Athlete Safety Standards:

- > **Athlete Safety Standards - Prohibited Conduct** – USA Luge's SafeSport-related documentation and administrative materials do not specifically define and/or prohibit bullying, hazing, harassment (including sexual harassment) emotional misconduct, physical misconduct, or sexual misconduct (including child sexual abuse).
- > **Athlete Safety Standards - Criminal Background Checks and Education and Training Testing** – Requiring background checks and training is not consistently enforced by USA Luge. The following exceptions were identified during our testing:
 - Four individuals selected for testing (40% 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.
 - One individual selected for testing (10% 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 - Application of the SafeSport Policy (Minors)** – The USA Luge SafeSport Program Handbook (Section 2 - Education and Awareness Training) states that, "It is the policy of USA Luge that all staff, coaches, Board Members and chaperones shall complete the SafeSport program before having contact with youth participants." The USA Luge SafeSport Program Handbook 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

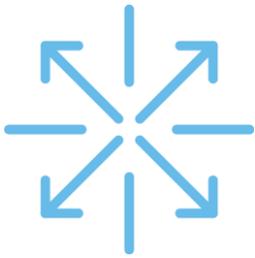
USOC engaged Baker Tilly Virchow Krause (Baker Tilly), to assist the USOC in the completion of SafeSport audits, to assess compliance with SafeSport policies and procedures at the USOC and all of its NGBs and High Performance Management Organizations (HPMOs).

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



- > Developed and executed an audit program that included:
 - Holding a virtual entrance meeting to discuss and document USA Luge'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 USA Luge'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 USA Luge. 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.

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.



Detailed Report

The table below represents opportunities to enhance the design and effectiveness of USA Luge'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	USA Luge's SafeSport-related documentation and administrative materials do not specifically define and/or prohibit bullying, hazing, harassment (including sexual harassment) emotional misconduct, physical misconduct, or sexual misconduct (including child sexual abuse).
Cause	USA Luge 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	<p>USA Luge 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 be aware of the specific requirements of the Athlete Safety Standards and could be out of compliance with the requirements and/or may not be 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.</p>
Recommendation	USA Luge 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. Further, USA Luge should update the links included in their SafeSport documentation to the appropriate type of defined misconduct. Compliance with these requirements must be completed within 90 days of receipt of the final audit report.

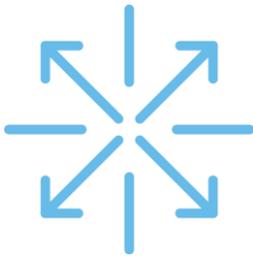


1. Athlete Safety Standards - Prohibited Conduct

Management response	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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2. Athlete Safety Standards - Criminal Background Checks and Education and Training Testing

Criteria	The Athlete Safety Standards state each USA Luge 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	<p>Requiring background checks and training is not consistently enforced by USA Luge. The following exceptions were identified during our testing:</p> <ol style="list-style-type: none"> 1. Four individuals selected for testing (40% 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. 2. One individual selected for testing (10% 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.
Cause	USA Luge 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 the USA Luge 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. USA Luge 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

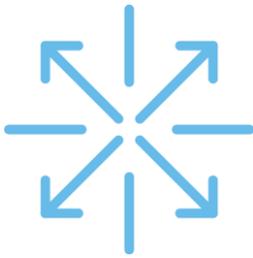


2. Athlete Safety Standards - Criminal Background Checks and Education and Training Testing

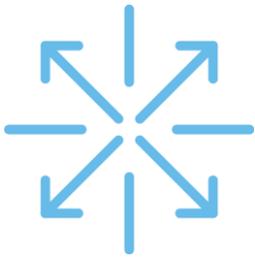
	<p>of SafeSport misconduct and the potential impact to athletes' well-being and/or have contact with individuals who have a criminal history, which could put athletes at SafeSport-related misconduct risk.</p>
<p>Recommendation</p>	<p>USA Luge must require that individuals it formally authorizes, approves, 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. USA Luge 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>USA Luge 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>Management response</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>Criteria</p>	<p>The Athlete Safety Standards state USA Luge 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>Condition</p>	<p>The USA Luge SafeSport Program Handbook (Section 2 - Education and Awareness Training) states that, "It is the policy of USA Luge that all staff, coaches, Board Members and chaperones shall complete the SafeSport program before having contact with youth participants." The USA Luge SafeSport Program Handbook 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>

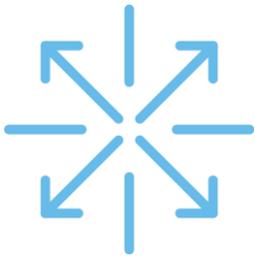


3. Athlete Safety Standards - Application of the SafeSport Policy (Minors)	
Cause	USA Luge may not be consistently tracking and monitoring compliance with the criminal background checks and education and training requirements of the Athlete Safety Standards.
Effect	<p>USA Luge may not be in compliance with the Athlete Safety Standards. USA Luge 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>
Recommendation	USA Luge 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.
Management response	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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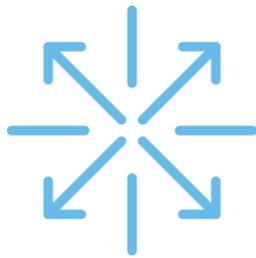
Report Appendices



Appendix A: Documents Reviewed

We reviewed the following documents:

- > Athlete Safety Standards Program Questionnaire
- > Population listing of “required individuals”(i.e., covered individuals required to undergo background check and training)
- > United States Luge Association, Inc. By Laws
- > USA Luge SafeSport Program Handbook



Appendix B: Personnel Interviewed

We interviewed the following personnel:

- > Jim Leahy, Chief Executive Officer
- > Amy Chapin, Director of Administration