



United States Olympic Committee

United States Olympic Committee SafeSport Audit of US Sailing

October 2017

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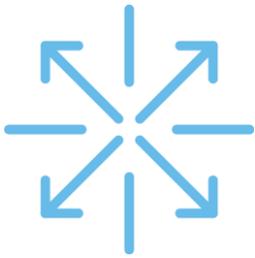
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¹ To consider the report in its entirety, please refer also to the detailed management response that will appear here [[Governance Documents](#)] within 90 days of the date of this report.



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 US Sailing's compliance with the Athlete Safety Standards:

- > **Athlete Safety Standards - Criminal Background Checks and Education and Training Testing** - Seven individuals selected for testing (70% 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 checks were completed prior to issuing the audit report.
- > **Athlete Safety Standards - Application of the SafeSport Policy (Minors)** - US Sailing's SafeSport Program Handbook (Handbook) states, "US Sailing implemented a background screening policy for staff, coaches and contractors and volunteers in 2010. US Sailing will not authorize or accept any staff or coach who has routine access to minors unless that person consents to be screened and passes a comprehensive screen by US Sailing's approved background screen vendor." US Sailing'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.

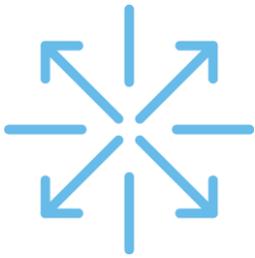
Background and Approach

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 US Sailing to evaluate compliance with the Athlete Safety Standards. The following activities were performed for this review of US Sailing:

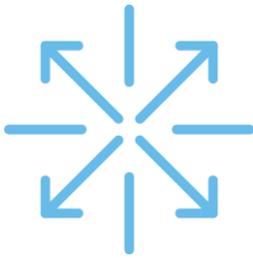
- > Developed and executed an audit program that included:
 - Holding a virtual entrance meeting to discuss and document US Sailing's SafeSport program and processes.
 - Selecting a sample of 10 from the required individuals to ensure a background check was performed and education and training was completed. See **Appendix A** for a list of documents reviewed.

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.



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- Reviewing US Sailing’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 US Sailing. 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 US Sailing’s compliance with the Athlete Safety Standards.

1. 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	Seven individuals selected for testing (70% 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 checks were completed prior to issuing the audit report.
Cause	US Sailing 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 US Sailing 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 USOC’s SafeSport program because they have not completed criminal background checks and/or education and training prior to having contact with athletes. US Sailing must be in compliance with the USOC’s Athlete Safety Standards to be a member in good standing. Noncompliance with the USOC’s 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	US Sailing 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

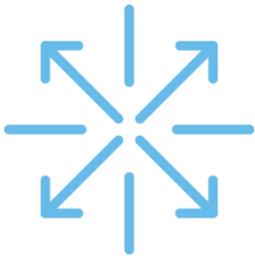


1. Athlete Safety Standards - Criminal Background Checks and Education and Training Testing

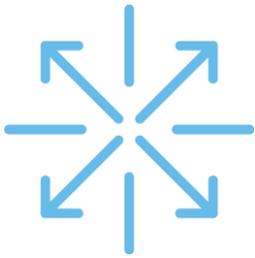
	<p>requirements of the Athlete Safety Standards. US Sailing must consistently track and verify criminal background checks and education and training requirements are met for all required individuals. Compliance with these requirements must be completed within 90 days of receipt of the final audit report.</p> <p>US Sailing 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>US Sailing does have a plan in place for full compliance with the SafeSport requirements for background checks and education and training of individuals that US Sailing puts in positions of authority over athletes. Post BOD approval of necessary SafeSport policies, there was a necessary time period required to obtain full compliance which we have done. HR policies have been implemented to require both background checks and SafeSport education and training prior to start date of contract coaches and employees. We agree that at the time of audit that we were not fully compliant but do have the processes in place moving forward. A plan will be submitted to address the above concern within 90 days as stated above.</p>

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

<p>Criteria</p>	<p>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.</p>
<p>Condition</p>	<p>US Sailing's SafeSport Program Handbook (Handbook) states, "US Sailing implemented a background screening policy for staff, coaches and contractors and volunteers in 2010. US Sailing will not authorize or accept any staff or coach who has routine access to minors unless that person consents to be screened and passes a comprehensive screen by US Sailing's approved background screen vendor." US Sailing'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>

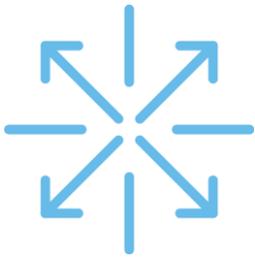


2. Athlete Safety Standards - Application of the SafeSport Policy (Minors)	
Cause	US Sailing may not have updated its SafeSport-related documentation and administrative materials to align with requirements in the Athlete Safety Standards.
Effect	<p>US Sailing may not be in compliance with the Athlete Safety Standards. US Sailing 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 check requirements apply to them or be informed of SafeSport initiatives and the related misconduct areas. Also, athletes may have contact with individuals who have a criminal history, which could put athletes at SafeSport-related misconduct risk.</p>
Recommendation	US Sailing 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 check requirements in a timely manner and before they have contact with athletes to provide assurance that they are following 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	US Sailing acknowledges that a review of SafeSport Handbook and other documentation with regard to application of SafeSport policy is worthwhile and will be done within 90 days of this review/final report. However, please note that US Sailing does recognize that SafeSport policy is not restricted to interaction with minor athletes but with all athletes participating in the sport over which individuals are placed in positions of authority over athletes and we believe our current policies reflect that. We will respond with a detailed plan to ensure compliance with current NGB athlete safety policy to the USOC within the 90 day timeline referenced above.



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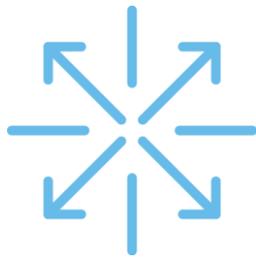
Report Appendices



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)
- > Procedure for Reporting and Direct Contact Information
- > US Sailing Regulations 2017
- > US Sailing SafeSport Handbook
- > The US Sailing SafeSport Program



Appendix B: Personnel Interviewed

We interviewed the following personnel:

- > Betsy Allison, Adult Director
- > Lee Parks, Inshore Director