



# United States Olympic Committee

## United States Olympic Committee SafeSport Audit of USA Shooting

October 2017

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**BAKER TILLY**

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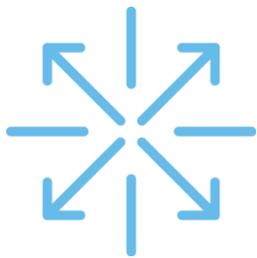
United States Olympic Committee  
USOC SafeSport Audit of USA Shooting

# United States Olympic Committee SafeSport Audit of USA Shooting<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 Shooting's 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 USA Shooting.

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 four of the individuals had completed the criminal background checks prior to issuing the audit report.
- Four individuals selected for testing (40% 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 three of the individuals had completed the education and training requirements prior to issuing the audit report.

### Background and Approach

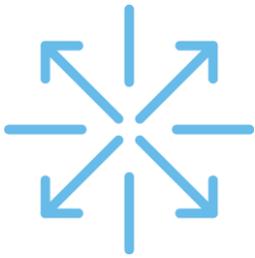
USOC engaged Baker Tilly Virchow Krause (Baker Tilly), to assist the USOC in the completion of SafeSport audits, to assess compliance with SafeSport policies and procedures at the USOC and all of its NGBs and High Performance Management Organizations (HPMOs).

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

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

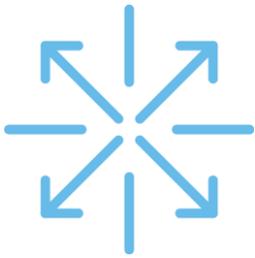
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<sup>2</sup> Effective June 20, 2017 the USOC replaced the Athlete Safety Standards with the NGB Athlete Safety Policy. Due to the timing of this audit, fieldwork was performed in accordance with the Athlete Safety Standards.



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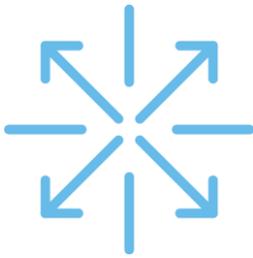
- Reviewing USA Shooting's athlete safety policy and determining whether the following was addressed:
    - Required misconduct is prohibited and defined;
    - Reporting procedures are documented; and
    - The grievance process is documented and complies with Athlete Safety Standards.
  - Identifying 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 Shooting. 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

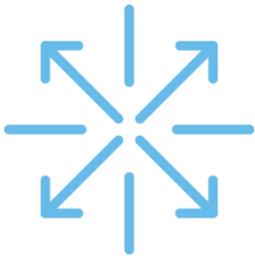
The table below represents opportunities to enhance the design and effectiveness of USA Shooting's compliance with the Athlete Safety Standards.

1. Athlete Safety Standards - Criminal Background Checks and Education and Training Testing	
<b>Criteria</b>	The Athlete Safety Standards 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.
<b>Condition</b>	<p>Requiring criminal background checks and education and training is not consistently enforced by USA Shooting. 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 four of the individuals had completed the criminal background checks prior to issuing the audit report.</li> <li>2. Four individuals selected for testing (40% 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 three of the individuals had completed the education and training requirements prior to issuing the audit report.</li> </ol>
<b>Cause</b>	<p>USA Shooting may not be consistently tracking and monitoring compliance with the criminal background checks and education and training requirements of the Athlete Safety Standards.</p> <p>After Baker Tilly's request for the required SafeSport documentation for the selected individual, USA Shooting personnel, noted via email that the selected individual is included on the NGB's list of covered individuals during the testing period; however, the selected individual is actually a parent who was listed as a "coach." USA Shooting personnel noted that if the primary USA Shooting Certified Training Center (CTC) in Seattle, WA does not communicate to him that they added a new coach to the CTC program, he, nor USA Shooting, have any way of policing the SafeSport requirements.</p>



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

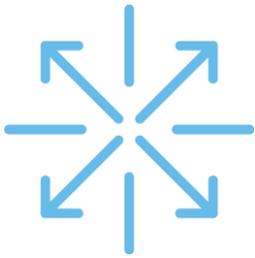
<p><b>Effect</b></p>	<p>Individuals USA Shooting formally authorizes, approves or appoints (a) to a position of authority over, or (b) to have frequent contact with athletes may not be in compliance with the SafeSport program because they have not completed criminal background checks and/or education and training prior to having contact with athletes. USA Shooting 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.</p>
<p><b>Recommendation</b></p>	<p>USA Shooting 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 Shooting 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 Shooting 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 response</b></p>	<p>USAS was asked to identify and finalize who is considered a 'covered individual' in January 2017. The 'categories' of covered individuals was communicated to all USAS staff, national coaches and those that are considered 'covered individuals' in February 2017.</p> <p>At that point in time USAS had put into place a single reporting contact and tracking procedure for all covered individuals provided to US Center for Safe Sport.</p> <p>This current audit looked at 'covered individuals' <u>prior</u> to our formalized tracking procedure was fully implemented in February 2017 under the guidance issued by the US Center for SafeSport in February 2017 and before 'covered individuals' were <u>formally</u> identified and contacted.</p>



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

USAS has named a single reporting contact for all Safe Sport policy compliance, Reya Kempley who is a fulltime USAS staff member. She is making steady progress to get over 300+ individuals in full compliance.

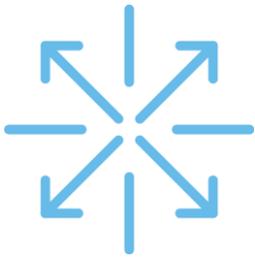
USAS is committed to Safe Sport and developed the first online free NGB specific Safe Sport training that was rolled out in 2012. Good faith effort has been made to get all of our coaches and volunteers to take Safe Sport training with NCSI background checks. We will continue to make good faith efforts to have all of our named 'covered individuals' in compliance.



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## Report Appendices

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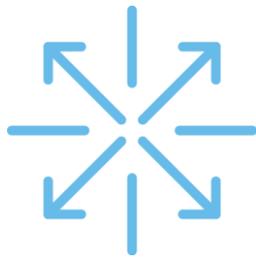


## Appendix A: Documents Reviewed

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We reviewed the following documents:

- > Athlete Safety Standards Program Questionnaire
- > Population listing of “required individuals” (i.e., covered individuals required to undergo background check and training)
- > USA Shooting SafeSport Policy
- > Amended and Restated Bylaws of USA Shooting, Inc.



## Appendix B: Personnel Interviewed

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We interviewed the following personnel:

- > Michael Theimer, Coach Academy Director
- > Dave Johnson, Interim Chief Executive Officer