
United States Olympic Committee

Audit Division



Report for:
United States Olympic Committee

Follow-up on:
SafeSport Audit

Dated:
July 17, 2018



July 17, 2018

Susanne Lyons
Acting Chief Executive Officer
United States Olympic Committee

Dear Susanne,

During the second and third quarter of 2017, Baker Tilly Virchow Krause (Baker Tilly) performed a SafeSport audit of the United States Olympic Committee (USOC). The purpose of this follow-up review is to report on the status of recommendations from the SafeSport audit of the USOC dated October 2017. Our methodology was limited to communication with USOC personnel, additional testing of processes and a review of various policies provided by the organization. The Audit Division performed additional audit work to verify action was taken.

The review found that two of the testing recommendations were implemented and are considered closed. One testing recommendation is still in-process. Six of the process improvements were implemented and are considered closed. One process improvement is considered in-process as the USOC gathers feedback from Athletes and the National Governing Bodies.

The Audit Division will continue to follow-up with the appropriate individuals until the in-process recommendations are implemented.

Sincerely,

Bridget Toelle, CPA, CIA
Senior Director, Audit

Andrea Andrews, CIA
Principal Auditor

cc: Rick Adams
Nicole Deal
Wendy Guthrie
Gary Johansen
Chris McCleary
Kevin Penn



SafeSport Audit Follow-up Report

United States Olympic Committee

Follow-up Status	Testing Recommendation	Management Response	Follow-up Action
Implemented	<p>USOC 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 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. USOC must consistently track and verify education and training requirements are met for all required individuals.</p>	<p>We agree with the condition and recommendation. Before the audit report was issued and on its own initiative, the USOC implemented processes to track and verify all required individuals take education and training for USOC Headquarters (Employees).</p>	<p>USOC implemented a process to track and verify all employees completed SafeSport education and training. The USOC Internal Audit Division retested a sample of USOC employees to verify education and training was completed. This recommendation was fully implemented and is considered closed.</p>
Implemented	<p>USOC Olympic Training Center 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 it is following the Athlete Safety Standards. USOC Olympic Training Center must consistently track and verify criminal background check requirements are met for all required individuals. USOC Olympic Training Center should review the testing results and require all necessary individuals to</p>	<p>We agree with the condition and recommendation. Before the audit report was issued and on its own initiative, the USOC implemented a procedure that requires NGBs to certify that criminal background checks are conducted for required individuals for each program conducted at an OTC.</p>	<p>USOC implemented a process that requires all OTC users to sign a user agreement for each camp/program it holds at the OTC. Through the user agreement, the user certifies all non-athletes associated with the program and staying onsite at the OTC have completed and passed a criminal background check in the prior two years. The USOC Internal Audit Division retested a sample of programs/camps at the OTCs in March and April 2018 to verify user agreements were completed for the programs, This recommendation was</p>

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	complete the necessary requirements (i.e., criminal background check).		fully implemented and is considered closed.
In Process	Games, Medical Staff, and Paralympics 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 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. Games, Medical Staff, and Paralympics must consistently track and verify education and training requirements are met for all required individuals.	We agree with the condition and recommendation. Before the audit report was issued and on its own initiative, the USOC updated its Athlete Safety Policy to require individuals it formally authorizes, approves, or appoints (a) to a position of authority over or (b) to have frequent contact with athletes to complete safe sport awareness training and education. Additionally, the USOC implemented processes to track and verify all required individuals take safe sport training and education for Games, Medical Staff and Paralympics.	<p>Games - the Olympic and Paralympic Delegation for the Games in Korea was required to take SafeSport training. Follow up testing showed that 3% of the Delegation did not complete SafeSport Training. This recommendation is in process and will be retested in October 2018 after the Youth Olympic Games.</p> <p>Medical Staff - Medical volunteers who were approved to work at OTC facilities with athletes were tested from January 1, 2018 to June 8, 2018. All volunteers had completed training prior to contact with athletes. This recommendation is implemented.</p> <p>Paralympic - starting in 2017 Paralympics updated its contracts to include a SafeSport training requirement. Auditor tested contracts in 2017 and 90% of contracts included the required language. One contract was on an old template that did not include SafeSport training requirements. This recommendation is considered in process since not all the contracts included SafeSport training requirements. This will be retested in October 2018.</p>

Follow-up Status	Process Improvement	Management Response	Follow-up Action
Implemented	<p>The USOC should consider updating the Athlete Safety Standards to provide specific guidance for administering criminal background checks and education and training requirements (e.g., timeliness requirements).</p>	<p>We agree with the condition and believe the recommendation will provide clarity for the NGBs and HPMOs. The USOC intends to conduct a review of the NGB Athlete Safety Policy in 2018.</p>	<p>The USOC updated the NGB Athlete Safety Policy to require that background checks and education and training are completed within 60 days of an individual interacting with athletes or being in the role that would require a background check and training. This was fully implemented and is considered closed.</p>
Implemented	<p>The USOC should consider providing guidance for an appropriate process for tracking, monitoring, and maintaining compliance with the Athlete Safety Standards related to criminal background checks and education and training requirements. Guidance could include the following:</p> <ul style="list-style-type: none"> ➤ Review and update criminal background checks and education and training quarterly to verify completion and compliance with Athlete Safety Standards ➤ Review covered individuals (e.g., coaches, volunteers, officials, staff) at least annually to ensure the appropriate positions are included as NGBs/HPMOs change, grow, and are exposed to more public scrutiny. 	<p>We agree with the condition and believe the recommendation will provide clarity for the NGBs and HPMOs. The USOC intends to conduct a review of the NGB Athlete Safety Policy in 2018.</p>	<p>The USOC has updated the NGB Athlete Safety Policy to require that NGBs publish a list, and update it at least annually, of those categories of people who are required to complete background checks and education and training. This recommendation was fully implemented and is considered closed.</p>
Implemented	<p>The USOC should consider updating the Athlete Safety</p>	<p>We agree with the condition and believe the</p>	<p>The USOC has updated the NGB Athlete Safety Policy to</p>

Follow-up Status	Process Improvement	Management Response	Follow-up Action
	<p>Standards to include policy templates and guidelines that NGBs/HPMOs can use to streamline their SafeSport program structure and help create consistency between each NGB's/HPMO's SafeSport documentation. Additionally, the USOC should strongly encourage NGBs/HPMOs to include all SafeSport-related requirements in one centralized area to create a "one stop shop" (e.g., a handbook, a policy, a website, etc.).</p>	<p>recommendation will provide clarity for the NGBs and HPMOs. The USOC intends to conduct a review of the NGB Athlete Safety Policy in 2018.</p>	<p>require that NGBs publish its athlete safety policy in a common area in the NGB's online resources. This recommendation was fully implemented and is considered closed.</p>
In Process	<p>The USOC should consider updating the Athlete Safety Standards to indicate the policy applies to athletes and include requirements for athlete-specific criminal background checks and education and training.</p> <p>If there are concerns related to requiring athletes to undergo background checks, then we suggest that athletes, whether they are adults or minors, are required to disclose any misdemeanors and felonies committed to allow the NGB/HPMO to determine what action to take and hold athletes accountable if an incident is revealed that they have not disclosed.</p> <p>Additionally, if the USOC determines that the Athlete Safety Standards should not include athletes, then it should address athlete peer to peer abuse, criminal background checks, and education and training in a separate standard</p>	<p>We agree with the condition and believe the recommendation will provide clarity for the NGBs and HPMOs. The USOC intends to conduct a review of the NGB Athlete Safety Policy in 2018.</p>	<p>The USOC has determined this recommendation requires further discussion within the USOC and with the NGB Council and Athlete Advisory Council. The USOC is in the process of gathering feedback. This recommendation is in process and a decision regarding athlete-specific background checks and education and training will be determined by December 31, 2018.</p>

Follow-up Status	Process Improvement	Management Response	Follow-up Action
	that NGBs/HPMOs will be required to comply.		
Implemented	The USOC should consider updating the Athlete Safety Standards to specifically address creating a process for anonymous and/or confidential reporting and specifically prohibit any requirement that could prevent an individual from reporting (e.g., filing fees, written requirements, timeliness requirements).	We agree with the condition and believe the recommendation will provide clarity for the NGBs and HPMOs. The USOC intends to conduct a review of the NGB Athlete Safety Policy in 2018.	The USOC has updated the NGB Athlete Safety Policy to provide more reporting guidance. This includes making anonymous reports and no fees charged for SafeSport reports. This recommendation was fully implemented and is considered closed.
Implemented	The USOC should consider updating the Athlete Safety Standards to include guidance or recommendations on an appropriate process for each NGB/HPMO to review and vet the results of a criminal background check.	We agree with the condition and believe the recommendation will provide clarity for the NGBs and HPMOs. The USOC intends to conduct a review of the NGB Athlete Safety Policy in 2018.	The USOC has updated the NGB Athlete Safety Policy to state that all NGB policies must comply with requirements under the Ted Stevens Olympic and Amateur Sports Act. This provides guidance on the process for dealing with reviewing criminal background checks. This recommendation was fully implemented and is considered closed.
Implemented	<p>The USOC should consider including SafeSport monitoring in Internal Audit's annual audit plan. The following are SafeSport-related areas Internal Audit could start within the next five years:</p> <ul style="list-style-type: none"> > Year 1: Compliance with completing education and training > Year 2: Compliance with completing criminal background checks > Year 3: Compliance with required 	We agree that SafeSport monitoring is valuable and the USOC should play a part in the monitoring process. The Internal Audit Division will take part in the monitoring process in 2018, this will be evaluated on a continuing basis.	There are SafeSport elements in the annual compliance checklist which began in February 2018. SafeSport will also be audited through the NGB audit process. NGB audits conducted in 2018 include SafeSport audit procedures. Internal Audit will also continue to follow-up on SafeSport recommendations from the NGB Baker Tilly audits. The US Center for SafeSport will also conduct random and regular audits of NGBs. This recommendation

Follow-up Status	Process Improvement	Management Response	Follow-up Action
	<p>prohibited language and definitions</p> <ul style="list-style-type: none"> > Year 4: Compliance with reporting and grievance processes > Year 5: Compliance with all Athlete Safety Standards or updated SafeSport Standards <p>Dividing the review into small subsets of the Athlete Safety Standards will allow Internal Audit to review each NGB/HPMO and prepare NGBs/HPMOs for an overall review in Year 5.</p>		<p>was fully implemented and is considered closed.</p>