Lakeshore National Adapted Sport Organization (LNASO) Policy

Department Human Resources	**Original Date** 5/15/2023	**Responsible to** President and CEO
Subject **Athlete Safety -** Response and Resolution Policy for Lakeshore Foundation National Adapted Sport Organization (LNASO)	**Revision Date** **9/30/2025** **3/20/2026**	**Page** 1 of 10

This policy and procedure rescind any previous material covering this subject matter.

Introduction

Lakeshore National Adapted Sport Organization ("LNASO") joins with the U.S. Center for SafeSport ("The Center") **and the United States Olympic and Paralympic Committee ("USOPC)** in their commitment to building a sport community where participants can train and compete together in an atmosphere free of emotional, physical, and sexual misconduct. LNASO is committed to protecting opportunities for athletes participating in sport. LNASO will continue to collaborate with various stakeholders with oversight responsibilities, e.g., IOC, IPC, WWR, World Boccia and WPPO, to ensure that women have a fair and safe competition environment consistent with Executive Order 14201 and the Ted Stevens Olympic & Amateur Sports Act, 36 U.S.C. § 22501, et. seq.

An effective response and resolution policy is a key part of the SafeSport program and crucial to preventing abuse.

Duty To Report

All adult participants and individuals associated with LNASO are mandatory reporters under the SafeSport code. All LNASO Board of Directors, officers, and employees are REQUIRED to report suspected SafeSport violations involving alleged sexual misconduct, physical misconduct, emotional misconduct, or violations of the MAAPP. Suspected child abuse and/or sexual misconduct is required to be reported immediately after becoming aware of the allegation to the U.S. Center for SafeSport AND local law enforcement AND comply with any other applicable reporting requirements under state law. Individuals should not attempt to conduct their own investigation.

There are no fees for filing a SafeSport report with the U.S. Center for SafeSport or the LNASO.

An Adult Participant who learns of information or reasonably suspects that a child has suffered an incident of child abuse, including sexual abuse, must immediately:

Make a report to law enforcement AND

Make a report to the U.S. Center for SafeSport AND

Comply with any other applicable reporting requirements under state law.6

Reporting to the Center alone is not sufficient. You must report to both the Center and to law enforcement and comply with any other applicable state or federal laws.

Child Abuse includes incidents that involved a victim who is a minor at the time of the alleged incident, even if the victim is now an adult.

Reporting Requirements Relating to Sexual Misconduct

An Adult Participant who learns of information or reasonably suspects that an incident(s) of Sexual Misconduct has occurred, must immediately report the incident(s) directly to the Center. This reporting requirement applies regardless of whether the suspected victim is an adult or minor. If the Sexual Misconduct involves a minor, it must be reported as child abuse pursuant to Section X.B of the Safe Sport Code.

Additional Misconduct that Adult Participants must report to the Center:

1. Criminal Charge(s) or Disposition(s) involving sexual misconduct or misconduct involving Minors.

2. Misconduct related to the Center's process, including suspected incident(s) of:

    a. Aiding and Abetting

    b. Abuse of Process

3. Retaliation

4. Emotional & Physical Misconduct and Proactive Policies

An Adult Participant who learns of information or reasonably suspects that an incident(s) of emotional or physical misconduct (including bullying, stalking, hazing, and harassment) prohibited under the Code has occurred must report it to the organization (USOPC, NGB, or LAO) with which the Participant is affiliated. An Adult Participant who learns of information or reasonably suspects a violation of the Minor Athlete Abuse Prevention Policies or other proactive policies must report it to the organization (USOPC, NGB, or LAO) with which the Participant is affiliated.

LNASO Jurisdiction and Reporting

All questions or concerns regarding suspected SafeSport violations other than child abuse and/or sexual misconduct, such as failure to comply with the policies (i.e., MAAPP and/or the SafeSport Code) and other misconduct such as emotional or physical misconduct, bullying, hazing or harassment should be directed to LNASO as outlined below.

Reporting of misconduct will be directed to the U.S. Center for SafeSport. However, certain instances may require LNASO to report information to the U.S. Olympic and Paralympic Committee (USOPC). LNASO will notify the USOPC Athlete Safety Office any allegation of prohibited conduct or temporary measures related to:

- An individual attending a delegation event such as an Olympic or Paralympic Games or Pan-American Games
- An individual with access to or attending an event at the Olympic and Paralympic Training Centers (OPTC) in Colorado Springs, CO or Lake Placid, NY
- An individual who receives a benefit or service from the USOPC"

All questions or concerns regarding suspected SafeSport violations than involve child abuse and/or sexual misconduct should be directed to the U.S. Center for SafeSport AND reported to local law enforcement. The Center has **Exclusive Jurisdiction** to investigate and resolve allegations that a Participant engaged in one or more of the following:

- Sexual Misconduct, including without limitation child sexual abuse and any misconduct that is reasonably related to an underlying allegation of Sexual Misconduct.

- Criminal Charges or Dispositions involving Child Abuse or Sexual Misconduct; Misconduct Related to Reporting, where the underlying allegation involves Child Abuse or Sexual Misconduct

- Misconduct Related to Aiding and Abetting, Abuse of Process, or Retaliation, when it relates to the Center's process.

- Other Inappropriate Conduct, as defined herein.

The Center has **Discretionary Jurisdiction** to investigate and resolve allegations that a Participant engaged in one or more of the following:

- Non-sexual Child Abuse.
- Emotional and physical misconduct, including stalking, bullying behaviors, hazing, and harassment.
- Criminal Charges or Dispositions not involving Child Abuse or Sexual Misconduct.
- Minor Athlete Abuse Prevention Policy or other similar Proactive Policy violations.
- Misconduct Related to Aiding and Abetting, Abuse of Process, or Retaliation, when it relates to the processes of the USOPC, an NGB, an LAO, or any other organization under the Center's jurisdiction.

  Click here to report a suspected SafeSport violation to the U.S. Center for SafeSport. Reports to the Center must be made within 24 hours of report receipt. LNASO must make an identified reporting party aware of their determination of jurisdiction in writing as well as their notification to the Center as outlined in this policy.

Reporting a Concern

The process for issuing a complaint or accusation of misconduct from an LNASO employee, contractual staff member, coach, volunteer or participant athlete will be to report such to the Chief Program Officer (CPO) at jena@lakeshore.org and/or the Director of Human Resources (Director of HR) at debbies@lakeshore.org. Both may also be reached by calling 205-313-7400.

Complaints may be made anonymously via phone; however, to assist in investigation, they will be encouraged to be made with the identity of the accuser or reporter being identified.

In addition to reporting any violations that have occurred, individuals can report violations directly to the U.S. Center for SafeSport at https://uscenterforsafesport.org/report-a-concern/.

Please note that in addition to the prohibited conduct contained in this policy, this reporting policy includes but is not limited to violations of the Minor Athlete Abuse Prevention Policy (MAAPP) which addresses: one on one interactions, massage and

rubdowns/athletic training modalities locker room and changing areas, social media and electronic communication, local travel, and team travel.

Response and Resolution Process

The LNASO shall initiate an internal process to respond and resolve reported allegations that falls within LNASO's jurisdiction or for which the Center declines jurisdiction as outlined below:

1. A SafeSport report is received and reviewed (within 24 hours) by the CPO and Director of HR who ensures that appropriate law enforcement has been contacted if applicable. Initial jurisdiction is assigned by the CPO and Director of HR in consultation with the CEO and Ethics Committee Chair within 24 hours. If the complaint is associated with LNASO's role as a Performance Partner Sport Organization with the USOPC for wheelchair rugby or boccia, reports shall be made to the Team Leader in Sport Performance at the USOPC.

a. Reports that fall under the Center's exclusive jurisdiction will be referred to the Center immediately and within 24 hours.

b. If the Center assumes jurisdiction, LNASO will not interfere in, attempt to interfere in, nor attempt to influence the outcome of, a report for which the Center has jurisdiction or any Center investigation.

c. The CPO or Director of HR will respond to the Center within 72 hours if eligibility status of a participant or additional membership information is needed along with any imposed temporary measures that have already been assigned by LNASO.

2. The reporter shall be contacted promptly (within 24 hours of jurisdiction assignment) to provide a jurisdiction status update--if LNASO will assume jurisdiction or if it will be referred to the Center under their jurisdiction so the reporter knows who to contact/follow-up if needed.

3. A summary of the alleged violation will be sent to the respondent (within 24 hours of jurisdiction assignment) via a confidential email including the alleged violation, indication that the respondent is allowed to participate unless an immediate suspension is implemented and that a response from the respondent is required within five business days. A summary of the alleged violation is also provided to the U.S. Center for SafeSport and LNASO Ethics Committee.

4. Investigation/Information gathering (estimated ten business days of jurisdiction assignment) including applicable videos, screenshots, text messages, email, etc. as well as interviewing the reporter, victim(s), respondent, witness(es), etc. to gather information

5. Investigation/Information will be sent to the CEO (within 24 hours of completing the investigation).

6. The CPO and Director of HR complete their investigation; a decision and report is sent to the Ethics Committee for review (within 24 hours of decision on the investigation).

7. If the CPO and Director of HR determines that the report includes allegations of ethical/policy violations, the Ethics Chair will report and send all necessary documents to the Ethics Committee for a determination as to whether disciplinary proceedings should be initiated and will schedule a call to discuss if necessary. A decision shall be reached by the Ethics Committee within five business days.

8. An Ethics Committee Administrative Closure / Summary of Decision will be sent to the respondent (within 24 hours of Decision) via confidential email including: alleged violation, participation status and/or suspensions. The respondent shall be required to respond within five business days. The reporter shall also be provided with a status update at this time.

9. If the respondent accepts the Administrative Closure/Disciplinary Proceedings/Sanction, the matter shall be considered resolved. If the respondent does not accept, they may file a grievance per LNASO Bylaws/Grievance Procedures (appealing the Ethics Committee decision).

10. A grievance decision is reached.

11. LNASO shall enforce sanctions (within 24 hours of Decision), update the QCS and a summary of the decision will be provided to The Center and LNASO Ethics Committee.

Response to Center Requests

As noted above, any requests from the Center for SafeSport shall be responded to within 72 hours of receipt for the eligibility status of a Participant and the existence of any Organization-imposed temporary measures or safety plans. The Chief Program Officer or Director Human Resources shall be responsible for serving as respondents.

Data of Matters Addressed by LNASO

LNASO must annually submit to the Center data tracked in the Quality Control System regarding:

a. Reports of emotional or physical misconduct made to LNASO.
   i. Total reported incidents of alleged emotional misconduct.
   ii. Total reported incidents of alleged physical misconduct
   iii. Total number of investigations of alleged emotional misconduct
   iv. Total number of investigations of alleged physical misconduct
   v. Total number of violations for emotional misconduct adjudicated by LNASO.
   vi. Total number of violations for physical misconduct adjudicated by the LNASO.

b. Reports to LNASO that a Participant violated the Minor Athlete Abuse Prevention Policies (MAAPP)
   i. Total reported incidents of alleged violations of the MAAPP, by policy type.
   ii. Total number of investigations of alleged violations of the MAAPP
   iii. Total number of violations of the MAAPP

c. Reports to LNASO that a Participant engaged in retaliation.
   i. Total reported incidents of alleged retaliation.
   ii. Total number of investigations of alleged retaliation
   iii. Total number of violations of retaliation policy

No Interference Policy

At no time shall any employee, board member or affiliated individual interfere in, attempt to interfere in, or attempt to influence the outcome of any Center investigation.

Prohibited Assistance

Any individual who is an employee, contractor, or agent of LNASO is prohibited from assisting a member or former member in obtaining a new job (except for the routine transmission of administrative and personnel files) if the individual knows that that member or former member violated the policies or procedures of the Center related to sexual misconduct or was convicted of a crime involving sexual misconduct with a minor in violation of applicable law or the policies or procedures of the Center.

Quality Control

The LNASO shall maintain a quality control system that tracks individuals with sanctions or temporary measures (issued by the Center or the LNASO). This information shall be utilized to ensure that said individuals are prohibited from participating in any event, program, activity, or competition authorized by, organized by, or under the auspices of the LNASO. As noted above, said individuals may not be assisted in obtaining a new job.

The Quality Control System shall also track the training of all individuals who are required to be SafeSport trained. Any individuals who are not SafeSport Trained are either prevented from participating or are in a role that does not include regular contact with or authority over amateur athletes who are minors in accordance with the LNASO's Child Protection and MAAPP policies.

The Quality Control System will also internally track all reports, decisions of jurisdiction, investigation decisions and responsible party within the LNASO to ensure the timely process and communication to parties in writing, distributed electronically.

This policy is shared with applicable individuals at a minimum on an annual basis. The implementation of this policy is the responsibility of the Chief of Programs and Director of Human Resources, reporting to the President and CEO.

Any good faith reporter is protected under this policy.
Retaliation against any individual who reports, in good faith, wrongful conduct and/or participates in the investigation is prohibited. Knowingly making a false

report is a violation of this policy and may be reported as such.

No employee, contractor, agent, volunteer, or LNASO as an NGB shall take or threaten to take any action against an athlete as a reprisal for disclosing information to or seeking assistance from the Office of the Athlete Ombuds as outlined in Section 220509(b)(5) of the Act.

Anti Retaliation

Retaliation before, at the time of report, during an investigation or after a decision is reached (whether led by LNASO or The Center) against any individual who reports, in good faith, wrongful conduct and/or participates in an investigation is expressly prohibited.

DEFINITIONS

Good Faith – an honest, reasonable belief that wrongful conduct has occurred or is occurring.

Retaliation – As defined in Section 220501(b)(11) of the Act, any adverse or discriminatory action, or the threat of an adverse or discriminatory action, including removal from a training facility, reduced coaching or training, reduced meals or housing, and removal from competition carried out against a Protected Individual as a result of any communication, including the filing of a formal complaint, by the Protected Individual or a parent or legal guardian of the Protected Individual relating to the allegation of physical abuse, sexual harassment, or emotional abuse, with the United States Center for SafeSport; a coach, trainer, manager, administrator, or official associated with the USOPC; the United States Attorney General; a federal or state law enforcement authority; the Equal Opportunity Employment Commission; or Congress. Retaliation also refers to any adverse or discriminatory action, or the threat of an adverse or discriminatory action, against any person who in good faith reports misconduct, and/or violations of the USOPC's or NGBs' Bylaws, policies, and procedures. Athletes who disclose information to or seek assistance from the Office of the Athlete Ombuds are also protected from retaliation as set forth in Section 220509(b)(5) of the Act.

Wrongful Conduct – illegal, dishonest, immoral, discriminatory, or fraudulent activity including accounting fraud or malfeasance that constitutes a serious violation of Lakeshore policies and procedures, state, or federal laws.

RESOURCES

Office of the Athlete Ombuds

Team USA athletes may contact the Office of the Athlete Ombuds for independent and confidential advice on a variety of sport-related matters, including their rights, applicable rules, policies or processes, and questions related to resolving disputes and grievances. The Athlete Ombuds can also help Team USA athletes connect with legal, mental health, and other support resources. All other NGB athletes (i.e., athletes competing at the masters, recreational, or youth level) are welcome to visit the Athlete Ombuds website to review informational resources and should work directly with their NGB to understand additional resources and options available to them.

Contact Information Phone: 719-866-5000

Email: ombudsman@usathlete.org

Website: usathlete.org

USOPC Integrity Portal

The USOPC is committed to providing a positive, healthy, and safe environment, and promoting a culture of integrity within the United States Olympic and Paralympic community. An important part of this commitment is the USOPC's Integrity Platform, which includes reporting mechanisms that allow members of our community to report their concerns either confidentially or anonymously.
https://www.usopc.org/reporting-a-concern

Any questions regarding the LNASO Response and Resolution policy shall be addressed to Chief Program Officer at jena@lakeshore.org or Director of Human Resources at debbies@lakeshore.org. Both may also be reached by calling 205-313-7400.