

REPORT OF THE
**INDEPENDENT
OBSERVERS**

2019 PAN AMERICAN GAMES
LIMA, PERÚ



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1.0 Introduction

The World Anti-Doping Agency's (WADA's) Independent Observer (IO) Program was introduced at the 2000 Sydney Olympic Games. IO missions have taken place at numerous major sporting events including all Olympic Games since 2000. Its main purpose is to strengthen the doping control process by ensuring openness and transparency, which serves to build confidence among athletes, sport and the public.

In advance of the 2019 Pan American Games "the Games", assistance and feedback were provided by WADA to the Panam Sports Medical Commission (PSMC) and the Lima 2019 Organizing Committee to ensure the delivery of an intelligence-based and effective testing program during the Games as required by the World Anti-Doping Code and International Standards.

In June 2019, WADA and Panam Sports signed an agreement for the presence of the Independent Observer Program at the 2019 Pan American Games held in Lima, Perú.

The four independent observers appointed by WADA were present in Lima from 23 July to 7 August 2019, and through their daily observations provided recommendations and guidance to the PSMC throughout the Games on the following areas:

- Development and implementation of general anti-doping policies and procedures;
- Test distribution planning (TDP);
- Implementation of the out-of-competition (OOC) and in-competition (IC) program;
- Selection of athletes for sample collection;
- Athlete notification and sample collection procedures;
- Therapeutic Use Exemption (TUE) procedures;
- Transport and chain of custody of samples;
- Result management process including all hearings that occurred during the IO Team's presence; and
- Any other relevant areas.

During the time in Lima, the IO Team visited 19 venues and observed doping control for 34 sports/disciplines. In addition, the Chair and the Team Manager of the IO Team attended the PSMC daily meetings to report on the team's observations and to provide ongoing feedback. Many of these recommendations for improvements were acted upon and implemented throughout the period of the Games. The IO Team attended the Chef de Mission and Team Physician introductory meetings as well as the initial meeting of the Doping Control Officers (DCOs). The IO Team also observed how the initial review of an Adverse Analytic Finding (AAF) was conducted, attended three hearings, and observed how TUEs were processed while onsite during the Games.

2.0 Acknowledgements

The IO Team wishes to thank the PSMC and the Comisión Nacional Antidopaje de Perú (CONAD), for their support and partnership throughout the Games.

We extend our appreciation to Dr. Bernardo Chernilo, President of the PSMC, to Dr. Orlando Reyes, member of the PSMC appointed by Panam Sports as the main point of contact for the IO Team, and to Dr. Victor Carpio, Manager of CONAD and his hard-working staff, for their consideration of the observations and recommendations provided by the IO Team.

We would also like to extend our gratitude to all the Games volunteers who facilitated our stay in Lima and especially our drivers who ensured a safe and smooth transport to all venues including those persons in remote areas outside of Lima.

3.0 Executive Summary

The IO Team had a positive experience at the Pan Am American Games in Lima. Like most major events, these Games faced some challenges with anti-doping activities, which were able to be dealt with thanks to the active engagement of the PSMC and CONAD.

The anti-doping program delivered at the Games showed some improvements from the program delivered in Toronto of 2015, i.e. an increase of 27% of the overall testing program, increase of 6% of OOC testing and a significant increase of the application of the Technical Document for Sport Specific Analysis (TDSSA). The IO Team appreciated the commitment of the PSMC to further improve moving forward.

The Pan American Games had the participation of 6,680 athletes representing 41 countries from North America, South America, Central America and the Caribbean, and 20% of those athletes (1,350) have been tested at the Games.

The Test Distribution Plan (TDP) delivered in Lima 2019, included a total of 1,912 samples, showing an increase of 27% compared to the original testing plan. This increase in the number of tests was due to several reasons and including; additional tests requested by IFs, additional samples collected due to samples not meeting the specific gravity requirements, and additional samples allocated to athletes who qualified in Lima for the Tokyo 2020 Summer Olympic Games.

The testing program itself was generally comprehensive and was based on an accurate and well-developed risk assessment.

Athletes and athlete support personnel provided mainly positive feedback to the IO Team during the Games, which showed confidence in the anti-doping program delivered, and were very supportive of efforts made to fight for clean sport.

Panam Sports contracted the WADA-accredited laboratory in Montreal, Canada for the analysis of all samples collected during the Games and to report its findings in accordance with WADA's International Standard for Laboratories (ISL).

The IO Team appreciated the efforts made by the relevant stakeholders to address the issues raised during the Games. The IO Team encourages the PSMC and CONAD to transfer the doping control knowledge and experience gained from these Games to the next Games to be held in Santiago, Chile in 2023 to ensure this mechanism will result in continuous improvement as well as consistency of approach from one edition of the Games to the next.

Besides the number of challenges faced during the Games which are included in this report, the IO Team was generally satisfied with the doping control program implemented and shares its recommendations with the hope that they will be considered and implemented during the next Games.

4.0 The Independent Observers (IO) Team

The IO Team appointed for this mission consisted of:

- Ilaria Baudo (Chair), Senior Manager, Standards and Harmonization, WADA
- Juan Manuel Lauria (Team Manager), Manager, WADA Regional Office, Latin America
- Andrés Gonzalez, National Anti-Doping Organization of Chile
- Saul Salcedo, National Anti-Doping Organization of Panama

5.0 Key Stakeholders

a) Panam Sports & its Medical Commission

Panam Sports is the governing body for the Panam American Games and is responsible for developing and enforcing Code-compliant anti-doping rules.

The PSMC is the committee in charge of all aspects of the anti-doping program and responsible for the development and delivery of doping control activities at the Games.

The PSMC is chaired by Dr. Chernilo and consists of 17 members. Three members of the PSMC with expertise in anti-doping were appointed by Panam Sports as the Anti-Doping Sub-Committee. The Anti-Doping Sub-Committee was responsible for managing the practical aspects of anti-doping , including the initial review of the result management process during the Games.

The PSMC meets once a year, including during the year of the Panam Games. There are no additional meetings scheduled for the PSMC to discuss and approve the anti-doping program in advance of the Games. The IO Team observed that the planning and workload involved to implement a robust anti-doping program for a major Games is difficult to manage by attending only one meeting per year.

Panam Sports contracted the WADA-accredited laboratory in Montreal, Canada for the analysis of all samples collected during the Games and to report its findings in accordance with WADA's International Standard for Laboratories (ISL).

Recommendation:

- ***For future Games, it is recommended that the PSMC move away from the traditional approach of managing anti-doping operations through its Medical Commission. Instead, Panam Sports should expand and officialize its Anti-Doping Sub-Committee, including adding additional members with expertise in anti-doping.***
- ***It is also recommended that the Anti-Doping Sub-Committee meet regularly (in person and/or via conference call), in particular during the 12 months leading up to the Games period, to ensure that all the mandatory requirements of an anti-doping program, including processes and procedures, are agreed upon and in place well in advance of the Games. It should also communicate regularly with the Local Organizing Committee responsible for the planning and implementation of the Games' anti-doping program.***

b) Comision Nacional Antidopaje (CONAD)

CONAD was appointed by Panam Sports as the Sample Collection Authority (SCA) responsible for implementing and delivering the anti-doping program of the Games.

CONAD's full time staff and volunteers were managed by its Chief Executive Officer, Dr. Victor Carpio, who is also a member the Panam Sports Medical Commission.

The IO Team was most appreciative of the welcoming and professional approach adopted by the CONAD staff and volunteers during the Games.

6.0 Panam Sports Anti-Doping Rules

WADA received the first version of the Panam Sports draft Anti-Doping Rules in March 2019. This version of the draft Rules was reviewed by WADA and feedback was provided to Panam Sports on 3 April 2019. Since then, WADA provided regular assistance and guidance to Panam Sports on this process.

On 23 July 2019, a revised version of the Panam Sports' draft Anti-Doping Rules was provided to WADA. This version of the draft Rules was reviewed by WADA and feedback was provided to Panam Sports the following day (24 July 2019). Further correspondence was exchanged on 25 July 2019 between WADA and Panam Sports.

Since the draft rules submitted to WADA did not contain any clause about conflict of interest and confidentiality in relation to both the Disciplinary Commission and the Medical Committee, Panam Sports informed WADA that such rules would be complemented by *ad hoc* declarations signed by the members of these two panels. This issue was posteriori addressed accordingly.

Recommendation:

- ***Panam Sports shall ensure that each member of the PSMC, of the Therapeutic Use Exemption Committee, of the Results Management Panel as well as any person involved in any aspect of the anti-doping program sign a conflict of interest and confidentiality agreement in advance of the Games.***

7.0 Pre-event Phase of the Games

During the pre-Games phase, CONAD expressed its interest in creating a Pre-Games Taskforce in collaboration with a number of International Federations (IFs) and National Anti-Doping Organization (NADOs), with the objective of developing a comprehensive and effective pre-Games OOC testing program. While the Pre-Games Taskforce did not happen due to a lack of time, CONAD did engage with many IFs and NADOs in advance of the Games to gather athletes' information, including athletes' test history. This task was extremely time consuming for CONAD staff and unfortunately not every IF and NADO responded to their requests. Still, from the information received by some, CONAD was able to establish a list of athletes that should be targeted for OOC testing on arrival to the Games and during the Games.

This process may have been more effective with the involvement of the PSMC and by signing an ADAMS access agreement with the relevant IFs/NADOs to enable access to athlete data such as test history.

While we commend CONAD for their efforts to develop a list of athletes that should be targeted for OOC testing, establishing a pre-Games Taskforce ahead of the Games would have alleviated some of the pressure around collecting athlete information in a very short period of time. Benefiting from more time, the pre-Games Taskforce could have reviewed testing information and intelligence to establish a list of athletes that should be subject to testing (or increased testing) in the lead-up to and during the Games. For these Games, the work of such a Taskforce could have further strengthened the OOC priority list prepared by CONAD while also informing athlete selection for IC testing.

Recommendations:

- ***For future Games, the PSMC should consider the development of a Pre-Games Taskforce involving the Local Organizing Committee (LOC) and the appointed Sample Collection Authority (SCA) as well as some relevant IFs and NADOs. It is highly recommended that PSMC start the Taskforce 12 months in advance of the Games to benefit from its work.***
- ***The PSMC should ensure that ADAMS access is provided to the LOC in order to plan effective testing and avoid duplication of testing.***
- ***Given that a higher risk period for doping is prior to the athlete's arrival at a major game, efforts should also be made to test some athletes, prior to their arrival and in particular, high risk sports, or those who arrive later during the Games period, for example, those in the sports of athletics and cycling. The IO Team recommends this be incorporated into the next Games Test Distribution Plans (TDPs) and that testing agreements with relevant IFs and NADOs be put in place to facilitate such testing outside of the Athlete Village(s) and Games venues.***
- ***It is recommended that the PSMC liaise with other Major Event Organizations (MEOs) such as the International Olympic Committee (IOC) and WADA in advance of the next Games to receive guidance on how to develop such a Taskforce.***

8.0 Games Overview

The Pan American Games is a major sporting event in the Americas featuring summer sports, in which, for this edition of the Games, 6,680 athletes participated, representing 41 countries from North America, South America, Central America and the Caribbean.

The Pan American Games is held every four years in the year before the Summer Olympic Games. The XVIII Pan American Games, also known as Lima 2019 Panam Games or Lima 2019, were held in Lima, Perú from 26 July to 11 August 2019 and included 419 sporting events in 39 sports, which was the largest number of medal events ever held at a single edition of the Pan American Games. A total of 1,361 medals were handed out in Lima and 14 sports events served as qualification events for Tokyo 2020 Olympic Games. Bodybuilding and Surfing took part at the Pan Am Games for the first time in Lima, and Basque Pelota was reintroduced after being absent from the 2015 Pan American Games in Toronto.

The XVIII Pan American Games were held in 21 venues in and around Lima and have been the largest sporting event ever hosted in Perú.

9.0 Doping Control Command Center (DCCC)

The Doping Control Command Centre (DCCC) was located in Videna, which was the competition and training venue for ten sport disciplines.

All anti-doping operations were centralized and directed by the DCCC. The operations managed by the DCCC included: testing strategy, test planning, ADAMS administration, intelligence gathering and analysis, staff & volunteers scheduling and management, logistics, transports, delivery of samples from all testing venues, and shipping of the samples to the WADA-accredited laboratory.

The DCCC was led by Dr. Victor Carpio and supported by CONAD's full time staff and volunteers. Soon after the Games began, it became clear that, regardless of the tireless hours being put in by the DCCC staff, the DCCC was understaffed and could not deliver on all the operations mentioned above. To fill the gaps, volunteer Chaperones and DCOs were recruited to help fulfill some of the administrative tasks.

The mission orders for each testing session were prepared in ADAMS by the staff of the DCCC, and the IO Team was given access to those mission orders. This was very helpful not only to review test planning but also for the IO Team to plan its daily observations.

Unfortunately, from early on during the Games period, the IO Team realized that the mission orders were usually uploaded at the last minute in ADAMS, preventing the IO Team from planning their observations. This also had an impact on the sample collection personnel operations, including lack of time to prepare properly for the testing missions. Therefore, the IO Team requested that all mission orders be uploaded into ADAMS at least 48 hours in advance of the missions taking place outside of Lima and 24 hours in advance for the testing missions in the Lima area. Timely entry of mission orders into ADAMS remained a challenge for the duration of the Games.

Apart from the delay in planning missions for the following day, the IO Team was generally satisfied with the operations of the DCCC. CONAD and its staff should be commended for their commitment and dedication throughout the Games.

Recommendations:

- ***It is recommended for future Games that the LOC and the PSMC ensure that the DCCC have adequate staffing capacity and expertise to manage the delivery of the extended anti-doping operations required.***
- ***It is recommended that the mission orders be uploaded into ADAMS several days in advance, allowing the sample collection personnel to prepare properly for their testing mission in order for the IO Team to plan its observations and prioritize high risk sports/disciplines accordingly.***

10.0 Doping Control Stations

The Games were held in 21 competition venues, and in each venue a Doping Control Station (DCS) was made available. A spacious and well-equipped DCS was also set up for OOC testing in the Athlete Village at Villa "El Salvador". For the athletes residing in hotels in and/or outside Lima, an area within the athletes' residence was secured for OOC testing purpose.

In terms of the processes at various DCSs, the IO Team was generally impressed with the efficient, effective and professional manner with which the doping control staff and volunteers conducted themselves.

While the IO Team observed some inconsistencies in the setup and layout of the DCSs during the startup phase of the Games due to delivery delays, (i.e., some DCSs did not have tables and chairs), after this initial phase, the setup of the DCSs was satisfactory in all the venues visited by the IO Team. While the setup was appropriate, the standard of the facilities was not consistent across all venues. Some venues had new facilities which were very spacious, warm and comfortable, included TV, posters and Anti-Doping Guidelines documentation in Spanish and English; and others were very basic temporary spaces that were not very welcoming, had no TV, and in some instances were also cold.

The signage for the DCSs was a challenge in all venues and for most of the Games. The IO Team observed that DCSs were not well identified within the competition venues and signage at the door of the DCSs were missing, which led to doping control personnel, athlete representatives and volunteers facing challenges in finding the DCSs.

Another element that was observed by the IO Team was the lack of security staff present at the entrance of most DCSs, which meant anyone was free to enter, and in some cases people with no accreditation were able to access the DCS area. While each DCS had a check-in and check-out desk, it would have also been beneficial to have security outside monitoring access to the DCSs.

Recommendations:

- ***It is recommended that the PSMC ensure that all the DCSs are fully equipped with furniture and equipment from the official date of the opening of the village.***
- ***It is recommended that DCSs be well identified and that directional signage be available within competition venues.***
- ***It is recommended that athletes be provided with a pleasant and consistent doping control experience by having a more standardized setup and 'look and feel' across all DCSs.***
- ***It is recommended that access to DCSs be monitored by adding security personnel at the entrance of each DCS.***

11.0 Risk Assessment

A comprehensive risk assessment was developed by CONAD and the PSMC in advance of the Games in order to conduct an intelligence-based testing program.

The risk assessment considered all the mandatory elements required by the International Standard for Testing and Investigations (ISTI) and additional information such as testing statistics and outcomes of anti-doping programs over the past four years.

The risk assessment was developed also taking into account the testing program of the Toronto 2015 Panam Games and whether the sport/discipline was part of the qualifying process for the Tokyo 2020 Olympic Games.

WADA and the IO Team reviewed the risk assessment and were satisfied with its outcomes. The outcomes of the risk assessment were reflected in the development of the Test Distribution Plan originally planned for the Games.

Test Distribution Plan (TDP)

a) TDP Development

The TDP was developed based on the outcomes of an accurate risk assessment. The TDP originally aimed for 1500 samples to be collected with a 50/50 split between IC and OOC testing, which was impressive on paper.

The IO Team also had the opportunity to review the TDP prior to the Games starting and provided feedback to Panam Sports in advance of the Games. In particular, the following recommendations were provided to Panam Sports in advance of and during the Games:

- For some sports/disciplines, the Minimum Levels of Analysis (MLAs) of the Technical Document for Sport Specific Analysis (TDSSA) were not met. The IO Team encouraged Panam Sports to review each sport/discipline to ensure the MLAs were met for each of them.
- It appeared that a significant amount of OOC testing was allocated to lower risk sport such as Shooting and Archery and not so many in higher risk sports such as Boxing and Wrestling. The IO Team recognized that this was probably due to the number of athletes participating (i.e., quota) in those sports, however the IO Team recommended that the number of OOC testing in high risk sports be increased and OOC testing in lower risk sports be decreased.
- Some sports and disciplines which were assessed as high risk, for example, Modern Pentathlon had zero OOC testing allocated. The IO Team recommended to revise the distribution of the OOC testing to ensure the allocation for each sport/discipline were based on the outcomes of the risk assessment.
- The number of IC tests allocated to some high-risk sports and disciplines seemed to be low, considering they were sports with multiple events, for example, Track Cycling, Rowing or Canoe, where athletes can compete in more than one competition. The IO Team recommended to revise the distribution of the IC testing to ensure the number of tests was proportionate to the number of events of the sports.

The feedback provided by the IO Team was partially incorporated and resulted in some amendments to the TDP such as an increase of OOC in some high-risk sports.

b) TDP Delivery

The TDP delivered during the Games included a total of 1,912 samples, showing an increase of 27% compared to the original testing plan. This increase in the number of tests was due to several reasons and including; additional tests requested by IFs, additional samples collected due to samples not meeting the specific gravity requirements, and additional samples allocated to athletes who qualified in Lima for the Tokyo 2020 Summer Olympic Games. This last factor had a significant impact on the number of samples collected IC.

Of the 1,912 samples collected during the Games:

- a total of 1,350 athletes were tested
- 618 were samples collected OOC representing 32% of the overall testing;
- 1,294 were samples collected IC;
- of the 1,912 samples collected, 254 were blood samples (148 collected IC and 106 collected OOC) and 26 were ABP samples (2 collected IC and 24 collected OOC).

The overall number of testing is commendable and generally the TDP delivered was in line with the outcomes of the risk assessment. However, for some sports/disciplines, the number of OOC testing was quite limited or non-existent (e.g., Modern Pentathlon, Gymnastic and Rugby).

The delivery of the TDP for some sports/disciplines was not fully compliant with the MLAs of the TDSSA. The IO Team stressed the need to follow the TDSSA MLAs at least for all high and medium risk sports/disciplines with Erythropoiesis Stimulating Agents (ESAs) greater than 30%. In the end, five high risk sport disciplines were not in line with the MLAs required. The IO Team recommended that the PSMC conduct retroactive analysis to address this gap, but it did not occur.

Recommendations:

- ***For future Games, it is recommended that the PSMC conducts OOC testing as a minimum in all high and medium risk sports, distributing the number of tests based on the risk factors of the sports through the outcomes of the risk assessment.***
- **It is recommended that the PSMC ensures the TDSSA MLAs are met for all sports/disciplines especially for those identified as high-risk sport disciplines.**

c) Out-of-Competition Testing (OOC)

The OOC testing program at the Games represented, as mentioned above, 32% of the overall testing program.

Based on the long list of athletes likely to participate at the Games, CONAD as part of its risk assessment, developed a priority list of athletes to be target tested OOC. The risk assessment by athletes was well developed and had considered the risk of the sport, the risk of the country of the athlete, the athlete world ranking and if the athlete had an ADAMS account or not. It also included information received by various IFs.

This priority list of athletes did not however include previous testing history given CONAD did not have access to this information. Having access to this information would have allowed CONAD to further refine their priority list and avoid duplication of testing for certain athletes. Also, CONAD only had access, for most sports to the 'long list' of athletes who could participate in the Games, and the 'short list' was not provided by all delegations. Being able to use the 'short list' of qualified athletes would again have allowed CONAD to further refine their priority list.

As mentioned in the section “Pre-event phase of the Games” above, PSMC should consider establishing a Pre-Games Taskforce which could also review testing information and intelligence in order to establish a list of athletes that should be subject to testing (or increased testing) in the lead-up to and during the Games. For these Games, the work of such a Taskforce could have further strengthened the OOC priority list while also informing athlete selection for IC testing.

While most of the OOC testing was conducted at the Athlete Village, some OOC testing was also conducted at training venues and hotels where athletes were residing. This was the case for the majority of OOC tests conducted on athletes residing outside of Lima.

Since the opening of the Athlete Village, the main challenge regarding the delivery of OOC testing was the lack of a system in place to verify if the athletes had actually arrived or not in the host country. The arrival and departure dates of the athletes as well as their rooming lists which the National Olympic Committees (NOCs) via their Chef de Missions provided to Panam Sports, were often inaccurate. This resulted in many challenges in trying to locate athletes for OOC testing.

The IO Team observed that the station manager, (who was the same person for the duration of the Games), at the athlete Village was very experienced and pragmatic in instructing the Chaperones to locate the selected athletes. However, many Chaperones had none to very little experience in locating athletes for OOC testing. This was a challenge especially at the initial phase of the Games in combination with the fact that there was a lack of system to know if the athletes had arrived in Perú or not.

Recommendations:

- ***For future Games, it is highly recommended that the PSMC ensure that all delegations provide accurate arrival and departure details of their athletes, as well as precise rooming lists via their NOCs. This could also be facilitated by having an accreditation scanning system in place that shows when athletes are entering and exiting accredited venues such as the athlete village, training and competition venues.***
- ***It is recommended that the PSMC engage in advance of the Games with all IFs and NADOs to ensure that resources are directed to high risk athletes to avoid repetitive testing on certain athletes.***
- ***It is recommended that the PSMC continue for future Games the great initiative to conduct OOC testing outside the Athlete Village, including at training locations and athletes’ hotels.***

d) Whereabouts information

The Panam Sports Anti-Doping Rules indicate that when an athlete is in any IFs’ or NADOs’ Registered Testing Pool (RTP), Panam Sports will access the athlete’s whereabouts filings not via the athlete but rather via the IFs or NADOs that are receiving the athlete’s whereabouts filings. Panam Sports does not require the athlete to file any different whereabouts information with it. However, the IO Team observed that Panam Sports did not seek access via IFs and NADOs to whereabouts information in ADAMS. As a result, whereabouts information for RTP athletes was not accessible to CONAD to plan and conduct OOC testing based on information available in ADAMS.

The NOCs, via their Chef de Mission, were required to provide to Panam Sports a rooming list and training activities to allow for an effective OOC testing program. While that was the case, there were no consequences applied to the NOCs if whereabouts information was not provided or if the information provided was not accurate. PSMC proactively acted on this matter by sending reminders to Chefs de Mission, stressing the need to provide accurate training activities for the duration of the Games, but not all NOCs were compliant with the requirements.

Obtaining athlete whereabouts during Games time is a well-known challenge across major Games, however the IO Team believes that a more robust system can be put in place for future Games including, enabling anti-doping personnel to access the accreditation database to verify when athletes arrive and depart the country. This can be done only if each athlete is required to activate their accreditation individually rather than as a group via the Chefs de Mission.

As an example, for these Games, the Chefs de Mission activated accreditations for their whole delegation, regardless of whether each athlete had arrived in Lima or not. This created a lot of confusion from a test planning perspective.

Recommendations:

- ***It is recommended that for future Games, the PSMC obtain, in advance of the Games, access to whereabouts information available for RTP athletes in ADAMS via IFs or NADOs to facilitate OOC testing.***
- ***It is highly recommended the PSMC ensure that all delegations provide accurate arrival and departure details for their athletes, as well as precise rooming lists, via their NOCs. This can be also facilitated by having an accreditation scanning system in place that shows when athletes are entering and exiting the Athlete Village, training and competition venues.***
- ***It is recommended that the PSMC develop a whereabouts system in which clear requirements for the NOCs are set, including deadlines to provide accurate and comprehensive whereabouts information, training activities, etc. Clear consequences should be applied in the case of non-compliance and incorporated into the anti-doping rules.***

e) In-Competition Testing (IC)

The IC testing program was based on the outcomes of the risk assessment but was also focused on those athletes who were qualifying for the Tokyo 2020 Olympic Games.

The IO Team was generally satisfied with the distribution of the IC testing across the different sports and disciplines, but it was observed that some high-risk sports with multiple multi-disciplines could have benefited from a more robust IC testing program, for example, in the case of Canoe/Kayak, Rowing and Cycling. However, it is to be noted that following the IO Team's recommendation in this regard, additional testing was added to multi-discipline events and slightly reduced in lower risk sports.

The selection of athletes for IC testing was mainly based on medals, and additional testing was allocated to some competitions mainly based on random selection. The IO Team observed that the IC testing selection could have benefitted from a broader target selection strategy. An intelligence-based priority list of athletes (similar to the one developed for OOC testing) could have been prepared for IC testing.

The IO Team observed that CONAD and Panam Sports were provided with a number of target selections by IFs and those requests were acted upon.

It was also noted that the involvement of the IF technical delegates during the IC testing process was inconsistent depending on the IF. Some technical delegates were very familiar with the testing process and were actively supporting the doping control personnel while others were not involved at all.

The instructions provided to the Lead Doping Control Officers (DCOs) within mission orders for IC testing were not comprehensive and provided minimal details. For example, for random selections, the mission order indicated only "random selection" without providing any specific information as to how and when to conduct the random draw or who should be involved in the draw process. Sport-specific information was not included in the mission orders nor was it provided to the Lead DCOs by any other means. The IO Team noticed that the lack of instructions resulted in having the Lead DCOs deciding on the best way to proceed based on their personal experience, which created inconsistencies depending on who was the Lead DCO in charge.

Recommendations:

- ***It is recommended that for future Games, the PSMC ensure more detailed information regarding the sport specificities and testing requirements are included in the mission orders, to ensure a consistent approach across all sports.***
- ***Following the approach that was implemented for OOC testing, a similar priority list of athletes could have also been determined for IC testing in addition to the focus on medalists and instead of using random selections. Given the risk assessment conducted and the ISTI requirement to focus on target testing, the IO Team recommends this to be considered for future Games.***
- ***The presence of the IF technical delegates is a very useful resource for sample collection personnel, which can be further utilized to ensure sport-specific requirements are met consistently. It is recommended that they be present during the doping control process or if this is not possible that this information is provided in advance of the competition starting.***

f) International Federation Protocols

Panam Sports and CONAD did not seek IF testing protocols for the Games. As a result, and as discussed above, the implementation of the IC testing process relied on the Lead DCOs, who in many cases had expertise in testing the sport. The IO Team also observed on a few occasions, especially in team sports, that team representatives were aware of the athletes selected for doping control well ahead of the completion of the match. This is clearly in breach of ISTI Article 5.3.1 as this may provide advance notice to the athletes. Clear and sport-specific

protocols that provide no advance notice should be established in advance of the Games to ensure all IF protocols are in line with the requirements of the ISTI.

Recommendations:

- ***For future Games, it is highly recommended that the PSMC develop IF protocols well in advance of the Games to ensure they are fully compliant with the ISTI. Specifically, protocols in place should ensure no advance notice is provided to athletes.***
- ***The IO Team recommends that the PSMC develop a template IF protocol that can be adapted for each IF. This template should include a broad description in terms of test type, number and timing (instead of committing to specific numbers); who the IF technical delegate will be (name and contact information) and his/her responsibilities during the Games; specific information on selection draw requirements and materials; procedures regarding testing athletes who achieve record performances; any sport-specific anti-doping procedures; and an agreed procedure for how information and intelligence held by the IF can be shared with PSMC and CONAD as well as how the IF can request target tests during the Games (i.e., contact name, contact method – phone or secure email, etc.).***

g) Athlete Biological Passport (ABP)

During the Games, 26 ABP samples were collected. All ABP tests performed were based on requests from IFs and NADOs.

The IO Team was aware that a contingency budget was put in place for any ABP requests from IFs or NADOs during the Games. Having said that, it is unknown to the IO Team what type of information was shared by the ABP custodian with the PSMC and/or CONAD and when, which kind of requests were received and if all the requests were implemented.

Recommendations:

- ***It is recommended for future Games, the PSMC coordinate with the relevant IFs and NADOs in advance of the Games to utilize the ABP passport custodian knowledge and expertise to conduct target testing during the Games.***

12.0 Gathering and Sharing of Information and Intelligence

As part of its numerous visits to the DCCC, the IO Team observed how intelligence was gathered, processed and what type of measures were taken after intelligence was received.

CONAD was the entity responsible for collecting intelligence, and the intelligence and information received was then shared with the PSMC to decide what actions needed to be implemented. CONAD or PSMC did not have a tip-off line to gather intelligence during the Games.

The IO Team observed that CONAD instructed its sample collection personnel to report any suspicious behaviours. In addition, as part of the pre-Games training, security and cleaning workforce operating at the Athlete Village, hotels, training locations and competition venues were asked to report any suspicious behaviours to the DCCC.

During the Games, a no-needle policy was put in place and the workforce was also asked to report any needles or other suspicious paraphernalia found.

The IO Team observed that a documented process was not in place to gather and process intelligence and information received although the process was theoretically in place. It was also observed that there was no instruction or guidance for athletes and their support personnel on how and to whom to report doping and/or suspicious activities. The IO Team suggests that a confidential 'tip-off' line to report doping activities should be arranged and promoted in advance of and during the Games.

The IO Team inquired several times during the Games as to whether any intelligence or information had been received, but no answer was provided. Therefore, it is unknown how much information (if any) was received, processed, acted on or shared with other anti-doping organizations.

Recommendations:

- ***It is recommended that the PSMC develop a documented process to gather, assess and process intelligence and information received.***
- ***It is recommended that a tip-off line be set up for future Games for athletes, support personnel and members of the public to report suspicious anti-doping related matters. The tip-off line should be promoted before and during the Games to maximize the valuable use of such initiative.***
- ***It is also recommended that the PSMC invite relevant IFs, NADOs, Regional Anti-Doping Organizations (RADOs) and NOCs to provide any intelligence that might be relevant to the Games and to share intelligence and information received during the Games with the relevant anti-doping organization, as well as with the IO Team.***

13.0 Sample Collection Personnel

The IO Team would like to praise CONAD for the recruitment and management of the doping control personnel who performed their roles effectively with dedication and enthusiasm during the Games.

Most of the local sample collection personnel recruited and trained by CONAD for the Games had the opportunity to perform their roles also during the pre-Games test events, which was a great initiative. The IO Team suggests continuing this initiative moving forward for all sample collection personnel involved in future Games.

a) International Doping Control Officers (IDCOs)

There was a team of 24 International Doping Control Officers (IDCOs) recruited by CONAD from NADOs for the Games.

The IDCOs to be selected were asked to provide their experience in doping control at major events, their educational level, seminars and courses attended, and their specific sports knowledge and experiences.

The IO Team observed that the majority of the IDCOs had previous major Games experience, some of them extensive experience since the Sydney 2000 Summer Olympic Games. The

IDCOs were often appointed as a Station Manager and/or Lead DCO, with the main duty of managing the doping control team and the testing mission at each venue.

A number of IDCOs during the Games approached the IO Team members expressing their frustration with the fact that their sport-specific expertise and abilities were not fully utilized. They also raised concerns about the fact that they had very little time or not enough time to prepare for the testing missions as they were only notified the night before, and sometimes very late at night for missions happening the following morning. The IDCOs were often advised by text message and very little information was provided. The mission orders, in most of the cases, were made available to the Lead DCOs and station managers only at their arrival at the doping control station, which was too late for the DCOs to prepare for the mission accordingly. As mentioned previously, the mission orders contained very little detail and instruction therefore, as a result, IDCOs felt it was left up to them to make decisions on their own, which created some inconsistencies.

The IO Team brought this matter to the attention of the PSMC and suggested that comprehensive instructions be provided and that this information be provided well in advance of testing missions.

The PSMC explained that the reasoning for not providing testing mission details in advance was to protect the confidentiality of the testing mission and to minimize the risk of leaks despite the fact that every sample collection personnel had signed a confidentiality agreement in advance of the Games.

It was also noted that the relationship between the IDCOs and local DCOs was not always “friendly” based on some observations and feedback received by the IO Team. The local DCOs felt they were considered as “lower class” DCOs compared to the IDCOs and were upset by how they were being treated by some IDCOs. The relationship between IDCOs and local DCOs could have been improved by clearly explaining the role and responsibilities of each member of the doping control team.

Recommendations:

- ***It is highly recommended that IDCOs’ sport expertise be used where possible.***
- ***Considering IDCOs are coming from different countries and NADOs, which may have slightly different testing procedures, it is recommended that for the next Games, a comprehensive training program be delivered upon their arrival to ensure greater consistency.***
- ***It is recommended that sample collection personnel be notified in advance of their missions and that comprehensive details be provided to them in the mission orders to enable them to prepare appropriately for the testing missions.***
- ***A more balanced relationship should be found between IDCOs and local DCOs to avoid future conflicts. It is recommended that a different approach be taken for future Games to ensure DCOs’ expectations are met, and no one feels as a “second” class DCO.***

b) Local Doping Control Officers (DCOs)

The local DCO group was comprised of 54 individuals who were recruited, trained and certified by CONAD in advance of the Games. The level of experience varied; some were very experienced while others had very little experience.

The IO Team was generally satisfied with the performance of the local DCOs, and the fact that the DCOs with less experience were always supported by experienced DCOs, which ensured the sample collection process was up to standard.

In addition to their sample collection duties, some local DCOs also performed several administrative tasks such as entry of Doping Control Forms into ADAMS.

c) Blood Collection Officers (BCOs)

There were 12 BCOs who were local certified phlebotomists and who were trained and certified as BCOs by CONAD.

Even though the BCOs were all professional phlebotomists, the level of experience was inconsistent; some BCOs were incredibly talented and managed to take the blood very efficiently while others did not seem as experienced and were very nervous during the blood collection.

On two occasions, the IO Team observed that the BCOs were unable to take a blood sample even though the athlete's veins were very visible. The BCOs on both occasions appeared to be very nervous, which did not instill confidence and had the athlete, the athlete's support personnel, members of the IO Team and the PSMC individuals present, questioned their abilities.

On both occasions, the collection of blood was suspended, and was re-scheduled or postponed due to the fact that the BCO was not able to draw blood.

These instances were reported to the PSMC and CONAD, and the relevant BCOs were promptly dismissed from their duties for the rest of the Games. It is commendable that this serious matter was acted upon immediately by both the PSMC and CONAD.

Recommendations:

- ***It is highly recommended to verify the experience and quality of the performance of all BCOs in advance of the Games and not solely rely on the fact that they are certified phlebotomists.***
- ***It is also recommended that for future Games the BCOs experience is verified also during the test events pre-Games.***

d) Chaperones

A total of 87 local Chaperones were recruited and trained by CONAD. Generally, the local Chaperones performed their roles well and with great enthusiasm. The lack of experience for some was obvious but it was reassuring for the IO Team to observe that the inexperienced

Chaperones (at least for in-competition testing) were always shadowed by either experienced Chaperones or DCOs.

During the initial phase of the Games, the IO Team observed that Chaperones appointed to the Athlete Village were asked to look for athletes for the purpose of OOC testing without concrete information regarding the athletes' schedules or precise location. As noted above, Chaperones often lacked the experience to react quickly when looking for an athlete. In some instances, the IO Team noticed that Chaperones were also unfamiliar with the competition venues and Athlete Village, and they were asked to look for athletes without having been given a venue tour in advance.

The IO Team also observed a number of times the presence of Canadian and American students in the Videna venue during IC testing sessions, Videna was the venue hosting the majority of the sporting events. These foreign students were appointed as Chaperones just before a testing session and subsequently 'trained' on-site prior to notification by the Lead DCO or DCS Manager. These newly appointed Chaperones were asked to notify athletes who were Games medalists. The recruitment process of these students was unclear to the IO Team who expressed concerns regarding their age, although the DCS Manager confirmed they were at least 18 years old.

The IO Team observed that these Canadian and American students who did not speak Spanish were appointed to notify Spanish speaking athletes. While those Chaperones were usually shadowed by more experienced Chaperones or DCOs, the IO Team nonetheless felt that these Games were not the right environment to have a young and inexperienced Chaperone perform notification duties for the first time on a medalist and not able to speak the main language of the Games.

Although it may be a good initiative to involve young students in a major Games, the recruitment and training process of these foreign Chaperones was not in line with the ISTI.

Recommendations:

- ***If the PSMC plans to involve international students as part of the Chaperone program, it is recommended that a comprehensive recruitment and training process be put in place in advance of the Games. The IO Team suggests that after their recruitment and training, all Chaperones gain experience in performing their role in their own country through their NADO's Chaperone program before being appointed as a Chaperone for future Games.***
- ***It is recommended that the PSMC ensure Chaperones are familiar with their roles and responsibilities prior to notifying athletes.***
- ***It is highly recommended that all Chaperones be given a tour of all competition and training venues in advance of the Games to ensure they are familiar with each venue before a testing mission.***
- ***It is recommended that Chaperones be provided with specific whereabouts information in order to locate the athlete as efficiently as possible.***

14.0 Sample Collection

a) Specific Gravity – Dilute Samples

During the initial phase of the Games, athletes who were providing a dilute sample (i.e., the sample was not meeting the specific gravity requirement as per ISTI Annex G) were asked to provide one or two additional samples instead of continuing to collect additional samples until the requirement for suitable specific gravity was met (or until the DCO determined that there were exceptional circumstances that meant that for logistical reasons it was impossible to continue with the sample collection session). WADA, in advance of the Games, provided comments to Panam Sports related to this practice, which was detailed in their “testing and sample collection process guide”. Specifically, WADA had requested this process be revised to ensure it was in line with the ISTI.

During the Games, the IO Team further recommended that the PSMC and CONAD change the specific gravity protocol to ensure it was in line with the requirements of the ISTI. The recommendation was quickly addressed, and both the PSMC and CONAD should be praised for sending new instructions to DCOs and ensuring that additional samples were collected until the requirement for suitable specific gravity was met.

The total number of dilute samples collected at the Games was 103; of which 58 analyzed. On two occasions the IO Team observed that the athlete was not advised not to hydrate excessively after providing a dilute sample, since this may delay the production of a suitable sample.

The IO Team commends the PSMC and CONAD for collecting additional samples from athletes who provided dilute samples and demonstrated suspicious behaviors (i.e., target testing athletes).

Recommendations:

- ***It is recommended that the PSMC ensure that testing procedures implemented for dilute samples are in line with the ISTI for their next Games.***
- ***In order to avoid collecting multiple samples from the same athlete, which is far from ideal for athletes and expensive for the sample collection authority, it is highly recommended that Chaperones or DCOs advise the athlete and the athlete’s support personnel not to hydrate excessively as it may delay the production of a suitable sample and DCOs be reminded to ensure that athletes, after providing the first dilute sample, do not hydrate any further as outlined in Annex G of the ISTI.***

b) Partial Samples

The IO Team observed that when athletes provided a partial urine sample, i.e. less than the minimum volume of 90ml, the PSMC instructed DCOs to collect additional urine samples but only to a maximum volume of 100-120 ml. If the athletes were providing more than 100-120 ml, they were asked to dispose the additional urine. This practice is not in line with the ISTI which requires that urine should only be discarded when both the A and B bottles have been filled to capacity. If more than the minimum suitable volume of urine for analysis has been provided, the DCO must ensure that the athlete fills the A bottle to capacity as per the recommendation of the equipment manufacturer. The DCO must ensure that the athlete then fills the B bottle to

capacity (should there be sufficient urine remaining) as per the recommendation of the equipment manufacturer. The manufacturer used for the Games was Berlinger. Berlinger Kits' urine capacity is 90ml per bottle. The IO Team brought this matter to the attention of the PSMC and CONAD and the recommendation was followed accordingly for the remainder of the Games.

Recommendation:

- ***It is recommended that PSMC ensure that testing procedures adopted for insufficient volume of urine samples are in line with the ISTI.***

15.0 Chain of Custody, Transport and Delivery of the Samples

a) Chain of Custody

The IO Team observed that DCOs were instructed to bring all the sealed samples to the DCCC once the doping control process was completed for each testing session.

At the DCCC, there was a dedicated person from CONAD who diligently verified each sample code number against the Chain of Custody forms and the Doping Control Forms to ensure accuracy. A staff member from CONAD was then responsible first to pack the samples accordingly then store in a refrigerated secure room which was monitored by video cameras.

The IO Team observed that the chain of custody process was overall efficient and effective, but the cooler containers did not have secured seals. It is considered best practice to have in place a secondary layer of security for the containers that samples are stored and transported in, i.e. a numbered security seal and this seal number recorded on the Chain of Custody.

Recommendation:

- ***For future Games it is recommended that the transport/cooler boxes have a recorded seal linked to the closing system.***

b) Transport

CONAD contracted a local courier company, Naciones Unidas de Servicios para Proyectos (UNOPS), to collect samples from the DCCC and to transport the samples to the appointed laboratory for the duration of the Games. The UNOPS employees were asked to sign the Chain of Custody Form and a separate UNOPS document was signed acknowledging custody of the samples.

The IO Team did not observe the process once the samples arrived at the airport but was informed that airport/courier employees were responsible for ensuring the samples were transported to the laboratory. CONAD provided to the IO Team the agreement signed with UNOPS, which seemed very comprehensive and included the temperature for the samples to be kept at and the maximum time for urine and blood samples to be delivered to the WADA-accredited laboratory. The IO Team was satisfied that the requirements included in the agreement signed between UNOPS and CONAD were in line with the ISL.

c) Delivery to the Laboratory

Despite the precautions taken in advance of the Games, some samples did not reach the laboratory in ideal condition.

The first batch of blood samples sent to the Montreal laboratory arrived with nine blood tubes frozen which could not be analyzed due to the fact that the blood samples spent two days at temperatures of less than 0°C, as was recorded by the data logger monitor. After this incident, it was recommended by the laboratory that the blood tubes be packed in a cardboard box and to put the box inside the one containing the ice packs to prevent the direct contact with the tubes. After this recommendation, the IO Team observed that packing of blood samples was in line with the instructions provided by the laboratory. No other blood samples arrived frozen at the laboratory.

On another occasion, a urine sample (B bottle) arrived at the laboratory empty, due to the bottle not having been sealed properly. The A sample was analyzed for intelligence purposes and returned a negative result.

The IO Team did not visit the WADA-accredited laboratory in Montreal as this was not in its scope of observations but did monitor the reporting of the results in ADAMS. All reporting by the laboratory was submitted in a timely fashion.

Recommendation:

- ***To further strengthen the Chain of Custody process and to ensure the safe delivery of all samples to the laboratory, it is recommended that the PSMC ensure for the next Games that the sample transport procedures used for these Games be applied by the next Local Organizing Committee.***

16.0 Sample Retention and Further Analysis strategy

The IO Team noticed that there was no sample retention and further analysis strategy planned for these Games. The IO Team provided recommendations and comprehensive instructions to the PSMC on how to develop and implement such a strategy but unfortunately this recommendation was not implemented.

It is mandatory under the ISTI that a MEO have a sample retention and further analysis strategy incorporated into its TDP to enable further analysis of such samples at a later date. The strategy should focus on samples from high risk sports or athletes (including medalists), as determined by the risk assessment and other available intelligence such as feedback from the laboratory or the Athlete Passport Management Unit (APMU), and also consider the ability for samples to be transferred to applicable IFs or NADOs for long-term storage.

Recommendations:

- ***The strategy and procedures for retaining samples for further analysis become an important element of the Panam Sports' TDP for future Games as required by the ISTI. As analysis techniques evolve over time, it is recommended that the PSMC plan to store samples and re-analyze them once new or improved analysis techniques become available.***

- ***In creating a sample retention strategy and determining the number of samples to be stored, the PSMC should consider the following elements: priority of sport/discipline samples to be stored, i.e. high risk sports as determined by the risk assessment, intelligence to be considered such as feedback from the laboratory, APMU or other intelligence including from the ‘tip off’ hotline mentioned earlier in the report, sample collection personnel, timeframes for reviewing stored samples, analysis timeframes, and type(s) of analyses to be conducted.***
- ***It is recommended that the PSMC also consider any existing IF retention policy to account for situations where transfer of sample ownership may be appropriate. It is recommended that the PSMC offer to the applicable IFs and NADOs of competing athletes, the opportunity to have samples transferred to their organization in accordance with their respective storage and analysis policies and then store the samples not taken by the IFs or NADOs.***

17.0 Use of the Anti-Doping Administration and Management System (ADAMS)

The IO Team noted that Doping Control Forms (DCFs) were entered into ADAMS by CONAD staff. A few discrepancies in the data entry related to DCFs were noted but they were quickly fixed following the IO Team’s recommendations.

In July, WADA received a request from the PSMC to upload the short list of athletes into ADAMS, but this was too late for the ADAMS’s Team to upload and unfortunately, this created several challenges resulting in CONAD and the PSMC not having access to athletes’ ABP profiles and test history. The ADAMS Team supported the PSMC remotely by providing access to the ADAMS profile after an athlete had been tested. For future Games, the PSMC should submit to WADA’s ADAMS Team the request to upload the list of athletes participating in the Games at least three months in advance of the Games.

Please refer to the Therapeutic Use Exemptions (TUEs) section for further observations and recommendations related to ADAMS.

Recommendations:

- ***It is recommended that the PSMC ensure that the LOC for future Games has full access to athletes’ accounts to enable access to all information available in ADAMS to be used for the delivery of an effective testing program.***
- ***It is recommended that the PSMC submit a request to the ADAMS Team with at least three months notice if they wish to have the list of participating athletes uploaded into ADAMS.***

18.0 Therapeutic use exemption procedures

As was done at prior Games, the IO Team reviewed the procedure and processes for the handling of TUEs at the Games but did not review the content of the medical files or the rationale for the decisions made by the Therapeutic Use Exemption Committee (TUEC) to recognize, grant or refuse a TUE. This is the role of WADA’s Science and Medical Department, which has the right review and appeal in these matters.

Under Panam Sports' Anti-Doping Rules, athletes were required to submit existing TUEs granted by their IF or their NADO for recognition by the Panam Sports' TUEC, as well as requests to grant new TUEs for the Games, prior to the Games opening.

Panam Sports appointed a TUEC consisting of four physicians to consider applications for TUEs permitting the use of prohibited substances or methods during the Games. In total, the TUEC registered in ADAMS 13 approved TUEs and 1 rejected TUE. The TUEC recognized a total of 7 TUEs.

The IO Team and WADA's Medical Team reviewed the TUE application process and observed that neither the process for application to its TUEC, nor the TUE application form were available on Panam Sports' website for the athletes at the beginning of the Games, as required by the ISTUE. There was also no system in place to submit and gather TUE applications at venues outside the city of Lima. Originally TUE applications were asked to be submitted by email due to the strict medical confidentiality contained within a TUE application. The IO Team recommended at the daily meetings held between the IO Team and the PSMC during the Games, that TUE applications should either be submitted in ADAMS or in hard copy through a secure mailbox located in the Polyclinic of the Athlete Villages.

In addition, in pre-Lima 2019 correspondence, the IO Team requested the PSMC to provide a link to its website so that documents and information about the TUE process were available for athletes. After the recommendation given during the Games, the PSMC sent a correspondence to all NOCs and published the TUE application form and its application process on Panam Sports' website.

Regarding the TUE recognition process, there were several reasons that made the TUEC unable to review all TUEs in advance of the Games and to recognize (or not) the TUEs early on as a Major Event demands. Since Panam Sports signed an ADAMS agreement with WADA a few days before the beginning of the Games, the TUEC could not recognize TUEs granted by International Federations or National Anti-Doping Organizations prior to the Games. In addition, since Panam Sports did not share with WADA's ADAMS Team in a timely fashion the short list of athletes attending the Games, the TUEC did not have access to the athletes' profiles in ADAMS prior to the Games and could not recognize TUEs already granted by IFs or NADOs. Therefore, there were duplicated TUEs and TUEs were not recognized in ADAMS in a timely fashion. Besides the delay in the recognition process, this also led to a very time-consuming task for WADA's ADAMS Team, who had to grant access to athletes' medical records one by one to the TUEC.

Regarding the entering of granted TUEs by the TUEC in ADAMS, it was mentioned in previous IO reports that WADA's right to review TUEs is dependent on the MEO registering granted TUEs in ADAMS in a timely fashion. Despite reminders and requests for action by the IO Team, there were excessive delays in registering the TUEs in ADAMS and in updating ADAMS once the TUE was granted. This situation prevented WADA's timely evaluation of the TUEs, and so denied the PSMC the extra layer of transparency and accountability that WADA's review on the TUE application process is intended to provide, having also a negative impact in the results management procedures. In addition to these delays outlined, the WADA Medical Department noticed that some of the TUE application forms were either unsigned or undated and there were no English or French summary of the information as required by the ISTUE.

Recommendations:

- ***The PSMC should establish a clear process for athletes to apply for a TUE, including an appeal process for TUEC's decisions, in compliance with the ISTUE and publish it on its website together with the TUE application form well in advance of the Games.***
- ***The PSMC should ensure that the TUE process is managed in ADAMS to protect the confidentiality of the athlete's medical information.***
- ***Panam Sports should ensure to sign ADAMS agreements with WADA well ahead of the beginning of the Games so that the TUEC can start recognizing TUEs prior to the Games.***
- ***The PSMC should promptly report (in English or in French) all decisions of its TUEC granting or denying TUEs, and all decisions to recognize or refusing to recognize other ADOs' TUEs, through ADAMS. A decision not to grant a TUE must include an explanation of the reason(s) and must inform the athlete about their right to appeal the decision.***
- ***The PSMC should ensure that all TUEC members sign a conflict of interest declaration and a confidentiality agreement before having access to an athlete's TUE.***
- ***The PSMC should ensure to consult the TUE section of WADA's website ahead of the Games for the latest documentation and templates, and consult WADA's Medical Department.***
[\(<https://www.wada-ama.org/en/what-we-do/science-medical/therapeutic-use-exemptions>\)](https://www.wada-ama.org/en/what-we-do/science-medical/therapeutic-use-exemptions)

19.0 Results Management

Summary of results management and hearings.

Results management - initial review

The Doping Review Panel (DRP) appointed by the Chair of Panam Sports Medical Commission was in charge of conducting the initial review related to potential Anti-Doping rules violations (ADRVs) that arose during the Games. Then, cases were referred to a Disciplinary Commission of three (3) experts appointed by the President of Panam Sports for adjudication.

The IO Team had the opportunity to observe the processing of some of the reported adverse analytical findings, and in particular, the initial review and disciplinary proceedings of these. All potential ADRV cases that were reported during the Games were analytical cases.

The IO Team reviewed an athlete's notification of an ADRV regarding a non-specified substance and noted that the notification did not provide sufficient details regarding the hearing process and it was not clear enough for the athlete¹. The notification did not mention or refer to the mandatory provisional suspension, thus the object of the convocation was unclear, based on the notification sent to the athlete.

¹ After the Hearing the IO Team approached the athlete's representatives and discussed the notification sent to the athlete. They claimed that they were confused about the nature of the hearing they were attending.

Hearings

The IO Team had the opportunity to observe three (3) provisional hearings² conducted by the Disciplinary Commission during the Games. The other AAFs were reported after the period of the Games and the results management process was therefore not observed by the IO Team. One of the hearings observed by the IO Team involved a non-specified substance, in which case a provisional suspension shall be imposed upon or promptly after the notification. In this case, the provisional suspension was imposed on the athlete at the hearing. However, the IO Team observed that the athlete had no knowledge of the real purpose of the hearing, since the notification sent to the athlete did not mention or refer to any mandatory provisional suspension, and the provisional hearing was automatically conducted without the athlete requesting it. Thus, the athlete had no accurate information of the potential ADRV he was facing, and several misunderstandings occurred during the hearing. Finally, the Disciplinary Commission imposed a provisional suspension to the athlete and declared the athlete ineligible, ordering his exclusion from the Games, withdrawing his accreditation and asking him to leave the Athlete Village. The athlete did not have the opportunity to appeal the provisional suspension imposed and no expedited final hearing was conducted. In addition, the athlete's individual results obtained in the event were not disqualified. The Disciplinary Commission rendered a decision on August 3rd which did not assert the commission of an ADRV pursuant to Article 8 of the Panam Sports' Anti-Doping Rules. The case was still referred to the International Federation for it to decide on the applicable sanction after the Games.

The IO Team attended another hearing that involved a specified substance. During the hearing, the athlete's representatives informed the Disciplinary Commission that the athlete had submitted a request for a retroactive TUE and the athlete was still waiting for a decision from the TUEC. Based on that, the Disciplinary Commission decided to postpone the hearing to the following day. However, at the hearing, the athlete's representative informed the Panel that it had appealed the TUEC's decision to reject the TUE.

Recommendations:

- ***Given the importance of the results management process and the lack of familiarity with the results management and adjudication process by many athletes, Panam Sports should ensure that the notification documentation provides sufficient details regarding the hearing process by clearly indicating the potential sanction and the athlete's rights.***
- ***Panam Sports should have a clear step-by-step process in place to establish who in the organization is responsible for imposing a mandatory provisional suspension and whether this should be done through the notification sent to the athlete subject to a hearing if requested by the athlete or whether this should be imposed only during an in-person provisional hearing.***
- ***Panam Sports should ensure that before deciding on the ineligibility of an athlete for the Games, the athlete needs to be found to have committed an ADRV. It is only once the Disciplinary Commission concludes that there is an ADRV, that the results obtained at the Games can be disqualified.***

²Panam Sports' Anti-Doping Rules article 7.6.3: "Where a Provisional Suspension is imposed, whether pursuant to Article 7.6.1 or Article 7.6.2, the Athlete or other Person shall be given either: (a) an opportunity for a Provisional Hearing either before or on a timely basis after imposition of the Provisional Suspension; (...)".

- ***The Disciplinary Commission shall also indicate in the decision that the case will be referred to the applicable IF for the determination of consequences applicable beyond the Games.***
- ***Panam Sports should implement a system to ensure that there is a good and efficient communication between the individual in charge of the initial review, the Disciplinary Commission and the TUEC members as well as the members of the Medical Commission to ensure that all relevant information is shared efficiently***
- ***Panam Sports should have policies and procedures in place to conduct investigations of potential non-analytical ADRVs. This is recommended for future Games.***

Summary of Atypical Findings – Clenbuterol

Three (3) atypical findings were reported by the laboratory during the Games period. The IO Team had the opportunity to observe the investigation conducted by the DRP of an atypical findings (ATF) reported by the laboratory for clenbuterol, in accordance with the notice published by WADA on May 30th, 2019 to its stakeholders regarding meat contamination. As part of the DRP investigation, the athlete was interviewed by the Panel to gather information mainly about the athlete's whereabouts before the Games. Once the investigation was completed, the DRP concluded that the presence of clenbuterol was due to the consumption of contaminated meat and decided not to bring the ATF forward as an AAF.

Summary of AAFs

WADA is monitoring the outcomes of all cases.

	Sample Collection Date	Sport	Substance(s) Found	Athlete Gender	Test Type	Sample Type
1	27 Jul 2019	Baseball	oxandrolone	M	OOO	Urine
2	28 Jul 2019	Bowling (Ten Pin)	chlortalidone	M	IC	Urine
3	28 Jul 2019	Handball	boldenone	M	OOO	Urine
4	31 Jul 2019	Cycling (Track Sprint)	LGD-4033	M	OOO	Urine
5	01 Aug 2019	Cycling (Track Sprint)	Carboxy-THC greater than the Decision Limit of 180 ng/mL	M	IC	Urine
6	02 Aug 2019	Baseball	amfetamine	M	IC	Urine
7	03 Aug 2019	Boxing	furosemide	F	IC	Urine
8	04 Aug 2019	Cycling (Track Sprint)	methylphenidate	F	IC	Urine
9	04 Aug 2019	Volleyball	oxilofrine (methysynephrine)	M	IC	Urine
10	04 Aug 2019	Equestrian (Jumping)	d-amfetamine/dextroamfetamine	F	IC	Urine
11	06 Aug 2019	Aquatics (Swimming Sprint 100m or less)	amfetamine	F	IC	Urine
12	06 Aug 2019	Aquatics (Swimming Sprint 100m or less)	testosterone	M	IC	Urine
13	06 Aug 2019	Athletics (Throws)	other anabolic agent	F	IC	Urine
14	07 Aug 2019	Aquatics (Swimming Sprint 100m or less)	methylphenidate	F	IC	Urine
15	07 Aug 2019	Equestrian (Jumping)	cocaine	F	IC	Urine
16	07 Aug 2019	Wrestling (Greco Roman)	furosemide	M	IC	Urine
17	09 Aug 2019	Basketball	oxandrolone; stanozolol	F	IC	Urine
18	09 Aug 2019	Judo	fenoterol	F	IC	Urine
19	09 Aug 2019	Rowing	methylphenidate	M	IC	Urine
20	10 Aug 2019	Karate	heptaminol	M	IC	Urine
21	10 Aug 2019	Aquatics (Swimming Sprint 100m or less)	amfetamine	F	IC	Urine

20.0 Anti-Doping Awareness and Education

The IO Team observed that CONAD developed and made available printed copies of Anti-Doping Guidelines and posters of testing procedures in each waiting room of the DCSs (in Spanish and in English). This was a good initiative, which should continue for future Games.

Even though Panam Sports strongly encouraged the participants of the Games to complete the e-learning program ADeL prior to the Games, the IO Team observed a very clear lack of education among many athletes and support personnel attending the Games, which could be improved by making anti-doping education a mandatory requirement for athletes and support personnel in advance of the next Games. This could be achieved if the PSMC works in collaboration with IFs, NADOs and NOCs to ensure anti-doping education is delivered to all participants in advance of the Games and if it considers making e-learning programs such as ADeL a mandatory requirement to participate in the Panam Games.

It was also appreciated that CONAD provided WADA with the translations in Spanish of two ADeL courses, this was of great assistance for athletes and athletes' support personnel in the region. This exercise resulted in having 1,275 ADeL users, but only 865 have completed only one of the eight courses available.

Further enhancement of anti-doping education is required for athletes and athletes' support personnel at future Games and this could be achieved if the PSMC works in collaboration with IFs, NADOs and NOCs to ensure anti-doping education is delivered to all participants in advance of the Games and if it considers making e-learning programs such as ADeL a mandatory requirement to participate in the Panam Games.

It is highly recommended that the PSMC enhance anti-doping awareness and education by making available education material on its website and by promoting education tools and e-learning programs such as ALPHA (for athletes), Coach True (for coaches) and the Medical Tool Kit (for doctors), all available on ADeL in English, French and Spanish.

The WADA Outreach Booth located in the Athlete Village played a key role in promoting both knowledge and confidence in the anti-doping efforts. The WADA Outreach Booth was located strategically in the dining hall and was a very successful initiative based on the feedback received from athletes and athletes' support personnel.

The IO Team observed that athletes located outside Lima did not have access to outreach sessions. For future Games, it is recommended that all athletes regardless of their locations benefit from the same access to anti-doping awareness.

Recommendations:

- ***It is recommended that the PSMC consider making anti-doping education a mandatory requirement for athletes and athlete support personnel who will participate at future Games by using exciting educational tools such as ADeL. The PSMC should work closely with IFs, NADOs and NOCs to coordinate and maximize anti-doping education efforts.***
- ***It is recommended that the PSMC continue to make available anti-doping education materials in each DCS at future Games.***
- ***It is recommended that outreach booths be available at all athletes' village locations of the next Games to ensure every athlete and athlete support personnel has the same opportunity to enhance their anti-doping knowledge.***

Annex A - Games Statistics

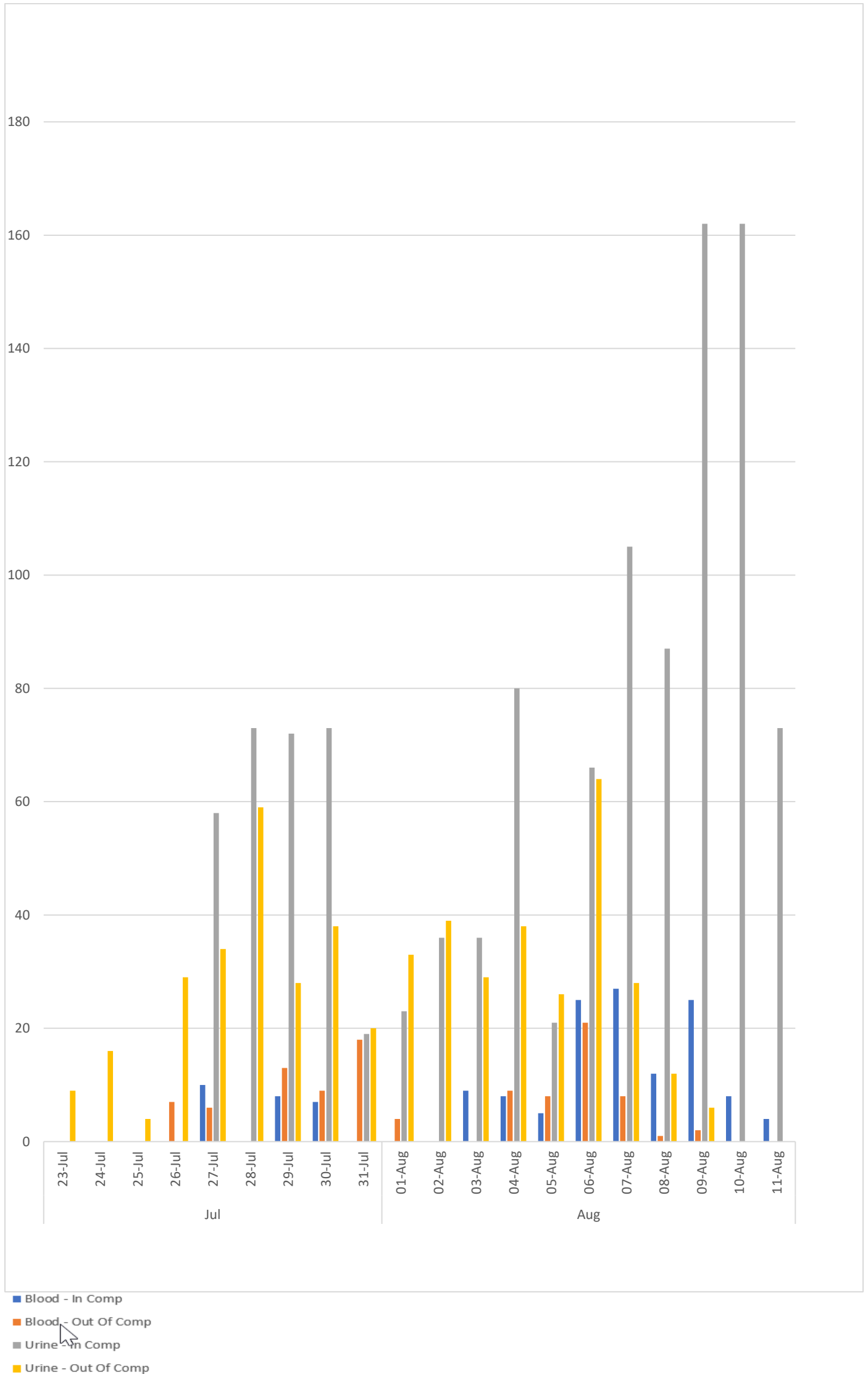
Testing Overview

Total samples	1912
In-Competition samples	1294
Out-of-Competition samples	618
Urine samples	1658
Blood samples	254
Athletes tested	1350
ESA analysis	280
GH analysis	204
GHRF analysis	1600
Adverse Analytical Findings	21
Atypical Findings	3

Testing by Sport

Sport	Urine		Blood		Total Samples
	In Competition	Out of Competition	In Competition	Out of Competition	
Aquatics	177	42	26	4	249
Archery	21	2	-	-	23
Athletics	149	57	42	4	252
Badminton	8	4	-	-	12
Baseball	12	24	4	-	40
Basketball	26	19	4	-	49
Basque Pelota	10	1	2	-	13
Bodybuilding	8	14	2	4	28
Bowling	8	-	-	-	8
Boxing	30	18	-	13	61
Canoe/Kayak	43	18	10	3	74
Cycling	66	53	3	27	149
Equestrian	28	1	-	-	29
Fencing	15	13	-	2	30
Field Hockey	29	22	6	-	57
Football	31	28	8	6	73
Golf	7	4	-	-	11
Gymnastics	30	4	5	-	39
Handball	20	12	4	--	36
Judo	29	12	1	4	46
Karate	38	15	-	3	56
Modern Pentathlon	14	-	-	-	14
Racquetball	6	5	-	-	11
Roller Sports	8	6	1	-	15
Rowing	29	28	1	6	64
Rugby Union	24	4	-	-	28
Sailing	20	5	2	-	27
Shooting	47	4	-	-	51
Softball	15	5	2	-	22
Squash	7	5	-	-	12
Surfing	9	5	1	-	15
Table Tennis	18	4	1	-	23
Taekwondo	21	13	-	-	34
Tennis	9	5	2	-	16
Triathlon	8	4	2	-	14
Volleyball	32	18	6	2	58
Waterskiing	24	-	-	-	24
Weightlifting	33	16	13	17	79
Wrestling	37	22	-	11	70
Total	1146	512	148	106	1912

Samples collected per day



Tests conducted by date

Date	Urine		Blood		Total samples
	In Competition	Out of Competition	In Competition	Out of Competition	
23-Jul	-	9	-	-	9
24-Jul	-	16	-	-	16
25-Jul	-	4	-	-	4
26-Jul	-	29	-	7	36
27-Jul	58	34	10	6	108
28-Jul	73	59	-	-	132
29-Jul	72	28	8	13	121
30-Jul	73	38	7	9	127
31-Jul	19	20	-	18	57
01-Aug	23	33	-	4	60
02-Aug	36	39	-	-	75
03-Aug	36	29	9	-	74
04-Aug	80	38	8	9	135
05-Aug	21	26	5	8	60
06-Aug	66	64	25	21	176
07-Aug	105	28	27	8	168
08-Aug	87	12	12	1	112
09-Aug	162	6	25	2	195
10-Aug	162	-	8	-	170
11-Aug	73	-	4	-	77
Total	1146	512	148	106	1912