

Corrective Action Plan

Organization EADA - Estonian Anti-Doping Agency
CAR submitted on Feb 13, 2018 14:17 GMT by WADA
Last updated on May 14, 2018 14:58 GMT by WADA

- **Critical** program areas require implementation within **3 months** after receiving the Corrective Action Report from WADA:
05 actions with **DEADLINE** 13 May 2018
- **High Priority** program areas require implementation within **6 months** after receiving the Corrective Action Report from WADA:
07 actions with **DEADLINE** 13 Aug 2018
- **Important** program areas require implementation within **9 months** after receiving the Corrective Action Report from WADA:
04 actions with **DEADLINE** 13 Nov 2018

INTRODUCTION

The Corrective Action Report (CAR) is organized in four (4) categories based on the required action to be undertaken in order to ensure that your organization's anti-doping program is in line with the World Anti-Doping Code and the International Standards. The four (4) categories are as follows:

- 1) Critical Findings
- 2) High Priority Findings
- 3) Important Findings
- 4) Best Practices

Critical, High Priority and Important findings are non-conformities that require a corrective action be implemented by the dates stated above. The CAR also includes a Best Practices section. WADA proposes that these recommendations be considered for improvement of your anti-doping program. However, these are not mandatory requirements based on the Code or the International Standards.

This report includes a Corrective Action Plan (CAP) section that must be completed within one month of the date the CAR was issued. For each corrective action, your organization must include in the CAP who within its organization will implement the corrective action, how, and by when. Once received, WADA will review to ensure it is fit for purpose, and if not, it will assist to ensure it is.

CRITICAL

2. Testing & Investigations

■ **1.** Have you conducted a full risk assessment as outlined in Article 4.2 of the International Standard for Testing & Investigations (ISTI) for the sports/disciplines within your jurisdiction ?


← Answer type: Yes/No

- Yes

1.1 Please submit your risk assessment procedure and outcomes. Please use the following template if required:

← Answer type: File upload

- *EAD RTP 201604.pdf*

 **Corrective Action for 1 - 1.2**


While we note the document attached, what was provided is a list/group of Registered Testing Pool (RTP) athletes and the planned tests on those athletes. This is more reflective of a Testing Distribution Plan (TDP) exercise. The Risk Assessment involves conducting an assessment of each sport/discipline in order to determine how best to plan an effective, intelligent and robust testing program. Once conducted, the Risk Assessment would then inform EADA's TDP.




Please conduct a Risk Assessment, ensuring that all relevant and minimum requirements described in International Standard for Testing and Investigations (ISTI) Article 4.2.1 are included.

Consult the 'About Risk Assessment' (Section 2), 'Identifying Predictive Factors / Gathering Intelligence' (Section 3) and 'Prioritizing and Planning Effective Testing' (Section 4) parts of the Guidelines for Implementing an Effective Testing Program for further guidance.

A Risk Assessment template is also attached as a reference.


 **Reference** [Guidelines for Implementing an Effective Testing Program](#)

 **Reference Files** [Risk Assessment Template EN.xlsx](#)

 **Corrective Action Plan** Signed-off  Completed 

This document enclosed sets forth the criteria for the planning of doping test distribution by the Estonian Anti-Doping Agency (EADA), covering the general framework, risk assessment for smart testing, principles of blood testing, target testing, sample retention and testing foreign athletes. Whereas the document describes the general principles of smart testing in Estonia, it ends with measurable strategic aims for 2018 with the intention of reviewing each year.

The document is a working document for the internal use only, meant directly to the personnel, who is responsible for testing strategy in EADA. On demand, the document may be shared with the supervisory board of EADA. In addition the Risk Assessment table is added.

 **Reference Files** [ead_testing_strategy_risk_assessment_10may2018.pdf](#) | [Lisa1_EADA_Risk_Assessment_2018.xlsx](#)

- 4. Are you meeting the Minimum Levels of Analysis (MLAs) required in the Technical Document for Sport Specific Analysis (TDSSA) for the sports/disciplines within your Test Distribution Plan (TDP)?

← Answer type: Single choice

- Yes

 Corrective Action for 4 - 4.1

The implementation of the Technical Document for Sport Specific Analysis (TDSSA) is mandated by Code Article 5.4.1. Please note that for this first year of compliance review, the TDSSA Expert Group has decided that the review should focus on Erythropoiesis Stimulating Agents (ESAs) Minimum Levels of analysis (MLAs) equal to and greater than 30% and on Growth Hormone/Growth Hormone Releasing Factors (GH/GHRFs) MLAs equal to and greater than 10%.

As such, while EADA indicated it is meeting the TDSSA MLAs, according to ADAMS data, MLAs for the following sports are not met:

- ESAs: Athletics - Long Distance 3000m or greater, Biathlon, Rowing, Skiing - Cross-country, and Skiing - Nordic Combined.
- GH/GHRFs: Bodybuilding - Fitness, Football, Skiing - Cross-country

Please be reminded that an Anti-Doping Organization (ADO) can apply to WADA for a reduction in the MLAs contained in the TDSSA based on the implementation of an Athlete Biological Passport (ABP) – Haematological module and/or based on other particular circumstances. WADA will consider such a request only where such reduction would lead to a more intelligent Testing program. For example, the implementation of the haematological module of the ABP within the specific sport/discipline for which a reduction is being sought is considered a justifiable criterion for possible reduction given that its operation can be evaluated and subsequently has the potential to be a more intelligent basis for specified analyses than the MLAs prescribed by the TDSSA. An ADO may also present a case for possible reduction based on other particular

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In spring 2016 EADA applied for the reduction of Minimum Level of Analysis for ESA, GH and GHRF tests within three sports: rowing, cross-country skiing and athletics long-distance. In all of these sports, an effective athlete's biological passport programme had been developed, together with the help of NAPMU and several experts, hence the reduction of MLA would be reasonable to save the testing resources. EADA's application was approved by WADA on April 1st 2016.

However, EADA acknowledges that within some sports the MLA requirements are not fully met due to the poor accessibility of the athletes (either missed tests or athletes competing abroad, where it would not be so easy to test them, also financial reasons). In addition, followed up by the compliance exercise, EADA recognises that MLA requirements also extend to in-competition-testing that had not been considered before.

In 2018 EADA's testing plan (enclosed) has been reviewed based on WADA's guidelines, including TDSSA. The testing plan is being continuously monitored to meet MLA requirements.

 Reference Files

Lisa 1. Testiplaan arvudes 2018.xlsx

circumstances provided that the ADO demonstrates how the reduction of the MLA can support a more intelligent, effective and efficient use of available Testing resources. This includes but is not limited to: target testing based on recommendations from an APMU, the gathering and use of intelligence to inform Testing and conduct investigations, the sharing of Testing information with other ADOs or other sport specific, intelligent or innovative anti-doping strategies.

For any TDSSA related questions, please contact: tdssa@wada-ama.org. You can also consult WADA's 'Reporting Guide to Monitor Testing' to generate reports that will assist with monitoring your compliance with the TDSSA.



Reference

[Reporting Guide to Monitor Testing TDSSA SUPPORTING DOCUMENT A: Application for a reduction in Minimum Levels of Analysis](#)

■ 29. Do you have a Registered Testing Pool (RTP) ?

← Answer type: Yes/No

- Yes

29.1 Please provide the number of athletes per sport and discipline.

← Answer type: Custom

Sport	Discipline	No. of Athletes	No of tests under your Testing Authority (TA)
Sailing	Sailing	5	7
Cycling	Road	1	3

Corrective Action for 29 - 29.1

As per the International Standard for Testing and Investigations (ISTI), where an Anti-Doping Organization (ADO) plans to collect three or more samples per year out-of-competition from particular athletes, it shall put them into a Registered Testing Pool (RTP) so that they are required to comply with Code Article 2.4 (Whereabouts Requirements).

By not planning to test an athlete at this level of frequency means that the burden on the athlete to comply with Code Article 2.4 is disproportionate.

EADA must review its testing strategy as well as the outcome of its Risk Assessment (once conducted) and ensure that athletes included in its RTP are tested at least three times per year out-of-competition. EADA shall

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UPDATED ON MAY 11: EADA confirms that the athletes included in the RTP will be tested 3 times out-of-competition

Please find enclosed the updated RTP of EADA (consisting of 33 athletes) with the general introduction and the principles of its compilation. The principles are as follows:

- the sport-specific information, including the technical Document TDSSA 2018
- the level of the athlete and his/her recent sports achievements
- funding from the Estonian Olympic Committee, umbrella organisation for Estonian sports
- athlete's accessibility
- the previous testing history (mainly related to

Judo	Judo	2	5
Athletics	Combined Events	3	8
Athletics	Throws	6	15
Athletics	Sprint 400m or less	3	4
Athletics	Jumps	2	4
Athletics	Marathon	5	14
Athletics	Long Distance 3000m or greater	1	3
Wrestling	Wrestling	3	9
Boxing	Boxing	1	2
Badminton	Badminton	2	6
Rowing	Rowing	5	13
Tennis	Tennis	1	2
Triathlon	Triathlon	1	2
Weightlifting	Weightlifting	1	4
Aquatics	Swimming Sprint 100m or less	3	3
Fencing	Fencing	5	10
Volleyball	Volleyball	2	2
Skiing	Cross-Country	6	5
Skating	Speed Skating 1500m or less	1	2
Biathlon	Biathlon	1	5
Para-Athletics	Throws	2	4


either increase tests on its RTP athletes or review the inclusion criteria and consider the use of other whereabouts pools.

Consult the 'Whereabouts Program Integration' (Section 7) and the 'RTP Requirements' (Section 8) parts of the Guidelines for Implementing an Effective Testing Program for further guidance.

 **Reference** [Guidelines for Implementing an Effective Testing Program](#)

ABP-information)

 **Reference Files** CAP 29_EADA NRTP 01_05_2018.pdf

 **WADA Comments** Comments shared with ADO

Thank you for your response.

Can you please confirm that the athletes included in the RTP will be tested 3 times out-of-competition?

Para-Swimming	Middle Distance 200-400m	1	2
Para-Swimming	Sprint 100m or less	2	4

3. Results Management

■ **36.** Do you notify WADA when an investigation for a potential non-analytical Anti-Doping Rule Violation (ADRV) is launched by your organization ?

← Answer type: Yes/No

- No

36.1 Please explain why:

← Answer type: Single choice

- *We prefer to inform WADA at a later stage when the investigation is finalized*

 **Corrective Action for 36 -36.1**

Please revise EADA's practice and if applicable its written procedures to ensure that WADA is always notified when EADA initiates an investigation into a non-analytical Anti-Doping Rule Violation (ADRV) as is required by International Standard for Testing and Investigations (ISTI) Article 12.3.2.

This information can be provided to: RM@wada-ama.org.

 **WADA Comments**

Comments shared with ADO 

Corrective Action Plan satisfactory.

 **Corrective Action Plan**

Signed-off 

Completed 

For the explanation, EADA has filled out the questionnaire referring to the year 2016. In 2016 there were no non-analytical ADRV cases under EADA's jurisdiction. However, EADA agrees that the procedures of the non-analytical case management should be in place.

Based on the experience and procedures onwards (in 2017 and 2018) the non-analytical cases have been notified as follows:

- Possible possession of the prohibited substance – results management took place in 2017-2018; when the athlete was notified, the copy of the letter was also sent to the national federation, the case was recorded to ADAMS and both international federation and WADA were notified via ADAMS-system.
- Possible investigation of the athlete support personnel, when the Minor was involved – first step of the investigation was sending the inquiry letters to two coaches involved with the athlete. The letters were sent in Russian to the coaches and copied also to WADA Results Management team (ResultManagement.WADC@wada-ama.org). As there was no rule violation identified and no proof provided (maybe some level of negligence), no official charges were made.
- EADA is preparing another notification letter regarding the possible prohibited association. In case there appears to be an anti-doping rule violation, EADA will make sure that WADA Results Management team will be notified.


The reason, why EADA sees the notification of WADA as being complicated, is of course, the question of translation. EADA has no intention to hide any of the information related to non-analytical ADRV, however, EADA understands that in case the information sharing to be beneficial, the case or information should be translated into English and that is very often time-consuming and/or

costly.
EADA has used ADAMS as the platform for information sharing with the relevant ADOs and WADA. It will be updated in the EADA results management procedures that WADA will be notified of the possible rule violation as soon as possible.

■ 38. Do you have a process to impose provisional suspensions ?

← Answer type: Yes/No



- No

 **Corrective Action for 38**




Please develop, document and implement a process to impose provisional suspensions as per Code Articles 7.9.1 and 7.9.2.

Refer to the 'Provisional Suspension' (Section 4) part of the Results Management, Hearings and Decisions Guidelines for further guidance.

 **Reference** [Results Management, Hearings and Decisions Guidelines](#)

 **WADA Comments** Comments shared with ADO 


Corrective Action Plan satisfactory.

 **Corrective Action Plan** Signed-off  Completed 

EADA has followed closely WADA Results Management, Hearings and Decisions Guidelines.

Hence, EADA follows the process of imposing provisional suspension, as it is stated in the Guidelines. The same way it has been explained to the athlete in their notification letter (see the notification letter attached, where the relevant text referring to the provisional suspension has been highlighted, depending, if there are specified or non-specified substances involved).

Furthermore, following from this corrective action report, EADA has translated and updated the athlete's written consent to accept the provisional suspension, see the attachment.

 **Reference Files** [EAD_en-et_4735_Acceptance of PS - Template_apr2018.doc | EAD Teatis -A-proovi tulemus - template aprill 2018 provisional suspension highlighted.doc](#)

HIGH PRIORITY

2. Testing & Investigations

- **95.** Do you have policies and procedures in place to ensure information (intelligence) is collected and processed for anti-doping purposes ?

← Answer type: Yes/No

- No

- 95.2** Please outline the reason(s) you do not have policies and procedures in place. Please select all that apply.

← Answer type: Multiple

- *In the process of creating one*



Corrective Action for 95 - 95.2

Please develop, document and implement policies and procedures (i.e., a step-by-step process) to ensure that anti-doping intelligence captured or received is handled securely and confidentially, and is processed, used and disclosed only for legitimate anti-doping purposes. Review International Standard for Testing and Investigations (ISTI) Article 11.2.2 to ensure that all criteria are met.

Information gathered shall also be used to inform EADA's Test Distribution Plan (TDP).

Refer to the 'Types of Intelligence' (Section 3.3), 'Collection of Information from Different Sources' (Section 4) and 'Collation of Collected Information' (Section 5) parts of the Information Gathering and Intelligence Sharing Guidelines for further guidance.

You can also contact investigations@wada-ama.org for further assistance.



Reference

[Information Gathering and Intelligence Sharing Guidelines](#)



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■ **96.** Do you have a system in place to enable information to be captured, assessed and utilized to inform target testing ?


← Answer type: Yes/No

- No

96.2 Please outline the reason you do not have a system in place:

← Answer type: Single choice

- *In the process of creating one*

 **Corrective Action for 96 - 96.2**

As per International Standard for Testing and Investigations (ISTI) Article 11.4.2, please develop, document and implement a system to capture, assess and utilize anti-doping information/intelligence.

Specifically, this information shall be used to assist in developing, reviewing and revising the Test Distribution Plan (TDP) and/or determining when to conduct target testing.

Refer to the 'Types of Intelligence' (Section 3.3), 'Collection of Information from Different Sources' (Section 4), 'Collation of Collected Information' (Section 5), 'Analysis' (Section 6) and 'Reporting' (Section 7) parts of the Information Gathering and Intelligence Sharing Guidelines for further guidance.

EADA can also contact investigations@wada-ama.org for further assistance.


 **Reference** [Information Gathering and Intelligence Sharing Guidelines](#)

 **Corrective Action Plan** Uncompleted

■ **99.** Do you have documented procedures to investigate a possible Failure to Comply (FTC)?

← Answer type: Yes/No

- No

 **Corrective Action for 99 - 99.1**

As per International Standard for Testing and Investigations (ISTI) Article A.3.1, Anti-Doping Organizations (ADOs) are responsible for ensuring that they instigate an investigation of a possible Failure to Comply (FTC) based on the relevant information and documentation.

Please document procedures that meet the requirements of ISTI A.3.1 to ensure that EADA notifies WADA and instigates an investigation into a possible FTC.

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Refer to the 'Review of Other Anti-Doping Rule Violations' (Section 3.8) part of the Information Gathering and Intelligence Sharing Guidelines for further guidance.

 Reference

[Information Gathering and Intelligence Sharing Guidelines](#)

3. Results Management

- 6. Do you have a process in place to ensure that the initial review of an Adverse Analytical Finding (AAF) is conducted in a timely manner ?

← Answer type: Yes/No

- No

Corrective Action for 6

EADA shall develop, document and implement a process to ensure that the initial review of all Adverse Analytical Findings (AAFs) is conducted in a timely manner and meets the requirements outlined in Code Article 7.2.

Refer to the 'Results Management: Pre-Hearing Phase' (Section 3, more specifically Section 3.4) part of the Results Management, Hearings and Decisions Guidelines for further guidance.



Reference

[Results Management, Hearings and Decisions Guidelines](#)

Corrective Action Plan

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- **22.** If a case is brought forward as an Adverse Analytical Finding (AAF), do you always notify the athlete of the: (check all that apply)

← Answer type: Multiple choice

- *Adverse Analytical Finding (AAF)*
- *Anti-doping rule violated*
- *Right to promptly request the analysis of the B Sample*
 - *Opportunity to attend the B Sample opening and analysis*

 **Corrective Action for 22**

Please update your notification letter (and/or other relevant athlete communication) to ensure that all requirements identified in Code Article 7.3 are communicated to the athlete. Specifically, ensure that the right to request copies of the A and B Sample laboratory documentation package is communicated to the athlete.

Refer to the 'Athlete notification after the initial review and notification of the asserted ADRV (Section 3.4.3) part and Templates A, B and F of the Results Management, Hearings and Decisions Guidelines for further guidance.

 **Reference** [Results Management, Hearings and Decisions Guidelines](#)

 **WADA Comments**

Comments shared with ADO 

Corrective Action Plan satisfactory.

 **Corrective Action Plan**

Signed-off 

Completed 

Please find the updated notification letter (template) enclosed. That includes the following information:

- Adverse analytical finding, indicating the prohibited substance, the lab etc
- Assertion of ADRV
- Athlete's right to provide a written explanation
- Athlete's right regarding the B-sample analysis (with the right to attend the opening/analysis) and the right to request the Laboratory Documentation Package (updated since the last version)
- Information about the provisional suspension
- Consequences of the ADRV
- Opportunity of the prompt admission
- Possibility to provide Substantial Assistance

Please note that in addition to the written notification letter, EADA also stresses in the e-mail (sent together with the official notification letter) that the athlete can turn to EADA for additional information any time. The experience has shown that there has been no confusion about the letter amongst the athletes, but sometimes the consultation by phone has helped to explain the basic rights of the athlete or elaborate on terms, such as "strict liability", "negligence" or "intentional use".

 **Reference Files**

EAD Teatis -A-proovi tulemus - template aprill 2018 A-B-lab.doc

- **69.** Do you have a process in place to ensure that all potential cases of prohibited association are identified and followed up in a timely manner ?

← Answer type: Yes/No

- No

 **Corrective Action for 69**

As per Code Article 2.10, please develop, document and implement a process to ensure that all potential cases of prohibited association are identified and followed up in a timely manner.

Consult the 'Prohibited Association' (Section 3.8.1.2) and Template C ('Prohibited Association first letter') in the Results Management, Hearings and Decisions Guidelines for further guidance.



Reference

[Results Management, Hearings and Decisions Guidelines](#)

 **Corrective Action Plan**

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6. Data Privacy

- 5. Do you have internal processes for recording and monitoring your organisation's ongoing compliance with the International Standard and with local legislation and/or regulations ?

← Answer type: Yes/No

- No

Corrective Action for 5

Please review and update EADA's practices to ensure that controls, including contractual controls, are in place to protect the confidentiality and privacy of the personal data shared and to ensure that the personal data is only processed for and on behalf of the Anti-Doping Organization (ADO) as required by International Standard for the Protection of Privacy and Personal Information (ISPPPI) Article 9.

EADA shall implement an internal process to record and monitor its on-going compliance with the ISPPPI and all locally applicable privacy and data protection laws. EADA should also consider conducting occasional audits.

Corrective Action Plan

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IMPORTANT**2. Testing & Investigations**

- What percentage of your tests were target tests Out-of-Competition (OOC) ?

← Answer type:Single choice

- 0-25 %

Corrective Action for 6

As per International Standard for Testing and Investigations (ISTI) Article 4.5, please review and update your athlete selection procedures to ensure that target testing is made a priority, i.e., that a significant amount of your testing is targeted.

Consult the 'Prioritizing Between Different Athletes' (Section 4.2.3) and 'Target Testing' (Section 9.3.4) parts of the Guidelines for Implementing an Effective Testing Program for further guidance.



Reference

[Guidelines for Implementing an Effective Testing Program](#)

Corrective Action Plan**Uncompleted**

3. Results Management

■ **19.** Where a retroactive TUE is granted pursuant to Article 4.3(d) of the ISTUE, do you seek WADA's prior approval ?

← Answer type: Yes/No

- No

 **Corrective Action for 19**

As per International Standard for Therapeutic Use Exemptions (ISTUE) Article 4.3(d) WADA's approval must be sought when granting a retroactive Therapeutic Use Exemption (TUE).

Please adjust your practices to ensure WADA's approval is sought prior to granting a retroactive TUE.

Questions and requests can be sent to WADA at the following email address: RM@wada-ama.org.

 **Corrective Action Plan**

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■ **56.** Do you publicly disclose the decision where it was decided that no Anti-Doping Rule Violation (ADRV) has been committed ?

← Answer type: Yes/No

- No

56.2 Please explain why. Select all that apply.

← Answer type: Multiple

- *We did not consider it was necessary*

 **Corrective Action for 56 - 56.2**

As per Code Article 14.3.3, in such cases, the decision may be publicly disclosed only with the consent of the athlete or other person. EADA shall, however, use reasonable efforts to obtain the athlete or other person's consent and publish the decision.

Please develop, document and implement a process whereby the consent is sought and once obtained, the decision is publicly disclosed.

 **Corrective Action Plan**

Uncompleted

6. Data Privacy

- 4. Do you appoint a single person within your organization to ensure compliance with the International Standard and all locally applicable privacy and data protection laws ?

← Answer type: Yes/No

- No

Corrective Action for 4

Please appoint a person within your organization who will be responsible for compliance with the International Standard for the Protection of Privacy and Personal Information (ISPPPI) and all locally applicable privacy and data protection laws.

EADA must also take reasonable measures to ensure the name and contact information of this person is made readily available to participants should they request it.

Corrective Action Plan

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BEST PRACTICES


Testing and Investigations

1. While EADA developed a Test Distribution Plan (TDP), once it conducts its Risk Assessment, it can consider reviewing and revising it for 2018. Specifically, EADA can consider whether or not the number of tests allocated to some sports/disciplines should change, whether or not the distribution of in-competition versus out-of-competition should be adjusted, whether or not more blood tests should be conducted (and some conducted out-of-competition). Consult the 'Prioritizing and Planning Effective Testing' (Section 4), 'Developing a Test Distribution Plan' (Section 5), 'Whereabouts Program Integration' (Section 7) and 'Registered Testing Pool (RTP) Requirements' (Section 8) parts of the Guidelines for Implementing an Effective Testing Program for further guidance.
2. Once a Risk Assessment is conducted, please review EADA's testing strategies. Please review the allocation of in-competition versus out-of-competition testing for Erythropoiesis Stimulating Agents (ESAs), Growth Hormone Releasing Factors (GHRFs), Growth Hormone (GH). It is recommended that some analysis should be allocated to in-competition tests. You can consult the attached Testing Guides for further guidance.
3. EADA indicated that it does not test foreign athletes residing or training in their country. As per the International Standard for Testing and Investigations (ISTI) Article 4.5.2.b (iv), you can consider conducting target testing on high-level athletes who are nationals of other countries and who are present (whether residing, training, competing or otherwise) within your country.
4. As per the International Standard for Testing and Investigations (ISTI) Article 4.7.3, please consider developing and implementing a sample retention and re-analysis strategy as part of your Test Distribution Plan (TDP). Consult the 'Retention of Samples and Further Analysis' (Section 6.4) part of the Guidelines for Implementing an Effective Testing Program for guidance.
5. EADA indicated that athlete identity is shared with its Athlete Passport Management Unit (APMU). In order to eliminate any potential conflict of interest, it is recommended that the athlete's identify is not shared with your APMU.

Results Management

6. In order to ensure that athletes who are serving a period of ineligibility cannot breach their prohibition against participation as per Code Articles 10.12.1, 10.12.3 and 15, we recommend that EADA verifies participation in competitions; verifies participation in training with a team or use of the facilities of a club of a member organisation prior to the return to training set forth in Article 10.12.2 of the World Anti-Doping Code (WADC); notifies relevant Major Event Organizations (MEOs) that the athlete is under sanction and; notifies any other relevant sports organizations that the athlete is under sanction.
7. EADA does not inform athletes that they can always provide substantial assistance, even after the decision is final as per Code Article 10.6.1. Please ensure that athletes are informed that they can always provide substantial assistance, even after the decision is final. Consult the 'Substantial Assistance' (Section 6) and 'Template A' (AAF Notice of charge and Mandatory Provisional Suspension) in the Results Management, Hearings and Decisions Guidelines for additional information and guidance.

 **Reference** [Results Management, Hearings and Decisions Guidelines](#)
[Guidelines for Implementing an Effective Testing Program](#)

 **Reference Files** [Testing Guide for Growth Hormone \(GH\).pdf](#) | [Testing Guide for Growth Hormone Releasing Factors \(GHRFs\).pdf](#) | [Testing Guide for Erythropoiesis Stimulating Agents \(ESAs\).pdf](#)
