

CCES Submission to 2027 International Standard for Education Review Second Consultation Phase

In response to WADA's request for comments as part of Phase 2 of the 2027 International Standard for Education consultation process, the CCES submitted the following comments.

Article 6 – Establishing Education Pool

Article 6.1.2: Consider moving “Minors competing at International events where testing takes place” to Article 6.1.1 as a specific requirement for IFs, as they have full knowledge of all international events where testing is taking place. Alternatively, this group could be downgraded from “shall” to “should.”

Article 7 - Educators

Article 7.2: The wording “simulated delivery” is unusual. Consider replacing with “mock” or “practice” session.

Article 7.2: Consider removing the phrase “activity development” from “*Education* session planning and activity development.” It is noted that an Educator, as defined in Article 7.0 as one who “leads the delivery of formal in-person *Education* (physical or virtual) and may be supported by other *Persons*,” does not necessarily need to be competent in activity development. Defining learning objectives, designing the learning experience, assessment and evaluation design, etc., is a different skills set than delivering the activity. Additionally, as *Education Activity* is a defined term, the use of activity here could cause confusion if used inconsistently.

Article 8 – Developing the Education Programs

Article 8.1.1: Clarify what is intended as “Governance of the anti-doping system” as a mandatory topic. It is unclear if this requires content on national governance, international governance, or both.

Article 10 – Coordinating Education Delivery

Article 10.3: As written, this article is essentially asking ADOs to evaluate education plans of other Code signatories. ADOs should operate under the assumption that all Code signatories have in place an education plan compliant with the ISE unless WADA has confirmed non-compliance through the Code compliance process.

Proposed Wording: Signatories **shall** acknowledge the Education Activities carried out by other Signatories and **may** recognize the completion of such Education Activities by learners (in their Education Pool). When determining whether to recognize the completion of Education Activities by learners, the Signatory recognizing the education **should** ensure that the Education Activity has been delivered as per Article 9.2, unless WADA has confirmed non-compliance through the Code compliance process.

Article 13 – Roles and Responsibilities of Signatories

General comment to Article 13

Consider combining Article 6 and Article 13. As currently written, there is a need to refer to two separate Articles to gain a wholesome understanding of Signatories roles and responsibilities. Consolidating all information at the onset of the ISE would allow for an easier comprehension of the Standard.

Article 13.3: The role of the MEO described in this article appears to duplicate work already being completed by ADOs (NADOs and IFs) during a pre-Games period. It is therefore suggested that the MEOs role be focused on the timely and clear publication of rules and guidelines to allow ADOs to adequately educate their event-bound teams in advance of Games.

General Comment

In Articles 2.2, 4.0, 6.2, 13.1.2, 13.2.2, 13.3.2. the term “influential” is used to refer to athlete support personnel. The CCES would request WADA provides guidance to clearly define how an ADO should determine which athlete support personnel are “most influential.”