TEMPLATE: POLICY FOR SAMPLE RETENTION AND FURTHER ANALYSIS STRATEGY

[INSERT ADO NAME]

**Introduction and General Principles**

In accordance with International Standard for Testing and Investigations (ISTI) Article 4.7.3, **[ADO]** has developed a sample retention and further analysis strategy.

The objective of this policy is to protect the rights of clean athletes by ensuring that new information or intelligence received, and new or improved analytical methodologies introduced since the initial analysis are utilized on samples retained during the 10-year statute of limitations in the World Anti-Doping Code (Code) The purpose of this policy is tomaximize detection opportunities and achieve greater deterrence to those athletes who may consider doping.

All samples collected by **[ADO]** may be subject to retention and further analysis at the direction of **[ADO]** or the World Anti-Doping Agency (WADA), in accordance with the Code and/or International Standards (IS). In addition, as set out in Code Article 6.6, **[ADO]** may request permission from any other Anti-Doping Organization (ADO) with authority to test an athlete, to conduct analysis of a sample from that athlete stored by such ADO.

This policy shall be implemented for the purpose of analysis of samples as set out in Code Article 6.2. Furthermore, long-term storage and further analysis conditions shall comply with requirements set forth in the International Standard for Laboratories (ISL) Articles 5.3.11.3 and 5.3.6.3.

**[ADO]** has identified a specific amount dedicated to the implementation of this policy within its yearly anti-doping budget, and will advertize its sample retention plans in general terms in order to promote a message to ahletes that doping may be detected long after the initial collection and analysis.

**[ADO]**’s [Insert position and/or title] is responsible for the implementation and follow-up of this policy and subsequent procedures.

**Sample Retention Strategy**

A minimum of [Insert number] samples per year shall be selected for retention.

**[Briefly describe how the retention process is implemented, e.g., centralized in a single laboratory facility contracted for this purpose, stored where the initial analysis took place, a combination of options depending on costs, type of samples, consultations with from laboratories / Athlete Passport Management Unit (APMU), service providers, etc. Any related agreement with a laboratory may be added as an Annex to this policy. The internal procedures for recording/maintaining the list of stored samples (e.g., spreadsheet or otherwise) may be also briefly described].**

**[ADO]** shall retain all sample collection documentation in relation to its samples selected for retention, in compliance with the retention times set out in the International Standard for the Protection of Privacy and Personal Information (ISPPPI), so as to enable a further analysis at a later date.

Consideration for sample retention will be implemented on an ongoing basis and selection criteria may evolve depending on **[ADO]**’s risk assessment, new intelligence received, new methods of detection, laboratories and APMU recommendations.

**[ADO]**’s selection criteria for sample retention are:

**[In line with the number inserted above, describe the selection criteria].**

1. **Athlete’s performance criteria**

Where there is no specific intelligence, the following samples collected from athletes based on results/performance and **[ADO]**’s determination of its highest risk sports/disciplines **[and participating nations (for International Federations (IFs)]**:

**[Insert details, in line with the minimum number determined above. For example:**

* **Medal winners/top finishers at World Championships/flagship events from those disciplines or nations identified as higher risk (for IFs ), top National-Level Athletes or athletes qualified for prominent Major Events in high risk sports (for National Anti-Doping Organizations), top finishers at World Championships in high risk disciplines (for International Federations (IFs)). Medal winners in major/flagship events from those sports identified as higher risk.**
* **Athletes’ ages in relation to potential career paths, e.g. promising performers in the top Juniors categories.**
* **Out-of-competition samples from athletes within these criteria if the risk of doping has been determined as higher out-of-competition and these are samples where the detection of prohibited substances is most probable]**.
1. **Intelligence-based criteria**
* Samples collected from athletes meeting individual risk factors, as set out in ISTI Article 4.5.3, including any reliable information outcoming from **[ADO]**’s whistleblower program, or that has been shared with **[ADO]** by a reliable third party.
1. **Recommendations from laboratories and APMU in assisting [ADO] to identify any potential at risk athlete whom sample(s) could be usefully stored**

This includes, without limitation:

* Samples deemed suspicious by a laboratory while not having met the AAF or ATF criteria.
* Athlete’s samples with suspicious Athlete Biological Passport (ABP) data (including samples collected from the same athlete at the same time as an ABP sample which the APMU or Expert Panel has determined as suspicious).
* Samples technical and analytical conditions (samples having sufficient volume to enable further analysis, chain of custody, risk that samples degrade over time, etc.).
* New detection methods to be introduced in the near future relevant to **[ADO]**’s athletes, sports, disciplines.
* New intelligence regarding doping strategies that may have been carried out by applicable athletes.
* Samples that could be kept for reference DNA analysis.
* **[Samples collected for sports which have a higher risk of doping with particular substances or methods such as narrow detection windows (e.g., EPOs)]**.
1. **Any other information made available to [ADO]**
* **[Consider any other information you may have that could justify long-term storage]**

**Cooperation with other ADOs**

As relevant, **[ADO]** will discuss its retention plan with other ADOs that may have jurisdiction over the same athlete and that may be also storing samples from the same athletes, to ensure that no more than the necessary number of samples are retained for the same athlete.

**Further Analysis Strategy**

Further analysis of samples shall be performed under the ISL, Technical Documents Letters, and Laboratories Guidelines in effect at the time the further analysis is performed.

1. **Reviewing stored samples**

In cooperation with laboratories and its APMU, **[ADO]** shall conduct a regular ***[annual]******[other time period]*** review of its stored samples and analysis already conducted, together with relating athletes samples records available into ADAMS from tests conducted by **[ADO]** or any other ADO with testing authority, in order to identify opportunities to conduct further analysis*.*

In conducting this review, **[ADO]** shall also consider opportunities to conduct further analysis on samples from athletes over which it has testing authority, stored by other ADOs that initiated and directed that samples collection. **[ADO]** will also consider any other ADO’s with authority to test the athlete that wishes to conduct further analysis on an **[ADO]**’s stored sample.

For each stored sample, at the conclusion of the regular review based on the decision-making process described below, **[ADO]** shall decide to either:

* Discard it, or
* Keep it further stored (i.e., before the 10-year period ends), or
* Conduct a further analysis.

During the period between regular reviews, the opportunity to further analyze stored samples will be continuously monitored on ad-hoc basis (e.g., if a new analytical method and/or a new instrument with better sensitivity is available in a laboratory, ADAMS data monitoring, specific intelligence received about an athlete whom a sample is stored, need for reference DNA analysis in a manipulation case, etc.).

In any case, at the end of 10-year storage period, stored samples shall either be discarded or made anonymous and used for research as provided in the ISL.

1. **Decision-making process**

The decision on the outcomes of the above review, including whether to proceed with further analysis, shall be based, without limitation, on the following criteria:

* Athletes’ current situation in their career path (e.g., age, active or retired, performance level);
* Intelligence received (e.g., from **[ADO]**’s whistleblower program) and/or outcomes of investigations for a particular athlete;
* Upcoming major events in which athletes will participate;
* Timelines for statutes of limitation (including, for analysis closer to the end of the 10-year period, consideration for potential delays in the result management process (e.g., B sample analysis, athletes delaying the process, etc.);
* Intelligence received or research on doping trends and/or other factors;
* Availability of the sample’s required documentation; and
* Recommendations by WADA-Accredited laboratories and or **[ADO]**’s APMU, such as:
	+ ABP data;
	+ Newly available technologies, methodologies or significant improvements in either detection methods or sensitivity of equipment, for prohibited substance(s) or method(s) at high risk for **[ADO];** and
	+ Sample’s technical and analytical conditions (sufficient sample volume, degradation over time, etc.).
1. Substances to be considered for further analysis:

**[ADO]** shall, as a matter of principle, conduct further analysis for substances and methods that were prohibited at the time of the sample collection, considering:

* Any analysis for specific prohibited substance(s) or method(s) not analyzed in the initial analysis, where such substance or method is at high risk for **[ADO]**;
* Analysis for any new detection or updated methods for a particular substance or method; and
* Retroactive analysis in connection with the ABP program.

In determining substance(s) or method(s) to be analyzed, **[ADO]** shall also decide which WADA-accredited laboratory will conduct the further analysis (e.g., if not all the laboratories have a new method available at the same time).

1. Outcomes of further analysis

Based on the results/outcomes of any further analysis, **[ADO]** may conduct a new review based on the above selection criteria for sample retention, and decide to re-seal and store that sample again (subject to the state of the sample, including but not limited to the volume being sufficient) for further analysis within the 10-year statute of limitations. A particular consideration will be given to any potential need for reference DNA analysis.

**Policy Review**

This policy as a whole shall be reviewed annually and adjusted as necessary depending on various factors including, but not limited to, re-evaluation of the doping risks in **[*for IFs: [IF]sport] [for NADOs: the sports/disciplines in the scope of [NADO*]]**, intelligence received, new methods of detection, laboratories / APMU recommendations, **[ADO]**’s budget, and any other relevant information **[*Insert any other relevant criteria*]**.