

## **USOPC Compliance Assessment**

### ***Overview***

In its first full year, the USOPC's Ethics and Compliance department continued to build and develop the organization's Ethics and Compliance program, including hiring key team members, reviewing organization-wide policies and procedures, and launching a reporting site for anonymous and confidential complaints for individuals within the Olympic and Paralympic Movement.

A critical piece of evolving the program included staffing for both USOPC and NGB Compliance, and NGB Audit. In 2021, the USOPC hired a Compliance Director to oversee USOPC and NGB Compliance, an NGB Audit Director, both of whom report directly to the Chief Ethics and Compliance Officer (CECO), additional NGB auditors, and a Senior Investigator to investigate USOPC and NGB compliance matters. With the significant contributions of those individuals, the Ethics and Compliance team has increased engagement with internal stakeholders, thereby allowing the team to effectively identify and better understand risks within the organization.

In addition to engaging with internal stakeholders, the USOPC's CECO meets on a regular basis with counterparts at LA28 to collaborate on shared ethics and compliance practices for both organizations. The CECO also initiated a quarterly Sports Compliance Roundtable that includes legal and compliance professionals from professional sports leagues and international sports organizations. This Roundtable allows industry peers to share best practices and discuss ethics and compliance issues specific to the sports industry.

The CECO also continued to provide monthly updates on NGB and USOPC compliance to the Chief Executive Officer and quarterly updates to the Board Chair. Additionally, the CECO reports to the USOPC's Ethics and Compliance Committee, including reporting higher risk conflicts of interest among senior leadership, updates on the USOPC's efforts to address risk assessment findings, complaint metrics from the USOPC's Integrity Portal, described below, and ethics-related investigations.

#### **A. USOPC Integrity Portal**

The USOPC launched its Integrity Portal, using a platform provided by an industry leading third-party vendor that works with large organizations across a wide variety of industries. The Integrity Portal allows individuals to submit complaints online or by phone anonymously or confidentially 24 hours a day, seven days a week, and each complaint is systematically screened upon submission to ensure that users who have access to reports are prevented from viewing reports that refer to them. The USOPC's Integrity Portal also has an accompanying case management system where all cases, including their resolutions, are documented. The case management system allows the Ethics and Compliance team to provide detailed metrics reporting to the Ethics and Compliance and NGB Oversight and Compliance Committees, tracks case aging to ensure cases are resolved in a timely manner and includes a feature that holds the Ethics and Compliance team accountable for following up with their USOPC colleagues or NGBs to validate that required reforms have been implemented.

#### **B. Risk Assessment Update**

As noted in the 2020 Annual Impact Report, the USOPC engaged the law firm DLA Piper to conduct a Compliance Risk Assessment in 2021 to assess the USOPC's Compliance program and to identify areas

within the organization that required more immediate attention. The USOPC's Ethics and Compliance team has taken significant steps to address those matters and provides regular progress updates to the USOPC's Ethics and Compliance Committee.

### **C. Policies and Procedures**

The USOPC's Ethics and Compliance team undertook a comprehensive review of existing policies and procedures, moved responsibility for certain policies and procedures to the Ethics and Compliance program and by extension, oversight by the USOPC's Ethics and Compliance and NGB Oversight and Compliance Committees, and identified other topics that required dedicated policies and procedures.

For instance, the Ethics and Compliance team expanded on existing principles in the USOPC's Code of Conduct by publishing a standalone Ethics Policy, Ethics Procedure, and Anti-Bribery and Anti-Corruption Policy. The Ethics and Compliance team also created a Compliance Policy that provides an overview of the Compliance team's responsibilities and a Compliance Investigations Procedure that outlines case types and the standard of review applied to compliance matters. Additionally, the Ethics and Compliance team published an expanded Certification Review Policy and Certification Review Procedure to address the USOPC's NGB Certification program for new NGB applicants; updated the Gift and Entertainment Policy to be in line with industry standards and best practices; and included retaliation provisions from the Ted Stevens Olympic and Amateur Sports Act (the Ted Stevens Act) in the Code of Conduct and Speak Up Policy.

### **NGB Compliance Assessment**

#### ***Overview***

The NGB Audit, NGB Compliance, and Compliance Investigations teams made meaningful progress in 2021 towards evaluating NGBs against the USOPC's NGB Compliance Standards and the accompanying Implementation Guide, requiring NGBs to implement reforms designed to address Compliance findings, and sharing findings from the Compliance and Audit teams to help NGBs identify common issues and to clarify requirements. In 2021, for the first time the USOPC's Certification Review Group (CRG) completed certification renewal reviews for seven NGBs and reviewed certification applications for five High Performance Management Organizations (HPMOs) seeking NGB certification.

To increase engagement between the Compliance and Audit teams and all 55 NGBs and HPMOs, the Compliance and Audit teams established quarterly meetings with NGBs to answer questions about compliance and audit issues, to share audit and investigations findings, and to note other red flags to help NGBs avoid common mistakes that may affect their overall compliance. In addition, these meetings serve as a platform to provide updates on the NGB Compliance Standards and the accompanying Implementation Guide, share best practices, and allow NGBs to ask general questions and share their feedback on the Implementation Guide's requirements.

The Compliance and Audit teams also have monthly meetings with their counterparts at the United States Center for SafeSport (the Center) to share information where appropriate, such as the NGB Audit team's findings relating to background check requirements. The USOPC's and the Center's teams also discuss NGBs that may be in danger of decertification and NGBs that require letters of concern for failing to timely address the Center's audit findings.

## **A. NGB Audit**

The NGB Audit team conducts audits on organizations applying to become an NGB, referred to as Certification Audits, and on existing NGBs the year before their certification is renewed. The audits conducted before an NGB is scheduled for certification renewal allow the USOPC's CRG to consider the results of the audit and the NGB's remediation efforts as part of the certification renewal process. During the audit process the NGB Audit team reviews the NGB's policies and procedures to evaluate compliance and conducts testing for higher-risk areas including conflicts of interest, athlete representation, grievance procedures, background checks, and USOPC funding. The NGB Audit team also meets with various departments within the USOPC to identify areas of concern or non-compliance, and the audit scope may be adjusted as needed based on these discussions. In certain circumstances, information obtained during the audit is escalated to USOPC Compliance for further review.

In 2021, the NGB Audit team audited 15 NGBs that will undergo certification renewal in 2022. Most findings required NGBs to update policies and procedures; however, higher-risk findings relating to conflicts of interest, athlete representation, and background check requirements were also identified.

## **B. Certifications and Certification Renewals**

The USOPC certification review process includes renewal of NGB certifications once every four years and certification of new NGBs following the completion of an audit and an overall review of an NGB by the CRG. In 2021, the CRG reviewed seven certification renewals and five certification applications. The sections below summarize those outcomes, and the current certification status for NGBs pending additional review or for NGBs certified with conditions can be found on [teamusa.org](http://teamusa.org).

### *1. Certification Renewals*

The USOPC Board of Directors recertified six NGBs that the USOPC considered certified as of January 1, 2021. A summary of each NGB and its certification renewal review is below, and the full certification recommendation reports for these NGBs are available on [teamusa.org](http://teamusa.org).

### **Renewal in Good Standing**

The USOPC Board of Directors renewed five NGBs' certifications with a status of Renewal in Good Standing, indicating that there are no significant outstanding issues affecting the NGBs' standing with the USOPC. While the CRG identified some areas of concern in its review of these NGBs, there were no severe deficiencies, and the NGBs acted to resolve most of the issues identified by the CRG within the certification review period.

The NGBs whose certifications were renewed with a status of Renewal in Good Standing in 2021 were:

- [United States Bowling Congress](#)
- [US Squash](#)
- [USA Baseball](#)
- [USA Boxing](#)
- [USA Water Ski and Wake Sports](#)

## **Renewal with Conditions**

The USOPC Board of Directors renewed one NGB's certification with a status of Renewal with Conditions, indicating there were significant deficiencies present at the close of the certification review that required remediation but were not so significant that they warranted actions that might have led to decertification proceedings or the initiation of decertification proceedings.

The NGB whose certification was renewed with a status of Renewal with Conditions in 2021 was:

- [USA Racquetball](#)

The CRG recommended that USA Racquetball's certification as a NGB be renewed with a status of Renewal with Conditions after identifying concerns with USA Racquetball leadership's understanding of its SafeSport obligations and SafeSport processes and noting that multiple NGB Audit findings remained open at the end of the CRG's review period. The CRG required USA Racquetball's Board of Directors and its leadership team to take additional training from the U.S. Center for SafeSport and required USA Racquetball to close its remaining NGB Audit findings as a condition of the NGB's certification renewal. The CRG will review USA Racquetball's progress toward the certification conditions and prepare an updated recommendation report in 2022.

## **Pending Additional Review**

The CRG paused one NGB's certification review process, indicating that it identified deficiencies that merited a Compliance review. Certification reviews may resume after the Compliance review is complete or decertification proceedings may begin if warranted.

The NGB whose certification renewal process was paused in 2021 was:

- USA Roller Sports

The CRG paused its certification renewal review of USA Roller Sports following the identification of several areas of concern including the disclosure and management of conflicts of interest, board governance, and financial stability. The CRG noted progress by USA Roller Sports in resolving these issues towards the end of 2021

### *2. Initial Certification Applications and Reviews*

In 2021, the CRG conducted initial certification reviews for five HPMOs seeking to become NGBs. A summary of each organization and its certification review is below. Full certification recommendation reports are available on [teamusa.org](http://teamusa.org) for the organizations that were certified in 2021.

#### **United States Association of Blind Athletes (USABA)**

##### **Certification Status: Certified in Good Standing**

The CRG recommended that USABA be certified in good standing in Q4 2021. USABA applied for NGB certification in Q3 2020, completed two public hearings, and was subject to a full audit. While the Certification Audit identified areas USABA needed to address to fully meet the NGB Compliance

Standards, USABA management presented and executed its plans to address all findings. The USOPC Board of Directors accepted the CRG's recommendation and certified USABA as an NGB through 2025.

#### **Lakeshore Foundation – USA Wheelchair Rugby and Boccia**

##### **Certification Status: Pending Additional Review**

The CRG's review of the Lakeshore Foundation's application for NGB certification was pending as of the end of 2021. The Lakeshore Foundation initially applied for NGB certification for the sport of Wheelchair Rugby in Q3 2020, completed two public hearings, and was reviewed in a full audit. Following the audit, the Lakeshore Foundation submitted an application for NGB certification for the sport of Boccia, and as a result, the organization's certification review was paused. A first public hearing was held for the Boccia application in November 2021, and the CRG's certification review for both Wheelchair Rugby and Boccia will conclude in 2022.

#### **Logan University – USA Para Powerlifting**

##### **Certification Status: Pending Additional Review**

The CRG's review of Logan University's application for NGB certification was pending as of the end of 2021. Logan University applied for NGB certification in Q3 2020, completed two public hearings, and was reviewed in a full audit. During the review, the U.S. Center for SafeSport informed Logan University that because the university as a whole sought NGB certification status, all university employees, including those who have no involvement with USA Para Powerlifting, would be subject to the Center's jurisdiction as required under the Ted Stevens Act. Because the Ted Stevens Act does not permit exceptions to the Center's jurisdiction for organizations that are certified as NGBs, the Center's audits would reflect that Logan University is not compliant with the Center's requirements. As a result, the USOPC concluded that it could not certify an organization that did not demonstrate full compliance with the Center's requirements. The CRG paused its certification review to allow the USOPC, the Center, and Logan University to explore other options. Those discussions were ongoing as of the end of 2021.

#### **National Wheelchair Basketball Association**

##### **Certification Status: Pending Additional Review**

The CRG's review of the NWBA's application for NGB certification was pending as of the end of 2021. The NWBA applied for NGB certification in Q3 2020, completed two public hearings, and was subject to a full audit. The NWBA underwent an audit and timely addressed findings that resulted from the audit. Before a final certification decision the USOPC became aware of concerns from athletes regarding retaliation, and concerns regarding management's failure to account for athletes' opinions, and concerns that management did not provide timely information to its athletes. To address these concerns before recommending NGB certification for the NWBA, the CRG paused its certification recommendation, and the review was in progress as of the end of 2021.

#### **USA Boccia**

##### **Certification Status: Application Declined**

The CRG declined to recommend that USA Boccia be certified as an NGB. USA Boccia applied for NGB certification in Q3 2020, completed two public hearings, and was subject to a full audit which identified concerns about the ability of USA Boccia to meet the obligations of an NGB as contemplated in the Ted Stevens Olympic and Amateur Sports Act and the NGB Compliance Standards, particularly related to the

organization's financial and operational capacity. As a result, the CRG declined USA Boccia's NGB application, and the USOPC terminated its recognition of USA Boccia as a High Performance Management Organization in Q3 2021. The USOPC's Paralympic Sport department worked with USA Boccia to transition its Paralympic program to the USOPC until another organization is identified to manage the program.

### *3. Other Certification Matters*

#### **Breaking**

In anticipation of the sport of Breaking's addition to the Olympic program for the 2024 Olympic Games, the CRG opened an application period for an organization to be certified as the sport's NGB in Q1 2021. Three organizations applied, and after an initial review, the CRG determined that none of the candidates met the USOPC's requirements for NGB certification and declined all three applications.

USA Dance, one of the declined applicants, was already recognized as the national federation for Breaking in the United States by the World DanceSport Federation, thus in the interest of preserving a pathway for Team USA Breaking athletes to compete, Compliance and NGB Services have maintained communication with USA Dance to receive updates on its efforts to incorporate Breaking into the organization and on its steps to meet NGB certification requirements. The USOPC's Sport Performance team is also working with USA Dance on selection procedures for competitions leading into 2024.

### *4. Conclusion*

In sum, the CRG's first year of NGB certification renewals and reviewing applications for new NGBs underscored that the process of holistically reviewing an NGB or NGB applicant both qualitatively and quantitatively, and obtaining feedback and perspective from various USOPC departments has significant value. More specifically, the certification review process has identified NGBs that are performing well and can serve as models for other NGBs, NGBs with serious risks that require the USOPC's more immediate attention, and NGB applicants that may require additional review and support before taking on the responsibilities required of NGBs.

## **C. Compliance Concerns**

### *1. Overview*

As noted above, a significant portion of the USOPC's Compliance program focuses on NGB Compliance, including addressing concerns regarding NGBs' compliance with their own policies and procedures, the Ted Stevens Act, and USOPC requirements. Compliance matters generally include a variety of case types, including issues that were brought to the USOPC's attention through complaints, proactive compliance actions, or audit findings that indicated a pattern of non-compliance or instances of non-compliance that warranted action by the USOPC's Compliance team. The summaries below include updates on significant matters that the USOPC has tracked from previous years into 2021, Section 10 complaints, and notable concerns that were brought to the USOPC's attention during 2021 and that were pending at the end of the year.

## 2. *NGB Compliance Matters*

### **USA Archery**

Towards the end of 2020, the USOPC received multiple complaints relating to favoritism, conflicts of interest, unequal support of the Paralympic archery programs, and general concerns that athletes would be retaliated against for speaking up. The USOPC engaged outside counsel to conduct an investigation to determine whether the complaints were substantiated and to determine the root cause of the complaints. The investigation was ongoing as of the end of 2021.

In addition to the compliance investigation, the NGB Audit team audited USA Archery in 2021 in advance of its scheduled certification renewal in 2022. The NGB Audit team found that USA Archery had a number of conflicts of interest that were not properly disclosed or managed, noting that this finding was of increased concern given similar findings noted in the prior audit report. The NGB Audit team also found that there were few complaints reported to USA Archery in relation to the number of concerns reported to the USOPC which tended to support concerns about fear of retaliation. USA Archery developed plans to address the audit findings, and the NGB Audit team will assess whether the organization implemented its plans, whether they had the intended outcome, and whether they are sustainable.

### **USA Badminton**

In Q3 2021, an individual contacted the USOPC to report that USAB was failing to comply with certain SafeSport reporting obligations and was also failing to meet its obligations as an NGB with respect to its governance, financial standards, financial reporting practices, auditing practices, and operational performance. After ensuring that the SafeSport related allegations were promptly reported to the US Center for SafeSport, the USOPC engaged outside counsel to investigate the remaining claims. The investigation was ongoing as of the end of 2021.

### **US Equestrian Federation**

Three separate complaints were filed between Q2 2020 and Q2 2021 against the US Equestrian Federation (USEF) under Section 10 of the USOPC Bylaws alleging non-compliance with the Ted Stevens Act, the USEF Bylaws, and USEF policies for actions related to implementing the U.S. Center for SafeSport's determinations of ineligibility for SafeSport violations. In two of the cases, complainants alleged that USEF violated the Ted Stevens Act and USEF policies by implementing the U.S. Center for SafeSport's determination of ineligibility without first providing a hearing. In both cases, a hearing panel dismissed the complaint, but the cases were appealed for arbitration and were ongoing as of the end of 2021.

The third case involved a complainant who alleged that USEF violated the Act and violated the Center's exclusive jurisdiction by restricting his participation on a committee until allegations of misconduct were resolved by the Center. The parties settled following mediation and the complaint was dismissed in July 2021.

### **USA Fencing**

Following formal and informal reports in the second half of 2021 concerning USA Fencing's (USAF) governance, including leadership and board dynamics, conflicts of interest, adherence to its grievance procedures, favoritism, and engagement with athletes, the USOPC informed USAF in Q4 that it was

launching a compliance investigation to determine whether the reports were substantiated, and if substantiated, to identify the underlying cause of those issues.

## **USA Gymnastics**

### *Decertification Proceedings*

In 2018, the USOPC initiated proceedings under Section 8 of its bylaws to decertify USA Gymnastics (USAG) under Section 8 of the USOPC bylaws based, in part, on USAG's failure to implement recommendations from a June 2017 independent investigation that followed news reports revealing multiple instances of sexual abuse, including by Larry Nassar, in the gymnastics world. Following USAG's December 2018 voluntary bankruptcy filing, the Section 8 hearing panel stayed the decertification proceedings in 2019. During the pendency of the stay, the USOPC continued to monitor USAG's overall compliance with the Ted Stevens Act and the USOPC's Bylaws, as well as USAG's continued progress in implementing the recommendations that resulted from the 2017 independent investigation.

In December 2021, the USOPC and USAG entered into a Consent Resolution setting out a framework for the negotiated resolution of the pending decertification proceedings, under which the USOPC would agree to withdraw its decertification complaint against USAG in exchange for USAG completing a number of compliance obligations. However, the agreement was conditioned on the confirmation of a bankruptcy plan and USAG reaching a global settlement to resolve all of the sex abuse related lawsuits that were pending against USAG at that time. Shortly after the Consent Resolution was finalized, the bankruptcy court confirmed a Plan of Reorganization for USAG, resulting in a global settlement of all pending lawsuits. As of the end of 2021, the USOPC was awaiting confirmation regarding the Effective Date for the bankruptcy plan before acting to withdraw its decertification complaint against USAG.

### *Compliance Review*

In Q1 2021, the USOPC initiated a compliance review of USAG that was prompted by allegations that USAG did not follow its established grievance procedures. The USOPC completed its review in Q3 2021 and concluded that although USAG resolved the matter in question in a manner consistent with its procedures, the concerns raised were warranted due to procedures that were somewhat ambiguous and a lack of communication on the part of USAG during the case resolution process.

USAG promptly addressed the USOPC's requirement to document the Board's approval of the relevant procedures and has since adopted the USOPC's recommendation to make USAG's athlete and participant safety policies, rules, and procedures more digestible and easier to understand.

## **USA Karate**

In Q1 2020, a number of individuals contacted the USOPC to raise concerns about the USA National Karate-do Federation (USA-NKF), including conflicts of interest; poorly managed 2020 team trials; alleged inappropriate influence by the board chair; and bias favoring athletes from the board chair's and the national team coach's clubs. In Q4 2020 the USOPC engaged outside counsel to conduct an investigation and to make recommendations. Outside counsel concluded its investigation in Q2 2021, and the USOPC issued a Demand Letter outlining findings from outside counsel's report, as well as required reforms and recommendations.



USA-NKF adopted all of the USOPC's recommendations and has made significant progress addressing the required reforms and recommendations, and the Board elected a new independent Board chair who has made meaningful governance changes. As of the end of 2021, USA-NKF was in the process of conducting an election to fill its remaining board seats, which will in turn allow it to address outstanding board training requirements.

### **USA Racquetball**

In March 2021, the USOPC sent a Letter of Concern to USA Racquetball (USAR) based on a notification from the U.S. Center for SafeSport that USAR had not completed required corrective actions from its 2019 Administrative Audit and was considered non-compliant by the Center. As requested in the Letter of Concern, USAR provided updates to the USOPC at regular intervals detailing its progress in addressing the corrective actions identified by the Center. USA Racquetball completed the corrective actions and received a closure letter from the Center in May 2021 affirming its compliance.

### **USA Roller Sports**

Following findings resulting from the NGB Audit team's 2020 consultative review,<sup>1</sup> reports of concerns with managerial capability in late 2020, and the CRG's review of USA Roller Sports (USARS), the USOPC sent a Letter of Concern to USARS in Q1 2021 regarding conflicts of interest, governance and managerial capabilities, financial capabilities, and the sport performance program. During 2021, USARS made significant progress addressing the underlying problems that gave rise to the concerns identified by the USOPC, implementing corrective actions to begin to address those concerns, and closing open audit findings. As of the end of 2021, USARS continued to work to address the USOPC's concerns and remediate open audit findings.

### **USRowing**

In the first half of 2020, a number of individuals contacted the USOPC to raise concerns about the culture within USRowing, including lack of trust, dissatisfaction with coaching methods, and fear of retaliation. The USOPC engaged outside counsel to conduct a review to evaluate whether USRowing's practices, including those relating to team selection, mental and physical health, resource allocation, and high-performance policies, were consistent with USRowing's general duties and obligations as an NGB. At the conclusion of the investigation, The USOPC and USRowing worked in coordination to share a summary of outside counsel's findings with USRowing's community in December 2021. USRowing also provided an overview of some key areas it was focusing on to improve the athlete experience and to change its high-performance culture. Following the release of the community report, the USOPC sent USRowing a Demand Letter outlining required reforms and recommendations to address the findings in the report. USRowing's response to the Demand Letter was pending as of the end of 2021.

### **US Ski & Snowboard**

The USOPC learned of concerns relating to the treatment of female athletes competing in the disciplines of Ski Jumping and Nordic Combined, including discrimination against female athletes, and failure to

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<sup>1</sup> The NGB Audit team conducted consultative reviews rather than full audits for NGBs that volunteered to be first to undergo the certification renewal process in 2021 because the USOPC's NGB Compliance Standards did not take effect until January 1, 2021.

comply with US Ski & Snowboard's Code of Conduct by individuals involved in those disciplines. The USOPC engaged outside counsel to investigate these allegations and also review US Ski & Snowboard's oversight of USA Nordic Sport, which is responsible for Ski Jumping and Nordic Combined. That investigation was pending as of the end of 2021.

### **US Soccer Federation**

A complaint was filed against the US Soccer Federation (USSF) in Q1 2018 under Section 10 of the USOPC Bylaws alleging that USSF does not develop interest and participation in the sport, does not treat female athletes equally, and does not provide reasonable direct representation on the USSF Board of Directors. The parties engaged in mediation, which was unsuccessful, and after a hearing in Q1 2021, the parties submitted a joint stipulation of dismissal in Q2 2021 to resolve the case.

### **USA Surfing**

Following a 2019 audit that identified multiple areas of concern, including significant deficiencies with USA Surfing's financial and accounting practices, failure to appropriately manage conflicts of interest, and failure to manage the operations of the high performance program, the USOPC closely monitored USA Surfing's performance.

In Q3 2021, the USOPC informed USA Surfing that it was suspending funding after learning that USA Surfing's financial practices had not markedly improved. The USOPC required USA Surfing to transfer direct management and oversight of its financial operations to a USA Surfing board member and advised USA Surfing that it would not consider any requests to reinstate funding unless the organization presented an acceptable plan for future oversight of the organization, including a change in leadership.

The USOPC reviewed a plan presented by USA Surfing and concluded that the initiation of decertification proceedings was appropriate. The USOPC and USA Surfing ultimately agreed that USA Surfing would voluntarily surrender its NGB status, and the parties signed a Decertification Agreement in Q4 2021. As part of that agreement, the USOPC assumed responsibility for USA Surfing's Olympic high performance program to ensure Team USA athletes continue to receive funding and support.

### **USA Table Tennis**

The NGB Audit team identified a number of issues during its 2021 audit requiring immediate attention, including multiple missing or expired background checks for required individuals; USATT's inadvertent failure to comply with specific requirements for election of its athlete representatives; and a repeat finding relating to conflicts of interest. The auditors also required continued focus on board engagement but noted an overall improvement in board engagement. USATT developed plans to address all concerns by Q4 2021. USATT completed its remediation plans for a significant number of the concerns, though some work was delayed and will be completed in 2022.

### **USA Team Handball**

In early 2021, the USOPC received concerns regarding the eligibility of certain candidates who ran in USA Team Handball's (USATH) 2020 election for the USOPC Athlete Advisory Council (AAC) representative. The complainant alleged that the candidate in question failed to disclose conflicts of interest and code of conduct issues. The USOPC investigated the allegations and following the conclusion of its investigation

in Q3 2021 presented its findings and recommendations to the USOPC Ethics and Compliance Committee, which has jurisdiction over USOPC AAC ethics matters. The Ethics and Compliance Committee adopted the recommendation that the 2020 USOPC AAC election results stand and agreed that the USOPC should provide recommendations to clarify USATH and USOPC AAC Representative qualifications and suggest the development of election procedures. As of the end of 2021, USATH was in the process of implementing these reforms.

USATH was also subject to an audit in 2021, which identified a number of issues, including issues relating to background checks, insufficient athlete representation, staff turnover, conflicts of interest, and grievances. Additionally, there were several findings from the previous USOPC audit that had not been addressed. USATH developed plans to address all open findings by the end of Q1 2022, and the NGB Audit team will conduct testing to validate that USATH fully remediated them.

#### **USA Taekwondo**

In Q3 2021, the USOPC received a complaint regarding alleged conflicts of interest and alleged retaliation within USA Taekwondo, which prompted a Compliance investigation into the allegations. The investigation was in progress as of the end of 2021.

#### **USA Track and Field**

Based on long-standing governance concerns expressed by various individuals from within USA Track and Field (USATF), the USOPC intended to audit USATF to review its governance structure in 2021. Although the audit was delayed until Q1 2022, the USOPC has continued to engage USATF to discuss governance best practices and has monitored governance changes. USATF athletes are aware of the governance concerns and have continued to be engaged on this issue.

#### **USA Water Polo**

In Q1 2021, the USOPC received a complaint from USA Water Polo (USAWP) members alleging that USAWP failed to comply with the Ted Stevens Olympic and Amateur Sports Act's athlete representation requirements, that its Board lacked transparency and engaged in governance practices that were inconsistent with the USOPC's governance requirements, and that it mishandled a 2009 sexual harassment complaint. The USOPC conducted an investigation and substantiated allegations relating to athlete representation, board transparency, and grievance procedures. USAWP made the USOPC's findings, required reforms, and recommendations available to its members, along with the organization's response, in Q3 2021. USAWP has since addressed each of the required reforms and recommendations it adopted.

### *3. Conclusion*

The USOPC's Compliance team concluded three significant NGB investigations in 2021, reached a decertification agreement with one NGB, initiated four investigations based on reported concerns, and continued to work with all NGBs to support their compliance efforts. The USOPC believes NGBs have made meaningful progress to ensure they have met important new requirements under the Ted Stevens Act and the USOPC Bylaws, and the USOPC will continue to support their work through its compliance and audit programs.