

UNITED STATES  
OLYMPIC & PARALYMPIC  
COMMITTEE



# **NGB Compliance Audit**

## **USA Lacrosse**

December 19, 2025

# Executive Summary

## Background, Scope, and Objectives

The United States Olympic & Paralympic Committee's Audit department (Audit) completed an audit of USA Lacrosse (NGB Candidate). The purpose of the audit was to determine if USA Lacrosse complies with the requirements of the 2025 NGB Compliance Standards (Standards) and identify areas of noncompliance that USA Lacrosse must adhere to post certification. The audit focused on the policies and procedures noted in the Standards in the following sections: Governance and Compliance, Financial Standards and Reporting Practices, Athlete Protections and Rights, Sport Performance, and Operational Performance.

## Audit Summary

Overall, Audit concluded that USA Lacrosse has met eight of 21 applicable Standards. While there are some areas of increased concern, the USOPC understands that USA Lacrosse is working with the USOPC to expand the definitions of 10-year athletes and create a pool for 10-year + athletes to meet athlete representation requirements. In addition to athlete representation, testing of USA Lacrosse's conflict of interest process indicated that a review over completed conflict of interest forms is not being documented. Finally, testing of USA Lacrosse's background check process revealed a significant number of individuals who had not undergone a background check. Additional details are included in the findings below.

## Post Certification Audit Follow-up

Audit may conduct follow-up reviews on NGB Compliance Standards that were determined to be not applicable and out of scope during the certification audit if USA Lacrosse is certified as an NGB. These follow-ups will help ensure USA Lacrosse is meeting all NGB compliance standards going forward. Refer to the appendix for a detailed list of standards that may be subject to review.

# NGB Compliance Audit Findings

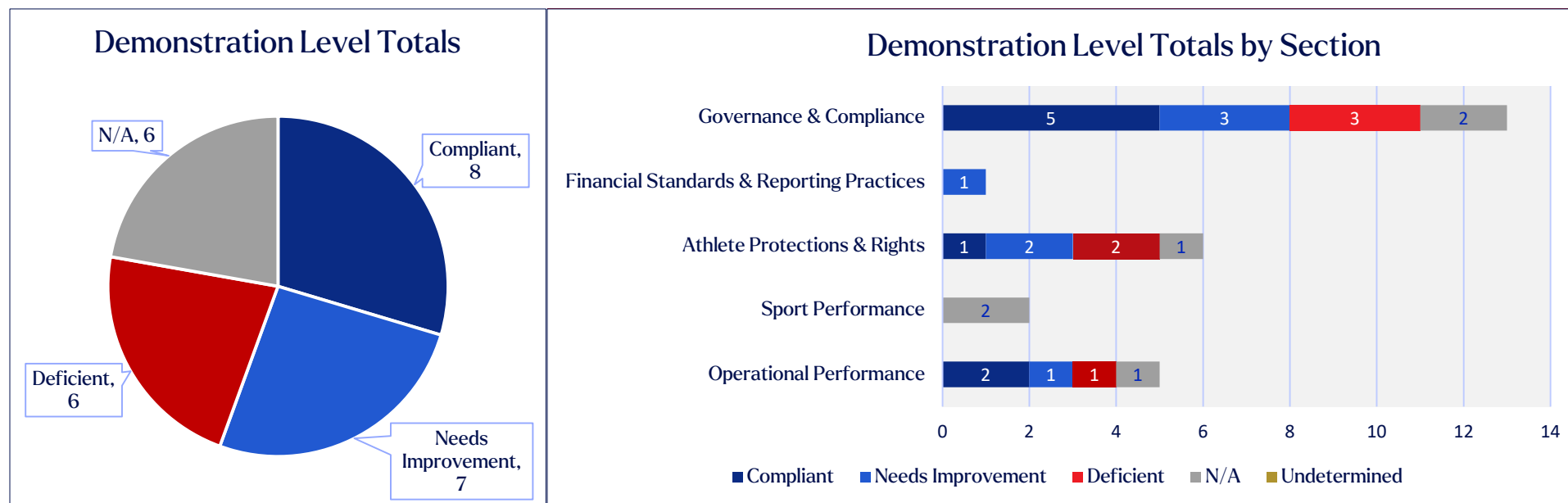
All Standards are evaluated against the 2025 Implementation Guide for Compliance Standards (Implementation Guide). References to the USOPC Bylaws are based on the effective February 1, 2025.

Select policies and procedures were reviewed to determine compliance with the Standards. The evaluation of and conclusion for each standard was based on the criteria met and the results of any testing. The definitions of the demonstration levels are below, with additional guidance for each standard detailed in the Implementation Guide. Findings and demonstration levels for each standard are detailed on the subsequent pages.

## Compliance Demonstration Level Definitions

<b>Compliant</b>	The NGB Candidate, through its written policies and procedures and its execution of those policies and procedures, mostly demonstrates that it is meeting the elements of the standard.
<b>Needs Improvement</b>	The NGB Candidate, through its written policies and procedures and its execution of those policies and procedures, demonstrates that it meets many elements of the standard, but changes or improvements are necessary to fully meet the standard.
<b>Deficient</b>	The NGB Candidate, through inadequate written policies and procedures and/or poor execution of those policies and procedures, demonstrates that it is not meeting several elements of the standard.
<b>Not Applicable / Undetermined</b>	Not applicable indicates the standard does not apply to the NGB Candidate and will not be evaluated. Undetermined indicates a reason a determination cannot be made at this time; however, the standard will be evaluated at a later date. Additional details are provided as necessary.

## Overall Demonstration Levels Summary



# Governance and Compliance

NGB Compliance Standards Section A				
Title	Standard	Compliant	Needs Improvement	Deficient
Athlete Representation	A.1 a & b			X
Independent and Affiliate Representation	A.1 c		X	
International Federation Affiliation	A.2 a	X		
Membership Requirements	A.2 b	X		
Athlete Advisory Council	A.3 a			X
Board Governance	A.4 a		X	
Board Development	A.4 b	X		
Code of Conduct	A.6 a		X	
Conflicts of Interest Policy	A.6 b			X
Gifts and Entertainment Policy	A.6 c	X		
Diversity Equity & Inclusion Requirements	A.7 b		N/A	
Equal Pay for Team USA	A.7 c		N/A	
Ombuds' Policy	A.9 a	X		
<b>Total</b>		<b>5</b>	<b>3</b>	<b>3</b>

Needs Improvement		
1	Independent & Affiliate Representation	Management Action Plan
	<p><b>A.1 c:</b> NGB must have a board structure that includes:</p> <ul style="list-style-type: none"> <li>i. A board position(s) as defined by the USOPC to provide an independent perspective, and</li> <li>ii. A board position for an affiliate member as required by the Act §220522 (12).</li> </ul> <p><b>FINDING:</b> USA Lacrosse's Bylaws require minor updates to the definition of the independent director position and do not include a required board position or allow for the addition of a position for affiliated member(s) if identified.</p>	<p>USA Lacrosse provided updated Bylaws that include the required language for an affiliate member, as required by the Act. Audit will review the updated Bylaws for compliance during the remediation period.</p>
2	Board Governance	Management Action Plan
	<p><b>A.4 a:</b> NGB must have Bylaws or board-approved policies and procedures that at least meet the minimum standards for governance practices and comply with §220522 of the Act.</p>	<p>USA Lacrosse provided updated Bylaws that meet the requirements. Audit will review the updated Bylaws for compliance during the remediation period.</p>

	<b>FINDING:</b> There are required elements missing from USA Lacrosse's Bylaws in the areas of election and selection procedures and designated committee requirements.	
3	Code of Conduct	Management Action Plan
	<p><b>A.6 a:</b> NGB must have a comprehensive code of conduct that meets the minimum code standards set forth by the USOPC. The code of conduct must be made available on the NGB's website.</p> <p><b>FINDING:</b> There are required elements missing from USA Lacrosse's Code of Conduct Policy in the following areas: applicability, organizational expectations, reporting, resolution and resources.</p>	USA Lacrosse provided an updated Code of Conduct that meets the requirements. Audit will review the updated code of conduct for compliance during the remediation period.
<b>Deficient</b>		
4	Athlete Representation	Management Action Plan
Policy	<p><b>A.1 a &amp; b:</b></p> <p>a. NGB must have at least 33.3% athlete representation on its board of directors as required by §220522(13) of the Act and further defined by the USOPC Bylaws, Section 8.5.3.</p> <p>b. NGB must have at least 33.3% athlete representation on all Designated and Other Committees as required and defined by the USOPC Bylaws, Section 8.5.4 and 8.5.5.</p> <p><b>FINDING:</b> USA Lacrosse's Bylaws are missing most of the requirements for athlete representatives on the board and committees.</p>	USA Lacrosse provided updated Bylaws to meet the athlete requirements. Audit will review the updated Bylaws for compliance during the remediation period.
Application	<p><b>FINDING:</b> Testing identified multiple issues related to athlete representation.</p> <p>While the USA Lacrosse Board of Directors has 33.3% athlete representation, the Executive Committee and all but one designated committee do not meet the 33.3% athlete representation requirement.</p> <p>None of the USA Lacrosse athletes currently seated on the board or committees meet the definition of 10 year or 10 year+ athletes as required by USOPC bylaws.</p> <p>USA Lacrosse athletes currently appointed to the USA Lacrosse board of directors are not elected by a pool of eligible athletes.</p>	<p>USA Lacrosse will have 33.3% athlete representation on the Executive Committee and all other committees.</p> <p>USA Lacrosse is working with the Athlete Representation Review Working Group to expand the definition of 10 year and 10 year+ athletes. USA Lacrosse's proposed definitions of 10 year and 10 year+ athletes would encompass all athletes currently determined by USA Lacrosse as eligible voters, the current athlete representatives on the USA Lacrosse board, USA Lacrosse committees and the USA Lacrosse Athlete Advisory Council.</p> <p>In addition, USA Lacrosse will ensure athlete representatives on their Board of Directors are elected by a pool of eligible athletes.</p>

		<b>Due Date:</b> 120 days post certification.
5	Athlete Advisory Council	
	<p><b>A.3 a:</b> NGB must have an Athletes Advisory Council (AAC) that meets the minimum standards set forth by the USOPC.</p> <p><b>FINDING:</b> While USA Lacrosse's Bylaws include an appendix for the AAC, the council has not been formed.</p>	<p>USA Lacrosse will form a standing Athletes Advisory Council that meets all minimum standards as required.</p> <p>USA Lacrosse is currently working with the Athlete Representation Review Working Group to expand the definition of 10 year and 10 year+ athletes. USA Lacrosse's proposed definitions of 10 year and 10 year+ athletes would encompass all athletes currently determined by USA Lacrosse as eligible voters, the current athlete representatives on the USA Lacrosse board, USA Lacrosse committees and the USA Lacrosse Athlete Advisory Council.</p> <p><b>Due Date:</b> 120 days post certification.</p>
6	Conflicts of Interest Policy	Management Action Plan
Policy	<p><b>A.6 b:</b> NGB must adopt and enforce a Conflict of Interest Policy that meets the minimum standards set forth by the USOPC.</p> <p><b>FINDING:</b> There are elements missing from USA Lacrosse's Conflict of Interest Policy in the areas of applicability, organizational expectations, disclosures, reporting, and resolution.</p> <p>Additionally, USA Lacrosse does not have a process for disclosing potential conflicts of interest on hearing panels.</p>	<p>USA Lacrosse provided an updated Conflict of Interest Policy to meet the requirements. Audit will review the updated Conflict of Interest Policy for compliance during the remediation period.</p>
Application	<p><b>FINDING:</b> During testing, the auditor noted the following:</p> <p>Three USA Lacrosse staff members did not complete a conflict of interest disclosure form.</p> <p>Two individuals have not completed a conflict of interest disclosure form within the past two years.</p> <p>USA Lacrosse was unable to provide evidence of a documented review of the completed conflict of interest disclosure forms and issuance of management direction letters when necessary.</p>	<p>USA Lacrosse will implement a formal review process as stated in the updated USA Lacrosse Conflict of Interest Policy. The formal review process will incorporate a documented review of all annual conflict of interest disclosure forms, provide management direction letters to address actual, potential and perceived conflicts and include a process to address non-responses to annual conflict of interest disclosure form submissions.</p> <p><b>Due Date:</b> 120 days post certification.</p>

## Financial Standards and Reporting Practices

NGB Compliance Standards Section B				
Title	Standard	Compliant	Needs Improvement	Deficient
Financial Capability	B.1 a		X	
<b>Total</b>		<b>0</b>	<b>1</b>	<b>0</b>

Needs Improvement		
7	Title	Management Action Plan
	<p><b>STANDARD:</b> NGB must demonstrate financial capability to administer its sport</p> <p><b>FINDING:</b> USA Lacrosse's policies and procedures need minor adjustments to be fully compliant.</p>	<p>USA Lacrosse will update their financial policies and procedures to meet the requirements.</p> <p><b>Due Date:</b> 120 days post certification.</p>

## Athlete Protection and Rights

NGB Compliance Standards Section C				
Title	Standard	Compliant	Needs Improvement	Deficient
Child Protection and US Center for SafeSport	C.1 a - b	N/A		
USOPC Athlete Safety Requirements	C.2 a			X
Anti-Doping Policies	C.3 a	X		
Anti-Doping Policy Language	C.3 b		X	
Athlete Agreements	C.4 a			X
Athlete Support Criteria	C.5 a		X	
<b>Total</b>		<b>1</b>	<b>2</b>	<b>2</b>

Needs Improvement		
8	Anti-Doping Policy Language	Management Action Plan
	<p><b>C.3 b:</b> NGB must have USOPC-approved anti-doping language in its bylaws (or board-approved document), membership agreements (if applicable), and license agreements (if applicable).</p> <p><b>FINDING:</b> There is no relevant document informing all participants they must comply with anti-doping requirements.</p>	<p>USA Lacrosse is currently working with USADA and will update all relevant documents to inform all participants they must comply with anti-doping requirements.</p> <p><b>Due Date:</b> 120 days post certification.</p>
9	Athlete Support Criteria	Management Action Plan
	<p><b>C.5 a:</b> NGB must post on its website the criteria for athletes to be eligible for Basic Services, consistent with the definition listed in the USOPC NGB Athlete Agreement Policy.</p> <p><b>FINDING:</b> USA Lacrosse's athlete support criteria is not posted on its website.</p> <p>Basic Services are not defined in USA Lacrosse's Selection Procedures.</p> <p>Additionally, the Selection Procedures do not state when Basic Services will begin being provided.</p>	<p>USA Lacrosse will finalize and publish their athlete support criteria, which are included in their selection procedures, to the USA Lacrosse website.</p> <p>The USA Lacrosse selection procedures will include defined basic services to be provided and the timeframe on which basic services begin and end.</p> <p><b>Due Date:</b> 120 days post certification.</p>
Deficient		
10	USOPC Athlete Safety Requirements	Management Action Plan
Policy	<p><b>C.2 a:</b> NGB must ensure compliance with policies and standards including but not limited to:</p> <ul style="list-style-type: none"> <li>i. USOPC's NGB Athlete Safety Policy</li> <li>ii. Responsible Sport Organization Background Check Policy</li> </ul> <p><b>FINDING:</b> There are required elements missing from USA Lacrosse's background check policy in the areas of applicability and background check report review.</p>	<p>USA Lacrosse provided an updated Background Check Policy to meet the requirements. Audit will review the updated Background Check Policy for compliance during the remediation period.</p>
Application	<p><b>FINDING:</b> Additionally, the following issues were identified during background check testing:</p> <p>One individual did not have a completed background check on file at the time of testing.</p> <p>Seven individuals had expired background checks on file at the time of testing.</p>	<p>USA Lacrosse will ensure all required background checks for applicable individuals are completed in accordance with USOPC requirements.</p> <p>USA Lacrosse ordered and completed background checks for 27 of 27 individuals noted in Audit's original finding before the end of audit fieldwork.</p>

	<p>Seventeen individuals had expired background checks at the time of the most recent event tested.</p> <p>Two individuals did not have a completed background check at the time of the most recent event tested.</p>	<p>USA Lacrosse created and provided an event background check review procedural document to ensure all participants sent to USA Lacrosse events have a current background check before attending the event. Audit will perform testing against the newly created review process during the remediation period.</p> <p><b>Due Date:</b> 120 days post certification.</p>
11	Athlete Agreements	Management Action Plan
	<p><b>C.4 a:</b> NGB must comply with the USOPC NGB Athlete Agreements Policy.</p> <p><b>FINDING:</b> USA Lacrosse's athlete agreements are not fully compliant with the USOPC NGB Athlete Agreements Policy because USA Lacrosse's athlete agreements contain commercial terms.</p>	<p>USA Lacrosse provided an updated athlete agreement that does not contain commercial terms during fieldwork.</p> <p>This audit finding has been remediated.</p>

## Sport Performance

NGB Compliance Standards Section D				
Title	Standard	Compliant	Needs Improvement	Deficient
High-Performance Plan Submission	D.3 a		N/A	
Event Sanctioning	D.3 b		N/A	
<b>Total</b>			<b>0</b>	<b>0</b>

# Operational Performance

NGB Compliance Standards Section E				
Title	Standard	Compliant	Needs Improvement	Deficient
Managerial and Board Capability	E.1 a	X		
Whistleblower and Anti-Retaliation Policy	E.3 a		X	
Complaint Resolution and Hearing Procedures	E.4 a & b			X
USOPC Trademark Protection	E.5 a – d	N/A		
Strategic Planning	E.6 a	X		
<b>Total</b>		<b>2</b>	<b>1</b>	<b>1</b>

Needs Improvement		
12	Whistleblower and Anti-Retaliation Policy	Management Action Plan
	<p><b>E.3 a:</b> NGB must adopt and maintain an organizational whistleblower policy that encourages and provides a mechanism for affiliated individuals to report alleged violations of any applicable law, rule, regulation, or adopted policy of the NGB, accounting or financial fraud, or other misfeasance and includes an anti-retaliation statement.</p> <p><b>FINDING:</b> There are minor elements missing from USA Lacrosse's Whistleblower and Anti-Retaliation Policy in the following areas: applicability, policy requirements, directions to report a concern, and resources.</p>	USA Lacrosse provided an updated Whistleblower and Anti-Retaliation Policy to meet the requirements. Audit will review the updated Whistleblower and Anti-Retaliation Policy for compliance during the remediation period.
Deficient		
13	Complaint Resolution and Hearing Procedures	Management Action Plan
	<p><b>E.4 a &amp; b:</b></p> <ul style="list-style-type: none"> <li>a. NGB must provide prompt and equitable resolution of grievances as outlined in the Act §220522(14).</li> <li>b. NGB must provide fair notice and opportunity for a hearing to any amateur athlete, coach, trainer, manager, administrator, or official before declaring the individual ineligible to participate as outlined in the Act §220522(8).</li> </ul>	USA Lacrosse provided an updated Grievance Policy to meet the requirements. Audit will review the updated Grievance Policy for compliance during the remediation period.

<b>FINDING:</b> There are several elements missing from USA Lacrosse's Grievance Policy in the following areas: investigation & resolution, and hearing procedures.	
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Findings in this report are currently in remediation. A closure letter will be issued once all findings have been remediated.

## Appendix: Post Certification Follow Up

USA Lacrosse was audited against the 2025 Implementation Guide for Compliance Standards. As detailed above, several of these standards are not applicable pre-certification. Post-certification, USA Lacrosse may be subject to follow-up reviews to assess compliance with these previously non-applicable standards, as listed below and detailed in the [2025 Implementation Guide for Compliance Standards.pdf](#)

- A.5 a: IRS Status
- A.6 d: Sport Integrity Policy
- A.7 a & b: Diversity, Equity & Inclusion Requirements
- A.7 c: Equal Pay for Team USA
- A.8 a-d: NGB Annual Reports
- B.1 b: Financial Reporting to the Board
- B.2 a: USOPC Funding
- B.3 a -d: Financial Documentation
- C.1 a & b: Child Protection and US Center for SafeSport Requirements
- D.1 a-c: Selection Procedures and Process
- D.2 a: Delegation List Submission
- D.3 a: High Performance Plan Submission
- D.3 c: Paralympic Classification (if applicable)
- E.2 a: Insurance Coverage
- E.5 a-d: USOPC Trademark Protection
- E.7 a: Publications