



**Certification Renewal Recommendation Report for
USA Gymnastics**
December 7, 2022



**UNITED STATES
OLYMPIC & PARALYMPIC
COMMITTEE**



USA Gymnastics Certification Renewal Executive Summary

In April 2022, the United States Olympic and Paralympic Committee (USOPC) Certification Review Group (CRG), in accordance with the USOPC's NGB Certification Policy, began a certification renewal review of USA Gymnastics.¹ The CRG evaluated USA Gymnastics and, based on input from CRG members and the results of NGB Audit's 2021 Compliance Audit², recommends a certification status of Renewal in Good Standing.

The CRG's review of USA Gymnastics found that the organization is meeting the USOPC's NGB Compliance Standards in the five core areas of evaluation for certification: Governance and Compliance, Financial Standards and Reporting Practices, Athlete Protections and Rights, Sport Performance, and Operational Performance. NGB Audit's Compliance Audit identified areas where USA Gymnastics was not yet fully meeting the USOPC's NGB Compliance Standards, but USA Gymnastics took action to remediate the identified issues and meet the NGB Compliance Standards by the time of the CRG's review, though one finding requires longer term action before it can be closed.

CRG members agreed that USA Gymnastics is presently meeting the requirements and expectations for an NGB. In its discussions of USA Gymnastics' interactions with the USOPC, the CRG did not identify any operational concerns or cultural issues that would prevent the organization's continued certification. Overall, in the areas in which CRG members had interacted with USA Gymnastics, the CRG had a generally favorable view of USA Gymnastics' operations.

As a result of this review, the CRG recommends that USA Gymnastics be granted a certification status of Renewal in Good Standing for a four-year certification term ending in 2026.

¹ See Appendix for more information about the certification process, including a link to the NGB Certification Policy.

² [NGB Audit Report](#) and [NGB Audit Addendum Report](#).



Organizational Overview

USA Gymnastics is the USOPC-certified NGB for gymnastics and is recognized as the United States' member of the International Gymnastics Federation (FIG). USA Gymnastics' mission is "to build a community and culture of health, safety and excellence, where athletes can thrive in sport and in life."³ USA Gymnastics "sets the rules and policies that govern the sport of gymnastics, including selecting and training the U.S. Gymnastics Teams for the Olympics and World Championships; promoting and developing gymnastics on the grassroots and national levels, as well as a safe, empowered, and positive training environment; and serving as a resource center for members, clubs, fans and gymnasts throughout the United States."⁴ The NGB serves nearly 200,000 members⁵ and is headquartered in Indianapolis, Indiana.

Certification History

USA Gymnastics was originally certified in January 2021.⁶ The CRG's certification review was initiated based on USA Gymnastics' scheduled quadrennial certification review. USA Gymnastics' certification status has not been referred for review outside of the standard NGB certification review schedule.

Certification Exceptions⁷

USA Gymnastics did not request any exceptions from the NGB Compliance Standards during its certification review.

Athlete Representation Approval and Exceptions⁸

USA Gymnastics sought and received approval to expand its definition of 10 Year and 10 Year+ Athletes by adding additional qualifying events. Athletes who competed in US Gymnastics Championships, the elite Artistic championships, and the Elite USA Gymnastics Championships, which covers the Rhythmic, Trampoline and Tumbling, and Acrobatic disciplines, in or after 2001 are eligible to serve as 10 Year and 10 Year+ Athletes for purposes of the athlete representation requirements of the USA Gymnastics Board of Directors and Designated Committees.

Certification Review⁹

Governance and Compliance

The CRG determined that USA Gymnastics is fulfilling the Governance and Compliance-related responsibilities of an NGB. USA Gymnastics has adopted and enforces a code of conduct, conflict of interest, and gifts and entertainment policies, has made these policies publicly available on its website, and has defined procedures to address violations of these policies.

Although no active Compliance issues were noted during the CRG's review, a Section 8 was filed in 2018 based, in part, on USA Gymnastics' failure to implement recommendations from a June 2017 independent investigation. Following USA Gymnastics' 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 USA Gymnastics' compliance. In December 2021, the USOPC and USA Gymnastics

³ [Mission](#), USA Gymnastics Website.

⁴ [About USAG](#).

⁵ [2021 Year in Review](#), USA Gymnastics Website.

⁶ Refer to the Appendix for details on the initial certification.

⁷ Refer to the Appendix for details on exception requests to the NGB Compliance Standards.

⁸ Refer to the Appendix for details on athlete representation exception requests.

⁹ Refer to the Appendix for details on the review standards and process for information related to the Compliance Audit.



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 USA Gymnastics in exchange for the completion of a number of compliance obligations.¹⁰ On April 25, 2022, the USOPC officially withdrew its Section 8 complaint upon confirmation of the Effective Date for the bankruptcy plan. USOPC Compliance noted no additional issues that would impact the continued certification of USA Gymnastics related to this initial concern.

In the 2021 Compliance Audit, NGB Audit found that USA Gymnastics did not meet the athlete representation requirement for its Ethics and Grievance Committee, pending approvals from the ARRWG that would allow additional athletes to qualify as 10 Year and 10 Year+ Athlete representatives. To remediate the finding, USA Gymnastics obtained the ARRWG's approval to expand the athlete representative definition and added two qualified athletes to the committee. In addition, NGB Audit confirmed that the board and all Designated Committees met the 33% requirement consistent with the NGB Compliance Standards. The ARRWG also reviewed and approved USA Gymnastics' proposed lists of Designated and Other Committees.

During conflict of interest testing, NGB Audit found that USA Gymnastics had a process to review conflict of interest disclosure forms but did not always clearly document the reviews or ensure reviews were conducted consistent with its policies or appropriate practices for all forms. NGB Audit verified USA Gymnastics' compliance with its processes during follow-up testing to resolve this finding.

The CRG received positive athlete feedback relating to USA Gymnastics' governance-related responsibilities. An athlete noted that the internal AAC is functioning well and holds two meetings a month: once with only athletes and once with the NGB's leadership team. The internal AAC members communicate well with each other, and USA Gymnastics' leadership team listens to its athletes. To ensure that athletes have better access to their athlete representative, athletes would like USA Gymnastics to help promote the internal AAC.

Financial Standards and Reporting Practices

During the bankruptcy proceedings, a hold was placed on conducting an external audit of USA Gymnastics' financials spanning 2018-2020. NGB Audit noted this finding in its 2021 Compliance Audit report, citing a management action plan to have externally audited financials completed by the end of 2022 for re-evaluation. However, litigation settlements and the Effective Date to resolve bankruptcy did not go into effect until late April 2022, which did not allow for enough time for external auditors to complete the necessary financial evaluation and the finding will remain open until NGB Audit can evaluate the completed externally audited financials. In the interim, the CRG requested and evaluated internal financial reporting to assess the organization's financial sustainability. No concerns were noted at this time.

NGB Audit found that USA Gymnastics' financial policies and procedures did not outline its receivables and accrual process. To remediate the finding, management updated policies to include specific thresholds for the accrual process and provided an outline of the receivables process. NGB Audit reviewed the updated policies and procedures and concluded that USA Gymnastics met compliance requirements.

Athlete Protection and Rights

The USOPC is not aware of any non-compliance issues with its anti-doping rules and requirements and those of the U.S. Anti-Doping Agency. The CRG also found that USA Gymnastics maintains and enforces an athlete safety program consistent with the requirements of relevant federal law, as well as with the policies and standards of the USOPC and the U.S. Center for SafeSport (the Center). The USOPC is not aware of any cases it has received in the past four years concerning USA Gymnastics that should have

¹⁰ Refer to USA Gymnastics - Decertification Proceedings on page 8 of the [2021 USOPC Impact Report's Compliance Assessment](#) for details.



been reported to the Center but were not reported in accordance with the Center's reporting requirements. For its part, the USOPC has reported all matters to the Center relating to USA Gymnastics that the USOPC was required to report.

In 2019, the Center conducted its most recent Administrative Audit¹¹ of USA Gymnastics' implementation of policies required by the Center's SafeSport Code and Minor Athlete Abuse Prevention Policies that resulted in a finding and direction for corrective actions. Specifically, USA Gymnastics received a Not Implemented rating in the area of Education and Training and was required to add additional controls for its training programs.¹² USA Gymnastics took corrective action to resolve the Center's finding and the Center confirmed USA Gymnastics' full compliance as of July 9, 2020.¹³

The Center conducted its most recent Event Audit at USA Gymnastics' National Championships on June 20-22, 2021, resulting in findings and directions for corrective actions. Specifically, USA Gymnastics was required to identify all participants at its sanctioned events, develop and implement protocol to communicate required information to participants at its sanctioned events, and improve its Quality Control System to prevent participation by individuals who were banned or had not completed SafeSport training.¹⁴ USA Gymnastics took corrective action to resolve the Center's findings and the Center confirmed USA Gymnastics' full compliance as of November 11, 2021.¹⁵

Although NGB Audit did not find any instances of issues that should have been reported, USA Gymnastics was not fully aware of its obligations to comply with the USOPC NGB and HPMO Athlete Safety Policy, including reporting prohibited conduct to the USOPC's Security & Athlete Safety Office when required. USA Gymnastics amended its policies and procedures to incorporate the reporting requirement to meet the NGB Compliance Standards.

Sport Performance

USA Gymnastics is fulfilling its obligations in Sport Performance. The organization maintains and executes a strategic plan that supports athletes in achieving sustained competitive excellence and grows the sport. USA Gymnastics established clear selection procedures for international competition, and successfully conducted team trials to fulfill those selection procedures in 2021.

Operational Performance

The CRG determined that USA Gymnastics is meeting the Operational Performance standards. The organization demonstrates managerial capability to administer its sport, keeps current insurance policies, maintains grievance procedures, and enforces a whistleblower and anti-retaliation policy.

In reviewing USA Gymnastics' grievances, NGB Audit found that some complaints sampled from 2020 were not resolved timely or were resolved without adequate communication to the parties involved. USA Gymnastics made improvements to its grievance process that were reflected in review of 2021 case samples, and NGB Audit's additional testing during the remediation period demonstrated that USA Gymnastics resolved grievances in a timely manner and communicated with all parties as necessary.

USA Gymnastics developed a 2021-2024 Diversity, Equity, and Inclusion (DE&I) Action Plan that it is executing to grow the sport. USA Gymnastics submitted its action plan to the USOPC with sufficient detail, meeting the NGB Compliance Standards. The action plan includes eleven objectives with details relating

¹¹ The Center began an Administrative Audit of USA Gymnastics in October 2022, but the results were not published in time for the CRG to include in its review.

¹² *US Center for SafeSport Audit Report – USA Gymnastics*, December 17, 2019.

¹³ *US Center for SafeSport Audit and Corrective Actions Closure Document*, July 9, 2020.

¹⁴ *US Center for SafeSport Event Audit Report – USA Gymnastics Nationals*, June 20-22, 2021.

¹⁵ *US Center for SafeSport Corrective Actions Update Form – USA Gymnastics*, November 29, 2021.



to specific initiatives, target groups, timelines, and success measures. Objectives include inclusive vendor bidding and contracting process development and expansion, community-based program development, increasing organizational awareness surrounding dimensions of gender identity, as well as broadening awareness and interaction with minoritized communities, and holding DE&I panels and organizational member trainings.

Conclusion

The CRG concluded that USA Gymnastics is performing satisfactorily based on input from the CRG members and the results of the NGB Audit team's 2021 Compliance Audit and there are no outstanding areas of concern affecting its certification status at this time. Accordingly, the CRG recommends that USA Gymnastics' certification as a member organization of the USOPC be renewed with a rating of Renewal in Good Standing.



Appendix

Certification Renewal Process

The USOPC believes in a culture of strong governance, ethics, and compliance among the NGBs that, as member organizations of the USOPC, make up the Olympic and Paralympic movement. Recent amendments to the Ted Stevens Olympic and Amateur Sports Act, which became effective in late 2020, require the USOPC to certify NGBs.¹⁶ The USOPC determined that as of January 1, 2021, all member organizations would be certified, and their certifications would be reviewed for renewal on a rolling basis every four years.¹⁷

Governed by the USOPC's [NGB Certification Policy](#), the NGB certification review process is supported by a cross-functional body of professionals at the USOPC, the Certification Review Group (CRG), who interact with NGBs in their day-to-day work. These professionals evaluate an NGB's operations across multiple functional areas to provide a holistic review of an NGB's performance and culture.¹⁸ In addition to enumerated standards for NGB performance described in the Act, the Bylaws, and the USOPC's [NGB Compliance Standards](#), the CRG considers departmental observations about an NGB's operations that may not be identified in a formal audit scenario but are relevant to consider when evaluating an NGB's overall performance.

Certification Standards, Exceptions, and Review Components

As described in Section 8.4.1 of the [USOPC Bylaws](#), NGBs must satisfy certification requirements in five core areas: Governance and Compliance, Financial Standards and Reporting Practices, Athlete Safety, Sport Performance, and Operational Performance. The USOPC Implementation Guide for NGB Compliance Standards provides NGBs with specific guidance for how they will be evaluated in each of these core areas.

Section 8.4.2 of the USOPC Bylaws permits an NGB to submit a request for limited exceptions to any of the NGB Compliance Standards which, as a result of its overall structure or other extenuating circumstances, cannot or need not be reasonably met. The CRG evaluates all requests received and grants or denies such limited exceptions.

Various provisions of Section 8.5 of the USOPC Bylaws permit NGBs to seek exceptions related to minimum athlete representation requirements on boards and designated committees as well as exceptions or additions to which of its committees are considered designated committees. The Athlete Representation Review Working Group evaluates and approves or denies all requests made under Section 8.5.

¹⁶ See §220521(a) of the Ted Stevens Olympic and Amateur Sports Act.

¹⁷ NGB Certification Policy, Section 1.

¹⁸ The CRG uses a four-year lookback period during this review process.