

UNITED STATES
OLYMPIC & PARALYMPIC
COMMITTEE



NGB Compliance Audit

USA Rugby

August 24, 2026

Executive Summary

Background, Scope, and Objectives

The United States Olympic & Paralympic Committee's Audit department (USOPC Audit) completed an audit of USA Rugby. The purpose of the audit was to determine if USA Rugby complies with the requirements of the National Governing Body (NGB) Compliance Standards (Standards), effective January 1, 2026, and to conduct testing in areas that present an increased risk to athletes, other members, and/or USA Rugby. 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. For questions on this report, please contact USOPC.Audit@usopc.org.

Audit Summary

Overall, Audit concluded that USA Rugby has met 18 of 27 applicable Standards. There was strong compliance noted for financial standards and reporting practices and sports performance, reinforcing its commitment to athlete success. USOPC Audit identified an area of concern related to the Athlete Advisory Council. Additional details are in the findings below.

NGB Compliance Audit Findings

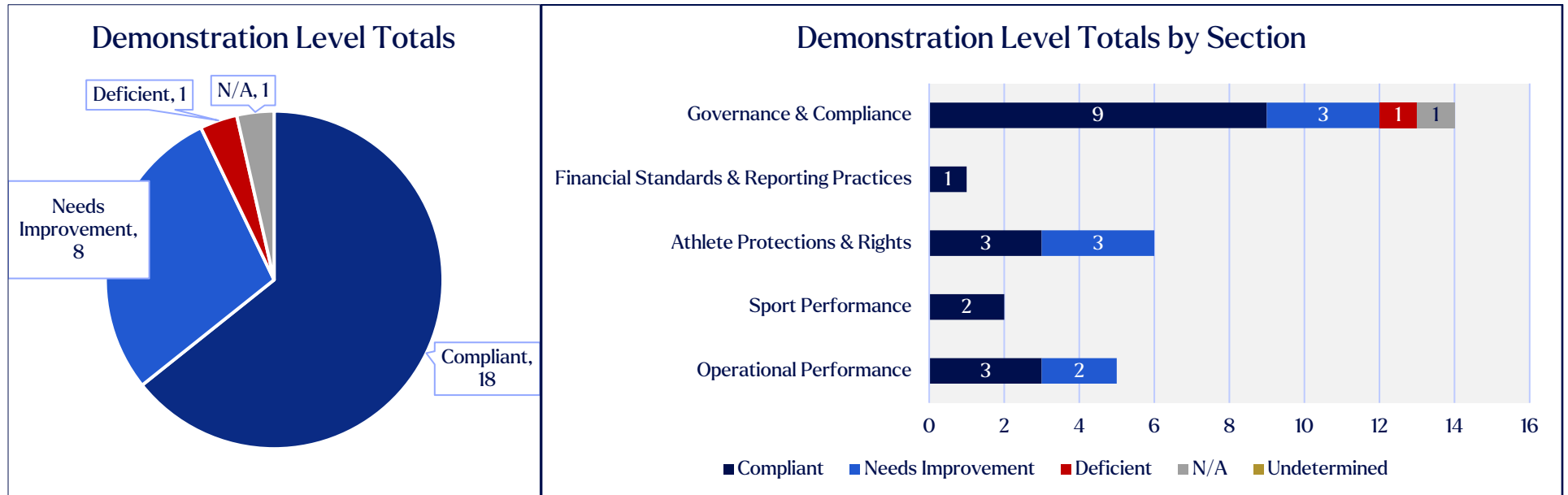
All Standards are evaluated against the 2026 Implementation Guide for Compliance Standards (Implementation Guide). References to the USOPC Bylaws are based on the effective February 1, 2025.

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

Compliant	The NGB, 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.
Needs Improvement	The NGB, 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.
Deficient	The NGB, 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.
Not Applicable / Undetermined	Not applicable indicates the standard does not apply to the NGB 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		
Sport Integrity Policy ¹	A.6 d	N/A		
Demographic & Inclusion Requirements	A.7 a & b	X		
Equal Pay for Team USA	A.7 c	X		
Ombuds' Policy	A.9 a	X		
Total		9	3	1

Needs Improvement		
1	Athlete Representation	Management Action Plan
	A.1 a & b: a. NGB must have at least 33.3% athlete representation on its board of directors as required by the Act §220522(13) and further defined by the USOPC Bylaws, Section 8.5.3. 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. FINDING: While the 7s athletes representatives are elected by a pool of eligible athletes, the 15s athlete representatives are elected by the IAC rather than	USA Rugby will amend the Terms of Reference for the International Athlete Council to amend the voting pool. Due Date: December 22, 2026

¹ This Standard will not be assessed for audits started prior to July 1, 2026.

	directly elected by the pool of eligible athletes who meet the definition of a 10-Year athlete.	
2	Board Development	Management Action Plan
	A.4 b: The NGB board must conduct the following activities: i. Formal onboarding process for board members and committee members, ii. USOPC training to the board members and committee members, iii. At least once per quad, perform a self-evaluation of the board's performance using the USOPC provided resource, and iv. Annual performance evaluation of the CEO/Executive Director. FINDING: USA Rugby does not have a formal onboarding process for new board members.	USA Rugby will establish a formal onboarding process for new board members. Due Date: December 22, 2026
3	Conflict of Interest Policy	Management Action Plan
	A.6 b: NGB must enforce a conflict of interest policy that meets the minimum policy standards set forth by the USOPC. The conflict of interest policy must be made available on the NGB's website. FINDING: While USA Rugby follows its conflict of interest process, USOPC Audit noted two individuals did not disclose a potential conflict.	USA Rugby followed up with the individuals to address the missed disclosures and obtained updated completed conflict of interest forms. This will be reviewed for compliance during the remediation period.
Deficient		
4	Athlete Advisory Council	Management Action Plan
	A.3 a: NGB must have an Athletes Advisory Council that meets the minimum standards set forth by the USOPC. FINDING: While it is required in the Bylaws, USA Rugby's current AAC does not meet the 80% 10 Year Athlete requirement. Additionally, USA Rugby does not require all AAC representatives to complete a conflict of interest form or to submit any other disclosures prior to the election.	USA Rugby is currently working to fill three vacant seats on the current USA Rugby International Athlete and will prioritize 10-Year athletes. Additionally, USA Rugby will amend the Terms of Reference for the International Athlete Council to reflect the 80% 10 Year athlete requirement. Finally, USA Rugby will adopt a modified version of the USOPC Candidate Vetting Checklist Template suitable to USA Rugby to help ensure the conflict of interest and other disclosures are submitted prior to an election. Due Date: December 22, 2026

Financial Standards and Reporting Practices

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

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		X	
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		
Total		3	3	0

Needs Improvement		
5	Child Protection and US Center for SafeSport	Management Action Plan
	C.1 a - b: a. As required by Section 220524(a)(12) of the Act, NGBs must adopt one or more policies that prohibit any individual who is an employee, contractor, or agent of the NGB from assisting a member or former member in obtaining a new job (except for the routine transmission of administrative and personnel files) if the individual knows that that member or former member violated the policies or procedures of the Center related to sexual misconduct or was convicted of a crime involving sexual misconduct with a minor in violation of applicable law or the policies or procedures of the Center.	USA Rugby updated the Athlete Safety Policy to meet the requirements. This will be reviewed for compliance during the remediation period.

	b. NGB must demonstrate compliance with child protection laws and the U.S. Center for SafeSport requirements through the U.S. Center for SafeSport's most recent audit report. FINDING: USA Rugby does not have a policy that meets all the requirements of Section 220524(a)(12) of the Act.	
6	USOPC Athlete Safety Requirements	Management Action Plan
	C.2 a: NGB must ensure compliance with policies and standards including but not limited to: i. USOPC's NGB Athlete Safety Policy ii. Responsible Sport Organization Background Check Policy FINDING: During testing, there were two instances of individuals who did not have a current background check at the time of the event.	USA Rugby's membership season begins on September 1. USA Rugby will make a coordinated effort to confirm all National 7s Team Athletes are properly registered and have complaint background checks prior to departure for any athlete's first appearance in any event. Due Date: November 20, 2026
7	Athlete Agreements	Management Action Plan
	C.4 a: NGB must comply with the USOPC NGB Athlete Agreements Policy. FINDING: USA Rugby's athlete agreements do not clearly define a reasonable number of media sessions and appearances that athletes must attend.	USA Rugby will update the athlete agreements to clearly define a reasonable number of media sessions and appearances. Due Date: December 22, 2026

Sport Performance

NGB Compliance Standards Section D				
Title	Standard	Compliant	Needs Improvement	Deficient
High-Performance Plan Submission	D.3 a	X		
Event Sanctioning	D.3 b	X		
Total		2	0	0

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	X		
Strategic Planning	E.6 a		X	
Total		3	2	0

Needs Improvement		
8	Complaint Resolution and Hearing Procedures	Management Action Plan
	E.4 a & b: a. NGB must provide prompt and equitable resolution of grievances as outlined in the Act §220522(14). 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). FINDING: There are elements missing from USA Rugby's Complaint Resolution and Hearing Procedures in the following areas: investigation and resolution and arbitration.	USA Rugby updated the Complaint Resolution and Hearing Procedures to meet the requirements. This will be reviewed for compliance during the remediation period.
9	Strategic Planning	Management Action Plan
	E.6 a: NGB must maintain and monitor the execution of an organizational strategic plan, in addition to a high-performance plan. FINDING: USA Rugby has a board-approved strategic plan that includes organizational initiatives distinct from high-performance plan initiatives. However, there is no documented process demonstrating that progress against the strategic plan is being monitored and periodically reported to the Board.	USA Rugby will create a monitoring framework to document progress against the strategic plan and will present progress periodically to the board. This will be reflected in the board meeting minutes. Due Date: December 22, 2026

Findings in this report are currently in remediation. A closure letter will be issued once all findings have been remediated.