United States Olympic and Paralympic Committee Certification Review Group



Certification Renewal Recommendation Report for USA Curling April 16, 2025



USA Curling Certification Renewal Executive Summary

In December 2024, 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 Curling (USA Curling).¹ The CRG evaluated USA Curling and, based on input from CRG members, including USA Curling's progress toward resolving the findings of NGB Audit's 2024 Compliance Audit², recommends a certification status of Renewal with Conditions.

The CRG's review of USA Curling found that the organization is meeting most of 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. A Compliance Audit conducted by the USOPC's Audit team in the first quarter of 2024 identified several areas where USA Curling was not fully meeting NGB Compliance Standards, including findings related to its athlete representation, financial policies and procedures, USA Curling's background check policy, and strategic planning.

During the CRG's review period, USA Curling made a good faith effort to reach compliance and remediated some of its outstanding audit findings by the time of the CRG's recommendation. However, several high risk audit findings remain outstanding and will be considered conditions of USA Curling's certification. The conditions of USA Curling's certification as an NGB are:

- USA Curling must update and publish its bylaws to meet the requirements for athlete representation, consistent with Standard A.1 a & b of the NGB Compliance Standards.
- USA Curling must fully document the eligible athlete voter listing, ensure athletes on the board and committees meet requirements, and adequately track athletes to ensure eligibility for athlete representation roles.
- USA Curling must update and publish its Code of Conduct to fully comply with Standard A.5 a.
- USA Curling must update its conflict of interest disclosure process to ensure disclosures are complete for all required parties and properly reviewed, in accordance with Standard A.6 a.
- USA Curling must update, approve, and publish Financial Policies and Procedures that meet Standard B.1 b.
- USA Curling must revise its background check policy to ensure it meets all of the mandatory requirements and revise its process to ensure all required background checks are completed in accordance with USOPC requirements.
- USA Curling must update its Whistleblower and Anti-Retaliation Policy to fully comply with Standard E.5 a.
- USA Curling must create a process to ensure its annual strategic plan is board-approved, includes success measures, and monitors progress.

As a result of this review, the CRG recommends that USA Curling be granted a certification status of Renewal with Conditions. In accordance with the NGB Certification Policy, USA Curling must resolve the remaining deficiencies outlined in this report by May 28, 2025. If the CRG determines that USA Curling has successfully addressed the specified conditions within that timeframe, the CRG may recommend that its certification status be upgraded to Renewal in Good Standing. If

¹ See Appendix for more information about the certification process, including a link to the NGB Certification Policy. ² NGB Compliance Audit – USA Curling, September 6, 2024.

USA Curling fails to resolve the specified issues to the CRG's satisfaction within that timeframe, the CRG will assess whether accountability measures, up to and including the initiation of decertification proceedings, are appropriate to address USA Curling's delayed action.

Organizational Overview

USA Curling is the USOPC-certified NGB for the sport of curling. USA Curling is a member of the World Curling Federation, and headquartered in Eden Prairie, Minnesota. The mission of USA Curling is to grow, strengthen, and advocate for the Olympic and Paralympic sport of Curling in the United States by prioritizing accessibility and programmatic development from grassroots to podium.³

Certification History

USA Curling was originally certified in January 2021.⁴ This is the first time USA Curling has gone through the certification review process.

Certification Exceptions⁵

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

Athlete Representation Approval and Exceptions⁶

USA Curling requested that the Athlete Representation Working Group (ARRWG) approve additional competitions as qualifying events for 10-Year and 10-Year+ Athlete status to expand the pool of athletes eligible to serve as athlete representatives. All events are either elite, international events or involve NGB-led selection procedures. The ARRWG approved the following competitions as qualifying events:

- Grand Slam of Curling Tour Events
- World Curling Championships
- Pan Continental Championships
- World Qualification Events
- Olympic Qualification Events
- USA National Men's and Women's Championships
- USA National Mixed Double Championships
- USA Olympic Team Trials
- USA Wheelchair Curling Team Selection

Certification Review⁷

Governance and Compliance

The CRG determined that USA Curling is fulfilling some of the Governance and Compliancerelated responsibilities of an NGB, including adopting and enforcing key ethics and compliancerelated policies and making them publicly available on its website, and defining procedures to

³ <u>About</u>, USA Curling Website.

⁴ Refer to the Appendix for details on the initial certification.

⁵ Refer to the Appendix for details on exception requests to the NGB Compliance Standards.

⁶ Refer to the Appendix for details on athlete representation exception requests.

⁷ Refer to the Appendix for details on the review standards and process for information related to the Compliance Audit.

address violations of these policies. Additionally, USA Curling has not been the subject of any formal complaints filed with the Dispute Resolution Unit within the last four years.

As a result of the 2024 Compliance Audit, USA Curling updated its Board of Directors roster on the USA Curling webpage and established a formal onboarding process for new members. USA Curling is in the process of updating and approving its bylaws, conflict of interest policy, and code of conduct to meet the NGB Compliance Standards. Additionally, USA Curling must update its conflict of interest disclosure process to ensure disclosures are complete for all required parties and properly reviewed. Updating and publishing the Code of Conduct policy and updating the conflict of interest disclosure process to meet requirements of the NGB Compliance Standards are conditions of certification.

USA Curling must make further improvements to athlete representation before the CRG will consider recommending a Renewal in Good Standing rating. As a condition of this certification renewal, USA Curling must demonstrate that all athletes on its Designated Committees meet the eligibility requirements, ensure that it adequately tracks athletes qualifying event data and status, and maintain adequate documentation of the athlete voter pool for elections.

The CRG received generally positive athlete feedback regarding USA Curling's new leadership. Athletes noted the internal Athletes Advisory Council is engaged and involved, and they expressed belief that their voices are heard and their recommendations are considered by NGB leadership. With regard to high performance programs and selection procedures, athletes noted they feel improvement and transparency, citing the inclusion of clear metrics. Athletes did express concern about coaching turnover and retainment within its high performance programming. Overall, the athletes expressed appreciation for the new leaderships' efforts to rebuild trust.

Financial Standards and Reporting Practices

The CRG determined that USA Curling meets most of the NGB Compliance Standards for Financial Standards and Reporting Practices. USA Curling made improvements to its policies and processes to demonstrate financial operational capability to administer its sport, and the USOPC will continue to evaluate its financial and operational transparency.

As a result of the 2024 compliance audit, USA Curling must implement procedures to appropriately document and report expenditures applied to USOPC funding agreements. USA Curling's 2024 USOPC funding final grant report did indicate improvements of financial controls since the NGB's compliance audit. However, as a condition of USA Curling's certification, the NGB must update and seek board approval of its financial policies and procedures, consistent with NGB Compliance Standard B.1 b.

The 2024 Compliance Audit identified that USA Curling's negative net assets of the previous fiscal year, combined with a negative cumulative change of net assets over the most recent four years, showed that USA Curling's financial standing may not be sufficient to support the operational needs of the organization. Demonstrating improved financial stability is a condition of the CRG's certification recommendation, and this will be evaluated through USA Curling's 2025 budget and quarterly check-ins with the USOPC.

Athlete Protection and Rights

USA Curling maintains and enforces an athlete safety program consistent with the requirements of relevant federal law. However, as a result of the 2024 compliance audit, USA Curling must

create a policy to notify the USOPC Office of Athlete Safety as required and revise its background policy to ensure compliance with the policies and standards.

The USOPC is not aware of any cases it has received in the past four years concerning USA Curling that should have 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 Curling that the USOPC was required to report.

In 2022, the Center conducted its most recent Administrative Audit⁸ of USA Curling's implementation of policies required by the SafeSport Code and the Minor Athlete Abuse Prevention Policies, which resulted in one finding that required corrective action. The Center deemed USA Curling's corrective action as complete and compliant on November 29, 2022.⁹ On November 2, 2024 the Center conducted an Event Audit¹⁰ of USA Curling's event in Las Vegas, NV, which resulted in no required corrective actions.

In addition to its athlete safety work, USA Curling updated its athlete agreements to be fully compliant with the NGB Compliance Standards.

Sport Performance

USA Curling is fulfilling its obligations in Sport Performance. The organization maintains and executes a high-performance plan that supports athletes in achieving sustained competitive excellence and grows the sport. In response to the 2024 compliance audit, USA Curling updated its event sanctioning documents to meet the NGB Compliance Standards.

Operational Performance

The CRG determined that USA Curling is meeting most of the Operational Performance standards required for NGBs. As a result of the 2024 Compliance Audit, and as a condition of certification, USA Curling must ensure its annual strategic plan is board-approved, includes success measures, and that the board monitors its progress. Additionally, USA Curling must update its whistleblower and anti-retaliation policy to meet compliance. USA Curling is also in the process of updating its grievance procedures to include required elements to meet the NGB Compliance Standards.

USA Curling developed a 2022-2026 Diversity, Equity, and Inclusion Action Plan focused on three objectives: recruitment diversity, retention diversity, and revenue diversity. The organization prioritizes the expansion of the existing Ice Breakers initiative, a program focused on intentional outreach and programmatic change, to include at least 75% of USA Curling member clubs. Additionally, the NGB aims to strengthen partnerships with youth sports organizations that serve communities of color, increase representation by recruiting professional staff from the BIPOC community, and continuously develop a pipeline of athletes that includes individuals of color. USA Curling is also committed to achieving a significant percentage of first-time participants from the BIPOC community. USA Curling also consistently met the data submission requirements for the USOPC's annual diversity scorecard.

Conclusion

⁸ <u>US Center for SafeSport Administrative Audit</u>, USA Curling, October 4, 2022.

⁹ <u>US Center for SafeSport Corrective Actions Update</u>, November 29, 2022.

¹⁰ <u>US Center for SafeSport Event Audit</u>, USA Curling, November 2, 2024.

USA Curling is meeting a majority of the NGB Compliance Standards but must address the identified conditions before it meets all requirements and expectations of an NGB. While there are no outstanding severe deficiencies that merit the consideration of immediate decertification, based on input from CRG members and the outstanding NGB Audit findings, the CRG has identified issues that require remediation before the CRG considers recommending certifying USA Curling as a member in good standing. As such, the CRG recommends that USA Curling's certification as a member organization of the USOPC be granted a rating of Renewal with Conditions.

As part of this Renewal with Conditions rating, USA Curling will have until May 28, 2025, to meet the conditions of this certification. If USA Curling successfully meets these conditions by the prescribed date, the CRG may recommend that its certification rating be upgraded to Renewal in Good Standing. If USA Curling fails to resolve these conditions to the CRG's satisfaction by May 28, 2025, the CRG will assess whether accountability measures, up to and including the initiation of decertification proceedings, are appropriate to address USA Curling's delayed action.

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.¹⁸ 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.¹⁹

Governed by the USOPC's <u>NGB Certification Policy</u>, 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.²⁰ In addition to enumerated standards for NGB performance described in the Act, the Bylaws, and the USOPC's <u>NGB Compliance Standards</u>, 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 <u>USOPC Bylaws</u>, 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.