

**United States Olympic and Paralympic Committee  
Certification Review Group**



**Certification Renewal Recommendation Report for USA National Karate-do  
Federation  
December 7, 2023**



**UNITED STATES  
OLYMPIC & PARALYMPIC  
COMMITTEE**

## **National Karate-do Federation Certification Renewal Executive Summary**

In May 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 National Karate-do Federation (USA-NKF).<sup>1</sup> The CRG evaluated the USA-NKF and, based on input from CRG members, as well as the results of NGB Audit department's 2021 Compliance Audit<sup>2</sup> of the organization and USA-NKF's fulfillment of the requirements from Demand Letters issued by Compliance, recommends a certification status of Renewal in Good Standing.

The CRG's review of the USA-NKF 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. In addition, USA-NKF received a Demand Letter and an Investigative Findings Letter from the USOPC's Compliance department stemming from two investigations into the NGB that included multiple required reforms that have since been completed.

CRG members agreed that USA-NKF is presently meeting the requirements for NGB certification. In its discussions of USA-NKF's interactions with the USOPC, the CRG did not identify any operational concerns that would prevent the organization's continued certification, but the CRG did note that USA-NKF faces governance challenges that put the organization's stability at significant risk. The CRG does not believe that USA-NKF and its membership have found a solution to satisfy all parties that would reduce the volatility among the board, committees, athletes, and other members, but also believes that USA-NKF's board has made progress toward improving the organization's governance since the Compliance Audit and the issuance of the investigative findings and required reforms.

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

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

<sup>2</sup> [NGB Audit Report](#) and [NGB Audit Addendum Report](#).

## **Organizational Overview**

USA-NKF is the USOPC-certified NGB for karate and is recognized as the United States' national federation by the World Karate Federation. The USA-NKF's mission is to "enable United States athletes to achieve sustained competitive excellence and to promote and grow the sport of Karate in the United States while maintaining the well-being of [its] members."<sup>3</sup> The organization is headquartered in Colorado Springs, Colorado.

## **Certification History**

USA-NKF was originally certified in January 2021.<sup>4</sup> This is the first time USSA has gone through the certification review process.

## **Certification Exceptions<sup>5</sup>**

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

## **Athlete Representation Approval and Exceptions<sup>6</sup>**

USA-NKF requested that the Athlete Representation Review Working Group (ARRWG) approve additional competitions as qualifying events for 10-Year and 10-Year+ status to expand the pool of athletes eligible to serve as athlete representatives. These competitions, which the ARRWG approved as presented, are:

- World Championships (starting in 2008)
- Pan American Karate Federation Championships (starting in 2007)
- Senior National Team Selection Competition – 2<sup>nd</sup> Stage

USA-NKF also requested that the ARRWG approve the USA National Karate Federation Championships as a qualifying event where athletes can gain eligibility as an Actively Engaged Athlete. This competition is a high-level domestic qualifier for the national team selection competition.

The ARRWG approved an exception for the Other Committees listed below to include athlete representation at a 20% threshold rather than the standard 33% threshold. USA-NKF and its AAC outlined that these committees deal with highly specific areas of the sport in which an athlete voice was necessary, but that the 33% threshold was not essential. As a condition to this exception, USA-NKF will ensure that the scope of these committees' work never includes governance, resource allocation, or national team matters. These include:

- Technical
- Referee Operations
- Medical

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<sup>3</sup> [USA-NKF Bylaws](#)

<sup>4</sup> Refer to the Appendix for details on the initial certification.

<sup>5</sup> Refer to the Appendix for details on exception requests to the NGB Compliance Standards.

<sup>6</sup> Refer to the Appendix for details on athlete representation exception requests.

## **Certification Review<sup>7</sup>**

### ***Governance and Compliance***

The CRG determined that USA-NKF is fulfilling the Governance and Compliance-related responsibilities of an NGB. USA-NKF has adopted a code of conduct, conflicts of interest policy, and gifts and entertainment policy, has made these policies publicly available on its website; and has defined procedures to address violations of these policies. Within the last four years, USA-NKF was the subject of two formal complaints filed with the USOPC Dispute Resolution Unit, which resulted in one dismissal and one ruling in favor of the NGB.

The CRG received athlete feedback as it related to athletes' views of USA-NKF's governance. Athletes felt that changes in the organization's leadership since 2021 were beginning to have a positive effect, although conceded that progress would be slow and that athletes who are not actively involved in the discussions may not yet feel much progress.

In response to the 2021 Compliance Audit, USA-NKF revised its bylaws in July 2022 to include missing elements required by the NGB Compliance Standards, including compliant election procedures for athlete representatives on the Board of Directors and requirements for independent board members. USA-NKF also revised its code of conduct, conflict of interest policy, and gifts and entertainment policy to fully meet the NGB Compliance Standards and resolve findings from the 2021 Compliance Audit.

In addition to the policy findings, Compliance required USA-NKF to conduct a more thorough review of its board and staff conflict of interest disclosures as part of the follow-up to a 2021 investigation. USA-NKF provided evidence of its disclosure reviews, which demonstrated the disclosures were reviewed consistent with USA-NKF's policies and procedures.

USA-NKF completed a number of required reforms to improve its governance as a result of investigations in 2021 and 2022, including holding elections for board members whose terms had expired; code of conduct and whistleblower policy training for USA-NKF's board, committee members, and employees; the adoption of a strategic plan with measurable and specific goals for putting athletes first at USA-NKF; and the restructuring of the referee committees. While USA-NKF has made improvements in these areas, the CRG notes that the USA-NKF board remains factional and volatile, which contributes to an undercurrent of instability for the organization.

### ***Financial Standards and Reporting Practices***

USA-NKF meets the requirements for an NGB's Financial Standards and Reporting Practices. The organization demonstrates financial operational capability to administer its sport and is financially and operationally transparent, while maintaining its accountability to its members and to the USOPC.

USA-NKF's Board of Directors adopted revised financial policies and procedures in June 2022 to include missing elements identified in the 2021 Compliance Audit. USA-NKF has resolved all open findings in the area of Financial Standards and Reporting Practices and there are no ongoing concerns with the organization's practices.

### ***Athlete Protection and Rights***

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<sup>7</sup> Refer to the Appendix for additional details on the review standards and process for information related to NGB Audit's Report on the USA-NKF.

USA-NKF 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). It also maintains an anti-doping program consistent with the requirements of the USOPC and the U.S. Anti-Doping Agency.

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

In July 2022, the Center conducted its most recent Administrative Audit<sup>8</sup> of USA-NKF's implementation of policies required by the Center's SafeSport Code and Minor Athlete Abuse Prevention Policies. USA-NKF received a rating of "Partially Implemented" in the Education and Training area of evaluation due to USA-NKF "not offer[ing] minor athlete training and parent training to its members." USA-NKF updated its communications to more explicitly state that such training is offered and the Center confirmed that USA-NKF's full compliance as of September 2022.<sup>9</sup> In April 2023, the Center conducted its most recent Event Audit<sup>10</sup> for USA-NKF at its USA Open Karate Championships & Junior International Cup event, resulting in one "Partially Implemented" rating in the area of Response and Resolution due to findings related to policy language and tracking mechanisms for reported issues. USA-NKF took corrective action to resolve the Center's findings and the Center confirmed USA-NKF's full compliance as of September 2023.<sup>11</sup>

USA-NKF revised its background check policy to explicitly list additional applicable parties required to receive a background check, which brought its policy in line with the requirements of the NGB Compliance Standards. USA-NKF also, in consultation with its Athletes' Advisory Council, amended its athlete agreement to include anti-doping language required by the NGB Compliance Standards. These policy revisions resolved audit findings from the 2021 Compliance Audit.

### ***Sport Performance***

USA-NKF is fulfilling its obligations in Sport Performance. The organization established selection procedures and identified selection trials competitions for Delegation Event qualification. As a result of reforms required by USOPC Compliance reviews in 2021 and 2022, USA-NKF has, and will continue to, make improvements to ensure that hosted events are conducted professionally and competently.

The CRG collected athlete feedback, which included comments that USA-NKF could do better to invest in its high performance pipeline by contributing development funds to emerging elite athletes in addition to elite athletes. Another comment was that USA-NKF should differentiate between its athletes and provide more support to the top karate athletes.

### ***Operational Performance***

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<sup>8</sup> [2022 Administrative Audit Report – USA National Karate-do Federation](#), July 13, 2022.

<sup>9</sup> [Corrective Actions Update – USA National Karate-do Federation](#), September 26, 2022

<sup>10</sup> [2023 Event Audit Report – USA National Karate-do Federation](#), April 6-7, 2023.

<sup>11</sup> [Corrective Actions Update – USA National Karate-do Federation](#), September 1, 2023.

The CRG determined that USA-NKF demonstrates the managerial capability to administer its sport and maintains adequate insurance to manage its risk, fulfilling the majority of its Operational Performance obligations. USA-NKF has yet to resolve an audit finding relating to anti-discrimination training, but the CRG determined it does not impact USA-NKF's certification rating at this time.

In response to the 2021 Compliance Audit, USA-NKF revised its whistleblower and anti-retaliation policy and grievance procedures. The documents now include all elements required by the NGB Compliance Standards and are compliant. USA-NKF's Board of Directors adopted an updated strategic plan in April 2022 as required by Compliance's 2021 investigation and consistent with its management action plan stemming from the 2021 Compliance Audit. This strategic plan includes athletes' well-being as a priority, consistent with the organization's most recently adopted mission statement.

USA-NKF maintains a 2021-2024 Diversity, Equity, and Inclusion (DE&I) Action Plan that describes its DE&I vision and strategy for the coming years. USA-NKF submitted its action plan to the USOPC with sufficient detail, meeting the NGB Compliance Standards. USA-NKF's action plan contains several objectives to advance DE&I in karate, including improving data collection to better tailor its DE&I efforts, increasing DE&I awareness, increasing participation among women, veterans, and people with disabilities, and increasing the diversity among its Board of Directors. In addition, as a result of the 2021 Compliance investigation, USA-NKF's Board of Directors and management were required to participate in diversity and inclusion training with the intent of increasing the organization's engagement with and attention to DE&I best practices.

## **Conclusion**

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

While the CRG is recommending a Renewal in Good Standing rating, the CRG will continue to monitor the organization for volatility resulting from poor governance practices at the board level and reserves its ability to reinstate compliance action at any time should its governance deteriorate and become a significant issue affecting the organization's ability to effectively support athletes and steward the sport, and therefore, its continued certification as an NGB.

## 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.<sup>12</sup> 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.<sup>13</sup>

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.<sup>14</sup> 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.

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<sup>12</sup> See §220521(a) of the Ted Stevens Olympic and Amateur Sports Act.

<sup>13</sup> *NGB Certification Policy*, Section 1.

<sup>14</sup> The CRG uses a four-year lookback period during this review process.