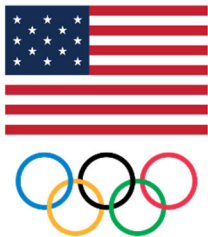


**United States Olympic and Paralympic Committee
Certification Review Group**



**Certification Renewal Recommendation Report for USA Track & Field
December 7, 2023**



**UNITED STATES
OLYMPIC & PARALYMPIC
COMMITTEE**

USA Track & Field Certification Renewal Executive Summary

In January 2023, 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 Track & Field (USATF).¹ The CRG evaluated USATF and, based on input from CRG members and the results of NGB Audit's 2022 Compliance Audit², recommends a certification status of Renewal with Conditions.

The CRG's review of USATF 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 NGB Audit department in 2022, identified several areas where USATF was not fully meeting the USOPC's NGB Compliance Standards, including findings related to board governance and management of conflicts of interest.

During the CRG's review period, USATF made a good faith effort to reach compliance with the NGB Compliance Standards and remediated most of its outstanding audit findings by the time of the CRG's recommendation. The CRG identified one open audit finding to be considered a condition of USATF's certification. The condition is:

- In accordance with standard A.6.a, USATF must demonstrate that its conflict of interest disclosure and review process is being executed on a consistent basis, specifically relating to the distribution of direction letters.

As a result of this review, the CRG recommends that USATF be granted a certification status of Renewal with Conditions. In accordance with the NGB Certification Policy, USATF has 180 days from the USOPC Board of Directors' ratification of this recommendation to resolve the remaining deficiency outlined in this report. If the CRG determines that USATF has successfully addressed this issue within that timeframe, the CRG will recommend that its certification status be upgraded to Renewal in Good Standing. If USATF fails to resolve this issue to the CRG's satisfaction within that timeframe, its certification rating will be downgraded to Probationary Renewal and the USOPC will discuss whether accountability measures are appropriate to address USATF's delayed action.

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

USATF is the USOPC-certified NGB for track and field, long distance running, and race walking, disciplines collectively known as “athletics”, and is the U.S. representative to the international federation that governs the sport, World Athletics. USATF’s mission is to “[drive] competitive excellence and popular engagement in [the] sport in a safe environment for all.”³ Structurally, USATF maintains organizational and individual memberships, with 56 USATF associations overseeing more than 3,000 clubs at the local level, and serves more than 130,000 individual members.⁴ USATF is headquartered in Indianapolis, Indiana.⁵ At the 2021 Tokyo Olympic Games, USATF athletes earned 26 medals, exceeding any other nation by 17 medals.⁶

Certification History

USATF was originally certified in January 2021.⁷ This is the first time USATF has gone through the certification review process.

Certification Exceptions⁸

In October 2023, one of USATF’s athlete directors stepped down from their position on the board, leaving a vacancy to be filled to meet the 33.3% athlete representation requirement. In accordance with the 2023 USATF Governance Handbook, “the Athletes Advisory Committee shall fill any 10 Year or 10 Year+ Athlete member vacancy until the next Annual Meeting, when the 10 Year or 10 Year+ Athlete delegates shall elect a replacement to serve the remainder of the term.”⁹ Based on this information, the CRG granted USATF’s request for an exception from a portion of NGB Compliance Standard A.1.a & b that requires all athlete representatives (10 Year and 10 Year+) to the NGB’s board be directly elected by the pool of athletes who meet the requirements as 10 Year athlete representatives for that NGB.¹⁰ The CRG approved this exception for USATF to follow its process in filling the vacant athlete director seat based on its understanding that the interim athlete director would be voted on by all eligible 10 Year and 10 Year+ athletes at USATF’s Annual Meeting, held November 30 through December 3, 2023.

Athlete Representation Approval and Exceptions¹¹

USATF requested that the Athlete Representation Review Working Group (ARRWG) approve additional international competitions as qualifying events for 10 Year and 10 Year+ status to expand the pool of athletes eligible to serve as athlete representatives. All these events are World Athletics-sanctioned events for which Team USA was chosen in accordance with world ranking or NGB-led selection procedures:

- World Athletics Outdoor Track & Field Championships
- World Athletics Indoor Track & Field Championships
- World Athletics World Relay Championships
- Senior NACAC Championships

³ [About USATF](#)

⁴ *Id.*

⁵ [Contact Us](#), USATF Website.

⁶ [Double Relay Gold Seals U.S. Medal Dominance on Final Day of Olympic Games](#), USATF Website.

⁷ Refer to the Appendix for details on the initial certification.

⁸ Refer to the Appendix for details on exception requests to the NGB Compliance Standards.

⁹ *2023 Governance Handbook Revised*, Article 11, Section J.3.

¹⁰ *2023 Implementation Guide for NGB Compliance Standards*, Standard A.1a & b, “Election.”

¹¹ Refer to the Appendix for details on athlete representation exception requests.

- World Athletics Cross Country Championships

The ARRWG approved the competitions from year 2000 onwards to account for gender equity.

In addition, USATF requested that the ARRWG approve additional national competitions as qualifying events for 10 Year and 10 Year+ eligibility. All the events are USATF-sanctioned National Championships, with a USATF-led qualification system:

- USA Outdoor Track & Field Championships – Top-8 Finishers
- USA Olympic Track & Field Trials – Top-8 Finishers
- USA Olympic Marathon Trials – Top-12 Finishers

The ARRWG approved the competitions with the restricted finishing places beginning in the year 2000.

To ensure USATF maintains 33.3% athlete representation at its Annual Meeting, USATF also requested that the ARRWG approve a weighted athlete vote. USATF proposed that the votes be equally distributed amongst all designated Team USA Athletes Commission athlete representatives. The ARRWG approved this proposal of a weighted vote given the size of USATF's voting membership in attendance at the Annual Meeting.

Certification Review

Governance and Compliance

The CRG determined that USATF is fulfilling many of the governance and compliance-related responsibilities of an NGB, including adopting and enforcing key ethics and compliance-related policies, making them publicly available on its website; and defining procedures to address violations of these policies. Additionally, USATF has not been the subject of any formal complaints filed with the Dispute Resolution Unit within the last four years.

To address 2022 Compliance Audit findings, USATF updated its policies, standardized its board's practices, and strengthened its athlete representation processes to meet the NGB Compliance Standards. Although audit findings pertaining to bylaw amendments and specific board and committee governance processes remain open, the CRG determined these open issues should not be conditions of certification.

While USATF made significant progress in Governance and Compliance, particularly in addressing NGB Audit's findings, the organization must make further improvements before the CRG will consider recommending a Renewal in Good Standing rating. In 2022, Compliance reviewed a report that a board member's conflict of interest affected the 2024 Olympic marathon trials bidding process. As a result of this review, and consistent with standards A.6.a and A.6.b, Compliance issued three requirements to address the concern. USATF submitted sufficient evidence of completing the requirements. Although USATF has also made significant progress in improving its conflict of interest disclosure and review process, the audit finding remains open. As a condition of this certification renewal, USATF must demonstrate that its conflicts of interest disclosure process is being executed on a consistent basis, with emphasis on its distribution of direction letters.

The CRG sought athlete feedback on USATF's Athletes Advisory Council (AAC) and its communication with USATF leadership. In general, athletes provided positive feedback, noting that communication is good, and the group continues to develop new strategies to increase engagement. Although athletes noted challenges in meeting athlete representation requirements due to lack of athletes' interest, the AAC and USATF are actively working to adhere to the NGB Compliance Standards.

Financial Standards and Reporting Practices

USATF 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 with its membership by publishing its audited financial statements and tax forms.

USATF updated its financial policies and procedures during the 2022 Compliance Audit remediation period and provided all required financial documentation to address audit findings.

Athlete Protection and Rights

USATF maintains and executes 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 non-compliance issues with the anti-doping rules and 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 USATF 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 USATF that the USOPC was required to report.

In October 2022, the Center conducted its most recent Administrative Audit¹² of USATF's implementation of policies required by the SafeSport Code and the Minor Athlete Abuse Prevention Policies, which resulted in fully implemented ratings, but included suggested corrective actions. The Center deemed USATF's corrective actions as complete on December 15, 2022.¹³ On March 17, 2023, the Center conducted an Event Audit¹⁴ of the National Youth Indoor Championships hosted by Norton Healthcare Sports & Learning Center in Louisville, Kentucky. The Center required that USATF update relevant policies and procedures that fell under its response & resolution process, which USATF resolved by June 26, 2023.¹⁵

As a result of the 2022 Compliance Audit, USATF updated its athlete safety and anti-doping policies, as well as other applicable documents, including its athlete agreements, consistent with required language outlined in the NGB Compliance Standards. Furthermore, USATF demonstrated that background checks were current for tested board members.

Sport Performance

USATF is fulfilling many of its obligations in Sport Performance. The organization maintains and executes a strategic plan that supports athletes in achieving sustained competitive excellence and

¹² [US Center for SafeSport Administrative Audit Report](#) – USATF, October 4, 2022.

¹³ [US Center for SafeSport Corrective Actions Update](#) – USATF, December 15, 2022.

¹⁴ [US Center for SafeSport Event Audit Report](#) – USATF, March 17, 2023.

¹⁵ [US Center for SafeSport Corrective Actions Update](#) – USATF, June 5, 2023.

grows the sport. USATF established selection procedures and executed them effectively to name and train Team USA athletes for Delegation Events.

Although an audit finding pertaining to USATF's delegation list submission remains open, the NGB and the USOPC are working together to develop an action plan to ensure its timely and accurate submission for future Delegation Events. The CRG determined that USATF has demonstrated its commitment to resolving this concern, and that this finding does not impact USATF's certification status at this time.

Operational Performance

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

During the audit remediation period, USATF updated its grievance procedures and whistleblower and anti-retaliation policy to meet the NGB Compliance Standards. Although USATF has made significant progress in addressing its managerial and board capability finding, both the NGB and the USOPC require additional time to assess the sustainability of reforms as they relate to specific committee responsibilities.¹⁶

USATF developed a 2021-2024 Diversity, Equity, and Inclusion (DE&I) Action Plan aimed to provide equal opportunity and a sense of belonging by educating and engaging its athletes, participants, coaches, officials, volunteers, and workforce. USATF submitted its action plan to the USOPC with sufficient detail to meet the NGB Compliance Standards. The action plan includes five objectives with details relating to specific initiatives, target groups, timelines, and success measures. Objectives include increasing leadership and volunteer awareness to DE&I's organizational impact; implementing strategies for advancing DE&I and cultural awareness; fostering a workforce that represents the diversity of USATF's community; investing in contracting and procurement aligned with USATF's DE&I values; and providing programs and services that are responsive to patrons' needs.

Conclusion

Considering the importance of managing conflicts of interest consistent with the USOPC's Compliance requirements, USATF must address that area of concern before its certification status is upgraded. As such, the CRG recommends that USATF's certification as a member organization of the USOPC be renewed with a rating of Renewal with Conditions. The condition of this certification is:

- In accordance with standard A.6.a, USATF must demonstrate that its conflict of interest disclosure and review process is being executed on a consistent basis, specifically relating to the distribution of direction letters.

As part of this Renewal with Conditions rating, USATF will have 180 days from the date of the USOPC Board of Directors' ratification of this report to correct the outstanding issue. If USATF successfully meets the condition, the CRG will recommend that its certification rating be

¹⁶ For additional information regarding NGB Audit's ad hoc review of committees that report to USATF's board, see USATF's Audit Addendum Report.

upgraded to Renewal in Good Standing. If USATF does not take satisfactory action to meet the condition of this certification within 180 days, its certification rating will be downgraded to Probationary Renewal and the USOPC will discuss whether accountability measures are appropriate to address USATF'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.¹⁷ 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.¹⁸

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.¹⁹ 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.

¹⁷ See §220521(a) of the Ted Stevens Olympic and Amateur Sports Act.

¹⁸ *NGB Certification Policy*, Section 1.

¹⁹ The CRG uses a four-year lookback period during this review process.