United States Olympic and Paralympic Committee Certification Review Group



Certification Renewal Recommendation Report for USA GOLF November 13, 2024



USA Golf Certification Renewal Executive Summary

In September 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 Golf.¹ The CRG evaluated USA Golf and based on input from CRG members, as well as the results of the NGB Audit department's 2023 compliance audit,² recommends a certification status of Renewal in Good Standing.

The CRG's review of USA Golf found that the organization meets the majority of applicable 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. The CRG assessed USA Golf with consideration for its unique organizational structure, which differs from the majority of certified NGBs. USA Golf is actively working to resolve some remaining open audit findings, which the CRG determined are not significant issues that affect the NGB's certification status at this time.

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

As a result of this review, the CRG recommends that USA Golf be granted a certification status of Renewal in Good Standing for a four-year certification term ending in 2028.

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

² <u>NGB Compliance Audit – USA Golf</u>, May 22, 2024.

Organizational Overview

USA Golf is the USOPC-certified NGB for the sport of golf, which is included on the Olympic and Pan American Games programs. The mission of USA Golf is to "pursue competitive success in Olympic, Paralympic or Pan American competition and to contribute to the development of future elite American golfers."³ USA Golf is the Unted States' representative to the International Golf Federation (IGF). USA Golf's principal office is located in St. Augustine, FL.⁴

USA Golf has a unique organizational structure, consisting of four founding members: the Professional Golfers' Association (PGA) of America, the PGA Tour, the Ladies Professional Golf Association (LPGA), , and the United States Golf Association (USGA). Together, the founding members and the board of directors drive the strategic plan of USA Golf, whose limited scope of work is concentrated on facilitating competitive success in Delegation Events.⁵ This structure differs from the majority of other certified NGBs; however, it aligns with the IGF's collaborative delivery model, which includes seven delivery partners: the R&A, USGA, PGA Tour, European Tour, PGA of America, LPGA, and Masters Tournament.⁶ Thus, USA Golf does not have an individual membership structure, rather, it's categories of membership include (1) founding members and (2) organization members.⁷

Certification History

USA Golf was originally certified in January 2021.⁸ This is the first time USA Golf has undergone a certification review.

Certification Exceptions⁹

Given USA Golf's unique organizational structure, the NGB Audit department determined several NGB Compliance Standards did not apply to the organization during the audit process.¹⁰ In addition, USA Golf requested exceptions from certain NGB Compliance Standards during its certification review. On March 14, 2024, the CRG approved two exception requests pertaining to standards A.2 a (Athlete Advisory Council) and B.1 d (Financial Reporting to the Board), which require the following:

- Standard A.2 a: NGB must have an Athletes' Advisory Council that meets the minimum standards set forth by the USOPC.
- Standard B.1 d: NGB management must provide financial reports to its board, at least three times per year, and confirmation of discussion must be included in board meeting minutes. NGB must provide financial information and documents as reasonably requested by board members.

The CRG determined that if USA Golf's elite athletes request additional voice and representation, the NGB must formalize an Athlete Advisory Council consistent with the provisions outlined in

³ <u>About Us</u>, USA Golf website.

^{4 &}lt;u>USA Golf Bylaws</u>.

⁵ As defined by the USOPC Bylaws, Delegation Events include the Olympic Games, Paralympic Games, Pan American Games, and the Parapan American Games. Currently, golf is included on the programs of the Olympic Games and Pan American Games.

⁶ Inside IGF, Organization, IGF website.

^{7 &}lt;u>USA Golf Bylaws.</u>

⁸ Refer to the Appendix for details about the initial certification of NGBs.

⁹ Refer to the Appendix for details on exception requests to the NGB Compliance Standards.

¹⁰ <u>NGB Compliance Audit – USA Golf</u>, May 22, 2024.

the NGB Compliance Standards and the exception will be void. Additionally, if USA Golf's board of directors meets more often than its current cadence of once a year, then financial reporting must be included on the agenda for discussion at each meeting.

Athlete Representation Approval and Exceptions¹¹

USA Golf requested that the Athlete Representation Review Working Group (ARRWG) approve additional international competitions and / or associations with founding members as qualifying criteria for NGB 10 Year and NGB 10 Year+ status to expand the pool of athletes eligible to serve as athlete representatives. USA Golf submitted the following requests:

- 1. An expansion of "NGB 10 Year Athlete" and "NGB 10-Year+" definition to include:
 - a) Athletes who, within the previous 10 years, represented the United States in the World Amateur Team Championships; or
 - b) American Athletes who, within the previous 10 years, are eligible to vote for the Player Advisory Council of the PGA Tour or the Player Advisory Group of the LPGA (as applicable).
- 2. An expansion of "NGB 10 Year+ Athlete" definition to include:
 - a) Athletes who represented the United States in the World Amateur Team Championships but not within the previous 10 years; or
 - b) American Athletes who were eligible to vote the Player Advisory Council of the PGA Tour or the Player Advisory Group of the LPGA (as applicable) but not within the previous 10 years.
- 3. An expansion of 33.3% athlete representation, in which the athlete vote on the board of directors and all committees be weighted 33.3% even if the number of athletes on the Board or committee is below the 33.3% threshold.

On October 7, 2024, the ARRWG approved USA Golf's exception requests as presented.

Certification Review¹²

Governance and Compliance

The CRG determined that USA Golf is fulfilling most Governance and Compliance-related responsibilities of an NGB. USA Golf has adopted and enforces all policies required by the NGB Compliance Standards; has made these policies publicly available on its website; and has defined procedures to address violations of these policies. In addition, USA Golf has not been the subject of any formal compliance-related complaints filed with the USOPC's Dispute Resolution Unit in the last four years.

To address 2023 compliance audit findings, USA Golf updated its bylaws to include required governance and athlete representation provisions. Although audit findings pertaining to additional bylaw revisions, the board's self-assessment, and USA Golf's conflict of interest disclosure and review process remain open, the NGB Audit department determined that USA Golf provided sufficient evidence of progress toward resolving these findings and that the remaining issues were not significant enough to affect the certification status of the organization.

Financial Standards and Reporting Practices

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

¹² Refer to the Appendix for details on the review standards and process for information related to the compliance audit.

USA Golf 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.

USA Golf updated its financial policies and procedures during the 2023 compliance audit remediation period and provided all required financial deliverables to the USOPC.

Athlete Protection and Rights

USA Golf 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 NGB 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 Golf 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 Golf that the USOPC was required to report.

To resolve 2023 compliance audit findings, USA Golf is in the process of implementing a written and board-approved process to report all applicable allegations and measures to the USOPC Office of Athlete Safety when required. USA Golf updated its athlete safety policy to comply with USOPC requirements and updated its background check process to use an approved background screening vendor and include its board of directors and staff as required by the NGB Compliance Standards. Although these audit findings remain open, the CRG determined that USA Golf has taken timely action to address these areas of concern and concluded that they do not impact the NGB's certification status at this time.

On September 19, 2023, the Center conducted its most recent administrative audit of USA Golf's implementation of policies required by the SafeSport Code and the Minor Athlete Abuse Prevention Policies, which resulted in no findings or directions for corrective actions.¹³

Sport Performance

USA Golf is fulfilling its applicable obligations in Sport Performance. The organization aligns founding members' strategic plans to support athletes in achieving sustained competitive excellence and to grow the sport within the Olympic and Paralympic Movement. USA Golf established selection procedures and executed them effectively to name and train Team USA athletes for Delegation Events.

Operational Performance

The CRG determined that USA Golf meets all Operational Performance standards. The organization demonstrates managerial capability to administer its sport, keeps current insurance policies, and demonstrates financial sustainability. In response to the 2023 compliance audit, USA Golf updated and implemented its grievance procedures to meet the NGB Compliance

¹³ <u>US Center for SafeSport Administrative Audit Report</u> – USA Golf, September 19, 2023.

Standards. USA Golf also submitted its strategic plan, including distinct measurables for itemized initiatives, to meet compliance.

USA Golf developed a concise 2021-2024 Diversity, Equity, and Inclusion (DE&I) Action Plan to reflect the NGB's vision to attract and build a diverse and inclusive golf community and support intentional and on-going engagement within all communities. Specifically, USA Golf has set goals to support gender parity within the sport with the International Olympic Committee and provide financial support to those with limited access to the sport. USA Golf submitted its action plan to the USOPC in a timely manner to meet the NGB Compliance Standards.

Conclusion

The CRG concluded that USA Golf is performing satisfactorily based on input from the CRG members and the results of the NGB Audit department's 2023 compliance audit. There are no outstanding areas of concern affecting the NGB's certification status at this time. Accordingly, the CRG recommends that USA Golf's certification as a member organization of the USOPC be renewed with a rating of Renewal in Good Standing for a four-year certification term ending in 2028.

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.¹⁴ 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.¹⁵

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.¹⁶ 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.

¹⁴ See §220521(a) of the Ted Stevens Olympic and Amateur Sports Act.

¹⁵ NGB Certification Policy, Section 1.

¹⁶ The CRG uses a four-year lookback period during this review process.