

United States Olympic & Paralympic Committee Policy



Policy Name: Compliance Policy

Publication Date: 03/06/2024

Policy Owner: Chief Ethics & Compliance Officer

Applies to: USOPC Staff

Purpose: The Compliance Policy outlines the role of the Ethics and Compliance department's Compliance team, led by the Chief Ethics & Compliance Officer (CECO).

Policy Statement: The USOPC promotes a culture of ethics and compliance throughout the U.S. Olympic & Paralympic Movement, including within the USOPC, among National Governing Bodies (NGBs), and among individuals and entities that engage with the USOPC and NGBs. In keeping with the USOPC's role in promoting this culture, the USOPC has a Compliance team that is responsible for ensuring the USOPC and NGBs comply with the Ted Stevens Olympic and Amateur Sports Act (the Ted Stevens Act), the USOPC Bylaws and policies, and, among NGBs, their own bylaws and policies, as well as any other applicable laws or regulations.

The Ethics and Compliance department includes Ethics, Compliance Operations, Compliance Investigations, and NGB Audit functions. This policy is specific to the Compliance functions and provides an overview of the Ethics and Compliance department's responsibilities relating to USOPC and NGB Compliance, Compliance Investigations, and the intake of concerns related to non-compliance and other issues in support of the Speak Up Policy.

1. USOPC Compliance

The Compliance team is responsible for the development and implementation of the USOPC's internal policies, procedures, and control framework related to its compliance obligations, consistent with the requirements set forth in the Ted Stevens Act, the USOPC Bylaws, and other applicable laws or regulations. The Compliance team also supports in the development and execution of policies related to the USOPC's Ethics functions, which are detailed in the Ethics Policy ([link](#)). The Compliance team also provides training to USOPC employees on Ethics and Compliance policies and related topics.

To the extent that the USOPC adopts operational policies, the departments that own those policies are responsible for the drafting or development of policies and procedures that govern their teams' operations. However, Compliance is involved in the policy development process for other departments by providing support to subject matter experts in the development of policy and by coordinating periodic policy refreshes.

2. NGB Compliance

The Compliance team administers the USOPC's NGB compliance functions and provides compliance support to NGBs, including consulting on compliance-related questions and ethics and compliance training to NGB senior management as necessary. In addition to engagement with NGB senior management on ad hoc matters, a member of the Compliance team attends monthly NGB Council meetings and the Compliance team will host, in conjunction with the NGB

United States Olympic & Paralympic Committee Policy

Audit team, periodic meetings to keep NGBs informed of program developments and to share best practices. The Chief Ethics & Compliance Officer provides regular program updates to the Board of Directors and to the USOPC's NGB Oversight and Compliance Committee.

A. NGB Compliance Standards

The Compliance team will maintain the NGB Compliance Standards, which outline the baseline requirements for certification as an NGB. The NGB Compliance Standards are based primarily on the certification requirements enumerated in the Ted Stevens Act and expanded upon by the USOPC Bylaws. The USOPC is also empowered to include any other certification requirements it views as necessary as an NGB Compliance Standard.¹

In addition to the NGB Compliance Standards, the Compliance team provides NGBs with resources that explain how to demonstrate compliance with the NGB Compliance Standards.

B. Compliance Assistance Program

The Compliance team will conduct a compliance assistance program for NGBs. The intent of the program will be to provide support to NGBs in meeting compliance obligations, with particular attention toward preparation for compliance audits.

The Compliance team will also support NGBs with content on the USOPC's NGB Hub, a resource portal that includes policy templates, best practices, NGB-related news, and training seminars.

C. Ongoing Compliance Monitoring

The Compliance team will conduct ongoing compliance monitoring of NGB compliance deliverables and NGB Compliance Standards that are determined to be candidates for ongoing monitoring by the Compliance team in its discretion. The Compliance team may consider whether a particular Standard can be passively assessed or requires more frequent assessment than a quadrennial audit can provide when scoping its ongoing compliance monitoring program.

D. NGB Certification

The NGB certification process is supported by a cross-functional group within the USOPC led by the Chief Ethics & Compliance Officer referred to as the Certification Review Group (CRG). This group meets on a regular basis to discuss NGB certification renewals and the applications of organizations that have applied for NGB certification.

In addition to the Chief Ethics & Compliance Officer's role leading the CRG, the Compliance team supports the CRG's work by developing and maintaining the NGB Certification Policy and the NGB Certification Procedure. The Compliance team is also tasked with drafting the CRG's reports and correspondence and serving as the CRG's point of contact for NGBs for all matters related to the NGB certification process.

¹ 36 U.S.C. §220522(18).

United States Olympic & Paralympic Committee Policy

3. Compliance Investigations

The Compliance team is responsible for overseeing, and in some cases conducting, inquiries, compliance reviews, and investigations relating to NGB non-compliance with the Ted Stevens Act, the USOPC Bylaws and/or policies, the NGB Compliance Standards, and NGB bylaws and/or policies. The Compliance team receives reports concerning NGB non-compliance from a variety of sources, including the USOPC Integrity Portal, direct contact from reporters, or escalations from other USOPC departments.

Upon receipt of such reports, the Compliance team prioritizes its handling of reports based on risk to athletes, the USOPC, and / or the NGB and time sensitivity. For all reports received, the Compliance team will conduct a preliminary review to determine if action is required, including whether the Compliance team should handle the report or whether the report should be referred to another USOPC team, an NGB, the United States Center for SafeSport (the Center), the United States Anti-Doping Agency (USADA), and/or law enforcement. If appropriate for Compliance, the Compliance team will review the report in accordance with the USOPC Compliance Investigations Procedure. As appropriate, the Compliance team will work with the USOPC's People & Culture team on internal matters involving employee misconduct.

4. USOPC Integrity Portal and Hotline

The Compliance team maintains an online system for the intake of confidential and anonymous reports. The [USOPC Integrity Portal](#) is a dedicated online portal available to any individual to report concerns related to the USOPC, NGBs, and the U.S. Olympic & Paralympic Movement. In addition to the online portal, reporters may report telephonically by calling the USOPC Integrity Hotline at 877-404-9935. The Integrity Hotline is available to reporters 24 hours a day, 7 days a week.

The Compliance team will review each report made through the Integrity Portal and Hotline and route reports based on the alleged conduct, as described in Section C.

5. Escalation

Concerns related to any of the matters listed below can be reported through the [Integrity Portal](#) but should also be immediately reported to the USOPC's Chief Ethics and Compliance Officer at Holly.Shick@usopc.org or at 719.922.9861.

- A. Evidence of substantial non-compliance with a grievance procedure affecting an athlete's right to compete in a Protected Competition.²
- B. Matters involving non-compliance with the Ted Stevens Act, the USOPC or NGB Bylaws, or the USOPC's Code of Conduct that present a risk to the USOPC, including but not limited to conflicts of interest involving members of the Board of Directors or executive level employees of the USOPC or an NGB, athlete wellness, and governance practices that adversely affect the day-to-day operations of the USOPC or an NGB.
- C. Fraud, misuse, or embezzlement of USOPC funds or property; bribery; or corruption by a USOPC or NGB employee or a USOPC or NGB board member.

² The term Protected Competition appears in this section, and it is used as defined by Section 1.3 of the USOPC Bylaws.

United States Olympic & Paralympic Committee Policy

- D. Any alleged violation of the USOPC’s Sports Betting Policy, including any illegal betting, wagering on any Protected Competition or USOPC-Sponsored Event, event manipulation, or dissemination of inside information, or allegation of cheating involving a Protected Competition by any individual associated with the USOPC or and NGB.
- E. Bribery of an official, referee, umpire, judge, or any other individual who is responsible for interpreting or enforcing rules of sport by a person employed by or associated with the USOPC or an NGB in connection with a Protected Competition.
- F. A member of a Board of Directors or an executive level employee of the USOPC or an NGB has been arrested or charged with a crime.
- G. Bribery of a member of the International Olympic Committee, the International Paralympic Committee, Panam Sports, the USOPC Board of Directors, or USOPC senior management in connection with a United States host city bid.

Sexual, emotional, and physical abuse, bullying, and hazing must be reported to the Center. Reports relating to alleged doping should be reported to USADA. If the USOPC Compliance team receives complaints that fall within the Center’s or USADA’s jurisdiction, those complaints will be referred to the appropriate organization for review. Reports of alleged criminal conduct will be referred to the appropriate law enforcement authorities, and senior management at the USOPC will also be notified.

6. Policy History

Publication Type	Policy Approver	Enabling Action	Publication Date	Next Scheduled Review	Revision Summary
Initial Publication	Board of Directors	Board Vote; June 17, 2021	June 17, 2021	N/A	N/A – initial publication
Policy Revision	Board of Directors	Board Vote; December 16, 2021	December 16, 2021	N/A	Revised to relocate certain details regarding Compliance investigation procedures to Compliance Investigation Procedure and updated references to the USOPC’s Integrity Portal and Certification Review Group
Policy Revision	General Counsel and COO	General Counsel and COO Approval, March 6, 2024.	March 6, 2024.	March 2025	Revised to include information about the Compliance team’s role in supporting NGBs through a compliance assistance program and Compliance’s ongoing monitoring program; updates to the policy’s organization; additional updates for consistency with referenced policies and procedures