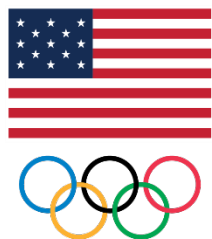


**United States Olympic and Paralympic Committee
Certification Review Group**



**Certification Renewal Recommendation Report for US Figure Skating
December 12, 2024**



**UNITED STATES
OLYMPIC & PARALYMPIC
COMMITTEE**

US Figure Skating Certification Renewal Executive Summary

In October 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 US Figure Skating.¹ The CRG evaluated US Figure Skating 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 with Conditions.

The CRG's review of US Figure Skating 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 2023, identified areas where US Figure Skating was not fully meeting the USOPC's NGB Compliance Standards, including findings related to athlete representation, incomplete or expired background checks, and policies that did not comply with all requirements.

During the audit remediation period, US Figure Skating made a good faith effort to remediate several of its audit findings, including those pertaining to timely submission of the required annual athlete expenditure report and to required updates to its athlete agreements. By the time of the CRG's recommendation, however, the NGB Audit department identified the remaining open audit findings to be considered conditions of US Figure Skating certification. The conditions include:

- US Figure Skating must update its board-approved document to meet the requirements for athlete representation, consistent with Standard A.1 a & b of the NGB Compliance Standards.
- US Figure Skating must provide evidence of 33.3% athlete representation on its designated and other committees to fully comply with Standard A.1 a & b of the NGB Compliance Standards.
- US Figure Skating must update its conflicts of interest policy to fully comply with Standard A.6 b of the NGB Compliance Standards.
- US Figure Skating must provide evidence that its Athlete Advisory Council members complete a conflict of interest disclosure form, consistent with the updated and approved conflict of interest policy, and to fully comply with Standard A.2 a of the NGB Compliance Standards.
- US Figure Skating must update its code of conduct to fully comply with Standard A.5 a of the NGB Compliance Standards.
- US Figure Skating must successfully demonstrate that it is executing its background check policy in accordance with Standard C.3 a of the NGB Compliance Standards.
- US Figure Skating must include required anti-doping language for individual and organizational members in its bylaws or board-approved document, consistent with Standard C.4 b of the NGB Compliance Standards.
- US Figure Skating must successfully demonstrate that it requires all participants to comply with anti-doping requirements in accordance with Standard C.4 b of the NGB Compliance Standards.

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

² [*NGB Compliance Audit – US Figure Skating*](#), June 4, 2024.

- US Figure Skating must update its Whistleblower and Anti-Retaliation Policy to fully comply with Standard E.5 a of the NGB Compliance Standards.

As a result of this review, the CRG recommends that US Figure Skating be granted a certification status of Renewal with Conditions with a deadline of January 31, 2025, to fulfill the conditions of certification. The CRG is aware of US Figure Skating's active work to resolve these outstanding issues, and in accordance with the NGB Certification Policy, if the CRG determines that US Figure Skating has successfully addressed these issues by the deadline, the CRG will recommend that its certification status be upgraded to Renewal in Good Standing. If US Figure Skating does not resolve these issues to the CRG's satisfaction by the deadline, its certification rating may be downgraded and the CRG will discuss whether accountability measures are appropriate to address US Figure Skating's delayed action.

Organizational Overview

US Figure Skating is the USOPC-certified NGB for the sport of figure skating. The mission of US Figure Skating is to “create and cultivate opportunities for participation and achievement in figure skating.”³ US Figure Skating is the United States’ representative to the International Skating Federation, the international federation that governs figure skating. US Figure Skating’s national office is located in Colorado Springs, Colorado.⁴

Certification History

US Figure Skating was originally certified in January 2021.⁵ This is the first time US Figure Skating has undergone a certification review.

Certification Exceptions⁶

US Figure Skating did not request any exceptions from the NGB Compliance Standards during its certification review.

Athlete Representation Approval and Exceptions⁷

In 2021, US Figure Skating requested that the Athlete Representation Review Working Group (ARRWG) review the following competitions as qualifying events for 10-Year and 10-Year+ status to expand the pool of athletes eligible to serve as athlete representatives. The ARRWG approved the following competitions as qualifying events⁸:

- World Figure Skating Championships
- World Synchronized Skating Championships
- ISU Senior Level Competitions⁹

In addition, US Figure Skating requested that athlete representatives on the board of directors may qualify by their Elite Athlete-status, whether by selection to a Delegation Event or another competition that qualifies them to be 10-Year or 10-Year+ athletes. While this expansion allowed for more athletes who may not have qualified by Delegation Event to be eligible to serve, the request provided that at least 50% of the total athlete representation on the board of directors qualify by way of Delegation Event. The ARRWG approved the request as presented.

³ [About US Figure Skating](#), US Figure Skating website.

⁴ *Id.*

⁵ Refer to the Appendix for details about the initial certification of NGBs.

⁶ Refer to the Appendix for details on exception requests to the NGB Compliance Standards.

⁷ Refer to the Appendix for details on athlete representation exception requests.

⁸ In 2023, the USOPC amended its Bylaws and updated the definition of NGB 10-Year Athlete, which now includes any international qualifying competitions on the qualification pathway for the Olympic and Paralympic Games. With that change, several of the competitions included in the 2021 request may inherently qualify athletes to meet the definition of NGB 10-Year Athlete.

⁹ US Figure Skating defined ISU Senior Competitions to encompass several competitions, which include ISU Grand Prix Events, ISU Challenger Series Events, ISU International Senior Competitions, ISU Challenger Events for the Synchronized discipline, International Senior Competitions for the Synchronized discipline, World Junior Figure Skating Championships, ISU Junior Grand Prix Events, and World Junior Synchronized Skating Championships.

Certification Review¹⁰

Governance and Compliance

The CRG determined that US Figure Skating is fulfilling many of the governance and compliance-related responsibilities of an NGB, including adopting and enforcing most key ethics and compliance-related policies; making the policies publicly available on its website; and defining procedures to address violations of these policies. As a result of the 2023 compliance audit, US Figure Skating took timely action to remediate findings, including submitting its 2024 athlete expenditure report to the USOPC, and the NGB is currently within the process of updating its bylaws and certain policies to meet all requirements of the NGB Compliance Standards. Although the audit finding relating to missing some required bylaws elements remains open, the NGB Audit department has reviewed draft bylaws that US Figure Skating's board is set to adopt in Q4 2024 that meet the NGB Compliance Standards. As this approval is imminent and the NGB Audit department did not consider the missing elements to be significant, the CRG determined that this open issue should not be a condition of certification. Within the last four years, US Figure Skating was the subject of one formal complaint filed with the USOPC's Dispute Resolution Unit. An arbitrator issued an initial decision, but the USOPC's Dispute Resolution Unit is still waiting for the arbitrator's fully reasoned decision. The CRG determined that this open report does not impact US Figure Skating's certification to date.

While US Figure Skating has made progress in fulfilling its governance and compliance obligations, the organization must make further improvements before the CRG considers recommending a Renewal in Good Standing rating. The NGB Audit department found that certain requirements are still missing from US Figure Skating's conflict of interest policy and code of conduct, which the CRG determined US Figure Skating must remediate as a condition of certification. Moreover, US Figure Skating must demonstrate successful execution of its conflict of interest disclosure and review process as it pertains to its internal Athlete Advisory Committee (AAC). Finally, US Figure Skating must update its Handbook, or board-approved document, to expressly state requirements for athlete representation, and demonstrate that its designated and other committees meet those requirements.

The CRG received positive athlete feedback regarding US Figure Skating's governance. Athletes noted support from the NGB to ensure that athlete representation requirements are met, and that the athlete voice is considered. Athletes also expressed appreciation for the NGB leadership's efforts to promote an "Athletes First" process and to reconnect alumni with the organization. Although athletes provided mostly positive feedback, they also expressed an opportunity for improvement concerning visibility to the drafting and publishing of selection procedures and expressed a desire to be involved at some level in advance of the 2026 Olympic Winter Games.

Financial Standards and Reporting Practices

US Figure Skating 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.

Athlete Protection and Rights

¹⁰ Refer to the Appendix for details on the review standards and process for information related to the compliance audit.

US Figure Skating maintains and enforces an athlete safety program consistent with the requirements of relevant federal law and is working to maintain and enforce its program consistent with the policies and standards of the USOPC and the U.S. Center for SafeSport (the Center). In addition to its work to meet athlete safety requirements, US Figure Skating is also working to maintain an anti-doping program consistent with the requirements of the USOPC and the U.S. Anti-Doping Agency. To resolve 2023 compliance audit findings, US Figure Skating updated its athlete agreements, created a background check policy separate from the SkateSafe policies and rulebook, and updated the form that AAC candidates complete to disclose any disqualifying convictions or periods of ineligibility. Building on this progress, US Figure Skating must take additional action to codify required language within its board approved documents pertaining to anti-doping requirements. In addition, US Figure Skating must also demonstrate successful execution on its background check policy in controlling for incomplete or expired background checks, specifically for individuals attending international events. The CRG determined these action items to be conditions of certification before considering an upgrade to Renewal in Good Standing.

The USOPC is not aware of any cases it has received in the past four years concerning US Figure Skating 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 US Figure Skating that the USOPC was required to report.

On January 24, 2024, the Center conducted its most recent event audit of a US Figure Skating sanctioned event held in Wichita, KS. The event audit resulted in fully implemented ratings in all areas of the Center's evaluation, and no findings or directions for corrective actions.¹¹

Sport Performance

US Figure Skating is fulfilling its obligations in Sport Performance. The organization maintains and executes a strategic plan that supports athletes in achieving sustained competitive excellence and in growing the sport. US Figure Skating established selection procedures and executed them effectively to name and train Team USA athletes for the Olympic Winter Games.

Operational Performance

The CRG determined that US Figure Skating meets most Operational Performance standards. The organization demonstrates managerial capability to administer its sport and keeps current insurance policies. In response to 2023 compliance audit findings, US Figure Skating is in the process of updating its grievance procedures and whistleblower and anti-retaliation policies. The NGB Audit department determined that US Figure Skating has made sufficient progress in updating its grievance procedures, and that although the finding remains open, it will not be a condition of certification. Rather, because US Figure Skating has more substantive updates to make on its whistleblower and anti-retaliation policies before they meet the NGB Compliance Standards, the CRG determined that the remediation of this policy be considered a condition of certification.

US Figure Skating developed a comprehensive 2021-2024 Diversity, Equity, and Inclusion (DE&I) Action Plan aimed to create an environment that is diverse and inclusive on all levels, including but not limited to teams, officials, staff, coaches, board, committees and spectators. US

¹¹ [US Center for Safe Sport 2024 Event Audit Report](#) – US Figure Skating, January 24, 2024.

Figure Skating submitted its action plan to the USOPC with sufficient detail to meet the NGB Compliance Standards. The action plan includes four key focus areas that are further broken down to twelve objectives, targeting specific groups of people and including respective measurements of success. Objectives include empowering athletes to be their authentic selves and provide a safe, inclusive space in which athletes can experience joy, a sense of belonging, and achieve personal success and competitive excellence; identifying and reducing barriers to entry and member retention and increase focus on underrepresented communities; developing a pool of knowledgeable and welcoming officials; and seeking strategic partners and sponsors whose shared values align with those of US Figure Skating, in addition to advancing strategic goals and promoting community involvement while securing and increasing revenue. US Figure Skating's target groups include people of color, women, people with disabilities, veterans, and athletes with a variety of prior sports experience.

Conclusion

Based on the remaining open audit findings detailed within this report, the CRG determined that US Figure Skating must address these issues as conditions of its certification¹² before its certification status could be considered in good standing. As such, the CRG recommends that US Figure Skating's certification as a member organization of the USOPC be renewed with a rating of Renewal with Conditions.

As part of this Renewal with Conditions rating, US Figure Skating will have until January 31, 2025, as ratified by the USOPC Board of Directors, to correct the outstanding issues. If US Figure Skating successfully meets these conditions, the CRG will recommend that its certification rating be upgraded to Renewal in Good Standing. If US Figure Skating does not take satisfactory action to meet the conditions of this certification by the deadline, its certification rating may be downgraded and the CRG will discuss whether accountability measures are appropriate to address US Figure Skating's delayed action.

¹² The conditions of certification are enumerated within the report and listed in their entirety in the Executive Summary.

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.¹³ 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.¹⁴

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.¹⁵ 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.

¹³ See §220521(a) of the Ted Stevens Olympic and Amateur Sports Act.

¹⁴ NGB Certification Policy, Section 1.

¹⁵ The CRG uses a four-year lookback period during this review process.