



CERTIFICATION RECOMMENDATION FOR USA FOOTBALL

Executive Summary

The USOPC's Certification Review Group (CRG) recommends certifying <u>USA Football</u> as the certified National Governing Body (NGB) for the sport of flag football within the United States. The CRG's holistic review resulted in a Certification with Conditions status recommendation to provide USA Football until May 1, 2025 to communicate the obligations under the SafeSport Code to its members that will come into effect based on its conditional certification as an NGB, and until September 30, 2025 to remediate other outstanding issues before the CRG considers an upgrade to Certified in Good Standing. The details of the CRG's review are included in the following report.

NGB Certification Overview

NGB Certification History

USA Football sought NGB certification for the sport of flag football for the first time in May 2024. The CRG sought applicants for certification at that time following the addition of the sport to the program of the Olympic Games in 2028. While it has not ever been a certified NGB, USA Football has been a Recognized Sport Organization of the USOPC.

Athlete Representation Review Working Group (ARRWG) Decisions

USA Football has not yet received approval from the Athlete Representation Review Working Group for its definition of NGB 10 Year and 10 Year+ Athletes, a process required by the unique circumstances of flag football's addition to a Delegation Event program for the first time in 2028. As the NGB 10 Year and 10 Year+ definitions are contingent on athletes' participation in a Delegation Event or Protected Competition, a sport with no Delegation Event participation has no NGB 10 Year or 10 Year+ Athletes. USA Football has been working with its internal athletes' advisory council to craft a definition of NGB 10 Year and 10 Year+ Athlete that will capture its elite athlete population to be presented to the ARRWG. Approval of this definition and subsequent population of athlete representatives meeting the definition throughout the USA Football board and Designated Committees is a condition of this certification.





Athlete Well-Being

Athlete Safety

As a non-NGB amateur sport organization, USA Football has not yet been subject to the US Center for SafeSport's (the Center) SafeSport Code, nor has it been through an audit by the Center. USA Football is currently engaged with the Center to ensure it is prepared to onboard as an NGB. The Center's NGB onboarding timeline provides a new NGB with time to fully comply with Center training and policy requirements before they are fully applicable. USA Football will follow this onboarding schedule and enter into the Center's standard auditing schedule. As a condition of this certification recommendation, no later than May 1, 2025, USA Football must complete its communications plan to put members on notice of their obligations under the SafeSport Code when the organization becomes a certified NGB. The USOPC's Audit department assessed additional athlete safety requirements within the scope of the Certification Audit, as noted below.

Anti-Doping

USA Football is prepared to maintain an anti-doping program consistent with the requirements of the USOPC and the U.S. Anti-Doping Agency (USADA) in its efforts to preserve clean and fair competition for its athlete participants. The organization is prepared to submit its Registered Testing Pool and Clean Athlete Program athlete lists on time, identify all athletes on Delegation Event Long Lists, and ensure that a staff member is responsible to serve as the USADA liaison in executing its anti-doping program. The USOPC's Audit department assessed additional anti-doping requirements within the scope of the Certification Audit, as noted below.

Operational Health

Audit

The Certification Audit conducted in 2024 resulted in 11 findings. The associated graph shows the percentage of audit findings per core area of evaluation. USA Football created management action plans to resolve the identified issues in a timely manner. The outstanding higher risk audit findings have been incorporated into this recommendation as conditions of the certification.

USOPC Audit found that USA Football's conflicts of interest processes, while meeting the policy requirements of the NGB Compliance Standards, did not include an adequate review process, among other execution elements. USA Football put a management action plan to adopt a formal review process in place as part of the Certification Audit, and the USOPC Audit department will return to assess its efficacy in Q3 2025 to resolve this finding. Resolution of the finding is a condition of this certification.







In its Certification Audit, the USOPC Audit department found that USA Football's background check policy was missing some elements required by the NGB Compliance Standards. Audit testing also found some deficiencies in USA Football's execution of its background check policy. USA Football developed management action plans to update its background check policy by the end of May 2025 and implement an improved review process by the end of June 2025. As a condition of this certification, USA Football must resolve these findings related to its background check policy and processes.

While USA Football engaged with the US Anti-Doping Agency (USADA) prior to seeking NGB certification, the USOPC Audit department also found that USA Football did not have an anti-doping policy or adequately publish anti-doping language required by the NGB Compliance Standards in documentation provided to athletes. USA Football is in the process of adopting a compliant anti-doping policy and putting the compliant anti-doping language in required documents.

Compliance

The USOPC will assess USA Football's operational health through its completion of ongoing compliance requirements, including the submission of required annual reporting, publication of required documentation on its website, adequate athlete representation on its board of directors, maintenance of required insurance coverage, and IRS standing, among other requirements. USA Football appears well prepared to execute on these requirements; the organization would become subject to the requirements, and any accountability measures for noncompliance, upon its certification.

Competitive Excellence

High Performance Programs

USA Football maintains and executes a high performance plan that supports Team USA athletes in achieving sustained competitive excellence. The organization has shown the ability to select a strong team and prepare its athletes for high achievement on the world stage in IFAF events, and this experience provides a strong foundation for the organization to prepare Team USA athletes for Delegation Events as an NGB.

Conclusion

The CRG has concluded, based on the results of the Certification Audit as well as individual CRG members' assessments, that USA Football has met most of the requirements in the core areas of evaluation for NGB certification. Furthermore, the CRG is confident in USA Football's ability to fulfill all management action plans and reach full compliance with the NGB Compliance Standards based on its interactions with USA Football and its staff. However, the CRG identified areas where USA Football has not yet demonstrated compliance with the NGB Compliance Standards and cannot yet be considered as a member in good standing. Accordingly, the CRG recommends that USA Football's certification as a member organization of the USOPC be granted with a status of Certified with Conditions with a deadline of September 30, 2025, to fulfill the conditions of certification. The conditions of this certification are listed below.





Standard		Condition	Assessment
A.1 a & b	Athlete Representation	USA Football must receive approval on an NGB 10 Year/10 Year+ Athlete definition from the	Submit to the USOPC Audit department testing to confirm that athlete
A.2 a	Athlete Advisory Council	Athlete Representation Review Working Group and fully populate its board, Athletes' Advisory Council, and Designated Committees with sufficient athlete representation to meet the NGB Compliance Standards.	representation requirements have been met.
A.6 a	Conflict of Interest Policy	USA Football must successfully execute on its revised conflicts of interest policy's disclosure process to meet the NGB Compliance Standards.	Submit to the USOPC Audit department testing to confirm that conflict of interest disclosure and review processes are being executed in accordance with USA Football's policy.
C.1 b	Child Protection and US Center for SafeSport	USA Football must make its membership aware of their obligations under the SafeSport Code that come into effect when the organization becomes an NGB.	Provide evidence that USA Football has executed its communications plan for SafeSport obligations no later than May 1, 2025.
С.3 а	USOPC Athlete Safety Requirements	USA Football must update its background check policy to include missing elements and successfully execute on its revised policy.	Submit the updated USA Football Background Check Policy to the USOPC Audit department to confirm compliance and complete testing against the revised policy.
C.4 a	Anti-Doping Policy	USA Football must develop and maintain a	Submit to the USOPC Audit department
C.4 b	Anti-Doping Policy Language	written anti-doping policy and add required anti-doping language to its relevant documentation.	the USA Football Anti-Doping Policy and evidence that compliant language has been added to participant documentation to confirm compliance.

In accordance with the NGB Certification Policy, if the CRG determines that USA Football has successfully addressed the conditions by the deadline, the CRG will recommend that its certification status be upgraded to Certification in Good Standing. If USA Football 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 USA Football's delayed action.





Appendix

Certification Process

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 organization's operations across multiple functional areas to provide a holistic review of performance and culture. In addition to enumerated standards for NGB performance described in the Ted Stevens Act Olympic and Amateur Sports Act, the <u>USOPC Bylaws</u>, and the USOPC's NGB Compliance Standards, the CRG considers departmental observations about an organization's operations that may not be identified in a formal audit scenario but are relevant to consider when evaluating an organization's overall performance.

In the case of an organization applying to become an NGB for the first time, the USOPC accepts applications from amateur sports organizations seeking to become the NGB for a particular sport during a public call for applications. Following a 30-day application period, the CRG will select an organization to move forward as an NGB candidate. The NGB candidate will participate in two public hearings and a Certification Audit conducted by the USOPC Audit department. The CRG uses the information obtained from the organization's application, the public hearing, the Certification Audit, and any interactions with the organization and its management team to inform its certification recommendation.

Certification Standards, Exceptions, and Review Components

As required by Standard A.2 of the <u>USOPC</u> and <u>IMS Compliance Standards</u>, and described in Section 8.4.1 of the USOPC Bylaws, the USOPC must administer its membership by requiring NGBs to 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.

 $^{^{1}}$ The CRG generally uses a four-year lookback period during its review process.