

United States  
Olympic & Paralympic  
Committee

1 Olympic Plaza  
Colorado Springs, CO 80909

## 2024 USOPC AND NGB ANNUAL COMPLIANCE REPORT

### ***Overview***

Consistent with the Ted Stevens Olympic and Amateur Sport Act's (the Act) compliance reporting requirements,<sup>1</sup> this report summarizes the Ethics and Compliance team's compliance and audit initiatives as part of the USOPC's responsibility to ensure USOPC and NGB compliance with the Act, and the USOPC's bylaws, policies, and procedures. Part one of this report summarizes USOPC compliance initiatives, including the USOPC's efforts to adhere to standards it requires of NGBs. The second part of the report summarizes the Compliance and Audit team's annual work on NGB audits, NGB certification renewals and Compliance investigations, and outlines significant steps the Compliance and Audit teams have taken to support NGBs' compliance efforts.

### **I. *USOPC Compliance***

#### **USOPC and IMS Compliance Standards**

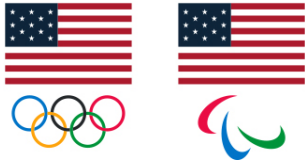
The USOPC is committed to holding itself to the same standards to which NGBs are held where applicable, including requirements in the USOPC's NGB Compliance Standards. To formalize this commitment, the USOPC published its USOPC and IMS Compliance Standards in 2024. These Standards incorporate the requirements of the Act and the USOPC Bylaws that the USOPC must comply with while also mirroring the additional obligations in place for NGBs, particularly in the context of Internally Managed Sports. While the Compliance team has operated and provided guidance to internal stakeholders consistent with the requirements and best practices developed for NGBs, the USOPC and IMS Compliance Standards document these practices and form the basis for future USOPC compliance audits that substantially mirror the substance and timing of NGB audits, assessing the USOPC's compliance with the Act and the USOPC's bylaws, policies, and procedures.

#### **Sport Integrity**

Ahead of the Olympic and Paralympic Games Paris 2024, the Compliance team revised the USOPC's Sports Betting Policy. It also provided training to athletes and staff selected to participate in the Olympic and Paralympic Games, as well as all USOPC staff, both in live training settings and through a pre-recorded training module. These trainings, which covered sports betting, match manipulation, and sharing insider information, are incorporated into a long-term ethics and compliance training strategy that includes delegation event-specific training and periodic training on core compliance topics such as conflicts of interest and retaliation. The trainings also provided athletes and staff with information about how to report concerns related to sport integrity, including to the International Olympic Committee, the International Paralympic Committee, and the USOPC's Integrity Portal. The training was supplemented by Integrity Portal reminders that were posted in high-traffic areas, such as the High Performance Center, during the Olympic and Paralympic Games.

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<sup>1</sup> 36 U.S.C. § 220511(a)(2)(F)-(G).



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## **Grant Management**

The Compliance team launched work on a long-term project in collaboration with other USOPC departments to streamline the process for reviewing NGBs' use of grants and to implement non-profit best practices into the review process. As part of this work, the Compliance team and internal stakeholders have gathered internal and external feedback, drafted a framework for an online platform that allows for easy access to and review of grant information, and developed an offline reporting tool that will be used in 2024 as a test case for the online platform.

## **Reports of Retaliation**

In April 2024, a USA Artistic Swimming athlete alleged that a member of the USA Artistic Swimming coaching staff retaliated against her for disclosing an illness and for raising safety concerns regarding the coach. Because the Center has jurisdiction over such matters, the USOPC referred the matter to the Center. In October 2024, the Center confirmed it had accepted jurisdiction. The Center has further confirmed that the matter has been administratively closed.

## **II. *NGB Compliance***

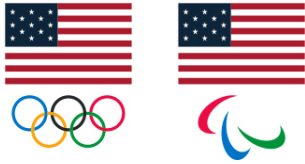
NGBs continued to make significant progress in meeting the NGB Compliance Standards, closing a total of 127 audit findings in 2024. Overall, the number of findings identified in 2024 steadily decreased, which demonstrates NGBs' ongoing commitment to compliance with the NGB Compliance Standards.

The Compliance and Audit teams also continue their commitment to providing support to NGBs through the Compliance Assistance Program, quarterly meetings hosted by both teams highlighting common findings and best practices, and governance support. The sections below summarize highlights of the Audit and Compliance teams' work throughout 2024, as well as the year's NGB certification renewals.

### **NGB Audit**

The Audit team conducted audits of 12 NGBs in 2024 in advance of those NGBs' scheduled certification renewals in 2025. The most common issues identified in those audits fell into the categories of athlete representation, conflicts of interests, and athlete safety requirements related to background checks. Although the number of findings NGBs closed decreased year over year, the decrease is mostly attributable to the closure of many 2023 findings. The Audit team continued to work closely with the Compliance team to ensure NGBs had sufficient time to remediate audit findings before the issuance of certification renewal reports, so the reports fully reflect the NGBs' compliance efforts.

In 2024, the audit team developed a risk-based assurance model for assessing NGB compliance, in which a variety of risk factors, particularly the results of prior audits and compliance investigations, are considered when determining the scope and scale of the audit. While all foundational compliance processes and practices, such as athlete protection and effective organizational governance, will remain part of the audit, the new risk-based model will allow for more targeted and robust examination of those areas that have the highest risk of non-compliance, resulting in a more effective, efficient, and value-added audit process. This new risk-based approach was implemented in January 2025 and is in effect for all NGB audits going forward.



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## **Revised NGB Compliance Standards**

In 2024, the Compliance team published revised NGB Compliance Standards and Implementation Guide for NGB Compliance Standards. This was the culmination of a multi-year project in which the team's learnings as well as NGB feedback from the first quadrennium of the current NGB Compliance program were considered to evolve and improve the program. These updates sought to simplify, clarify, and reduce the burden on NGBs where possible while still maintaining the USOPC's high standards and ensuring all requirements of the Ted Stevens Act, the USOPC Bylaws, and USOPC policy are addressed. A highlight of these efforts included shifting the evaluation methods for some Standards from the quadrennial audit to the ongoing compliance monitoring function.<sup>2</sup> This will optimize the timeliness and value of issue identification for both the USOPC and NGBs, while also allowing the Audit team to focus its efforts on higher risk areas. Additionally, each Standard was thoroughly reviewed to clarify the requirements and alleviate impracticalities in execution identified during audits and through discussions with NGBs.

## **New Sport Onboarding**

In anticipation of new sports being added to the program for the Olympic Games Los Angeles 2028 (LA28), the Compliance team worked with other USOPC departments and prepared a plan for the successful onboarding of certified NGBs for the three new sports added to the LA28 program that did not have existing certified NGBs: cricket, flag football, and lacrosse. In January 2024, the USOPC hosted an onboarding session for staff of the national federations recognized by the IOC-recognized international federations for these sports to prepare them for meeting the NGB Compliance Standards, as well as other obligations of NGBs, in anticipation of opening a call for applicants for NGB candidates for these sports following the Olympic Games Paris 2024. These organizations were provided with USOPC resources and offered Compliance Assistance Program support throughout 2024. The USOPC opened an application for NGB certification for the sport of flag football in May 2024 and the CRG selected USA Football as an NGB Candidate. The certification review process is ongoing and will conclude in early 2025. The USOPC did not open NGB certification application periods for cricket or lacrosse in 2024.

## **Compliance Assistance Program**

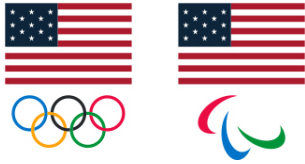
The USOPC Compliance team continued its Compliance Assistance Program in 2024. The Compliance Assistance Program includes three pillars: Audit Preparation, Compliance Check-Ins, and providing compliance-related resources for NGBs. The Compliance Assistance Program is a resource for NGBs – to the extent that active NGB participation is required in portions of the program, NGBs are invited to participate at the level that fits their needs and available resourcing.

### **Audit Preparation**

The Compliance Assistance Program's Audit Preparation program consists of policy reviews and testing walkthroughs. For policy reviews, the Compliance team works collaboratively with NGBs to review their existing policies, determine if revisions are necessary, and provide consultative assistance to the NGBs throughout policy drafting. Testing walkthroughs provide NGBs with a preview of what can be expected from

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<sup>2</sup> See "Compliance Check-In" for additional details about the ongoing compliance monitoring program.



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a testing period during an audit, when an NGB must demonstrate that it executed on its policies, such as conflict of interest disclosure review or background checks for all required individuals. Policy reviews and testing walkthroughs focus on specific areas where the Compliance team observed, from its own work with NGBs and from the NGB Audit team's findings, that NGBs often find challenging. The Compliance team offers Audit Preparation to select NGBs in the year before their scheduled audit, but NGBs may also request ad hoc reviews of their policies as part of the Compliance Assistance Program.

The Compliance team invited five additional NGBs or prospective NGBs to participate in the full Audit Preparation program in 2024 in addition to those that participated on an ad hoc basis. In 2024, the first group of NGBs that participated in the full Audit Preparation program completed their compliance audits and the data shows that NGBs that actively participated in Audit Preparation had fewer audit findings than their peers that did not participate. The Compliance team analyzed this data to determine where it may find additional opportunities to further support NGBs through program enhancements in 2025.

### Compliance Check-In

To provide additional support for NGBs and to monitor annual compliance requirements, the Compliance Assistance Program includes the Compliance Check-In, an ongoing compliance monitoring program that reviews certain NGB Compliance Standards that are better suited to an annual review cycle as opposed to the quadrennial audit cycle.

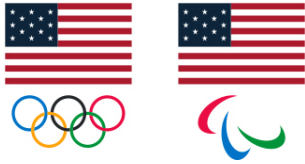
The Compliance Check-In is presented through an annual Compliance Scorecard that evaluates NGB compliance against requirements of the NGB Compliance Standards that can be verified through required NGB deliverables, a review of required publications and documentation on NGB websites, or reporting from other organizations, like the U.S. Center for SafeSport and the U.S. Anti-Doping Agency. NGBs can use these scorecards as a tool to identify areas for improvement and to highlight to their boards continued compliance with the NGB Compliance Standards, and the USOPC uses the data to identify trends or early warning signs of distress. The Compliance team issued a 2024 Compliance Scorecard to all 51 NGBs, assessing compliance with each of the requirements as of December 2024. The 2024 Scorecards built upon previous assessments, including 30 areas of evaluation compared to the 23 areas of evaluation in 2023.

### Compliance Resources

Since its inception, the Compliance team has provided resources to NGBs to assist their efforts in meeting the NGB Compliance Standards. Such resources include the Implementation Guide for NGB Compliance Standards, policy templates, resource guides for annual reporting requirements, and ongoing quarterly meetings at which compliance best practices and other useful content is shared. To accompany the revised NGB Compliance Standards and Implementation Guide, the Compliance team published revised versions of all existing resources to ensure consistency with the new requirements.

### **Compliance Investigations**

The Compliance team conducted a number of investigations and inquiries in 2024 that substantiated some concerns reported to the USOPC. The Compliance team reviewed concerns related to, among other things: whether an NGB took sufficient steps to impose U.S. Center for SafeSport sanctions; whether NGBs had processes in place to sufficiently disclose and manage conflicts of interest; whether NGBs had properly



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constructed Boards and Committees; whether an NGB was meeting and managing its financial obligations (including relating to donations and grants); and whether an Internally Managed Sport complied with the Act's requirements to timely communicate clear selection procedures and consistently apply them.

At the conclusion of these reviews, the Compliance team issued letters to the relevant NGBs outlining the Compliance team's findings and requiring specific action to address them. The Compliance team also included recommendations to NGBs to further strengthen their governance practices and their support of athletes, and informed NGB boards that they were responsible for overseeing the implementation of those recommendations if the NGB chose to adopt the recommendations. In addition, in October 2024, the USOPC initiated decertification proceedings in light of failures by an NGB to meet its compliance obligations.<sup>3</sup>

The Compliance team continues to provide quarterly summaries of investigations and other significant NGB issues to the NGB Oversight and Compliance Committee and to the board of directors. The Chief Ethics and Compliance Officer also notifies USOPC leadership, the board chair, and NGB Oversight and Compliance Committee chair of any matters that may require immediate attention, such as significant financial distress that may result in bankruptcy or serious governance deficiencies that may warrant decertification.

## **Certification Renewals and Decertification**

The USOPC certification review process includes the renewal of NGB certifications once every four years and certification of new NGBs following the completion of an audit and an overall review of the applicant sport organization. The USOPC's CRG, which is chaired by the Chief Ethics and Compliance Officer and includes representatives from USOPC departments which regularly interact with NGBs, conducts all certification reviews and provides its certification recommendations to the USOPC's Board of Directors. In 2024, the CRG considered 14 certification renewals and two follow-ups of previous conditional certifications. The sections below summarize the outcomes of those reviews. The current certification status and full certification recommendation reports for all NGBs that have gone through a certification review can be found on [usopc.org](https://usopc.org).

In 2024, the Compliance department also determined that one NGB was not meeting requirements to maintain its NGB status. As a result, the USOPC filed a decertification complaint under Section 8 of the USOPC Bylaws to initiate decertification; details about that matter are also summarized below.

### **1. Certification Renewals**

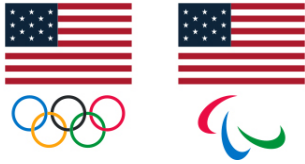
The USOPC Board of Directors accepted the NGB Oversight and Compliance Committee's recommendations and renewed the certifications of 14 NGBs that the USOPC considered certified as of January 1, 2021. The full certification recommendation reports for these NGBs are available on [usopc.org](https://usopc.org).

#### **Renewal in Good Standing**

Of the 14 renewals, the USOPC Board of Directors renewed six NGBs' certifications with a status of Renewal in Good Standing, indicating that there are no significant outstanding issues affecting the NGBs' standing with the USOPC. While the CRG identified some areas of concern in its review of these NGBs, there were no

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<sup>3</sup> See Certification Renewals and Decertification section below for additional details.



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significant deficiencies, and the NGBs acted to resolve the issues identified by the CRG within the certification review period.

The NGBs whose certifications were renewed with a status of Renewal in Good Standing in 2024 were:

- [USA Bobsled-Skeleton](#)
- [USA Cycling](#)
- [USA Fencing](#)
- [USA Golf](#)
- [USA Hockey](#)
- [USA Taekwondo](#)

#### *Renewal with Conditions*

The USOPC Board of Directors renewed the certifications of eight NGBs with a status of Renewal with Conditions based on outstanding issues these NGBs must resolve before they can be considered in good standing.

The NGBs whose certifications were renewed with a status of Renewal with Conditions in 2024 were:

- [US Figure Skating](#)
- [US Ski & Snowboard](#)
- [US Speedskating](#)
- [USA Luge](#)
- [USA Pentathlon Multisport](#)<sup>4</sup>
- [USA Rugby](#)
- [USA Shooting](#)
- [USA Softball](#)

#### *Upgraded Conditional Certification Renewals*

In 2023, the USOPC Board of Directors renewed [USA Track & Field](#)'s certification with a status of Renewal with Conditions. The CRG determined in 2024 that USA Track & Field successfully met the conditions of its certification and the Board of Directors upgraded the organization's certification status to Renewal in Good Standing for the remainder of its certification term.

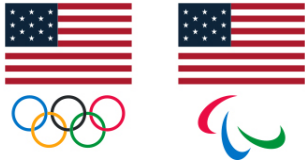
#### *Continued Conditional Certification Renewals*

In the first quarter, the USOPC Board of Directors renewed [USA Pentathlon Multisport](#)'s certification with a status of Renewal with Conditions. In the fourth quarter, following the end of the prescribed remediation period, the CRG determined that USA Pentathlon Multisport had not met the conditions of its certification renewal and that there were additional concerns that required action before the CRG would consider the

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<sup>4</sup> USA Pentathlon Multisport's initial certification renewal and the follow-up on the conditional renewal were both completed in 2024. See "Continued Conditional Certification Renewals" for additional information.





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NGB as being in good standing. The Board of Directors maintained the organization's certification status as Renewal with Conditions through the end of the first quarter of 2025, at which time the CRG will reevaluate its certification.

## **2. Decertification**

In October 2024, the USOPC initiated decertification proceedings against USA Badminton based on concerns with its continued failings related to governance, specifically: USA Badminton's failure to timely impose SafeSport sanctions; the board of directors' lack of oversight of the chief executive officer; the failure of the board to meaningfully review and examine financial reports and budgets; an inability to properly constitute its Board of Directors and other Committees; and USA Badminton's repeated inability to remediate over 14 audit findings that reflected significant non-compliance with the NGB Compliance Standards. A hearing panel was appointed to preside over the decertification complaint to review evidence and hear testimony from both parties. A hearing was scheduled for April 2025.

## **3. Conclusion**

The CRG's fourth year of certification reviews built upon the progress the USOPC and NGBs have made since 2021, with nearly all NGBs having been through a certification renewal review as of the end of 2024. The certification review process has contributed to robust conversations among the USOPC departments that interact with NGBs to ensure that high-functioning and highly capable NGBs can be recognized and NGBs that need additional support to resolve concerns or higher risk issues can receive comprehensive and coordinated support from across the USOPC. Athletes and the U.S. Olympic & Paralympic Movement will continue to see the benefits of the process as it encourages compliance and good governance among certified NGBs.