



**USOPC
NGB AUDIT**

AMERICAN CANOE ASSOCIATION

ADDENDUM REPORT

October 21, 2022

EXECUTIVE SUMMARY

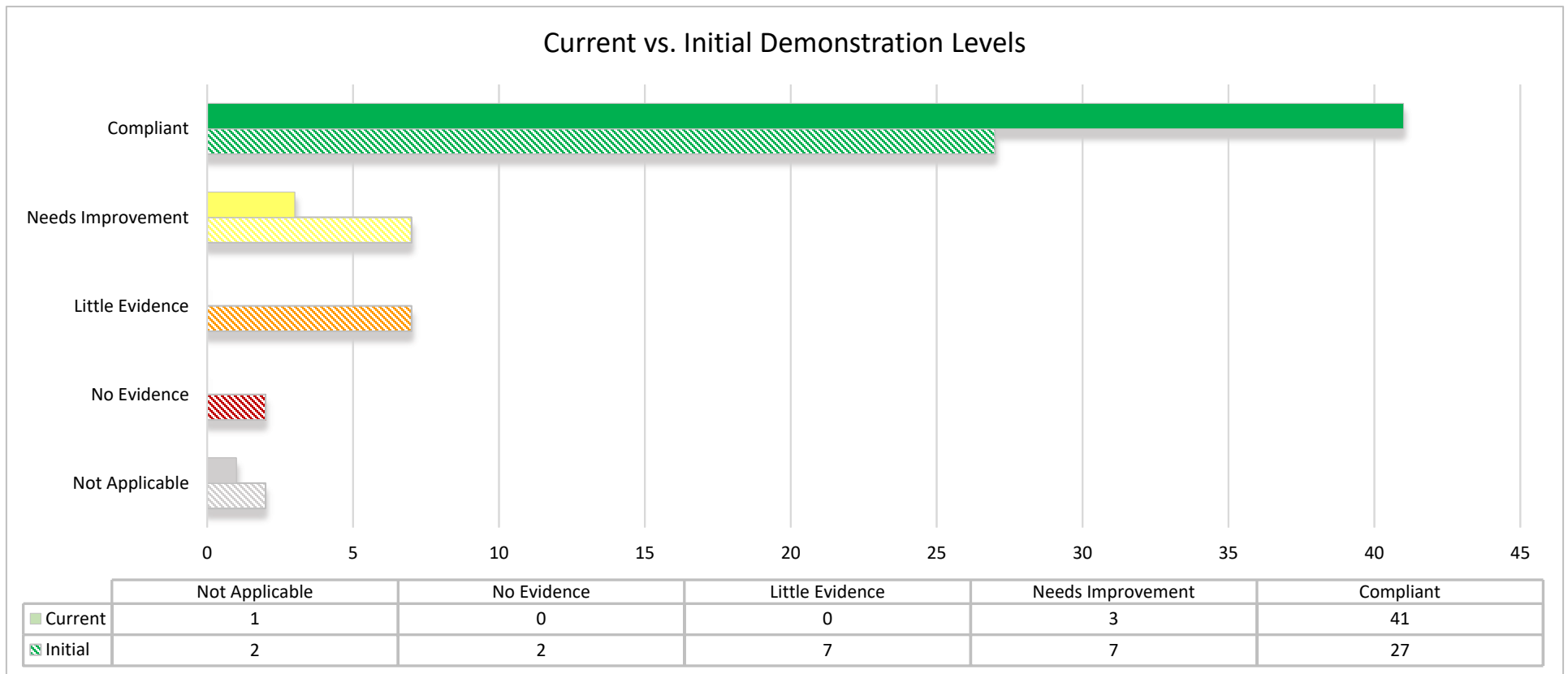
Background, Scope, and Objectives

The United States Olympic & Paralympic Committee’s (USOPC) NGB Audit department (Audit) completed an audit of American Canoe Association on January 19, 2022. The purpose of the audit was to determine if American Canoe Association complies with the requirements of the NGB Compliance Standards (Standards) and to conduct testing in areas that present an increased risk to athletes, other members, and/or American Canoe Association. The audit focused on the policies and procedures in the areas of Governance and Compliance, Financial Standards and Reporting Practices, Athlete Protections and Rights, Sport Performance, and Operational Performance.

Following the audit, NGBs have 120 days, unless otherwise specified, to provide evidence of remediation to Audit. Based on the evidence provided, Audit has assigned a Follow-up Demonstration Level¹ of Compliant, Needs Improvement, Little Evidence of Compliance, or No Evidence of Compliance. Details are provided in the findings below.

DEMONSTRATION LEVEL COMPARISON

The below charts present the updated distribution of compliance demonstration levels. For further detail not provided in this addendum report, please refer to the Audit report posted on TeamUSA.org.



¹See Appendix A

Follow-up Summary

Based on the evidence of remediation provided, American Canoe Association has remediated 13 current findings and one finding from a prior audit related to background checks. As of October 12, 2022, American Canoe Association is 91% compliant. Additional details are outlined below.

Subsequent Corrections

In the report issued on January 21, 2022, one Standard was pending a determination. The status update is below:

Child Protection and US Center for SafeSport – C.1 a and C.2

The U.S. Center for SafeSport (the Center) issued an audit report for American Canoe Association on June 2, 2021, which contained findings. American Canoe Association received a closure letter from the U.S. Center for SafeSport stating corrective action was taken and is compliant with this standard.

NGB AUDIT FINDINGS - FOLLOW-UP STATUS

All Standards are evaluated against the 2020 Implementation Guide for Audit Standards. Bylaws references are based on the USOPC Bylaws approved in June 2020.

GOVERNANCE AND COMPLIANCE

Needs Improvement		
1	Board Composition – A.1 c	Management Action Plan
	FINDING: American Canoe Association’s Independence Criteria Policy meets most of the requirements for the definition of independent perspective; however, they are missing two required elements.	American Canoe Association’s Independence Criteria Policy will be updated to include the missing elements of independent perspective. Due Date: April 30, 2022
	Follow-up Level: Compliant	
	American Canoe Association updated the independence criteria policy to include the requirements and is now compliant.	
2	Gifts and Entertainment Policy – A.6 c	Management Action Plan
	FINDING: American Canoe Association's Gift and Entertainment Policy does not state it is applicable to hearing panel members.	American Canoe Association’s Gifts and Entertainment Policy will be updated to include applicability to hearing panel members. Due Date: March 1, 2022
	Follow-up Level: Compliant	
	American Canoe Association updated the gifts and entertainment policy to include the required elements and is now compliant.	

Little Evidence of Compliance		
3	Bylaws – A.3 a	Management Action Plan
	<p>FINDING: There are elements missing from American Canoe Association's Bylaws in the following areas: general bylaw requirements, board election and selection procedures, and committee requirements.</p>	<p>American Canoe Association will update the bylaws to include all missing requirements.</p> <p>All changes to Bylaws must go through a process by which they are available for six months to the members prior to approval. With this constraint, updates will be completed for approval by September 1, 2022.</p> <p>Due Date: September 1, 2022</p>
Follow-up Level: Needs Improvement		
While American Canoe Association made updates to the bylaws, there are two elements partially missing and the bylaws are not board-approved.		
4	Board Development – A.3 b	Management Action Plan
	<p>FINDING: American Canoe Association does not currently provide onboarding to newly seated committee members.</p>	<p>All Board Development requirements will be completed no later than March 31, 2022.</p> <p>Due Date: March 31, 2022</p>
Follow-up Level: Compliant		
American Canoe Association developed and conducted onboarding for new committee members.		
5	Code of Conduct – A.5 a	Management Action Plan
	<p>FINDING: Prior to the audit, American Canoe Association drafted a code of conduct that meets USOPC requirements. However, due to their membership structure, they requested an exemption from the USOPC regarding applicability which was under review at the time of audit. As a result, the drafted code of conduct could not be approved prior to the audit.</p> <p>The code of conduct in effect is missing elements in the following areas: applicability, organizational expectations, reporting, resolution, and policy owner.</p>	<p>American Canoe Association's Board of Directors will review the drafted code of conduct which will be implemented immediately following approval.</p> <p>Due Date: April 30, 2022</p>
Follow-up Level: Compliant		
American Canoe Association updated the code of conduct to include the required elements and is now compliant.		
6	Conflicts of Interest Policy – A.6 b	Management Action Plan

<p>FINDING: There are elements missing from American Canoe Association’s Conflict of Interest Policy in the following areas: applicability, organizational expectations, disclosures, reporting, policy owner, and resources.</p> <p>American Canoe Association does not have committee members complete an annual conflict of interest disclosure form.</p> <p>Of the disclosure forms tested, there was one completed conflict of interest form with no evidence of review and one instance where an individual did not disclose potential conflicts. In addition, the board’s disclosure forms were not reviewed at the board or committee level.</p> <p>There is also no documentation that the executive committee performs a formal review of completed conflict of interest disclosures and provides a summary report to the board as required by the policy.</p>	<p>American Canoe Association will update its conflict of interest policy to include all missing elements.</p> <p>In addition, practices will be updated to ensure the completion and review of conflict of interest forms by all required individuals, including committee members. Updated practices will include a requirement for the board or executive committee to review forms, that the review is reflected in the minutes, and that the process is consistent with their policy.</p> <p>Due Date: April 30, 2022</p>
<p>Follow-up Level: Compliant</p>	
<p>American Canoe Association updated the conflict of interest policy to include the required elements. Audit conducted testing and noted conflict disclosure forms were appropriately obtained and reviewed. American Canoe Association is now compliant.</p>	

FINANCIAL STANDARDS AND REPORTING PRACTICES

Needs Improvement		
7	Financial Policies and Procedures – B.1 b	Management Action Plan
	<p>FINDING: American Canoe Association’s Financial Policies and Procedures are missing required elements, including contract requirements, and cash management and banking.</p> <p>In addition, the financial policies and procedures need to be updated to include all individuals authorized to approve expenses.</p>	<p>The financial policies and procedures will be updated to include all missing elements and all authorized individuals that are able to approve expenses.</p> <p>Due Date: March 31, 2022</p>
<p>Follow-up Level: Compliant</p>		
<p>American Canoe Association updated the financial policies and procedures to include the required elements and individuals authorized to approve expenses and is now compliant.</p>		

ATHLETE PROTECTION AND RIGHTS

Needs Improvement		
8	Anti-Doping Policies – C.4 a	Management Action Plan
	<p>FINDING: American Canoe Association does not have formal policies and procedures to enforce anti-doping sanctions.</p>	<p>The anti-doping policy will be updated to explicitly state American Canoe Association’s enforcement policy of anti-doping sanctions.</p> <p>Due Date: April 30, 2022</p>
Follow-up Level: Compliant		
American Canoe Association implemented an internal USADA Sanctioning Policy which meets the requirements and is now compliant.		
9	Anti-Doping Policy Language – C.4 b	Management Action Plan
	<p>FINDING: American Canoe Association’s Bylaws do not have the minimum required anti-doping language for NGBs with individual members as references to WADA and USOPC are missing.</p> <p>In addition, the Athlete Code of Conduct does not contain all the required anti-doping language.</p>	<p>The bylaws will be updated to include the minimum required anti-doping language and will be sent to the board for approval no later than September 1, 2022.</p> <p>The athlete code of conduct anti-doping language will be updated and sent to the board for approval no later than April 30, 2022.</p> <p>Due Date: September 1, 2022</p>
Follow-up Level: Needs Improvement		
American Canoe Association has updated the bylaws to include the required language, however, the bylaws are in draft form awaiting approval. In addition, the Athlete Code of Conduct was updated to include the required language and remediated this aspect of the finding.		
Little Evidence of Compliance		
10	USOPC Athlete Safety Requirements – C.3 a	Management Action Plan
	<p>FINDING: American Canoe Association’s Background Check Policy is missing elements in the following areas: applicability, timing, and types of offenses.</p> <p>Out of the 60 background checks tested, two individuals who were required to complete a background check did not. This is a repeat finding from the prior audit.</p>	<p>American Canoe Association’s Background Check policy will be updated to include missing elements and presented to the board for approval in February and implemented no later than April 30, 2022.</p> <p>American Canoe Association will take steps to improve internal procedures for checking background check status and enforcing the background check policy no later than March 31, 2022.</p> <p>Due Date: April 30, 2022</p>
Follow-up Level: Compliant		

	American Canoe Association updated the background check policy to include the required elements. In addition, all tested individuals had current background checks. American Canoe Association is now compliant.
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SPORT PERFORMANCE

No Evidence of Compliance		
11	Event Sanctioning – D.4 b	Management Action Plan
	<p>FINDING: American Canoe Association's sanctioning document(s) do not have five of the eight required elements.</p>	<p>American Canoe Association will create sanctioning standards that meet the USOPC's standards.</p> <p>Due Date: March 31, 2022</p>
Follow-up Level: Compliant		
American Canoe Association updated the sanctioning document(s) to include the required elements and is now compliant.		
12	Paralympic Classification – D.4 c	Management Action Plan
	<p>FINDING: American Canoe Association does not have national classification policies and procedures.</p>	<p>National classification policies and procedures will be written and posted to American Canoe Association's website.</p> <p>Due Date: March 31, 2022</p>
Follow-up Level: Compliant		
American Canoe Association implemented Paralympic classification procedures that meet the standard and posted it on the website. American Canoe Association is now compliant.		

OPERATIONAL PERFORMANCE

Needs Improvement		
13	Whistleblower and Anti-Retaliation Policy – E.5 a	Management Action Plan
	<p>FINDING: There are elements missing from American Canoe Association's Whistleblower Policy related to applicability and enforcement.</p>	<p>The whistleblower policy will be updated to include the missing elements.</p> <p>Due Date: March 31, 2022</p>
Follow-up Level: Compliant		

	American Canoe Association updated the whistleblower and anti-retaliation policy to include the required elements and is now compliant.	
14	Strategic Planning – E.8 a	Management Action Plan
	<p>FINDING: American Canoe Association’s Strategic Plan does not include sufficient measurable outcomes for organization-wide initiatives. Additionally, approval of the strategic plan is not documented in the board meeting minutes.</p>	<p>American Canoe Association’s Strategic Plan will be created with measurable goals and with documented approval of the board.</p> <p>Due Date: May 15, 2022</p>
Follow-up Level: Needs Improvement		
American Canoe Association is in the process of updating the strategic plan and anticipates completion and approval of the plan by year-end.		
Little Evidence of Compliance		
15	Grievance Procedure – E.4 a & b	Management Action Plan
	<p>FINDING: There are elements missing from American Canoe Association's grievance procedures, including types of grievances, manner of filing the complaint, administration of the grievance, hearing panel composition, and hearing process.</p>	<p>American Canoe Association’s Grievance Policy will be updated to include all missing elements and presented to the board for approval in February and be implemented immediately after approval.</p> <p>Due Date: March 31, 2022</p>
Follow-up Level: Compliant		
American Canoe Association updated the grievance procedures to include the required language and is now compliant.		
16	Gender Equity – E.7 b	Management Action Plan
	<p>FINDING: American Canoe Association has established performance criteria that are the same for all national or event team athletes who are on the Delegation Event program. However, the criteria to qualify for USOPC funded stipends and Elite Athlete Health Insurance are not published online or in an athlete handbook.</p>	<p>Standard criteria for all national and event team athletes to qualify for USOPC Stipends and Elite Athlete Health Insurance will be written and published online.</p> <p>Due Date: March 31, 2022</p>
Follow-up Level: Compliant		
American Canoe Association published criteria to qualify for athlete stipends and Elite Athlete Health Insurance on the website and is now compliant.		

Additional updates on findings that have not been remediated will be provided in the NGB Certification Report.

We would like to thank the American Canoe Association staff for their cooperation throughout the audit process.

APPENDIX A — FOLLOW-UP DEMONSTRATION LEVEL DEFINITIONS

Follow-up Demonstration Level Definitions	
Level	Definition
Compliant	NGB has implemented the action plan and now meets the requirements.
Needs Improvement	NGB has implemented part of the action plan but still needs to make minor improvements to meet all the requirements.
Little Evidence of Compliance	NGB has implemented part of the action plan but still has significant progress to make to meet all the requirements.
No Evidence of Compliance	NGB has not implemented the action plan and does not meet the requirements.