



USOPC NGB AUDIT

USA JUDO

ADDENDUM REPORT

April 1, 2022

EXECUTIVE SUMMARY

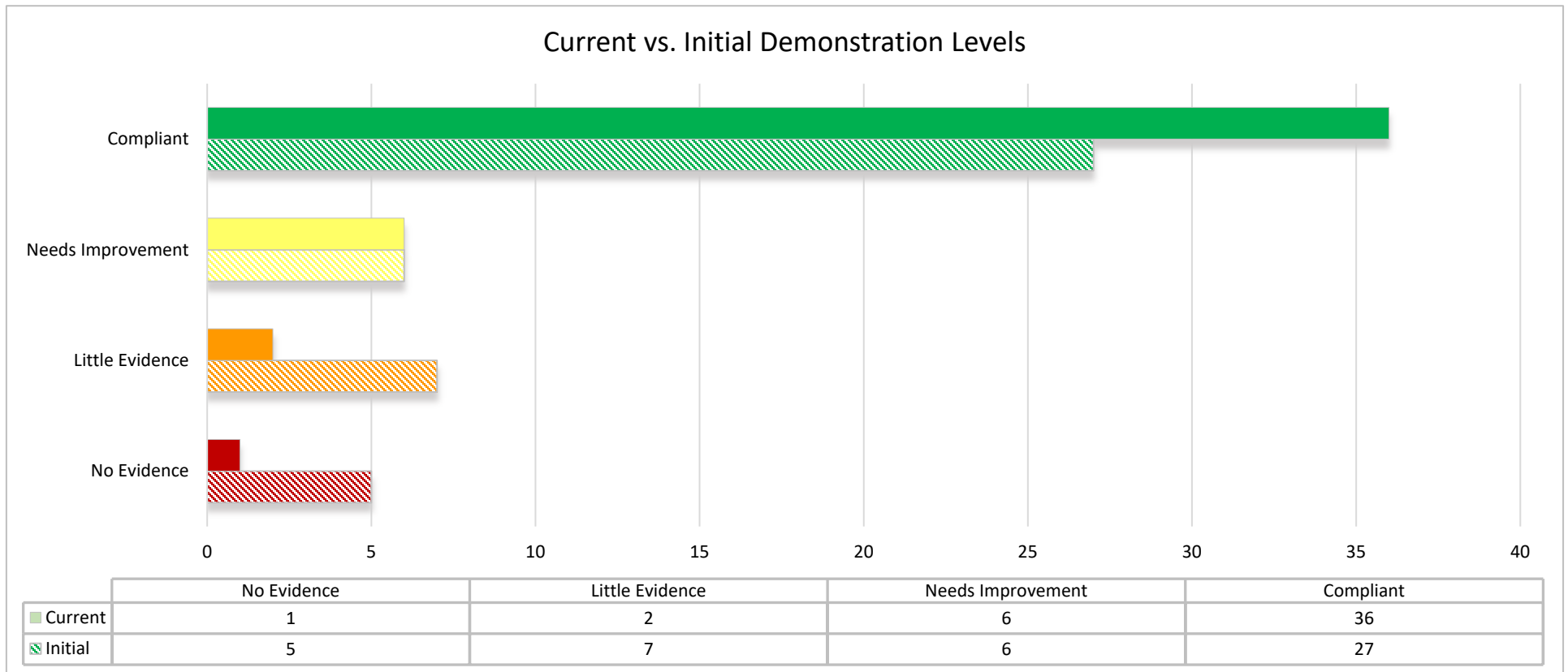
Background, Scope, and Objectives

The United States Olympic & Paralympic Committee’s (USOPC) NGB Audit department (Audit) completed an audit of USA Judo on September 7, 2021. The purpose of the audit was to determine if USA Judo 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 USA Judo. 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, USA Judo has remediated nine findings. Additionally, several findings have been corrected but are pending board approval. As of March 30, 2022, USA Judo is 80% compliant. Additional details are outlined below.

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
	<p>FINDING: USA Judo’s Bylaws meet most of the requirements for the definition of independent perspective, however, they do not state that independent board members must continue to meet the definition of providing an independent perspective for their entire term and any successive term.</p>	<p>USA Judo will further explain in its bylaws that an independent director must continue to meet the definition of independent for their entire term and any successive term.</p> <p>Due Date: December 16, 2021</p>
Follow-up Level: Needs Improvement		
USA Judo has updated the bylaws to include the required elements. However, the bylaws are currently in draft form, pending a membership comment period and subsequent board approval. Once the bylaws are approved, USA Judo will be compliant.		
2	Bylaws – A.3 a	Management Action Plan
	<p>FINDING: There are elements missing from USA Judo's Bylaws in the following areas: general bylaw requirements, board election and selection procedures, and committee requirements.</p>	<p>USA Judo will update its bylaws to meet the minimum policy standards set forth by the USOPC.</p> <p>Due Date: December 16, 2021</p>
Follow-up Level: Needs Improvement		
USA Judo has updated the bylaws to include the required elements. However, the bylaws are currently in draft form, pending a membership comment period and subsequent board approval. Once the bylaws are approved, USA Judo will be compliant.		
Little Evidence of Compliance		
3	Athlete Representation – A.1 a & b	Management Action Plan
	<p>FINDING: According to USA Judo's Bylaws, athlete representatives on most designated committees are appointed by the board and do not require approval by elite athletes.</p>	<p>USA Judo will update its bylaws and policies to comply with the required percentage of athlete representation and election/selection procedures.</p>

	<p>USA Judo does not have at least 20% athlete representation on its Ethics and Grievance Committee.</p> <p>In addition, one athlete representative does not meet the eligibility requirements outlined in the USOPC Bylaws.</p>	<p>USA Judo will update all its committees in January-February of 2022 and will have the required athlete representation in place for both percentages and approved eligibility requirements.</p> <p>Due Date: February 28, 2022</p>
Follow-up Level: Little Evidence		
	<p>USA Judo has updated the bylaws to require athletes for designated committees be selected by the Athlete Advisory Council. However, the bylaws are currently in draft form, pending a membership comment period and subsequent board approval. In addition, evidence has not been provided to verify that the Ethics and Grievance Committee has 20% athlete representation or that all athletes meet the eligibility requirements outlined in the USOPC Bylaws.</p>	
4	Board Development – A.3 b	Management Action Plan
	<p>FINDING: USA Judo does not currently conduct onboarding for new committee members.</p> <p>There is no documentation of the CEO performance evaluation.</p>	<p>USA Judo will implement a formal onboarding process for committee members and conduct an annual performance evaluation of the CEO.</p> <p>Due Date: December 16, 2021</p>
Follow-up Level: Needs Improvement		
	<p>The CEO performance evaluation was completed on February 24, 2022. USA Judo seated new committee members in February 2022 and onboarding is scheduled to take place on March 30, 2022.</p>	
5	Code of Conduct – A.5 a	Management Action Plan
	<p>FINDING: There are elements missing from USA Judo’s Code of Conduct in the following areas: applicability, organizational expectations, policy owner, resources, and reporting.</p>	<p>USA Judo will update its code of conduct to meet the minimum policy standards set forth by the USOPC.</p> <p>Due Date: December 16, 2021</p>
Follow-up Level: Compliant		
	<p>USA Judo updated the code of conduct to include all required elements and is now compliant.</p>	
6	Gifts and Entertainment Policy – A.6 c	Management Action Plan
	<p>FINDING: There are elements missing from USA Judo's Gift and Entertainment Policy in the following areas: applicability and policy owner.</p>	<p>USA Judo will update its gift & entertainment policy to meet the minimum policy standards set forth by the USOPC.</p> <p>Due Date: December 16, 2021</p>
Follow-up Level: Compliant		

	USA Judo updated the gift & entertainment policy to include the required elements and is now compliant.	
No Evidence of Compliance		
7	Conflicts of Interest Policy – A.6 b	Management Action Plan
	<p>FINDING: There are elements missing from USA Judo’s Conflict of Interest Policy in the following areas: applicability, organizational expectations, disclosure requirements, disclosure process, reporting and resolution for potential violations, and resources.</p> <p>USA Judo does not have committee members complete an annual conflict of interest disclosure form.</p> <p>During testing, there were four completed conflict of interest forms with no evidence of review. In addition, there were several instances where Board members did not disclose potential conflicts.</p>	<p>USA Judo will update its conflict of interest policy to meet the minimum policy standards set forth by the USOPC.</p> <p>USA Judo will update all its committees in January-February 2022 and will require the completion and submission of the annual conflict of interest disclosure forms by all committee members.</p> <p>For all conflict of interest forms received in 2022, extra steps will be taken to make sure all potential conflicts are disclosed, and reviews will be confirmed with appropriate reviewer(s’) signatures.</p> <p>Due Date: March 31, 2022</p>
Follow-up Level: Little Evidence		
USA Judo has updated the conflict-of-interest policy to include the required elements and is now compliant with this aspect of the finding. As USA Judo’s disclosure forms are not due until March 31, 2022, Audit has not yet been able to test the forms for remediation.		

FINANCIAL STANDARDS AND REPORTING PRACTICES

Needs Improvement		
8	Financial Reporting to the Board – B.1 d	Management Action Plan
	<p>FINDING: USA Judo provides financial updates to the Audit Committee and conducts regular calls with the board to discuss financial information. However, there was limited documentation to show discussion during board meetings.</p>	<p>USA Judo will more frequently share financial information with the full USA Judo Board in addition to the Audit Committee and will document these discussions in the meeting minutes.</p> <p>Due Date: December 16, 2021</p>
Follow-up Level: Compliant		
USA Judo provided sufficient evidence to show financial information is being shared with the board and is now compliant.		
Little Evidence of Compliance		
9	Financial Policies and Procedures – B.1 b	Management Action Plan

<p>FINDING: USA Judo’s Financial Policies and Procedures are missing several required elements including internal controls, receivables process, contract requirements, payroll procedures, and cash management/banking</p> <p>Additionally, the Wire process, which is used to make payments for most international competitions is not documented in the Financial Policies and Procedures.</p> <p>This is a repeat finding as the previous USOPC audit noted that procedures related to accounts receivable and payroll functions were not up to date.</p>	<p>USA Judo will update its financial policies and procedures to meet the minimum policy standards set forth by the USOPC.</p> <p>Due Date: December 16, 2021</p>
<p>Follow-up Level: Compliant</p>	
<p>USA Judo updated the financial policies and procedures to include the required elements and is now compliant.</p>	

ATHLETE PROTECTION AND RIGHTS

Needs Improvement		
10	Anti-Doping Policies – C.4 a	Management Action Plan
	<p>FINDING: USA Judo does not have formal policies and procedures to enforce anti-doping sanctions.</p>	<p>USA Judo will update its policies and procedures to further enforce anti-doping sanctions issued by USADA.</p> <p>Due Date: December 16, 2021</p>
<p>Follow-up Level: Compliant</p>		
<p>USA Judo updated policies and procedures to meet the requirement and is now compliant.</p>		
No Evidence of Compliance		
11	USOPC Athlete Safety Requirements – C.3 a	Management Action Plan
	<p>FINDING: USA Judo does not have a process to report potential allegations or temporary measures to the USOPC Office of Athlete Safety when required.</p> <p>There are elements missing from USA Judo’s Background Check Policy, including applicability and types of offenses.</p>	<p>USA Judo will update the process to report potential allegations or temporary measures to the USOPC Office of Athlete Safety when required. USA Judo will update its background check policy to meet the minimum policy standards set forth by the USOPC.</p> <p>USA Judo will follow up with the three identified expired background screens to ensure they are updated and two that still need background checks conducted. USA Judo will also investigate how the system missed these five individuals and whether there were other potential</p>

	Testing of USA Judo’s Background Check results showed three expired background checks and two individuals who did not have a background check conducted.	occurrences. Additionally, USA Judo will analyze whether these situations are unique or systemic and take appropriate corrective action as needed. Due Date: December 16, 2021
Follow-up Level: Compliant		
USA Judo updated the background check policy to include the required elements and updated the process to report potential allegations directly to the USOPC Office of Athlete Safety. In addition, Audit completed background check testing and verified required individuals have a current background check and the controls have been updated to ensure expired background checks are completed. USA Judo is now compliant with this requirement.		
12	Anti-Doping Policy Language – C.4 b	Management Action Plan
	FINDING: USA Judo’s Bylaws do not have the minimum required anti-doping language for NGBs with individual members.	USA Judo will update its bylaws to include the minimum required anti-doping language for NGBs with individual members. Due Date: December 16, 2021
Follow-up Level: Needs Improvement		
USA Judo has updated the bylaws to include the required language. However, the bylaws are currently in draft form, pending a membership comment period and subsequent board approval. Once the bylaws are approved, USA Judo will be compliant.		

SPORT PERFORMANCE

No Evidence of Compliance		
13	Event Sanctioning – D.4 b	Management Action Plan
	FINDING: USA Judo’s sanctioning document(s) do not have all the minimum required elements.	USA Judo will add the minimum required USOPC elements to its sanctioning documents. Due Date: December 16, 2021
Follow-up Level: Compliant		
USA Judo updated the sanctioning documents to include the required elements and is now compliant.		
14	Paralympic Classification – D.4 c	Management Action Plan
	FINDING: USA Judo has not adopted the U.S. Paralympics National Classification Policies & Procedures or established national classification policies and procedures that comply with the U.S. Paralympics National	USA Judo will officially adopt the policies and procedures that comply with US Paralympic and IPC Classification policies, procedures, and standards.

Classification Policies & Procedures and the IPC Athlete Classification Code and International Standards.	Due Date: December 16, 2021
Follow-up Level: No Evidence of Compliance	
USA Judo has not yet adopted the policies and procedures which comply with requirements.	

OPERATIONAL PERFORMANCE

Needs Improvement		
15	Equal Opportunity – E.7 c	Management Action Plan
	FINDING: While USA Judo provides an equal opportunity to participate as required, they do not provide anti-discrimination training.	USA Judo will provide anti-discrimination training as required by the USOPC. Due Date: December 16, 2021
Follow-up Level: Needs Improvement		
Audit granted an extension to April 15, 2022, as USA Judo needed to unexpectedly replace a director and elections are currently in process. Training is scheduled to occur following the election.		
16	Strategic Planning – E.8 a	Management Action Plan
	FINDING: There is no evidence that the strategic plan was board-approved.	USA Judo will document board approval of the strategic plan. Due Date: December 16, 2021
Follow-up Level: Compliant		
USA Judo’s Board of Directors approved the strategic plan on February 24, 2022, and is now compliant.		
Little Evidence of Compliance		
17	Grievance Procedure – E.4 a & b	Management Action Plan
	FINDING: There are elements missing from USA Judo’s Grievance Policy and Procedures in the following areas: types, the process to report, grievance form, administration of the grievance, the conduct of the proceedings, hearing panel composition, and hearing process. In addition, audit noted that a hearing panel formed for one of the grievances tested did not document if the panel was free of conflicts of interest.	USA Judo will update its grievance procedures to meet the minimum policy standards set forth by the USOPC. For all future hearing panels, documentation will be retained that the panel is free of conflicts of interest. Due Date: December 16, 2021

Follow-up Level: Needs Improvement		
USA Judo has updated the bylaws and finalized Ethics and Grievance Committee Procedures to include the required elements. However, the bylaws are currently in draft form, pending a membership comment period and subsequent board approval. Additionally, no hearing panels have been convened so Audit is unable to evaluate if they have documented they are free from conflicts.		
18	Whistleblower and Anti-Retaliation Policy – E. 5 a	Management Action Plan
	FINDING: There are elements missing from USA Judo’s Whistleblower Policy including applicability, expectations, and enforcement.	USA Judo will update its whistleblower policy to meet the minimum policy standards set forth by the USOPC. Due Date: December 16, 2021
Follow-up Level: Compliant		
USA Judo updated the whistleblower policy to include the required elements 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 USA Judo 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.