

UNITED STATES
OLYMPIC & PARALYMPIC
COMMITTEE



NGB Compliance Audit

USA Artistic Swimming

July 9, 2026

Executive Summary

Background, Scope, and Objectives

The United States Olympic & Paralympic Committee's Audit department (USOPC Audit) completed an audit of USA Artistic Swimming. The purpose of the audit was to determine if USA Artistic Swimming complies with the requirements of the NGB Compliance Standards (Standards), effective January 1, 2026, and to conduct testing in areas that present an increased risk to athletes, other members, and/or USA Artistic Swimming. The audit focused on the policies and procedures noted in the Standards in the following sections: Governance and Compliance, Financial Standards and Reporting Practices, Athlete Protections and Rights, Sport Performance, and Operational Performance.

Audit Summary

Overall, Audit concluded that USA Artistic Swimming has met 22 of 27 applicable Standards. There are no significant concerns, as the majority of findings are related to minor updates to policies and procedures. Additional details are in the findings below.

NGB Compliance Audit Findings

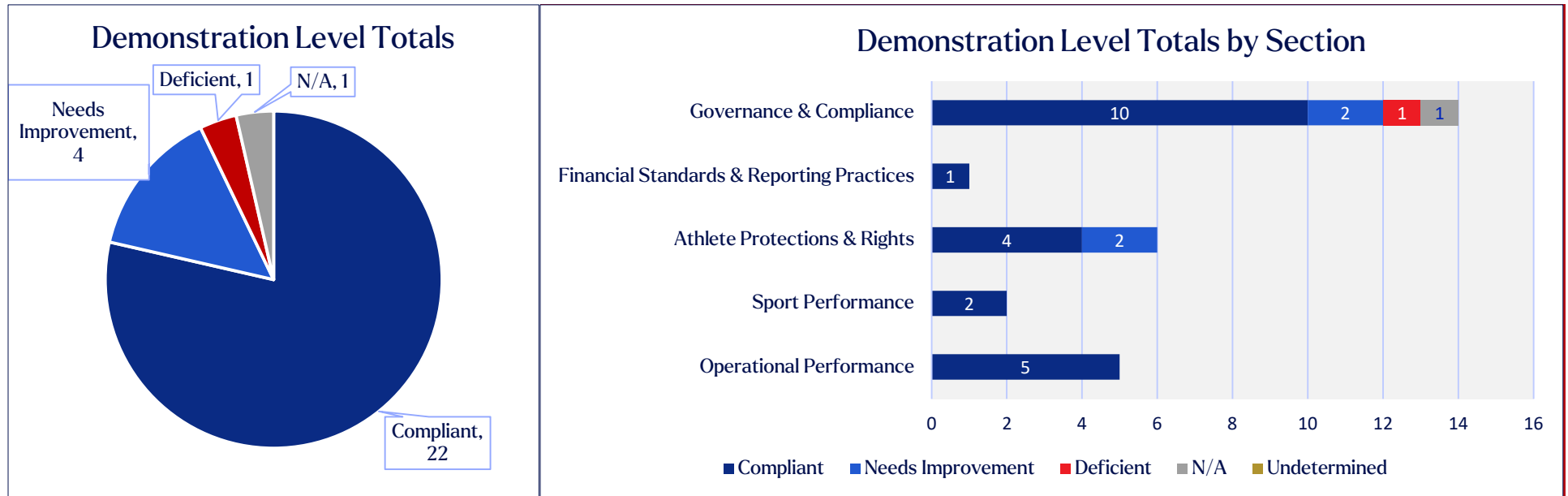
All Standards are evaluated against the 2026 Implementation Guide for Compliance Standards (Implementation Guide). References to the USOPC Bylaws are based on the effective February 1, 2025.

Select policies and procedures were reviewed to determine compliance with the Standards. The evaluation of and conclusion for each standard was based on the criteria met and the results of any testing. The definitions of the demonstration levels are below, with additional guidance for each standard detailed in the Implementation Guide. Findings and demonstration levels for each standard are detailed on the subsequent pages.

Compliance Demonstration Level Definitions

Compliant	The NGB, through its written policies and procedures and its execution of those policies and procedures, mostly demonstrates that it is meeting the elements of the standard.
Needs Improvement	The NGB, through its written policies and procedures and its execution of those policies and procedures, demonstrates that it meets many elements of the standard, but changes or improvements are necessary to fully meet the standard.
Deficient	The NGB, through inadequate written policies and procedures and/or poor execution of those policies and procedures, demonstrates that it is not meeting several elements of the standard.
Not Applicable / Undetermined	Not applicable indicates the standard does not apply to the NGB and will not be evaluated. Undetermined indicates a reason a determination cannot be made at this time; however, the standard will be evaluated at a later date. Additional details are provided as necessary.

Overall Demonstration Levels Summary



Governance and Compliance

NGB Compliance Standards Section A				
Title	Standard	Compliant	Needs Improvement	Deficient
Athlete Representation	A.1 a & b		X	
Independent and Affiliate Representation	A.1 c	X		
International Federation Affiliation	A.2 a	X		
Membership Requirements	A.2 b	X		
Athlete Advisory Council	A.3 a			X
Board Governance	A.4 a	X		
Board Development	A.4 b	X		
Code of Conduct	A.6 a	X		
Conflicts of Interest Policy	A.6 b		X	
Gifts and Entertainment Policy	A.6 c	X		
Sport Integrity Policy ¹	A.6 d	N/A		
Demographic & Inclusion Requirements	A.7 a & b	X		
Equal Pay for Team USA	A.7 c	X		
Ombuds' Policy	A.9 a	X		
Total		10	2	1

Needs Improvement		
1	Athlete Representation	Management Action Plan
	A.1a & b: a. NGB must have at least 33.3% athlete representation on its board of directors as required by the Act §220522(13) and further defined by the USOPC Bylaws, Section 8.5.3. b. NGB must have at least 33.3% athlete representation on all Designated and Other Committees as required and defined by the USOPC Bylaws, Section 8.5.4 and 8.5.5.	USA Artistic Swimming will update the bylaws to include the missing athlete representation elements. Due Date: November 6, 2026

¹ This Standard will not be assessed for audits started prior to July 1, 2026.

	FINDING: USA Artistic Swimming's Bylaws are missing elements related to athlete representation requirements on the board and committees.	
2	Conflict of Interest Policy	Management Action Plan
	A.6b: NGB must enforce a conflict of interest policy that meets the minimum policy standards set forth by the USOPC. The conflict of interest policy must be made available on the NGB's website. FINDING: USA Artistic Swimming's board of directors' disclosure forms are not reviewed by the Ethics Committee Chair as required by the USA Artistic Swimming Conflict of Interest Policy.	USA Artistic Swimming will ensure the board of directors' disclosure forms go to the Ethic Chair for review moving forward. Due Date: November 6, 2026
Deficient		
3	Athlete Advisory Council	Management Action Plan
	A.3a: NGB must have an Athletes Advisory Council that meets the minimum standards set forth by the USOPC. FINDING: USA Artistic Swimming's Bylaws allow for athletes who do not meet the 10 Year or 10 Year Plus athlete criteria to make up the AAC composition. Additionally, USA Artistic Swimming does not have athlete candidates submit disclosures indicating whether they have any disqualifying convictions or periods of ineligibility made before the election of athlete candidates. Finally, USA Artistic Swimming does not require all athlete candidates to complete a conflict of interest form prior to the election.	USA Artistic Swimming will request an exception from the USOPC Athlete Representation Review Working Group. If no exception is granted, USA Artistic Swimming will update their bylaws accordingly. USA Artistic Swimming will update their policy to require athlete candidates to the AAC to complete other disclosures indicating whether they have any disqualifying convictions or periods of ineligibility made prior to elections. Finally, USA Artistic Swimming will require athlete candidates to the AAC to submit conflict of interest disclosures prior to elections Due Date: November 6, 2026

Financial Standards and Reporting Practices

NGB Compliance Standards Section B				
Title	Standard	Compliant	Needs Improvement	Deficient
Financial Capability	B.1 a	X		
Total		1	0	0

Athlete Protection and Rights

NGB Compliance Standards Section C				
Title	Standard	Compliant	Needs Improvement	Deficient
Child Protection and US Center for SafeSport	C.1 a - b	X		
USOPC Athlete Safety Requirements	C.2 a		X	
Anti-Doping Policies	C.3 a	X		
Anti-Doping Policy Language	C.3 b	X		
Athlete Agreements	C.4 a		X	
Athlete Support Criteria	C.5 a	X		
Total		4	2	0

Needs Improvement		
4	USOPC Athlete Safety Requirement	Management Action Plan
	C.2a: NGB must ensure compliance with policies and standards including but not limited to: i. USOPC's NGB Athlete Safety Policy ii. Responsible Sport Organization Background Check Policy FINDING: USA Artistic Swimming's Athlete Safety Policy is missing elements relating to applicability and review process.	USA Artistic Swimming will update their athlete safety policy to include the missing elements. Due Date: November 6, 2026
5	Athlete Agreements	Management Action Plan
	C.4a: NGB must comply with the USOPC NGB Athlete Agreements Policy. FINDING: USA Artistic Swimming's athlete agreements do not clearly define a reasonable number of promotional and fundraising events that athletes must attend.	USA Artistic Swimming will update their athlete agreements to clearly define what a reasonable number of promotional events required to attend is. Due Date: November 6, 2026

Sport Performance

NGB Compliance Standards Section D				
Title	Standard	Compliant	Needs Improvement	Deficient
High-Performance Plan Submission	D.3 a	X		
Event Sanctioning	D.3 b	X		
Total		2	0	0

Operational Performance

NGB Compliance Standards Section E				
Title	Standard	Compliant	Needs Improvement	Deficient
Managerial and Board Capability	E.1 a	X		
Whistleblower and Anti-Retaliation Policy	E.3 a	X		
Complaint Resolution and Hearing Procedures	E.4 a & b	X		
USOPC Trademark Protection	E.5 a – d	X		
Strategic Planning	E.6 a	X		
Total		5	0	0

Findings in this report are currently in remediation. A closure letter will be issued once all findings have been remediated.