

UNITED STATES
OLYMPIC & PARALYMPIC
COMMITTEE



NGB Compliance Audit

Lakeshore National Adapted Sports Organization

July 29, 2025

Executive Summary

Background, Scope, and Objectives

The United States Olympic & Paralympic Committee's Audit department (USOPC Audit) completed an audit of Lakeshore National Adapted Sports Organization (LNASO). The purpose of the audit was to determine if LNASO complies with the requirements of the NGB Compliance Standards (Standards), effective January 1, 2025, and to conduct testing in areas that present an increased risk to athletes, other members, and/or LNASO. 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, USOPC Audit concluded that LNASO has met 17 of 27 applicable Standards and did not identify any significant concerns. There was strong compliance noted for financial standards and reporting practices and sports performance, reinforcing its commitment to athlete success. Additional details are in the findings below.

NGB Compliance Audit Findings

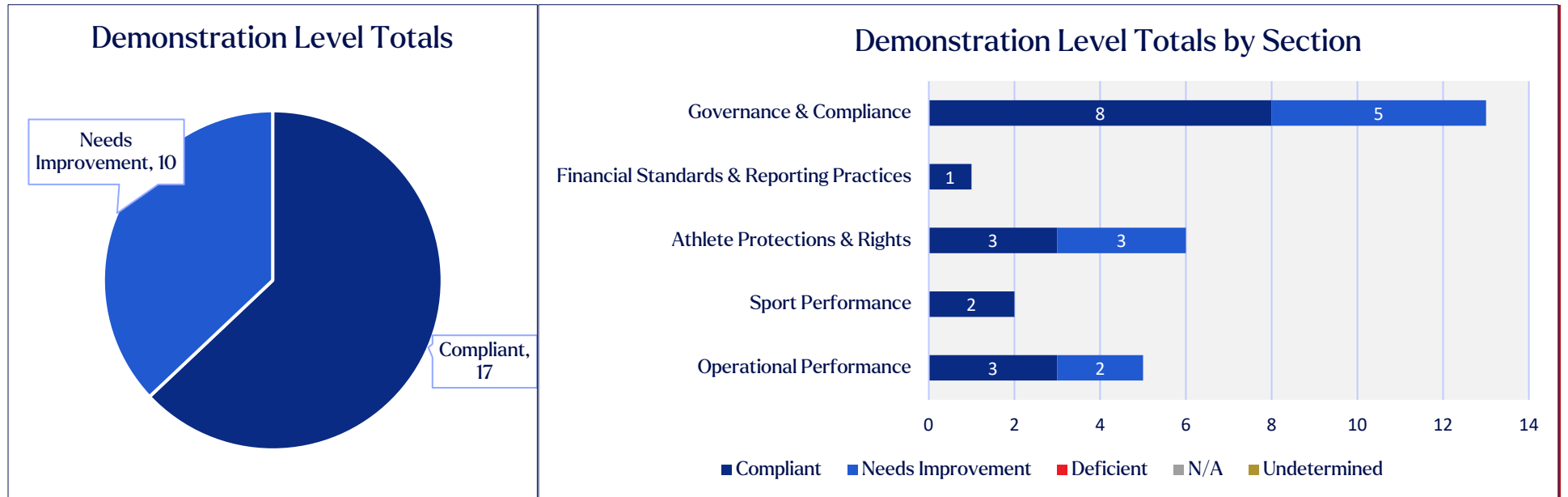
All Standards are evaluated against the 2025 Implementation Guide for Compliance Standards (Implementation Guide). References to the USOPC Bylaws are based on the effective February 1, 2025.

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		
Diversity Equity & Inclusion Requirements	A.7 b	X		
Equal Pay for Team USA	A.7 c	X		
Ombuds' Policy	A.9 a	X		
Total		8	5	0

Needs Improvement		
1	Athlete Representation	Management Action Plan
	<p>A.1 a & b:</p> <p>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.</p> <p>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</p> <p>FINDING: LNASO's Bylaws are missing minor elements of the athlete representation requirements regarding its board and committees.</p>	<p>LNASO will update the Bylaws to meet the requirements.</p> <p>Due Date: September 30, 2025</p>
2	Athlete Advisory Council	Management Action Plan
	<p>A.3 a: NGB must have an Athletes Advisory Council that meets the minimum standards set forth by the USOPC.</p>	<p>LNASO will update the Bylaws to meet the requirements.</p> <p>Further LNASO moving forward will require athletes to submit</p>

	<p>FINDING: The following issues were identified during a review of LNASO's AAC Requirements:</p> <p>LNASO's Bylaws do not state that the NGB's Team USA Athletes' Commission primary representative and alternate will automatically be members of the NGB AAC and must make up two of the allotted positions on the NGB AAC.</p> <p>Additionally, LNASO's Bylaws do not state that at least 80% of the NGB AAC membership are NGB 10 Year Athletes, and the remainder are NGB 10 Year of 10 Year+ Athletes.</p> <p>Finally, LNASO does not have athlete candidates submit disclosures indicating whether they have any disqualifying convictions or periods of ineligibility made before the election of athlete representative candidates.</p>	<p>disclosures indicating whether they have any disqualifying convictions or periods of ineligibility made before the election of athlete representative candidates. The disclosure forms will be circulated prior to the next election.</p> <p>Due Date: September 30, 2025</p>
3	Board Development	Management Action Plan
	<p>A.4 b: The NGB board must conduct the following activities:</p> <ul style="list-style-type: none"> i. Formal onboarding process for board members and committee members, ii. USOPC training to the board members and committee members, iii. At least once per quad, perform a self-evaluation of the board's performance using the USOPC provided resource, and iv. Annual performance evaluation of the CEO/Executive Director. <p>FINDING: LNASO has not conducted a board self-evaluation in the previous two years.</p>	<p>LNASO will initiate a board self-evaluation at the September 22nd board meeting.</p> <p>Due Date: November 30, 2025</p>
4	Code of Conduct	Management Action Plan
	<p>A.6 a: NGB must have a comprehensive code of conduct that meets the minimum code standards set forth by the USOPC. The code of conduct must be made available on the NGB's website.</p> <p>FINDING: There are elements missing from LNASO's Code of Conduct in the following areas: applicability, organizational expectations, reporting, and resources.</p>	<p>LNASO will update the Code of Conduct to meet the requirements.</p> <p>Due Date: September 30, 2025</p>
5	Conflict of Interest Policy	Management Action Plan
Policy	<p>A.6 b: NGB must enforce a conflicts 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.</p>	<p>LNASO will update the Conflict of Interest Policy to meet the requirements.</p> <p>Due Date: September 30, 2025</p>

	FINDING: There are elements missing from LNASO's Conflict of Interest Policy in the areas of disclosures, resolution, and resources.	
Application	FINDING: Additionally, board minutes did not include conflict declarations or recusals.	LNASO will ensure that moving forward all Board meetings shall include an account of any conflict declarations and approvals. Due Date: July, 31, 2025

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		3	3	0

Needs Improvement		
6	Child Protection and US Center for SafeSport	Management Action Plan

	<p>C.1 a-b:</p> <p>a. As required by Section 220524(a)(12) of the Act, NGBs must adopt one or more policies that prohibit any individual who is an employee, contractor, or agent of the NGB from assisting a member or former member in obtaining a new job (except for the routine transmission of administrative and personnel files) if the individual knows that that member or former member violated the policies or procedures of the Center related to sexual misconduct or was convicted of a crime involving sexual misconduct with a minor in violation of applicable law or the policies or procedures of the Center.</p> <p>b. NGB must demonstrate compliance with child protection laws and the U.S. Center for SafeSport requirements through the U.S. Center for SafeSport's most recent audit report.</p> <p>FINDING: LNASO does not have a policy that meets all the requirements of Section 220524(a)(12) of the Act.</p>	<p>LNASO will update the SafeSport Policy to meet the requirements.</p> <p>Due Date: September 30, 2025</p>
7	USOPC Athlete Safety Requirements	Management Action Plan
	<p>C.2 a: NGB must ensure compliance with policies and standards including but not limited to:</p> <p>i. USOPC's NGB Athlete Safety Policy</p> <p>ii. Responsible Sport Organization Background Check Policy</p> <p>FINDING: LNASO does not have a written process to notify the Office of Athlete Safety related to allegations as required.</p>	<p>LNASO will create and implement a written process to notify the USOPC Office of Athlete Safety, as required.</p> <p>Due Date: September 30, 2025</p>
8	Anti-Doping Policies	Management Action Plan
	<p>C.3 a: NGB must ensure compliance with anti-doping policies and standards including, but not limited to, the USOPC's National Anti-Doping Policy and the USADA Protocol.</p> <p>FINDING: LNASO does not have an anti-doping policy for enforcing sanctions issued by any applicable agency.</p>	<p>LNASO will update the anti-doping policy to include the required language for enforcing sanctions issued by any applicable agency.</p> <p>Due Date: September 30, 2025</p>

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		3	2	0

Needs Improvement		
9	Whistleblower and Anti-Retaliation Policy	Management Action Plan
	<p>E.3 a: NGB must adopt and maintain an organizational whistleblower policy that encourages and provides a mechanism for affiliated individuals to report alleged violations of any applicable law, rule, regulation, or adopted policy of the NGB, accounting or financial fraud, or other misfeasance and includes an anti-retaliation statement.</p> <p>FINDING: There are minor elements missing from LNASO's Whistleblower and Anti-Retaliation Policy in the following areas: applicability, legal and governance requirements, reporting, and resources.</p>	<p>LNASO will update the Whistleblower and Anti-Retaliation Policy to meet the requirements.</p> <p>Due Date: September 30, 2025</p>
10	Strategic Planning	Management Action Plan

	<p>E.6 a: NGB must maintain and monitor the execution of an organizational strategic plan, in addition to a high-performance plan.</p> <p>FINDING: LNASO has a strategic plan that meets the requirements. However, the plan has not been board-approved.</p> <p>This is a repeat finding from the previous USOPC audit.</p>	<p>LNASO will submit the strategic plan to the board for approval.</p> <p>Due Date: September 30, 2025</p>
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Findings in this report are currently in remediation. A closure letter will be issued once all findings have been remediated.