# UNITED STATES OLYMPIC AND PARALYMPIC COMMITTEE CERTIFICATION REVIEW GROUP



# Certification Renewal Recommendation Report for USA Climbing

September 15, 2022





#### USA Climbing Certification Renewal Executive Summary

In January 2022, the United States Olympic and Paralympic Committee (USOPC) Certification Review Group (CRG), in accordance with the USOPC's NGB Certification Policy, began a certification renewal review of USA Climbing. The CRG evaluated USA Climbing and, based on input from CRG members and the results of NGB Audit's 2021 audit<sup>2</sup>, recommends a current rating of Renewal in Good Standing.

The CRG's review of USA Climbing found that the organization is meeting the USOPC's NGB Compliance Standards in the five core areas of evaluation for certification: Governance and Compliance, Financial Standards and Reporting Practices, Athlete Protections and Rights, Sport Performance, and Operational Performance. NGB Audit's 2021 Compliance Audit identified areas where USA Climbing was not yet fully meeting the USOPC's NGB Compliance Standards, but USA Climbing resolved areas of concern well within NGB Audit's remediation period and by the time of the CRG review.

CRG members agreed that USA Climbing is presently meeting the requirements and expectations for an NGB. In its discussions of USA Climbing's interactions with the USOPC, the CRG did not identify any operational concerns or cultural issues that would prevent the organization's continued certification. Overall, in the areas in which CRG members had interacted with USA Climbing, the CRG had a favorable view of USA Climbing's operations.

As a result of this review, the CRG recommends that USA Climbing be granted a certification status of Renewal in Good Standing for a four-year certification term ending in 2026.

<sup>&</sup>lt;sup>1</sup> See Appendix for more information about the certification process, including a link to the NGB Certification Policy.

<sup>&</sup>lt;sup>2</sup> NGB Audit Report and NGB Audit Addendum Report.

#### **Organizational Overview**

USA Climbing is the USOPC-certified NGB for climbing and the U.S. representative to the International Federation for Sport Climbing (IFSC). USA Climbing "[promotes] the disciplines of Bouldering, Lead and Speed Climbing as well as the Collegiate and Paraclimbing series." USA Climbing's mission is to "support the well-being, development, and competitive excellence of [its] athletes as [it advances] the accessibility and growth of the climbing community nationwide." The NGB is staffed by fourteen employees and is headquartered in Salt Lake City, Utah.

### **Certification History**

USA Climbing was originally certified in January 2021.<sup>5</sup> The CRG's certification review was initiated based on the USA Climbing's scheduled quadrennial certification review. USA Climbing's certification status has not been referred for review outside of the standard NGB certification review schedule.

#### Certification Exceptions<sup>6</sup>

USA Climbing did not request any exceptions from the NGB Compliance Standards during its certification review.

# Athlete Representation Approval and Exceptions<sup>7</sup>

USA Climbing requested that the Athlete Representation Review Working Group (ARRWG) approve additional competitions as qualifying events for 10-Year and 10-Year+ status to expand the pool of athletes eligible to serve as athlete representatives. These competitions are:

- IFSC World Championships
- IFSC World Cup Competitions
- World University Games
- USA Climbing National Championships
- Paraclimbing World Championships
- Paraclimbing World Cup Competitions
- Paraclimbing National Championships

The ARRWG agreed that the IFSC World Championships from 2010 onward will be included as recognized competitions to generate additional 10-Year and 10-Year+ eligibility. The ARRWG also approved Paraclimbing World Championships, IFSC World Cup Competitions and Paraclimbing World Cup Competitions due to selection criteria determining an athlete's eligibility to compete. The ARRWG approved the World University Games as well, but USA Climbing noted that future requests to the ARRWG may retract this event. Athletes who qualify as elite finalists (6-8 athletes, event dependent) at the USA Climbing National Championships or the Paraclimbing National Championships were also approved as meeting 10-Year or 10-Year+ eligibility.

USA Climbing also requested and received approval of five of its committees to be defined as Designated Committees. These include:

- Nominating and Governance
- Audit
- Ethics

- Judicial
- Team Selection

The following committees were approved as Other Committees, as they do not deal with core issues affecting elite athletes to qualify for Designated Committees, but do otherwise require athlete representation:

<sup>&</sup>lt;sup>3</sup> About <u>USA Climbing</u>.

<sup>&</sup>lt;sup>4</sup> 2020-2024 Strategic Plan, USA Climbing Website.

<sup>&</sup>lt;sup>5</sup> Refer to the Appendix for details on the initial certification.

<sup>&</sup>lt;sup>6</sup> Refer to the Appendix for details on exception requests to the NGB Compliance Standards.

<sup>&</sup>lt;sup>7</sup> Refer to the Appendix for details on athlete representation exception requests.

- Paraclimbing Committee
- Coaching Committee
- Collegiate Committee
- Judges Committee
- Routesetting Committee
- Rules Committee

- Risk Management Committee
- Medical Committee
- Diversity, Equity, and Inclusion Task Force
- Competition Belaying Working Group
- NCAA Task Force

#### Certification Review<sup>8</sup>

#### Governance and Compliance

The CRG determined that USA Climbing is fulfilling the Governance and Compliance-related responsibilities for an NGB. USA Climbing has adopted and enforces a code of conduct, conflict of interest, and gifts and entertainment policies, has made these available on its website, and has defined procedures to address violations of these policies. USA Climbing has not been the subject of any compliance-related complaints filed in the USOPC Integrity Portal or formal complaints filed with the Dispute Resolution Unit.

NGB Audit found that USA Climbing's conflict of interest policy did not include some elements required by the NGB Compliance Standards. USA Climbing management revised its policy to include the missing elements to address the audit findings. NGB Audit also conducted testing of the organization's conflict of interest disclosure and review process and found that multiple disclosure forms were not completed or not completed appropriately. NGB Audit conducted follow-up testing and validated that disclosure forms were completed and properly reviewed.

The CRG received athlete feedback related to USA Climbing's governance and operations. Athlete feedback indicated that while there had been board-related issues in adhering to the bylaws for internal AAC voting procedures, those issues have since been resolved, and the new chair has provided optimal leadership. Although athlete representation opportunities are available, athlete feedback indicated some challenge in securing athlete representatives to populate committees similar to other NGBs' challenges, and that there is room for improvement on timely communications regarding elections and committee composition requirements.

#### Financial Standards and Reporting Practices

USA Climbing meets the requirements for an NGB's Financial Standards and Reporting Practices. The organization demonstrates financial operational capability to administer its sport and is financially and operationally transparent, while maintaining accountability to its members and to the USOPC.

In the 2021 Compliance Audit, NGB Audit found that USA Climbing's reports to account for USOPC funding required clarification. Although USA Climbing completed and submitted the final grant report by the established deadline, the High-Performance general ledger did not match the expenses reported on the 2020 final grant report and Value-In-Kind was not reported appropriately. Furthermore, upon testing reported expenses, NGB Audit found some gaps in the organization's process of documentation, review and adherence to financial policies and procedures.

To remediate this finding, USA Climbing implemented an invoice review process and a credit card expense management tool to ensure accurate and complete record-keeping. NGB Audit verified that the general ledger was reconciled to the final funding report and completed follow-up expense testing and no concerns were identified.

<sup>&</sup>lt;sup>8</sup> Refer to the Appendix for details on the review standards and process for information related to NGB Audit's Report on USA Climbing.

#### Athlete Protection and Rights

USA Climbing maintains and enforces an athlete safety program consistent with the requirements of relevant federal law, as well as with the policies and standards of the USOPC and the U.S. Center for SafeSport (the Center). It also maintains an anti-doping program consistent with the requirements of the USOPC and the U.S. Anti-Doping Agency.

The USOPC is not aware of any cases it has received in the past four years concerning USA Climbing that should have been reported to the Center but were not reported in accordance with the Center's reporting requirements. For its part, the USOPC has reported all matters to the Center relating to USA Climbing that the USOPC was required to report.

In 2021, the Center conducted its most recent Administrative Audit of USA Climbing's implementation of policies required by the Center's SafeSport Code and Minor Athlete Abuse Prevention Policies. USA Climbing received "Implemented" ratings in all areas of evaluation, resulting in no findings or corrective actions required by the Center. On March 9, 2022, the Center conducted an Event Audit at the National Team Trials in Kennesaw, Georgia, resulting in a minor finding and direction for corrective action. Described by the Center found that "USA Climbing must update language within its Quality Control System to state explicitly that day-of registrants in a role that requires them to be SafeSport trained are to be checked for current SafeSport training." USA Climbing took corrective action to resolve the Center's finding and the Center confirmed USA Climbing's full compliance as of May 20, 2022.

NGB Audit found that USA Climbing's anti-doping policy, SafeSport policy, and background check policy required minor updates to fully meet the NGB Compliance Standards. Management revised these policies to add the missing elements and now fully meets the NGB Compliance Standards. In addition, Security and Athlete Safety noted there were some concerns with USA Climbing's background checks in the past but said that management sought proactive assistance from the USOPC and addressed the issues in a timely manner.

#### Sport Performance

USA Climbing is fulfilling its obligations in Sport Performance. The organization maintains and executes on a strategic plan that supports athletes in achieving sustained competitive excellence and grows the sport. USA Climbing established clear selection procedures and executed them effectively to name and train Team USA athletes for Delegation Events. USA Climbing fulfilled all possible quota spots at the sport's debut in the 2020 Olympic Games in Tokyo. The U.S. was one of three national federations that met the criteria to field full teams for both men and women, showcasing the international strength of its high-performance program<sup>13</sup>.

NGB Audit found that USA Climbing's event sanctioning documents required minor updates to meet the NGB Compliance Standards. By updating its Local Host Facility Agreement to include elements surrounding medical personnel, USA Climbing remediated the finding.

## **Operational Performance**

The CRG determined that USA Climbing demonstrates the managerial capability to administer its sport and maintains adequate insurance to manage its risk, fulfilling its Operational Performance obligations.

NGB Audit found that USA Climbing's grievance procedures were missing elements required by the NGB Compliance Standards, and upon testing, NGB Audit noted one of the grievances was not handled within

<sup>&</sup>lt;sup>9</sup> US Center for SafeSport Administrative Audit Report – USA Climbing, October 20, 2021.

<sup>&</sup>lt;sup>10</sup> US Center for SafeSport Event Audit Report – National Team Trials, Kennesaw, GA, March 9, 2022.

<sup>&</sup>lt;sup>11</sup> ld.

<sup>&</sup>lt;sup>12</sup> US Center for SafeSport Corrective Actions Update – USA Climbing, May 20, 2022.

<sup>&</sup>lt;sup>13</sup> The Olympics, USA Climbing website.

its appropriate timeframe as required by its procedures. USA Climbing updated its grievance procedures, and NGB Audit conducted follow-up testing, which verified that for additional grievances, appropriate notifications were provided to the respondent within the required time period.

In addition to updating its grievance policy, USA Climbing updated its whistleblower policy and antiretaliation policy to include all elements required by the NGB Compliance Standards. Similarly, USA Climbing updated its athlete agreement to include pertinent information on how athletes could qualify for Elite Athlete Health Insurance. The athlete agreement, including the updated criteria, is published on its website.

While NGB Audit found that USA Climbing provides equal opportunity for athletes to participate in sport, the NGB initially did not provide anti-discrimination training for its staff as required by the USOPC. USA Climbing addressed this issue by providing the appropriate training and by including an attestation checkbox in the membership agreement that the signee reviewed the Anti-Discrimination Policy.

Athlete feedback on USA Climbing's operations recognized that USA Climbing staff is limited, and that individuals serve in multiple capacities operationally. The athlete gave significant credit to USA Climbing staff for their commitment and dedication to the high-performance pipeline. Specifically, the athlete noted the positive impact of having centralized coaching and a training center in Salt Lake City, underscoring the direct impact on successful performance outcomes.

USA Climbing also maintains a 2021-2024 Diversity, Equity, and Inclusion (DE&I) Action Plan that describes its DE&I vision and strategy for the coming years. USA Climbing submitted its action plan to the USOPC with sufficient detail, meeting the NGB Compliance Standards. USA Climbing's plan contains three goals surrounding infrastructure and leadership, funding and education, and memberships and partnerships. USA Climbing defines key stakeholders and target groups of minoritized populations, along with appropriate timelines and action items to meet the specific goals. The scope of USA Climbing's action plan spans the organization at the staff, board, committee, coaching, routesetting, and greater membership levels, including details on strategic, streamlined communications designed specifically for those target groups.

#### Conclusion

The CRG concluded that USA Climbing is performing satisfactorily overall based on input from the CRG members and the results of the NGB Audit team's 2021 Compliance Audit. USA Climbing remediated all identified deficiencies and there are no outstanding areas of concern affecting its certification status. Accordingly, the CRG recommends that USA Climbing's certification as a member organization of the USOPC be renewed with a status of Renewal in Good Standing.

#### **Appendix**

#### **Certification Renewal Process**

The USOPC believes in a culture of strong governance, ethics, and compliance among the NGBs that, as member organizations of the USOPC, make up the Olympic and Paralympic movement. Recent amendments to the Ted Stevens Olympic and Amateur Sports Act, which became effective in late 2020, require the USOPC to certify NGBs.<sup>14</sup> The USOPC determined that as of January 1, 2021, all member organizations would be certified, and their certifications would be reviewed for renewal on a rolling basis every four years.<sup>15</sup>

Governed by the USOPC's <u>Certification Renewal Policy</u>, the NGB certification review process is supported by a cross-functional body of professionals at the USOPC, the Certification Review Group (CRG), who interact with NGBs in their day-to-day work. These professionals evaluate an NGB's operations across multiple functional areas to provide a holistic review of an NGB's performance and culture. <sup>16</sup> In addition to enumerated standards for NGB performance described in the Act, the Bylaws, and the USOPC's <u>NGB Compliance Standards</u>, the CRG considers departmental observations about an NGB's operations that may not be identified in a formal audit scenario but are relevant to consider when evaluating an NGB's overall performance.

#### Certification Standards, Exceptions, and Review Components

As described in Section 8.4.1 of the <u>USOPC Bylaws</u>, NGBs must satisfy certification requirements in five core areas: Governance and Compliance, Financial Standards and Reporting Practices, Athlete Safety, Sport Performance, and Operational Performance. The USOPC Implementation Guide for NGB Compliance Standards provides NGBs with specific guidance for how they will be evaluated in each of these core areas.

Section 8.4.2 of the USOPC Bylaws permits an NGB to submit a request for limited exceptions to any of the NGB Compliance Standards which, as a result of its overall structure or other extenuating circumstances, cannot or need not be reasonably met. The CRG evaluates all requests received and grants or denies such limited exceptions.

Various provisions of Section 8.5 of the USOPC Bylaws permit NGBs to seek exceptions related to minimum athlete representation requirements on boards and designated committees as well as exceptions or additions to which of its committees are considered designated committees. The Athlete Representation Review Working Group evaluates and approves or denies all requests made under Section 8.5.

<sup>&</sup>lt;sup>14</sup> See §220521(a) of the Ted Stevens Olympic and Amateur Sports Act.

<sup>&</sup>lt;sup>15</sup> NGB Certification Policy, Section 1.

<sup>&</sup>lt;sup>16</sup> The CRG uses a four-year lookback period during this review process.