



# USOPC NGB AUDIT

## USA FIELD HOCKEY

### ADDENDUM REPORT

March 16, 2022

## EXECUTIVE SUMMARY

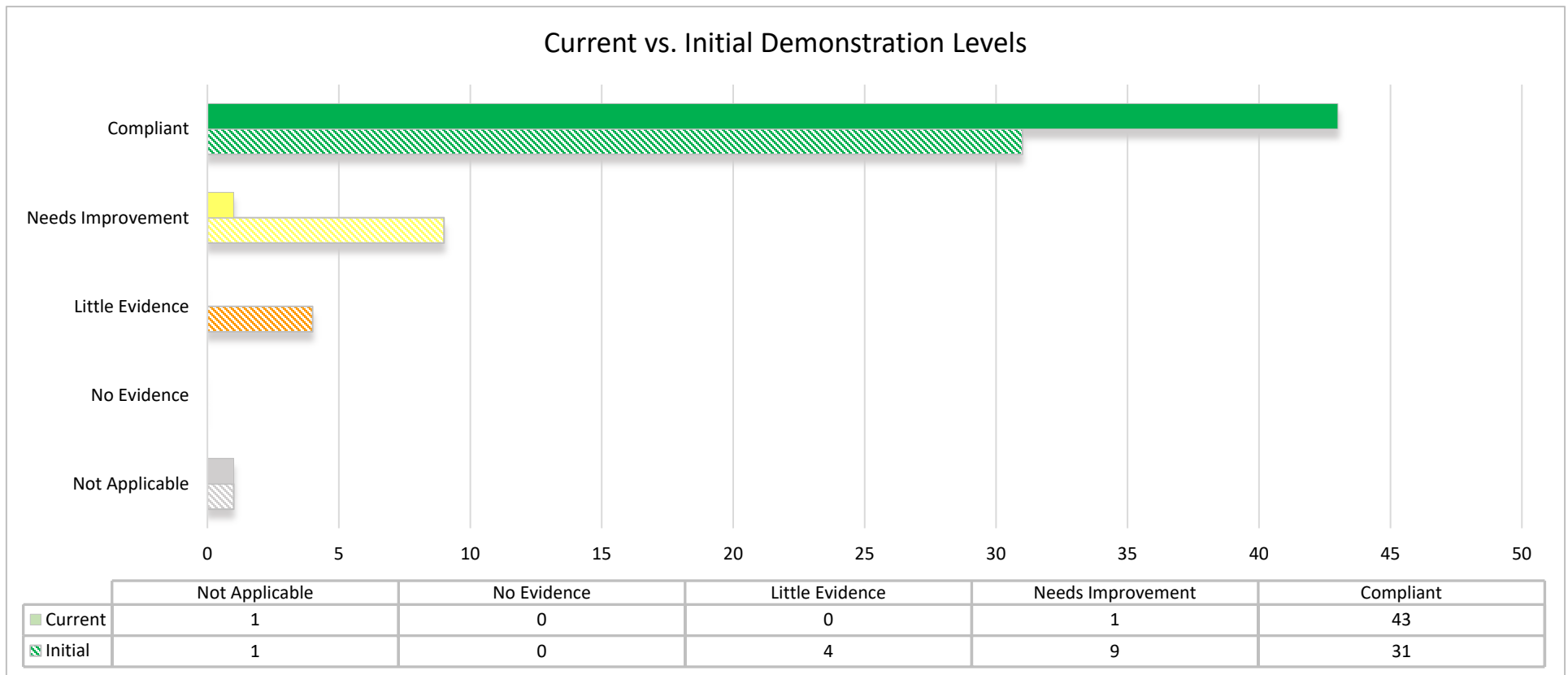
### Background, Scope, and Objectives

The United States Olympic & Paralympic Committee’s (USOPC) NGB Audit department (Audit) completed an audit of USA Field Hockey on June 18, 2021. The purpose of the audit was to determine if USA Field Hockey 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 Field Hockey. 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 Level<sup>1</sup> 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.



<sup>1</sup>See Appendix A

## Follow-up Summary

Based on the evidence of remediation provided, USA Field Hockey has remediated twelve findings. As of March 7, 2022, USA Field Hockey is 96% 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	Athlete Representation – A.1 a & b	Management Action Plan
	<p><b>FINDING:</b> USA Field Hockey's Bylaws state that athlete representatives on standing committees can be selected by the board of directors, not the elite athlete members as stated by the USOPC Bylaws.</p> <p>USA Field Hockey's Bylaws do not appropriately define the eligible voters who elect athlete representatives to serve on the board of directors. The Bylaws are in the process of being updated and have not been approved by the board.</p>	<p>USA Field Hockey has updated bylaw 13.3 to include the eligible voter requirements who elect athlete representatives to serve on the board of directors. USA Field Hockey has updated bylaw 10.3 to state that Athletes will be selected by USFHA or USFHA Board of Directors and will be approved by the USFHA AAC. Bylaws with these changes are currently in review with the USA Field Hockey Board of Directors and will be voted on by August 31, 2021, the new bylaws will be submitted to the USOPC by September 15, 2021.</p> <p><b>Due Date:</b> September 15, 2021</p>
	<b>Follow-up Level: Compliant</b>	
	USA Field Hockey updated the bylaws to include the required definitions and is now compliant.	
2	Bylaws – A. 3 a	Management Action Plan
	<p><b>FINDING:</b> USA Field Hockey's Bylaws do not expressly state the number of committee members required for each committee.</p> <p>The bylaws USA Field Hockey submitted for review have not been approved by the board.</p>	<p>USA Field Hockey has updated bylaw 10.1.1 to state the number of committee members required for each committee. The bylaws are currently in the review period with the Board of Directors.</p> <p>Bylaws with these changes are currently in review with the USA Field Hockey Board of Directors and will be voted on by August 31, 2021, the new bylaws will be submitted to the USOPC by September 15, 2021.</p>

		<b>Due Date:</b> September 15, 2021
<b>Follow-up Level: Compliant</b>		
USA Field Hockey updated the bylaws to include the required elements and is now compliant.		
<b>Little Evidence of Compliance</b>		
3	Code of Conduct – A.5 a	Management Action Plan
	<b>FINDING:</b> There are elements missing from USA Field Hockey's Code of Conduct in the following areas: applicability, resolution, and policy owner.	USA Field Hockey is updating the code of conduct to meet the standards as set forth by the USOPC.  <b>Due Date:</b> September 15, 2021
<b>Follow-Up Level: Compliant</b>		
USA Field Hockey updated the code of conduct to include the required elements and is now compliant.		
4	Conflict of Interest Policy – A.6 b	Management Action Plan
	<b>FINDING:</b> There are elements missing from USA Field Hockey's Conflict of Interest Policy in the following areas: applicability, disclosures, individuals required to disclose potential conflicts of interest, disclosure process, and resolution. In addition, the policy on USA Field Hockey's website is not the current version.  Only employees and board members were required to complete the conflict of interest forms.  During testing of USA Field Hockey's conflict of interest disclosure forms, one out of the ten individuals tested did not disclose potential conflicts. In addition, there is no evidence of review on any of the conflict of interest disclosure forms tested.	USA Field Hockey is updating the conflict of interest policy to meet the standards as set forth by the USOPC. In addition, USA Field Hockey will ensure the updated policy and processes will be followed for all disclosures forms.  <b>Due Date:</b> September 15, 2021
<b>Follow-Up Level: Compliant</b>		
USA Field Hockey updated the conflict of interest policy to include the required elements and ensured the updated policy is being followed for all disclosure forms. Audit conducted testing and did not identify any concerns. USA Field Hockey is now compliant.		

## FINANCIAL STANDARDS AND REPORTING PRACTICES

Needs Improvement		
5	USOPC Funding – B.1 c	Management Action Plan
	<p><b>FINDING:</b> USA Field Hockey recorded one of the expenses tested in the wrong grant year. While the amount was under the threshold required for repayment, USA Field Hockey needs to improve their controls to ensure expenses are allocated to the appropriate grant year.</p>	<p>The Team Manager will create a checklist of all vendors utilized to ensure invoices are submitted timely.</p> <p><b>Due Date:</b> September 1, 2021</p>
	<b>Follow-up Level: Compliant</b>	
	USA Field Hockey is now compliant as the above action plan was implemented; testing was conducted to verify the control is appropriate and operating effectively.	
6	Financial Policies and Procedures – B.1 b	Management Action Plan
	<p><b>FINDING:</b> USA Field Hockey's Financial Policies and Procedures require minor updates in the following areas: internal controls, financial reporting, receivables process, expense and advance reimbursements, payroll procedures, and budgetary process.</p> <p>There was a similar finding noted in the previous USOPC audit that has been partially remediated. The previous finding noted issues with how the Executive Director and board members' expenses are reviewed and approved. USA Field Hockey has updated the review and approval process for the Executive Director but not the board members.</p>	<p>USA Field Hockey has updated the financial policies to meet the standards as set forth by the USOPC. The updated financial policies have been submitted to the NGB Audit team for review.</p>
	<b>Follow-up Level: Compliant</b>	
	USA Field Hockey has updated the financial policies and procedures to include the required elements and is now compliant.	

## ATHLETE PROTECTION AND RIGHTS

Needs Improvement		
7	Anti-Doping Policy Language – C.4 b	Management Action Plan
	<p><b>FINDING:</b> USA Field Hockey has the required anti-doping language for NGBs with individual members but does not have the required anti-doping language for NGBs with organization members.</p>	<p>USA Field Hockey has updated bylaw 6.2 to include the anti-doping language for organizational members.</p> <p>Bylaws with these changes are currently in review with the USA Field Hockey Board of Directors and will be voted on by August</p>

		31, 2021, the new bylaws will be submitted to the USOPC by September 15, 2021.  <b>Due Date:</b> September 15, 2021
<b>Follow-up Level: Compliant</b>		
USA Field Hockey updated the bylaws to include the required anti-doping language and is now compliant.		
8	USOPC Athlete Safety Requirements – C.3 a	Management Action Plan
	<b>FINDING:</b> Out of the 60 background checks tested, two of the individuals had expired background checks. However, the two individuals with expired background checks do not have direct contact with athletes.	USA Field Hockey is working on an automated process for background screenings so that reminder emails are sent to all applicable individuals to submit their background screening.  <b>Due Date:</b> September 1, 2021
<b>Follow-up Level: Compliant</b>		
USA Field Hockey is now compliant as the above action plan was implemented; testing was conducted to verify the process functions effectively and required background checks were up to date.		

## SPORT PERFORMANCE

<b>Needs Improvement</b>		
9	Selection Procedures – D.1 a & D.5 b	Management Action Plan
	<b>FINDING:</b> The Men's National Team failed to submit team selection procedures by the date required by the USOPC.	USA Field Hockey will implement a process that includes an additional person to ensure selection procedures are submitted on time.  <b>Due Date:</b> September 15, 2021
<b>Follow-up Level: Needs Improvement</b>		
USA Field Hockey will not have the opportunity to remediate this finding until the selection procedures are due for the 2023 Pan American Games. This finding will be reevaluated by Audit at that time.		
10	Event Sanctioning – D.4 b	Management Action Plan
	<b>FINDING:</b> USA Field Hockey's event sanctioning document does not require the proper anti-doping protocol as required by the international federation.	For the audit period of 2021, USA Field Hockey's Event Sanctioning document does not meet the requirement. However, the document will be in compliance as of January 1, 2022, thus no remediation action is required.

<b>Follow-up Level: Compliant</b>	
As of January 1, 2022, USA Field Hockey's Event Sanctioning document meets the requirement and is compliant.	

## OPERATIONAL PERFORMANCE

<b>Needs Improvement</b>		
11	Strategic Planning – E.8 a	Management Action Plan
	<p><b>FINDING:</b> USA Field Hockey has a board-approved strategic plan and tracks progress. However, periodic updates to the board are not documented and there are no success measures noted in the actual plan.</p>	<p>USA Field Hockey will create and add measurable success items, as well as provide annual updates to the board of directors on progress towards the strategic plan.</p> <p><b>Due Date:</b> December 3, 2021</p>
<b>Follow-up Level: Compliant</b>		
USA Field Hockey implemented the action plan listed above and is now compliant.		
<b>Little Evidence of Compliance</b>		
12	Grievance Procedures – E.4 a & b	Management Action Plan
	<p><b>FINDING:</b> There are elements missing from USA Field Hockey's grievance procedures in the following areas: types of grievances filed, an anti-retaliation statement, hearing panel composition, and hearing process.</p> <p>USA Field Hockey has grievance procedures outlined in a standalone policy and a section of the bylaws. However, the two procedures are missing elements and do not align.</p> <p>There were two similar findings noted in the previous USOPC audit that have not been remediated. One previous finding noted that USA Field Hockey's grievance procedures did not comply with the Act as it relates to prompt resolution of grievances. The other finding, which was partially remediated, noted that USA Field Hockey's grievance procedures do not provide fair notice.</p>	<p>USA Field Hockey, with the help of USOPC NGB Services, will update the Grievance procedures to meet the minimum USOPC guidelines and will ensure all grievance procedures are consistent or located in one document.</p> <p><b>Due Date:</b> October 1, 2021</p>
<b>Follow-Up Level: Compliant</b>		

	<p>USA Field Hockey updated the grievance policy to include the required elements and is now compliant.</p> <p>The previous audit findings have not been remediated as there have not been grievances to evaluate progress.</p>	
13	Gender Equity – E.7 b	Management Action Plan
	<p><b>FINDING:</b> USA Field Hockey has established performance criteria within the player agreements, but nothing is published online or in an athlete handbook.</p>	<p>USA Field Hockey provides the athlete handbook and the player agreements for their review and signature. USA Field Hockey will merge the player agreements and athlete handbook in one document which will include the performance criteria.</p> <p><b>Due Date:</b> September 1, 2021</p>
<b>Follow-Up Level: Compliant</b>		
	<p>USA Field Hockey updated the athlete handbook to include performance criteria and is now compliant.</p>	

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

We would like to thank the USA Field Hockey 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.