



Policy Name: NGB Certification Policy

**Date of Issuance:** 09/25/2025

Policy Owner: Chief Ethics & Compliance Officer

**Applies to:** Certification Review Group, NGB Oversight and

Compliance Committee, Board of Directors, and NGBs

### **Purpose:**

To support a culture of strong governance, ethics, and compliance among National Governing Bodies (NGBs) and throughout the U.S. Olympic and Paralympic Movement by creating a USOPC-level certification process for NGBs.

### **Policy Statement:**

The USOPC believes in having a culture of strong governance, ethics, and compliance among NGBs and throughout the U.S. Olympic and Paralympic Movement. To support this culture and to fulfill the requirements set forth in the Ted Stevens Olympic and Amateur Sports Act (the Act), the USOPC certifies its member organizations as NGBs.

The NGB certification process is supported by USOPC staff serving on a cross-functional Certification Review Group (CRG), led by the USOPC's Chief Ethics & Compliance Officer. The purpose of the CRG is to review each NGB or NGB candidate holistically and then, in its reasonable judgment, make a recommendation on the organization's certification. This holistic view and recommendation require the CRG to consider both objective/quantitative and subjective/qualitative information. Building on NGB Audit processes, the CRG's certification review process is intended to look at both *what* the NGB or NGB candidate is doing, as well as *how* the NGB or NGB candidate is operating in practice, consistent with USOPC oversight responsibilities under the Act and the USOPC Bylaws.

NGB certification recommendations will be reviewed and ratified by the USOPC NGB Oversight and Compliance Committee (NGBOC Committee) and Board of Directors. Ultimately, the Board of Directors makes the final decision about each NGB's certification.

#### 1. NGB Certification and Renewal

Amateur sports organizations applying to become NGBs for the first time will be considered for certification by the CRG as necessary. The USOPC may open a call for applicants for an NGB in a sport when there is no existing NGB for a particular sport on a Delegation Event program and where NGB certification is appropriate for a given sport . The CRG may consider certification for NGB candidates only when an amateur sports organization submits a complete application during a designated call for applications for an NGB for a particular sport. The application process, subject to periodic updates, will be outlined in the Certification Review Procedure. Following the initial certification, these NGBs will be included in the CRG's rolling schedule for certification renewal reviews.

After this initial certification, all NGBs' certifications are reviewed and renewed once every four years on a rolling basis. Generally, the certification renewal process will take about six months from the issuance of an NGB's most recent compliance audit.

At any point between quadrennial certification renewals, the CRG may also determine that an NGB's certification status from its most recent renewal does not reflect its operations. In those cases, the CRG may conduct an off-cycle review to consider whether a downgrade in the NGB's certification status is appropriate. An off-cycle review will be considered only when an NGB does not act in a diligent and timely manner to resolve serious compliance concerns, such as failing to implement required reforms from a USOPC-issued Demand Letter. Certification downgrades are not a method for resolving day-to-day governance issues or minor compliance concerns.

### 2. Certification Review Group

#### a. Membership

The CRG will be chaired by the Chief Ethics & Compliance Officer. The CRG will include representation from departments that regularly interact with NGBs, including at least the following departments:

- i. NGB Audit
- ii. NGB Compliance
- iii. NGB Services and Sport Operations
- iv. Athlete Services
- v. Legal
- vi. Olympic & Paralympic Sport Performance
- vii. Athlete Safety

The Office of the Athlete Ombuds will be invited to provide information and input to the CRG review process but will not provide a rating or participate in the formal CRG recommendations contemplated in this policy. The Chief Ethics & Compliance Officer may, in her or his discretion, extend invitations to representatives of other departments to attend CRG meetings and provide input helpful to the CRG's work, but these departments will not vote on CRG actions.

CRG members should challenge each other on their respective NGB certification recommendations and seek to inform each other's impressions with relevant information and perspective. All members of the CRG should understand a CRG member's certification rating. The CRG as a whole owns the overall certification recommendation that the NGBOC Committee and Board of Directors will review and approve.

In the course of their day-to-day work, all CRG members should look for ongoing opportunities to collaborate and work together on their approach to issues with an NGB to foster an effective and efficient overall working relationship. Collaboration in support of NGB performance and compliance should not be considered only during the CRG's formal certification process. CRG members will note NGB best practices seen during the certification process and work with NGB Services to share them regularly with all NGBs.

#### b. Meetings

The Chief Ethics and Compliance Officer will maintain an ongoing, regular meeting cadence for the CRG. The CRG must meet no less frequently than monthly. Meeting minutes are maintained for internal use only.

In addition to reviewing the NGBs that are up for initial certification or certification renewal, the CRG will also review and discuss the NGBs that show signs of potential distress or are otherwise not meeting their obligations as a certified NGB. The CRG may recommend actions that can be taken by a particular member department to timely resolve these issues.

#### 3. Certification Review Criteria

The CRG's certification recommendation for each NGB or NGB candidate will be based on the following criteria:

- **a.** The results of the NGB's most recent audit against the NGB Compliance Standards. For NGB candidates undergoing an initial certification review, the Audit team will conduct an audit as part of the application process for NGB certification.
- **b.** Developments with the NGB or NGB candidate since the time of its most recent audit to remedy identified issues, and/or developments which one or more CRG members reasonably believe are significant in evaluating whether an NGB or NGB candidate can meet the obligations of an NGB as contemplated in the NGB Compliance Standards.
- **c.** The deeper knowledge and reasonable judgement that each CRG member brings regarding how an NGB or NGB candidate performs on matters related to their department against procedures or other specific metrics not included in the NGB Compliance Standards or evaluated in an audit.
- **d.** Other, more subjective criteria, not subject to audit but nonetheless important to the roles NGBs play as part of the U.S. Olympic and Paralympic Movement, as may be defined in the reasonable judgment of the CRG. These criteria will include, in all cases, whether an NGB or NGB candidate is actively promoting a culture of integrity and demonstrates it can work collaboratively with the USOPC.

The CRG may, in its reasonable judgment, allow limited exceptions for NGBs or NGB candidates from meeting one or more of the NGB Compliance Standards required for certification in accordance with Section 8.4.2 of the Bylaws. All exception requests must be submitted to the CRG for consideration and all granted exceptions shall be included in the CRG's final NGB certification report. The CRG may not grant exceptions to requirements related to athlete representation; all athlete representation exceptions are reserved for the NGB Athlete Representation Review Working Group as outlined in the USOPC Bylaws.

#### 4. Certification Recommendations and Statuses

The CRG will work as a group to develop an overall recommendation for each NGB or NGB candidate based on the processes set forth in the accompanying procedures to this Policy. The overall recommendation of the CRG will fall into the following categories.

#### a. Certified in Good Standing / Renewal in Good Standing

If the CRG votes in favor of certification, and there are no outstanding significant deficiencies left to be resolved, the CRG recommendation will be Certified in Good Standing or Renewal in Good Standing, as appropriate.

#### b. Certified with Conditions / Renewal with Conditions

If the CRG votes in favor of certification, but there are outstanding significant deficiencies left to be resolved, the CRG recommendation will be Certified with Conditions or Renewal with Conditions, as appropriate.

In an off-cycle review, the CRG may determine that the NGB has significant deficiencies that merit a downgrade from a previously issued good standing recommendation. If that is the case, the CRG may recommend a downgrade to Certified with Conditions / Renewal with Conditions as appropriate.

An NGB that receives a conditional recommendation will be required to resolve the issue(s) which led to the conditional status within a period specified by the CRG. The CRG will track the NGB's remediation efforts and determine, in its reasonable judgment, whether the deficiencies identified have been satisfactorily resolved within the specified period.

- i. If the CRG determines that the NGB's remediation of the specified issue(s) is satisfactory and timely, then the CRG will recommend that the NGB's certification status be updated Certified in Good Standing or Renewal in Good Standing, as appropriate, and will provide the NGBOC Committee with an updated recommendation report.
- ii. In the event the CRG determines that an NGB's remediation of the specified issues is unsatisfactory or is not timely, then the CRG may implement additional accountability measures, including and up to escalation to the USOPC's Investment Team for consideration of an adjustment to the funding or other services and/or the initiation of the NGB decertification process set out in Section 8 of the USOPC Bylaws.

### c. Compliance Review and Decertification Proceedings

At any time during the certification renewal process, if any CRG member raises a severe deficiency that merits immediate review and/or action before the CRG could make a recommendation, the CRG will pause the certification review process.

The Compliance team will initiate a review of the issue(s) raised and determine, in its discretion, if the NGB has failed to meet its compliance obligations and whether accountability measures, up to and including the initiation of decertification proceedings, are immediately necessary.

i. Recommendations and Certification Statuses

The CRG will not issue a recommendation report if an NGB's certification review is paused in accordance with this policy, but the CRG will maintain the certification status of the NGB publicly in the event that a certification review is not resumed and completed by the end of the scheduled renewal period.

If a compliance review is initiated but is not concluded by the end of the NGB's renewal period, the NGB's public certification status will be **Pending Additional Review** and it will remain so until the compliance review concludes and the certification review resumes and its completed.

If decertification proceedings are initiated, the NGB's public certification status will automatically be downgraded to **Pending Hearing Panel Review** and it will remain so until the conclusion of the decertification proceedings.

If the final outcome of a decertification proceeding is not to immediately decertify but to instead impose probationary conditions that must be remediated within an established timeframe, then the NGB's public certification status will be updated to **Probationary Renewal**. Upon successful remediation, the hearing panel that oversaw the decertification proceeding will recommend to the CRG that the NGB's certification review be resumed and the CRG will prepare its certification recommendation report. If the probationary conditions are not successfully remediated within the required timeframe, then the NGB will be decertified in accordance with the hearing panel's ruling.

#### 5. CRG Certification Review and Recommendation Process

The CRG's review of each NGB or NGB candidate will be based on CRG discussions and information gathered in advance of, or during, the NGB or NGB candidate's certification. The CRG's work will include ongoing fact gathering, conferring, and discussion between CRG members and NGBs prior to and during the certification cycle, so that all parties can seek to address issues affecting certification as early as possible.

To provide for thoughtful consideration and review of each NGB's certification and for meaningful NGB engagement and informed participation in the process, the CRG will engage in at least the following steps and timing during the certification renewal process.

### a. Initial Findings and Discussion

The formal CRG review process will begin with CRG discussions and initial inputs from each CRG member. This will be followed by a conversation between Compliance and the NGB or NGB candidate. This conversation will cover the CRG's initial assessment of the organization's current certification status, the reasons for the initial assessment, and actions the organization could take, if any, to improve its certification status.

Unless the NGB decertification process has been initiated, the CRG will afford reasonable opportunities for input and cooperative effort to address any perceived significant deficiencies (i.e., remediation of issues leading to certification conditions).

#### b. Draft Certification Recommendations

Following the discussion stage and a reasonable period to resolve deficiencies, the CRG will revisit its initial status recommendation for the NGB, updating for any remediation actions or other developments since the certification review began, and finalize its recommendation. Compliance, on behalf of the CRG, will prepare a draft NGB certification recommendation report. Following CRG approval of the draft report, Compliance will share it with the NGB or NGB candidate for review.

#### c. Final NGB Certification Recommendation Reports

After the NGB or NGB candidate has an opportunity to review the draft recommendation report and offer feedback and corrections, the CRG will finalize its certification report, share it with the NGB or NGB candidate, and present it to the USOPC CEO for review and approval.

#### 6. Final Recommendations and Ratification

#### a. NGB Oversight & Compliance Committee

Following approval by the CEO, final certification reports will be presented to the NGBOC Committee for review, approval, and recommendation to the full Board of Directors.

#### b. Board of Directors

Following NGBOC Committee review, revisions, and approval, the NGBOC Committee chair will present final certification recommendation reports to the Board for ratification or modification. The Board will vote and decide whether an NGB or NGB candidate should be certified.

#### 7. Publication

After the Board makes a final certification decision and prior to publication of certification status, the final Board-approved NGB certification report will be shared with the NGB.

For each NGB, the USOPC will publish online the NGB's certification term, certification status at the time of the Board's initial approval, its current certification status, and other relevant information, as determined by the Chief Ethics and Compliance Officer.

### 8. USOPC-Managed Sports

In instances where the USOPC itself is managing a sport instead of an NGB, the management of those sports is not subject to the same certification process outlined in this policy. Instead, internally managed sports will be subject to compliance audits.

# Revision History

Publication Type	Policy Approver	Enabling Action	Publication Date	Revision Summary
Initial Publication	Board of Directors	Board Vote; June 22, 2020	June 22, 2020	N/A – initial publication
Policy Revision	Board of Directors	Board Vote; March 11, 2021	March 11, 2021	Revised to include additional detail regarding rating categories and updated language concerning internally managed sports.
Policy Revision	Board of Directors	Board Vote; September 23, 2021	September 23, 2021	Revised to rename the Certification Verification Group as the Certification Review Group, expand the Policy's scope to include information about the certification of new NGBs in addition to certification renewals, expanded and clarified the policy as it relates to NGBs rated red during the CRG review process, and relocated policy elements previously located in the Certification Renewal Procedure to the Policy.
Policy Revision	Board of Directors	Board Vote, December 6, 2022	December 7, 2022	Revised to include Certified with Conditions status for new NGB certifications.
Policy Revision	Board of Directors	Board Vote, March 14, 2024	March 14, 2024	Revised to incorporate process improvements suggested by the Compliance team, including less restrictive timing for the initiation of reviews and completion of certification conditions.
Policy Revision	Board of Directors	Board Vote, September 25, 2025	September 25, 2025	Revised to include off-cycle reviews, updated CRG composition, and other minor updates; removes content more appropriate for procedural documents.