



USOPC and IMS Compliance Standards

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Introduction and Background

The Compliance department developed the following Compliance Standards to assist USOPC departments in meeting requirements set forth in the Ted Stevens Olympic and Amateur Sports Act (the Act), the USOPC Bylaws, and certain USOPC policies and procedures. Where applicable, these Standards directly align with the provisions required of certified-NGBs to establish consistency and accountability across organizations that oversee the Olympic & Paralympic Movement in the United States.

This document contains the complete listing of Standards; however, it is important to note that some of the Standards, or portions of Standards, apply specifically to the USOPC at an organizational level, and some Standards, or portions of Standards, apply specifically to Internally Managed Sports (IMSs). The application of certain requirements is outlined in further detail within the Implementation Guide for USOPC and IMS Compliance Standards, which also indicates who is responsible for the execution of respective Standards.

Although not directly developed in conjunction with the National Governing Body Council (NGBC) and the Athlete Advisory Council (AAC), the majority of USOPC and IMS Compliance Standards directly align with NGB Compliance Standards, which were jointly developed with input from these stakeholders. Thus, Compliance will review and revise these documents as necessary, consistent with the NGB-specific iterations, and / or consistent with any revisions to the Act and / or to the USOPC Bylaws.

The Compliance and Audit departments may account for exceptions to requirements pertaining to IMS Athlete Representation as granted by the Athlete Representation Review Working Group.

Please reach out to the Compliance department with any questions about this document, or the Implementation Guide.

Definitions and Clarification of Terms

Implementation Guide for Compliance Standards (Implementation Guide): The Implementation Guide for USOPC and IMS Compliance Standards provides further guidance for USOPC departments responsible for executing respective requirements. It is organized into two parts: Part I includes Standards that pertain to the USOPC organizationally, and Part II includes Standards specific to IMSs.

Internally Managed Sport (IMS): A high performance sport program that is managed and staffed directly by the USOPC (*i.e.*, not managed by a certified NGB).

Compliance Audits: As part of the internal audit program, the USOPC's Audit department conducts internal audits of the USOPC and all IMS programs on a quadrennial basis, or more frequently, if deemed necessary. The audits are helpful in identifying and mitigating risk to the organization, or to its internally managed high performance programs.

Ted Stevens Olympic and Amateur Sports Act: The Act gives the Compliance department the ability to review all matters related to the provisions outlined in this governing statute.

USOPC Sponsored Event: This term refers to IMS competitions that are run and managed by the USOPC's IMS department.

USOPC Bylaws: NGB membership, or certification requirements, are expressly listed in Section 8.4 of the USOPC Bylaws (effective April 1, 2024). To maintain consistency and accountability, NGB-specific requirements are reappropriated from the USOPC Bylaws to also apply, where applicable, to the "corporation," or to the USOPC and to IMSs.

Requirement A

Governance and Compliance

A.1 REQUIREMENT: Adopt and maintain governance and athlete representation policies complying with the requirements of the Act and the USOPC Bylaws.

To meet the above requirement, the USOPC and IMSs must meet the following applicable Standards:

- a. The USOPC must have at least 33.3% athlete representation on its board of directors as required by §220504(b)(2) of the Act, and further required by Section 3.2 of the USOPC Bylaws.
- b. 33.3% athlete representation is required on all Standing or Designated Committees, and Other Committees, as defined:
 - i. The USOPC must have at least 33.3% athlete representation on all Standing or Designated Committees, and Other Committees, consistent with the athlete representation requirements and definitions in Section 5.3 of the USOPC Bylaws.
 - ii. IMSs must have at least 33.3% athlete representation on all Standing or Designated Committees, and Other Committees, consistent with the athlete representation requirements and definitions in Sections 8.5.4 and 8.5.5 of the USOPC Bylaws.
- c. The USOPC must have reasonable representation opportunities for individuals that provide an independent perspective, as required by §220504(b)(4) of the Act, and as defined by Section 3.2 of the USOPC Bylaws.
- d. The USOPC must have reasonable representation opportunities for national governing bodies, as required by §220504(b)(1) of the Act, and as defined by Sections 3.2 and 15 of the USOPC Bylaws.
- e. The USOPC must have reasonable representation opportunities for amateur sport organizations, as required by §220504(b)(3) of the Act, and further defined by Section 16 of the USOPC Bylaws.

A.2 REQUIREMENT: Administer membership of the USOPC as set forth by the Act and the USOPC Bylaws.

To meet the above requirement, the USOPC must meet the following Standards:

- a. The USOPC must include in its bylaws a description of certification requirements for membership in the corporation, as required by §220504(d) of the Act.
- b. The USOPC must administer certification of NGBs in accordance with the provisions listed in §220521 and §220522 of the Act, and further defined in Section 8 of the USOPC Bylaws.
- c. The USOPC must establish procedures for an amateur sport organization to seek to replace a certified NGB, as required by §220528(b) of the Act.

A.3 REQUIREMENT: Adopt and maintain an Athletes Advisory Council as a part of overall governance structure.

To meet the above requirement, the USOPC and IMSs must meet the following applicable Standards:

- a. The USOPC must have the Team USA Athletes' Commission integrated in its overall governance structure, consistent with §220504(b)(2) of the Act and further defined by Section 3.5.2 of the USOPC Bylaws.
- b. IMSs must have an Athlete Advisory Group, consistent with the requirements for certified NGBs in

A.4 REQUIREMENT: Adopt and maintain appropriate governance practices.

To meet the above requirement, the USOPC must meet the following Standards:

- a. The USOPC must have bylaws or board-approved policies and procedures that at least meet the minimum standards for governance practices, including the provisions of §220505(a) of the Act.
- b. The USOPC board must ensure the following board development activities are completed:
 - i. Formal onboarding for board members and Standing or Designated Committee members;
 - ii. At least twice per quad, perform a self-evaluation of the board's performance;
 - iii. Annual performance evaluation of the CEO.

A.5 REQUIREMENT: Adopt and enforce ethics policies and procedures.

To meet the above requirement, the USOPC and IMSs must meet the following Standards:

- a. Adopt and enforce a code of conduct, as defined:
 - i. The USOPC must adopt and enforce a comprehensive code of conduct consistent with the minimum standards required of certified NGBs.
 - ii. IMSs must adopt and enforce an athlete code of conduct.
- b. Adopt and enforce a conflicts of interest policy, as defined:
 - i. The USOPC must adopt and enforce a conflicts of interest policy consistent with the minimum standards required of certified NGBs.
 - ii. IMSs must adopt and enforce procedures consistent with the organization's conflict of interest policy.
- c. The USOPC must adopt and enforce a gift and entertainment policy consistent with the minimum standards required of certified NGBs.
- d. Adopt and enforce a sport integrity policy, as defined:
 - i. The USOPC must adopt and enforce a sport integrity policy consistent with the minimum standards required of certified NGBs.
 - ii. IMSs must adopt and enforce procedures consistent with the organization's sport integrity policy.

A.6 REQUIREMENT: Demonstrate an organizational commitment to diversity and inclusion, including public disclosure as required.

To meet the above requirement, the USOPC and IMSs must meet the following Standards:

- a. The USOPC and IMSs must provide an equal opportunity to amateur athletes, coaches, trainers, managers, administrators, and officials to participate in amateur athletic competition, without discrimination on the basis of race, color, religion, sex, age, or national origin consistent with §220522(8) of the Act.
- b. IMSs must provide annual diversity, equity, and inclusion information to the USOPC Diversity, Equity, and Inclusion (DEI) department, consistent with the requirement of certified NGBs.
- c. IMSs must provide equitable support and encouragement for participation by women where separate programs for male and female athletes are conducted on a national basis consistent with §220524(a)(6)

of the Act's requirements for NGBs and to comply with the Equal Pay for Team USA requirements of §220505(d)(1)(D) and §220505(d)(2) of the Act.

A.7 REQUIREMENT: Submit annual reports to the President and to Congress and / or to the Compliance department.

To meet the above requirement, the USOPC and IMSs must meet the following applicable Standards:

- a. The USOPC must submit the following reports to the President and to Congress, consistent with §220511 of the Act and further required by Section 2.4 of the USOPC Bylaws:
 - i. The USOPC must submit a comprehensive description of the activities and accomplishments of the corporation during the preceding calendar year.
 - ii. The USOPC must submit on behalf of NGBs and IMSs data concerning the participation of women, disabled individuals, and racial and ethnic minorities in the amateur athlete activities and administration of the corporation and national governing bodies.
 - iii. The USOPC must submit a description of the steps taken to encourage the participation of women, disabled individuals, and racial minorities in amateur athletic activities.
 - iv. The USOPC must provide a description of any cause of action or complaint filed against the USOPC that was pending or settled during the preceding calendar year.
 - v. The USOPC must submit the agenda and minutes from all board of directors' meetings during the preceding calendar year.
 - vi. The USOPC must submit a report regarding:
 1. The USOPC's compliance with the provisions of the Act;
 2. Certified NGB compliance assessments, further defined in §220521 of the Act.
 - vii. The USOPC must provide a detailed description of any complaint of retaliation made during the preceding calendar year, including the entity involved, the number of allegations of retaliation, and the outcome of such allegations.
- b. The following reports must be submitted to the Compliance department, consistent with requirements of certified NGBs listed in §220522(17) and §220530A of the Act:
 - i. The Office of Athlete Safety and Security must provide a description of the manner in which the USOPC carries out its mission to promote a safe environment in sports that is free from abuse of amateur athletes (including emotional, physical, and sexual abuse), and addresses any sanctions or temporary measures required by the Center.
 - ii. IMSs must provide a detailed statement of the amounts expended on stipends, bonuses, and services for amateur athletes, organized by the level and gender of the amateur athletes.
 - iii. IMSs must provide a report describing the IMS' compliance with the Equal Pay for Team USA requirements of §220505(d)(1)(D) and §220505(d)(2), including detailed information on the median, minimum, and maximum stipends and bonuses provided to athletes, disaggregated by gender, race, and, as applicable, status of participation on a professional sports team.

A.8 REQUIREMENT: Facilitate the Office of the Athlete Ombuds and ensure the Ombuds' Policy is available for athletes' awareness.

To meet the above requirement, the USOPC and IMSs must meet the following Standards:

- a. The USOPC must hire and provide salary, benefits, and administrative expenses for an ombudsman and support staff for athletes in accordance with §220509 of the Act and further required by Section 13 of the USOPC Bylaws.
- b. The USOPC must fund the Athlete Legal Aid Program, managed by the Office of the Athlete Ombuds, in accordance with Section 13.6 of the USOPC Bylaws.

- c. The USOPC and IMSSs must publish the Ombuds' Policy on its respective websites in a logical and accessible location, and communicate its availability to athletes, consistent with §220509(b)(4)(E)(iii) of the Act.

A.9 REQUIREMENT: Adopt and enforce terms and conditions of employment.

To meet the above requirement, the USOPC must meet the following Standard:

- a. The USOPC must adopt and enforce one or more policies affecting employment in accordance with §220507 of the Act. Such policy or policies must:
 - i. Prohibit any individual who is an employee, contractor, or agent of the USOPC from assisting a member of former member in obtaining a new job (except the routine transmission of administrative and personnel files) if the individual knows that the member or former member violated policies and procedures of the U.S. Center for SafeSport or were convicted of a crime involving sexual misconduct with a minor.
 - ii. Include a requirement not to disburse bonus or severance pay where an individual is named as the subject of an ethics investigation by the USOPC's Ethics & Compliance Committee until that individual is cleared of wrongdoing.
 - iii. Provide that if the Ethics & Compliance Committee determines an individual has violated the aforementioned policies, (a) the individual is no longer entitled to bonus or severance pay previously withheld and (b) the Compensation Committee may reduce or cancel the withheld bonus or severance pay. Additionally, if an individual is the subject of a criminal investigation, the Ethics & Compliance Committee shall investigate that individual.

A.10 REQUIREMENT: Ensure constituent groups operate in accordance with the Act, USOPC Bylaws and relevant governing policy.

To meet the above requirement, the USOPC must meet the following Standards:

- a. The USOPC must ensure that the National Governing Bodies' Council operates in accordance with Section 15 of the USOPC Bylaws, as compelled by §220504(b)(1) of the Act.
- b. The USOPC must ensure that the Team USA Athletes' Commission operates in accordance with Section 14.1 through 14.8 of the USOPC Bylaws, as compelled by §220504(b)(2)(A) of the Act.
- c. The USOPC must ensure that the U.S. Olympians and Paralympians Association operates in accordance with Section 14.9 through 14.12 of the USOPC Bylaws.
- d. The USOPC must ensure that the Affiliate Organizations Council operates in accordance with Section 16.9 of the USOPC Bylaws.



Requirement B

Financial Standards and Reporting Practices

B.1 REQUIREMENT: Demonstrate financial operational capability.

To meet the above requirement, the USOPC must meet the following Standards:

- a. The USOPC must demonstrate financial capability to operate, consistent with minimum standards

required of NGBs set forth in §220522(2) of the Act.

- b. The USOPC must provide financial reports to its board of directors, at least three times per year, and confirmation of discussion must be included in board meeting minutes. The USOPC must provide financial information and documents as reasonably requested by board members.

B.2 REQUIREMENT: Comply with the USOPC resource allocation process.

To meet the above requirement, IMSs must meet the following Standard:

- a. IMSs must comply with all provisions of the resource allocation process, consistent with the minimum standards required of certified NGBs.

B.3 REQUIREMENT: Publish publicly applicable financial documentation, including audited financial statements and IRS Form 990s, in accordance with §220511(C) of the Act.

To meet the above requirement, the USOPC must meet the following Standards:

- a. The USOPC must publish its IRS Form 990 on its website.
- b. The USOPC must publish its audited financial statements on its website.
- c. The USOPC must publish a detailed statement of the amounts spent on stipends and services for athletes on its website.
- d. The USOPC must publish a detailed statement of the amounts spent on compensation and services for executives and administration officials of the corporation, including the 20 employees of the corporation who receive the highest amounts of compensation, on its website.
- e. This USOPC must publish a detailed statement of the amounts allocated to NGBs on its website.



Requirement C

Athlete Protections and Rights

C.1 REQUIREMENT: Comply with all applicable athlete safety, child protection laws, and the policies and requirements of the U.S. Center for SafeSport.

To meet the above requirement, the USOPC must meet the following Standards:

- a. The USOPC 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.

C.2 REQUIREMENT: Maintain and enforce an athlete safety program.

To meet the above requirement, the USOPC, in collaboration with IMSs, must meet the following applicable Standard:

- a. The USOPC must adopt and enforce comprehensive athlete safety policies and procedures consistent with the minimum requirements of certified NGBs.

C.3 REQUIREMENT: Comply with the anti-doping policies of the corporation and with the policies and procedures of USADA.

To meet the above requirement, the USOPC and IMSs must meet the following applicable Standards:

- a. IMSs must comply with anti-doping policies and standards including, but not limited to, the USOPC National Anti-Doping Policy and the USADA Protocol.
- b. Adopt and enforce anti-doping language, as applicable:
 - i. The USOPC must have anti-doping language in its bylaws (or board-approved document).
 - ii. IMSs must have USOPC-approved language in its athlete agreements.

C.4 REQUIREMENT: Comply with the USOPC NGB Athlete Agreement Policy.

To meet the above requirement, IMSs must meet the following Standard:

- a. IMSs must include the minimum required provisions outlined in the USOPC NGB Athlete Agreements Policy.

C.5 REQUIREMENT: Ensure that criteria for athletes to receive support is publicly available.

To meet the above requirement, IMSs must meet the following Standard:

- a. IMSs must publicly post on respective websites the criteria for athletes to be eligible for Basic Services.

C.6 REQUIREMENT: Administer an annual athlete feedback survey.

To meet the above requirement, the USOPC must meet the following Standards:

- a. The USOPC must administer annually a survey to collect athlete feedback on topics required by §220513 of the Act.
- b. The USOPC must make the results of the annual athlete survey publicly available in accordance with §220513(d) of the Act.



Requirement D

Sport Performance

D.1 REQUIREMENT: Publish selection criteria consistent with Section 8.4.1 (d)(ii)-(v).

To meet the above requirement, IMSs must meet the following Standards:

- a. IMSs must publish athlete, coach, and staff participation criteria for all Protected Competitions and such selection procedures for athletes, coaches, and staff must be:
 - i. Developed and approved by a Designated Committee; and
 - ii. Fair, clearly articulated in writing, and properly communicated and published in a timely manner.

- b. IMSs' selection procedures for Delegation Events must be timely submitted for approval, consistent with the requirements for certified NGBs.
- c. IMSs must consistently apply and effectively conduct, in accordance with applicable selection procedures, a selection process.
- d. IMSs must take and retain Selection Committee meeting minutes as part of respective team selection processes.

D.2 REQUIREMENT: Competently and timely recommend athletes, teams, and team officials for Delegation Event teams, as applicable.

To meet the above requirement, the USOPC and IMSs must meet the following applicable Standards:

- a. The USOPC must timely provide the listing of nominated athletes, teams, and team officials for Delegation Events to the Organizing Committees of the Delegation Events.
- b. IMSs must timely provide the listing of recommended athletes, teams, and team officials for Delegations Event teams to the USOPC consistent with §220523(a)(6) of the Act.

D.3 REQUIREMENT: Maintain and implement effective plans for successfully training Delegation Event athletes.

To meet the above requirement, IMSs must meet the following Standard:

- a. IMSs must develop and execute a high-performance plan that effectively and successfully trains Delegation Event athletes.

D.4 REQUIREMENT: Implement minimum specific standards for USOPC-sponsored events.

To meet the above requirement, IMSs must meet the following Standard:

- a. If an IMS sponsors events, it must comply with the specific sponsoring standards required by the USOPC Legal department.

D.5 REQUIREMENT: Maintain and implement policies and procedures that comply with national and international Paralympic classification requirements.

To meet the above requirement, IMSs must meet the following Standard:

- a. IMSs with a Paralympic program must comply with the U.S. Paralympics National Classification Policies & Procedures, the IPC Athlete Classification Code, and respective International Federation standards.



Requirement E

Operational Performance

E.1 REQUIREMENT: Demonstrate managerial capability to administer its sport.

To meet the above requirement, the USOPC must meet the following applicable Standards:

- a. The USOPC must have managerial capability to successfully administer its operations, defined as the powers and duties outlined in §220505 of the Act.

E.2 REQUIREMENT: Obtain and keep current insurance policies in such amount and for such risk management as appropriate.

To meet the above requirement, the USOPC must meet the following Standard:

- a. The USOPC must have insurance policies that manage risk consistent with the minimum requirements of certified NGBs.

E.3 REQUIREMENT: Adopt a whistleblower and anti-retaliation policy.

To meet the above requirement, the USOPC, in collaboration with IMSs, must meet the following applicable Standard:

- a. The USOPC must adopt and maintain an organizational policy that encourages and provides a mechanism for affiliated individuals to speak up and report concerns, including those related to violations of any applicable law, rule, regulation or policy; accounting or financial fraud; or other misfeasance; and includes an anti-retaliation statement.

E.4 REQUIREMENT: Maintain and enforce grievance procedures that provide for prompt and equitable resolution of grievances and fair notice and an opportunity for a hearing before declaring an individual ineligible to participate.

To meet the above requirement, the USOPC and IMSs must meet the following Standards:

- a. The USOPC and IMSs must provide prompt and equitable resolution of grievances as outlined in §220522(14) of the Act.
- b. The USOPC and IMSs must provide fair notice and opportunity for a hearing to any amateur athlete, coach, trainer, manager, administrator, or official before declaring the individual ineligible to participate as outlined in §220522(8) of the Act.

E.5 REQUIREMENT: Maintain and enforce procedures that provide for complaint resolution involving NGBs.

To meet the above requirement, the USOPC must meet the following Standard:

- a. The USOPC must establish and execute procedures for the filing and disposition of complaints against NGBs as outlined in §220527 of the Act.

E.6 REQUIREMENT: Maintain and execute an organizational strategic plan.

To meet the above requirement, the USOPC must meet the following Standard:

- a. The USOPC must maintain and monitor the execution of an organizational strategic plan that is capable of supporting athletes in achieving sustained competitive excellence and in growing sport, as outlined in Sections 2.2 and 2.3 of the USOPC Bylaws.

E.7 REQUIREMENT: Maintain current public documentation as required by or consistent with the Act and USOPC Bylaws.

To meet the above requirement, the USOPC and IMSs must meet the following applicable Standards:

- a. The USOPC shall publish the following documentation on its website:
 - i. USOPC Bylaws
 - ii. Board of directors meeting minutes for the most recent three years
 - iii. A board roster
 - iv. USOPC Code of Conduct
 - v. USOPC Conflict of Interest Policy
 - vi. USOPC Gift and Entertainment Policy
 - vii. IRS Form 990 for the most recent three years
 - viii. Audited financial statements for the most recent three years
 - ix. Complaint / Grievance Procedures
 - x. Whistleblower and Anti-Retaliation Policy
 - xi. Ombud's Policy

- b. IMSs shall publish the following documentation on respective websites:
 - i. Athlete Support Criteria
 - ii. Selection procedures for Delegation Events and other Protected Competitions
 - iii. IMS Athlete Code of Conduct
 - iv. Complaint Procedures
 - v. Whistleblower and Anti-Retaliation Policy
 - vi. Ombud's Policy

Revision History

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