

UNITED STATES  
OLYMPIC & PARALYMPIC  
COMMITTEE



# **NGB Compliance Audit**

## **USA Climbing**

June 4, 2025

# Executive Summary

## Background, Scope, and Objectives

The United States Olympic & Paralympic Committee's Audit department (USOPC Audit) completed an audit of USA Climbing. The purpose of the audit was to determine if USA Climbing 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 USA Climbing. 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 USA Climbing has met 20 of 27 applicable Standards. While strong compliance was noted for financial standards and reporting practices and sports performance, there is one area of significant concern regarding athlete representation. Additional details are in the findings below.

# NGB Compliance Audit Findings

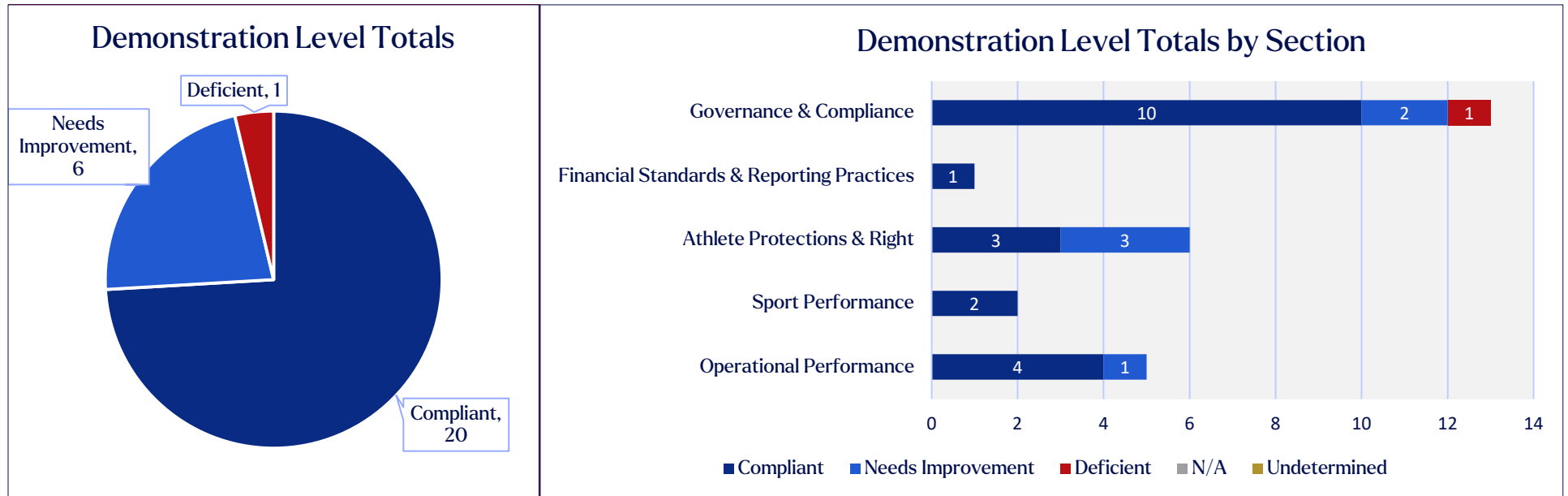
All Standards are evaluated against the 2025 Implementation Guide for Compliance Standards (Implementation Guide). References to the USOPC Bylaws are based on the effective February 1, 2025.

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		
<b>Total</b>		<b>10</b>	<b>2</b>	<b>1</b>

Needs Improvement		
1	Independent and Affiliate Representation	Management Action Plan
	<p><b>A.1 a &amp; b:</b> NGB must have a board structure that includes:</p> <ul style="list-style-type: none"> <li>i. A board position(s) as defined by the USOPC to provide an independent perspective, and</li> <li>ii. A board position for an affiliate member as required by the Act §220522 (12).</li> </ul> <p><b>FINDING:</b> USA Climbing's Bylaws do not include the required affiliated member language.</p>	<p>USA Climbing has updated the bylaws to include the required language for affiliate representation and will submit the updates to the board for approval.</p> <p><b>Due Date:</b> June 30, 2025</p>
2	Conflicts of Interest Policy	Management Action Plan
Policy	<p><b>A.6 a:</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>USA Climbing has updated the conflicts of interest policy to meet the requirements and will submit the updates to the board for approval.</p> <p><b>Due Date:</b> June 30, 2025</p>

	<b>FINDING:</b> There are elements missing from USA Climbing's Conflict of Interest Policy in the areas of applicability, disclosures, reporting, resolution, and resources.	
Application	<b>FINDING:</b> During testing, the auditor noted that management direction letters are not being issued.	The USA Climbing Ethics Committee will send a management direction letter to individuals with potential conflicts of interest.  <b>Due Date:</b> June 30, 2025
Deficient		
3	Athlete Representation	Management Action Plan
	<p><b>A.1 a &amp; b:</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul> <p><b>FINDING:</b> USA Climbing's Ethics Committee, Judicial Committee, and five of eight Other Committees do not meet the 33% athlete representation requirement.</p> <p>Additionally, there is an ineligible athlete seated on one Other Committee.</p> <p>Finally, the Team Selection Committee's athlete representation does not contain at least 50% Para sport event representation.</p>	<p>USA Climbing is actively working with its Athletes Commission to identify and seat eligible athletes on committees as required. Committee members, including athletes, change from time to time due to term dates and other reasons, leaving seats open. USA Climbing has a documented process for refilling these positions when they become vacated and is following its processes.</p> <p>It has been identified that the sampled ineligible athlete representative met the athlete representative criteria for their first term. A new athlete representative will be selected per the process mentioned above.</p> <p>Once the disciplines for the LA28 Paralympics are finalized, USA Climbing will seat Paralympic representatives on the Team Selection Committee.</p> <p><b>Due Date:</b> August 31, 2025</p>

## Financial Standards and Reporting Practices

NGB Compliance Standards Section B				
Title	Standard	Compliant	Needs Improvement	Deficient
Financial Capability	B.1 a	X		
<b>Total</b>		<b>1</b>	<b>0</b>	<b>0</b>

## 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		
<b>Total</b>		<b>3</b>	<b>3</b>	<b>0</b>

Needs Improvement		
4	USOPC Athlete Safety Requirements	Management Action Plan
Policy	<p><b>C.3 a:</b> NGB must ensure compliance with policies and standards including but not limited to:</p> <ul style="list-style-type: none"> <li>i. USOPC's NGB Athlete Safety Policy</li> <li>ii. Responsible Sport Organization Background Check Policy</li> </ul> <p><b>FINDING:</b> There are elements missing from USA Climbing's background check policy in the areas of applicability and background check report review.</p>	<p>USA Climbing has updated the background check policy to meet the requirements. This will be reviewed for compliance during the remediation period.</p>
Application	<p><b>FINDING:</b> Additionally, the following issues were identified during background check testing:</p> <p>One individual has not completed a background check.</p>	<p>After identifying the individual who had not completed a background check, USA Climbing contacted them via email and completed the screening on 3/26/25. USA Climbing will implement a more robust check-in process for athletes eligible to use the training center.</p>

	There was one individual who did not have a current background check at the time of the event.	Regarding the individual who did not have a background check at the time of the event. USA Climbing identified a unique system error that led to a discrepancy within the membership platform reflecting the validity of the sampled individual's background screen. USA Climbing has collaborated with its membership platform provider to address and resolve the system error to prevent future occurrences. USA Climbing will continue to monitor staff background screenings to ensure compliance.  <b>Due Date:</b> August 31, 2025
5	Anti-Doping Policies	Management Action Plan
	<p><b>C.3 a:</b> 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><b>FINDING:</b> USA Climbing does not have an anti-doping policy for enforcing sanctions issued by any applicable agency.</p>	USA Climbing has updated the anti-doping policy to include the required language for enforcing sanctions issued by any applicable agency. This will be reviewed for compliance during the remediation period.
6	Anti-Doping Policy Language	Management Action Plan
	<p><b>C.3 b:</b> NGB must have USOPC approved anti-doping language in its Bylaws, membership agreements (if applicable), and license agreements (if applicable).</p> <p><b>FINDING:</b> USA Climbing's bylaws do not include the required anti-doping language for organizational members.</p>	<p>USA Climbing has updated the bylaws to include the required anti-doping language for organizational members and will submit the updates to the board for approval.</p> <p><b>Due Date:</b> June 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
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## 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.6 a – d	X		
Strategic Planning	E.6 a	X		
<b>Total</b>		<b>4</b>	<b>1</b>	<b>0</b>

Needs Improvement		
7	Complaint Resolution and Hearing Procedures	Management Action Plan
Policy	<p><b>E.4 a &amp; b:</b></p> <p>a. NGB must provide prompt and equitable resolution of grievances as outlined in the Act §220522(14).</p> <p>b. NGB 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 the Act §220522(8).</p> <p><b>FINDING:</b> There are elements missing from USA Climbing's grievance policy in the following areas: investigation and resolution, hearing procedures, arbitration, and resources.</p>	<p>The Grievance Policy was updated to meet the requirements and was approved by the Board of Directors on May 2, 2025, and posted to the website. This will be reviewed for compliance during the remediation period.</p>
Application	<p><b>FINDING:</b> During testing, USA Climbing was unable to provide evidence that the hearing panel was communicated prior to the hearing for one of the samples tested.</p>	<p>USA Climbing will communicate the hearing panel composition to the parties prior to the hearing.</p> <p><b>Due Date:</b> June 30, 2025</p>

Findings in this report are currently in remediation. A closure letter will be issued once all findings have been remediated.