



**Certification Renewal Recommendation Report for
USA Table Tennis**
December 7, 2022



**UNITED STATES
OLYMPIC & PARALYMPIC
COMMITTEE**



USA Table Tennis Certification Renewal Executive Summary

In April 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 Table Tennis (USATT).¹ The CRG evaluated USATT and, based on input from CRG members and the results of NGB Audit's 2021 Compliance Audit,² recommends a certification rating of Renewal with Conditions.

The CRG's initial review of USATT found that the organization is meeting most of the USOPC's NGB Compliance Standards in the five core areas of evaluation: Governance and Compliance, Financial Standards and Reporting Practices, Athlete Protections and Rights, Sport Performance, and Operational Performance. The Compliance Audit, conducted by the USOPC's NGB Audit team in 2021, found that USATT's bylaws and several of its policies and procedures required revisions to fully meet the NGB Compliance Standards, among other findings. Additionally, USATT had repeat findings from a 2019 audit relating to the high-risk area of conflict of interest and medium-risk area of grievance procedures, as well as aged open findings within the core area of Financial Standards and Reporting Practices.

During the NGB Audit remediation period, USATT resolved the majority of its findings; however, three remained open at the time of the CRG's deadline to resolve issues before it finalized its recommendation. USATT is aware of and is actively working to resolve the remaining open NGB Audit findings.

In its discussions of USATT's interactions with the USOPC, the CRG identified some concerns with the NGB's operations that required additional corrective action from USATT, including overdue invoices and a Compliance Demand Letter. USATT repaid its overdue invoices and continues to work towards remediating the issues identified in the Demand Letter, which are consistent with the findings in the 2021 NGB Audit report. Although most issues that remain open are relatively minor, there is a significant deficiency identified by the CRG that remains outstanding and will be considered a condition of USATT's certification renewal:

- USATT must ensure its background check controls are operating effectively, resolve expired background checks, and ensure that persons within its tracking system are currently affiliated with the organization, in order to maintain compliance with NGB Compliance Standard C.3.a.

As a result of this review, the CRG recommends that USATT be granted a certification status of Renewal with Conditions. In accordance with the NGB Certification Policy, USATT has 180 days from the USOPC Board of Directors' ratification of this recommendation to resolve the remaining deficiencies outlined in this report. If the CRG determines that USATT has successfully addressed the specified issues within that timeframe, the CRG will recommend that its certification status be upgraded to Renewal in Good Standing. If USATT fails to resolve the specified issues to the CRG's satisfaction within that timeframe, its conditional certification status will be downgraded to Probationary Renewal and the USOPC will discuss whether accountability measures are appropriate to address USATT's delayed action.

¹ See Appendix for more information about the certification process, including a link to the NGB Certification Policy.

² [NGB Audit report](#) and [NGB Audit Addendum Report](#).



Organizational Overview

USATT is the USOPC-certified NGB for table tennis and the U.S representative to the International Table Tennis Federation (ITTF). USATT “[promotes] table tennis by creating opportunities for athletes and coaches of all backgrounds to participate in the sport through more than 250 clubs and over 350 tournaments across the nation annually.”³ The mission of USATT is “to support, develop, grow, and inspire the table tennis community; and to provide resources that enable athletes to achieve sustained competitive excellence and pursue Olympic and Paralympic success.”⁴ USATT is staffed by six employees and is headquartered in Colorado Springs, CO.⁵

Certification History

USATT was originally certified in January 2021.⁶ The CRG’s certification review was initiated based on USATT’s scheduled quadrennial certification review. USATT’s certification status has not been referred for review outside of the standard NGB certification review schedule.

Certification Exceptions⁷

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

Athlete Representation Approval and Exceptions⁸

USATT sought an extension on the deadline to meet the athlete representation requirements of the NGB Compliance Standards from the Athlete Representation Review Working Group (ARRWG). The extension, which would extend the deadline from January 1, 2022 to March 1, 2022, was to allow for additional elections to occur, provided that the remaining athlete representatives needed to fulfill the 33.3% representation requirements were seated by February 28, 2022. The ARRWG approved the extension to ensure the opportunity for fair elections for USATT’s athlete representatives.

Certification Review⁹

Governance and Compliance

The CRG determined that USATT is fulfilling many of the governance and compliance-related responsibilities of an NGB. USATT has adopted and enforces a code of conduct, conflict of interest policy, and gifts and entertainment policy; has made these policies publicly available on its website; and has defined procedures to address violations of these policies.

The USOPC’s Compliance team received several complaints concerning USATT’s Board of Directors and bylaws changes made in October 2021, including certain events leading up to the bylaw amendments. After reviewing relevant documentation and speaking with witnesses, the USOPC Compliance team concluded that the NGB addressed one issue through its grievance process, the Board addressed two issues once they were raised, and a board member’s failure to recuse themselves was found to be moot given that the amendments at issue would have passed even without that board member’s participation. The USOPC’s Dispute Resolution Unit (DRU) also received several complaints, both formal and informal, throughout the CRG’s review period. There were several Section 9 complaints and a Section 10 complaint filed against

³ [About USATT](#).

⁴ [Mission Statement](#), USATT Website.

⁵ [Contact Us](#), USATT Website.

⁶ Refer to the Appendix for details on the initial certification.

⁷ Refer to the Appendix for details on exception requests to the NGB Compliance Standards.

⁸ Refer to the Appendix for details on athlete representation exception requests.

⁹ Refer to the Appendix for details on the review standards and process for information related to NGB Audit’s Report on USATT.



USATT regarding its selection procedures and process. Most of these complaints were informally resolved between the parties. One Section 9 case went to arbitration, which resulted in favor of USATT.

During the Compliance Audit, NGB Audit found that USATT's bylaws required several revisions to meet NGB Compliance Standards, including the definition of independent perspective for members of the USATT Board of Directors. NGB Audit also found that USATT's internal AAC—as opposed to the pool of eligible athletes—had elected the athlete representatives to the board. Furthermore, USATT's internal AAC Chair nominated elite athletes to Designated Committees, and the positions were subsequently appointed by the board. These procedures for electing and selecting athlete representatives, as outlined in USATT's bylaws, were out of compliance with the athlete representation requirements of the USOPC Bylaws and NGB Compliance Standards. To remediate these issues, USATT updated its bylaws with clarifying language to define independent perspective and athlete representative election and selection procedures, among other missing elements. USATT held athlete representation elections consistent with the requirements, which NGB Audit verified as meeting the NGB Compliance Standards.

NGB Audit found that USATT was not providing onboarding training to newly seated committee members or documenting the board's CEO performance evaluation as required by the NGB Compliance Standards. To remediate the finding, USATT provided the necessary onboarding training to newly seated committee members as well as provided NGB Audit with documentation of the CEO's performance evaluation. NGB Audit determined that USATT's actions were sufficient to close the finding.

NGB Audit also found that USATT's conflict of interest, code of conduct, and gifts and entertainment policies were missing elements required by the NGB Compliance Standards. USATT revised these policies and published the updated versions, which were found to be fully compliant. NGB Audit also tested the implementation of USATT's updated conflict of interest policy to determine whether the disclosure review process was being executed consistent with the policy. NGB Audit noted minor deficiencies related to the disclosure and review process; however, USATT took additional corrective action to resolve the finding.

As a result of NGB Audit's 2021 Compliance Audit, as well as a 2019 outside counsel investigation and subsequent USOPC-issued letters, USOPC Compliance issued a Demand Letter on June 25, 2021, directing the organization to focus on its everyday operations and improve its governance practices. The requirements outlined in the Demand Letter correspond to the corrective actions required to close the findings included in NGB Audit's Compliance Audit. Once USATT addresses all open audit findings, it will also fulfill the Demand Letter requirements.

The CRG received athlete feedback relating to USATT's governance-related responsibilities. An athlete noted that the Board made decisions on bylaws amendments before the current athlete representatives were seated¹⁰ and added that communication with members could be stronger, emphasizing that the Board should be more open-minded and listen to disagreement. Athletes also expressed that leadership should be more responsive to questions by answering questions directly and with specificity rather than referring athletes to resources to find the answers themselves. In addition, athletes do not share the Board's opinion that leadership is performing well, noting that USATT events are unorganized and that communication between the organization and athletes is generally an issue. To address these concerns, the CRG recommended that USATT management survey its athletes to gain further insight on governance and operational issues from the athlete perspective, which USATT agreed to do. The results of the survey may inform actions USATT can take to resolve athlete concerns and better serve its athlete population. Although the CRG concluded this limited athlete feedback should not impact USATT's certification status, it will follow-up with USATT on its implementation of the recommendation.

Financial Standards and Reporting Practices

¹⁰ This was not necessarily an issue caused by USATT leadership. The USOPC required that these changes be made expeditiously to comply with NGB Compliance Standards by end of year 2021.



The CRG determined that the USATT demonstrates financial operational capability to administer its sport and is financially and operationally transparent, maintaining accountability to its members and to the USOPC.

During its audit, NGB Audit found that, due to USATT's manual tracking, USATT's USOPC final grant report did not contain general ledger details that reconciled with the final amounts of allocated funding. USATT did, however, provide sufficient evidence to demonstrate that USOPC funding was spent appropriately. USATT will implement additional policies to avoid this issue in future grant reports, which NGB Audit will evaluate when retesting USATT's final 2022 grant submissions in 2023 before closing this finding.

In testing, NGB Audit found two instances of reimbursed per diem amounts higher than the appropriate amounts dictated by USATT's financial policies and procedures. Testing also revealed an instance where the CEO's expenses were not reviewed. Furthermore, USATT did not present a documented review of its credit card statements, which was a repeat finding from 2019. Lastly, USOPC Finance noted that USATT had several outstanding aged invoices payable to the USOPC. During the remediation period, USATT made significant progress in updating its financial controls and in executing its existing policies and procedures. USATT provided documentation to NGB Audit confirming proper review of the CEO's expenses and its credit card statements and repaid the aged invoices payable to the USOPC. These findings are considered remediated.

Athlete Protection and Rights

The USOPC is not aware of any non-compliance issues with anti-doping rules and requirements of the USOPC and the U.S. Anti-Doping Agency. Although USATT maintains and enforces an athlete safety program consistent with the requirements of relevant federal law and the US Center for SafeSport (the Center), USATT's execution of its background check policy requires improvement to comply with the policies and standards of the USOPC. However, the USOPC is, not aware of any cases it has received in the past four years concerning USATT 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 USATT that the USOPC was required to report.

In 2021, the Center conducted its most recent Administrative Audit of USATT's implementation of policies required by the Center's SafeSport Code and Minor Athlete Abuse Prevention Policies that resulted in findings and direction for corrective actions. Specifically, USATT was required to "update and revise the organization's SafeSport Reporting Policy to explicitly include a requirement that members report violations of the Minor Athlete Abuse Prevention Policy."¹¹ Furthermore, USATT was required to "develop written policies and procedures to implement a quality control system [to]: prevent participation by individuals who are included on the Organization Exclusion List, prevent participation or regular contact with or authority over minors for those individuals who have not completed SafeSport training but are required to do so, address one-day/short term memberships, address all last-minute and day-of registrations by individuals...and provide oversight and monitoring of...requirements by USATT for all events sanctioned by USATT."¹² USATT took corrective action to resolve the Center's findings and the Center confirmed USATT's full compliance as of February 9, 2022.¹³

NGB Audit had findings related to both the policy content and execution of USATT's background check policy. USATT's background check policy was missing elements required by the NGB Compliance Standards. USATT revised and published an updated version of its policy that fully meets the NGB Compliance Standards. During its initial testing, NGB Audit found eleven expired background checks in its sample. Although NGB Audit noted a decrease in its follow-up testing, two background checks were still expired. To fully remediate this finding, USATT must implement controls to ensure that background checks

¹¹ [US Center for SafeSport Administrative Audit Report – USA Table Tennis](#), September 9, 2021.

¹² *Id.*

¹³ [US Center for SafeSport Corrective Actions Update – USA Table Tennis](#), February 9, 2022.



are completed timely, which NGB Audit will re-test in 2023. This is a significant deficiency that must be remediated as a condition of this certification renewal for the CRG to consider upgrading USATT's certification status to Renewal in Good Standing.

NGB Audit also found that USATT was missing anti-doping language in its bylaws and code of conduct required by the NGB Compliance Standards. USATT's athlete agreements also did not include the criteria necessary to obtain basic services and other support. USATT revised these documents and published the updated versions that meet the NGB Compliance Standards to resolve these findings.

Sport Performance

USATT is fulfilling its obligations in Sport Performance. The organization maintains and executes a strategic plan that supports athletes in achieving sustained competitive excellence and grows the sport. USATT established selection procedures for international competition, and successfully conducted team trials to fulfill those selection procedures in 2021.

In the 2021 Compliance Audit, NGB Audit found that some Sport Performance-related USATT policies required minor updates to meet the NGB Compliance Standards. To remediate findings, USATT updated its Paralympic classification policies and procedures to align with the U.S. Paralympics National Classification Policies & Procedures, as well as the IPC Athlete Classification Code and International Standards. USATT also updated its event sanctioning document to contain all the minimum required elements to reach full compliance.

Operational Performance

The CRG determined that USATT is meeting most of the Operational Performance standards required for NGBs. The organization is improving its managerial capability to administer its sport, keeps current insurance policies, maintains grievance procedures, and, following its audit remediation work, has a whistleblower and anti-retaliation policy.

During the Compliance Audit, NGB Audit found that USATT did not have a whistleblower and anti-retaliation policy and that its grievance procedures required revisions to meet the NGB Compliance Standards. USATT adopted and implemented a compliant whistleblower and anti-retaliation policy and updated its grievance procedures to fully meet the NGB Compliance Standards to resolve these findings. NGB Audit will return to test the implementation of grievance procedures in 2023 as no grievance had been filed to re-test as of the end of the audit remediation period. While reviewing grievances, NGB Audit found that a complaint handled under USATT's grievance procedures was ultimately dismissed due to it being reported anonymously and being submitted outside of the filing timeline required by the grievance policy. NGB Audit noted in its addendum report to the 2021 Compliance Audit that if USATT had a whistleblower and anti-retaliation policy, the complaint could have been investigated and resolved appropriately.

NGB Audit also found that USATT had not conducted anti-discrimination training as required by the NGB Compliance Standards. USATT addressed this audit finding related to equal opportunity by conducting a compliant anti-discrimination training for its board and staff. NGB Audit also made a finding that USATT's managerial capability was not sufficient to meet the NGB Compliance Standards. Based on NGB Audit's work with USATT to resolve its concerns and as corroborated with other USOPC departments, USATT's staff and board members have demonstrated improvements in managerial capability. USATT provided enough evidence for NGB Audit to verify compliance and close this audit finding.

USATT developed a 2021-2024 Diversity, Equity, and Inclusion (DE&I) Action Plan that it is executing to grow the sport. USATT submitted its action plan to the USOPC with sufficient detail, meeting the NGB Compliance Standards. The action plan includes seven objectives with details relating to specific initiatives, target groups, timelines, and success measures. Objectives include sharing educational materials on



USATT's membership website, increasing participation of marginalized populations, and collaborating with local organizations and top sports brands.

Conclusion

USATT is substantially meeting the NGB Compliance Standards but must address some areas of deficiency before it is fully compliant. While there are no outstanding severe deficiencies that merit the consideration of immediate decertification, based on input from CRG members and the results of the NGB Audit team's 2021 Compliance Audit, the CRG has identified a significant issue that requires corrective action before the CRG recommends USATT's NGB certification be renewed in good standing. As such, the CRG recommends that USATT's certification as a member organization of the USOPC be renewed with a rating of Renewal with Conditions. The condition of this certification renewal is:

- USATT must ensure its background check controls are operating effectively, resolve expired background checks, and ensure that persons within its tracking system are currently affiliated with the organization, in order to maintain compliance with NGB Compliance Standard C.3.a.

As part of this Renewal with Conditions rating, USATT will have 180 days from the date of the USOPC Board of Directors' ratification of this report to correct the significant issue with its background check policy execution and fulfill the above condition. If USATT successfully meets this condition, the CRG will recommend that its certification rating be upgraded to Renewal in Good Standing. If USATT fails to take satisfactory action to meet the condition of this certification within 180 days, its certification rating will be downgraded to Probationary Renewal and the USOPC will discuss whether accountability measures are appropriate to address USATT's delayed action.¹⁴

¹⁴ [NGB Certification Policy](#), Section 5(b).



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.¹⁵ 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.¹⁶

Governed by the USOPC's [NGB Certification Policy](#), 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.¹⁷ In addition to enumerated standards for NGB performance described in the Act, the Bylaws, and the USOPC's [NGB Compliance Standards](#), 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 [USOPC Bylaws](#), 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.

¹⁵ See §220521(a) of the Ted Stevens Olympic and Amateur Sports Act.

¹⁶ NGB Certification Policy, Section 1.

¹⁷ The CRG uses a four-year lookback period during this review process.