UNITED STATES OLYMPIC AND PARALYMPIC COMMITTEE CERTIFICATION REVIEW GROUP



Certification Renewal Recommendation Report for US Squash

December 10, 2021







US Squash Certification Renewal Executive Summary

In January 2021, the United States Olympic and Paralympic Committee (USOPC) Certification Review Group (CRG; formerly the Certification Verification Group), in accordance with the USOPC's NGB Certification Policy, began a certification renewal review of US Squash. The CRG evaluated US Squash and based on input from CRG members as well as NGB Audit's Consultative Review¹ recommends a certification status of Renewal in Good Standing.

The CRG's review of US Squash found that the organization was meeting many of the USOPC's NGB Compliance Standards² in the five core areas of evaluation for certification: Governance and Compliance, Financial Standards and Reporting Practices, Athlete Protections and Rights, Sport Performance, and Operational Performance. The Consultative Review conducted by the USOPC's NGB Audit team in late 2020 found that US Squash's bylaws and several of its policies required revisions, among other findings, to fully meet the NGB Compliance Standards. US Squash took action to resolve the findings and achieved compliance with the NGB Compliance Standards by the time of the CRG's certification recommendation.

In its discussions of US Squash's interactions with the USOPC, the CRG did not identify any operational concerns or cultural issues that raised concerns or would prevent the organization's continued certification. Overall, in the areas in which CRG members had interacted with US Squash, the CRG had a favorable view of its operations.

As a result of this review, the CRG recommends that USA Squash be granted a certification status of Renewal in Good Standing for a four-year certification term ending in 2025.

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¹ See Appendix for additional information about NGB Audit's Consultative Review and how it differed from a full audit.

² The NGB Compliance Standards were originally published as the NGB Audit Standards.



Organizational Overview

The United States Squash Racquets Association, Inc., commonly known as US Squash, is the USOPC-certified NGB for amateur squash in the United States and the United States' member of the World Squash Federation, the international federation for the sport of squash. US Squash "envision[s] people of all ages, abilities and backgrounds across the country enjoying squash, playing the game with a positive spirit, and participating in programs that foster camaraderie, facilitate competition and encourage healthy lifestyles" and the organization "continually invest[s] in the development of the sport to sustain growth, broaden access, and...embrace innovation." US Squash fields multiple national teams to represent the United States at international competitions, including adult and junior teams. As of 2019, US Squash's membership totaled approximately 17,300.

Certification History

US Squash was originally certified in January 2021.⁴ The CRG's certification review was initiated based on US Squash's scheduled quadrennial certification review. US Squash's certification status has not been referred for review outside of the standard NGB certification review schedule.

Certification Exceptions⁵

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

Athlete Representation Approval and Exceptions⁶

US Squash has not yet appeared before the Athlete Representation Review Working Group (ARRWG). US Squash will present to the ARRWG before January 1, 2022, when the USOPC's new athlete representation requirements go into effect.

US Squash did not signal intentions to request any exceptions from the athlete representation requirements during the certification process.

Certification Review⁷

Governance and Compliance

The CRG determined that US Squash is fulfilling the Governance and Compliance-related responsibilities of an NGB. US Squash has adopted and enforces a code of conduct, conflict of interest, gifts and entertainment, and whistleblower policies; has made these policies publicly available on its website; and has defined procedures to address violations of these policies. In addition, US Squash has not been the subject of any compliance-related complaints filed with the USOPC's NGB Compliance team or Dispute Resolution Unit in the recent past.

NGB Audit found that US Squash's bylaws needed updates in a number of areas, including board member eligibility and responsibilities, to fully meet the NGB Compliance Standards. US Squash also needed to revise its code of conduct and conflict of interest policies to include elements required under the NGB Compliance Standards. In addition to these issues, NGB Audit also found that US Squash's online board

³ US Squash's Vision

⁴ Refer to the Appendix for additional details on the initial certification.

⁵ Refer to the Appendix for additional details on exception requests in the certification process.

⁶ Refer to the Appendix for additional details on athlete representation exception requests.

⁷ Refer to the Appendix for additional details on the review standards and process for information related to NGB Audit's Consultative Review of US Squash.



roster required updates to include the board members' terms. US Squash took action to resolve these issues and revised bylaws and policies containing the required elements were adopted by the US Squash Board of Directors in November 2021.

US Squash completed a diversity and inclusion scorecard to provide a snapshot of the diversity of its board of directors, standing committees, staff, membership, national team coaches and athletes, and developmental team coaches and athletes. The scorecard is intended to provide a way to identify opportunities for US Squash to increase diversity, equity, and inclusion (DE&I) in amateur squash and to assist in creating action plans that best deploy its resources for DE&I success. In 2019, US Squash performed well against its own representation benchmarks for people of color on its executive committee, in its membership, and developmental national teams; women on its standing committees, national teams, and developmental national teams; and military veterans in its membership. In these areas, US Squash met at least 85% of its benchmark targets. US Squash performed moderately well against its own benchmarks for people of color in its professional staff and military veterans on its standing committees, meeting between 69% and 84% of its benchmark targets in these areas. In all other areas against which US Squash was measured its own benchmarks, including all categories evaluating the representation of persons with disabilities, US Squash had significant room for improvement, meeting less than 68% of its benchmark targets. US Squash will have the opportunity to address these and other areas of improvement in a DE&I action plan for the 2021-2024 quadrennium.

Financial Standards and Reporting Practices9

The CRG determined that US Squash is fulfilling its obligations related to its Financial Standards and Reporting Practices. US Squash demonstrates the financial capability to administer the sport of squash and maintains audited accounting records.

Upon initial review, NGB Audit found that US Squash had not made its most recent IRS Form 990s and audited financial statements publicly available on its website in a timely manner, but US Squash uploaded the necessary documentation to resolve this issue in December 2020. NGB Audit also found that US Squash's internal policies and procedures required updates to include written policies for the budgetary process, contract requirements, and the receivables process to fully meet the NGB Compliance Standards. US Squash revised its financial policies and procedures to include these required components and implemented them in October 2021.

Athlete Protections and Rights

US Squash has complied with applicable athlete safety and U.S. Center for SafeSport (the Center) requirements. The USOPC is not aware of any cases it has received in the past four years concerning US Squash 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 US Squash that the USOPC was required to report.

In 2019, US Squash was audited by the Center, resulting in findings and direction for corrective actions. Specifically, the Center assessed US Squash's implementation of policies required by the Center's Minor Athlete Abuse Prevention Policies, giving US Squash a rating of "Not Implemented" for its Education and Training Policy and "Partially Implemented" for the other six required policies. US Squash provided the Center with a February 2020 deadline to complete corrective actions, but it missed its self-selected deadline. The USOPC was notified of US Squash's failure to complete corrective actions on March 5, 2020 and sent a Letter of Concern to US Squash. US Squash eventually completed its corrective actions and the Center confirmed US Squash's compliance on June 16, 2020.

⁸ <u>US Squash 2019 Diversity and Inclusion Scorecard</u>

⁹ As noted in the Appendix, the NGB Audit team did not test US Squash's financial controls or procedures as part of the Consultative Review process.



NGB Audit also found that US Squash's background check policy and anti-doping policy required revisions to include language required by the USOPC's Responsible Sport Organization Background Check Policy and the NGB Compliance Standards, respectively. US Squash adopted revised versions of these policies that fully meet the requirements in October 2021.

Sport Performance

US Squash is fulfilling its obligations in Sport Performance. The organization maintains and executes on a strategic plan that is capable of supporting athletes in achieving sustained competitive excellence and growing the sport, established clear selection procedures for international competition, and has successfully conducted trials to fulfill those selection procedures.

USOPC Sport Performance indicated that US Squash does not have extensive interactions with the USOPC, but that there were no concerns with the organization's sport performance programs.

Operational Performance

The CRG determined that US Squash has demonstrated the managerial capacity to administer the sport, maintained adequate insurance to manage its risk, and maintained financial sustainability. However, NGB Audit found that US Squash's grievance procedures, whistleblower policy, and organizational strategic plan were missing elements required by the NGB Compliance Standards. US Squash revised each of these policies to meet the NGB Compliance Standards and adopted the revised policies as of November 2021, though NGB Audit and US Squash remain engaged on some marginal deficiencies remaining with the grievance procedures.

NGB Audit also found that US Squash was not providing equitable support and encouragement for participation by women where separate programs for male and female athletes as required by §220524(6) of the Act. US Squash's Elite Athlete Program distributed funding through a tiered system based on an athlete's Professional Squash Association world ranking, but the tiers were not standardized between men and women, creating a system in which elite male athletes receive more funding than similarly ranked elite female athletes. To comply with the Act, US Squash revised its athlete support requirements to provide equal criteria for men and women to receive funding from US Squash.

Conclusion

The CRG has concluded that US Squash is performing satisfactorily overall based on input from CRG members and the results of the NGB Audit team's Consultative Review completed in November 2020. US Squash addressed all significant deficiencies identified in the Consultative Review and there are no outstanding areas of concern affecting its certification status. Accordingly, the CRG recommends that US Squash's certification as a member organization of the USOPC be renewed with a rating of Renewal in Good Standing.



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 law in late 2020, require the USOPC to certify NGBs. ¹⁰ 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. ¹¹

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. 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 <u>USOPC Bylaws</u>, NGBs must satisfy certification requirements in five core areas: Governance and Compliance, Financial Standards and Reporting Practices, Athlete Protections and Rights, Sport Performance, and Operational Performance. The USOPC's 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.

Consultative Reviews

The NGB Compliance Standards were published in 2020; however, NGBs are not required to fully comply with the NGB Compliance Standards until January 1, 2022.

To provide time for NGBs that are scheduled for certification renewal in 2021 to fully comply with the NGB Compliance Standards, the NGB Audit team conducted Consultative Reviews for those NGBs rather than a full audit, which typically includes testing and more detailed reviews of internal controls and use of USOPC grant money. The Consultative Reviews assessed the NGBs' policies and procedures to assist them in focusing on areas reviewed under the NGB Compliance Standards in preparation for the certification renewal process.

NGB Audit completed a Consultative Review of US Squash in November 2020. All references to NGB Audit's assessment of US Squash's performance are derived from this Consultative Review.

¹⁰ See §220521(a) of the Ted Stevens Olympic and Amateur Sports Act.

¹¹ NGB Certification Policy, Section 1.