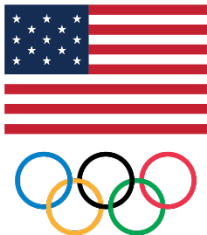


**United States Olympic and Paralympic Committee
Certification Review Group**



**Certification Renewal Recommendation Report for USA Shooting
December 12, 2024**



**UNITED STATES
OLYMPIC & PARALYMPIC
COMMITTEE**

USA Shooting Certification Renewal Executive Summary

In October 2024, 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 Shooting.¹ The CRG evaluated USA Shooting and, based on input from CRG members, the findings and progress reports of a Compliance-led consultancy task force established to assist USA Shooting in resolving serious compliance issues, and the results of the NGB Audit team's compliance audit issued in May 2024², the CRG recommends a certification status of Renewal with Conditions.

The CRG's review of USA Shooting found that the organization has made significant progress toward meeting the USOPC's NGB Compliance Standards 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. In July 2023, the USOPC initiated its consultancy task force with representatives from the Compliance, NGB Audit, NGB Services, and Olympic and Paralympic Sport Performance departments, supported by a member of the USOPC's NGB Oversight and Compliance Committee, to provide USA Shooting with comprehensive support and oversight to address serious deficiencies in the organization's financial capability, governance, and overall compliance with the NGB Compliance Standards, findings which were confirmed by the compliance audit that was in progress concurrently with the consultancy's initiation.

During the consultancy period, USA Shooting worked to resolve several of the outstanding required reforms necessary to comply with the NGB Compliance Standards and remediate many of its audit findings by the time of the CRG's recommendation. The CRG is encouraged by the significant progress USA Shooting has made toward reaching compliance and laying the foundation for a sustainable NGB; however, USA Shooting must still take additional action to resolve remaining concerns and the CRG determined that these action items should be considered conditions of USA Shooting's certification. The conditions include:

- USA Shooting must ensure all Designated Committees are populated in accordance with athlete representation requirements of Standard A.1(b) of the NGB Compliance Standards.
- USA Shooting must revise its bylaws to meet Standard A.1(c) of the NGB Compliance Standards' requirements for Independent and Affiliate Representation.
- USA Shooting must establish an internal AAC in accordance with the requirements of Standard A.3(a) of the NGB Compliance Standards.
- USA Shooting must comply with the board development requirements of Standard A.4(b) of the NGB Compliance Standards, including completing a CEO review, setting CEO performance goals, completing the USOPC Board Performance Assessment, and completing a review of the results of the Board Performance Assessment.
- USA Shooting must demonstrate that the organization has successfully executed its conflict of interest process, including reviewing conflict disclosures and providing management direction letters where applicable, in accordance with Standard A.6(b) of the NGB Compliance Standards.
- USA Shooting must provide evidence that quarterly financial reports are being made to its Board of Directors at quarterly meetings.

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

² [NGB Compliance Audit – USA Shooting](#), May 3, 2024.

- USA Shooting must develop a board-approved 2025 budget that accounts for its staffing plan and relies solely on guaranteed funding sources by the January 31, 2025 deadline of the NGB Compliance Standards.
- USA Shooting must timely submit its 2025 Mid-Year Grant Report to the USOPC and successfully demonstrate its compliance with its funding schedule.
- USA Shooting must demonstrate, through testing conducted by the NGB Audit team, that it is successfully executing its background check policy in accordance with Standard C.2(a) of the NGB Compliance Standards.
- USA Shooting must publish revised grievance procedures that meet the requirements of Standard E.4(a) and (b) of the NGB Compliance Standards.
- USA Shooting must provide evidence of a strategic plan that includes success measures and key performance indicators that can be tracked and validated. USA Shooting must also develop a High-Performance Plan and Organizational Staffing Plan.

As a result of this review, the CRG recommends that USA Shooting be granted a certification status of Renewal with Conditions with a deadline of September 30, 2025 to fulfill the conditions of certification. In accordance with the NGB Certification Policy, if the CRG determines that USA Shooting has successfully and timely addressed the conditions of this certification, the CRG will recommend that USA Shooting's certification status be upgraded to Renewal in Good Standing. If USA Shooting does not resolve these issues to the CRG's satisfaction by the deadline, its certification rating may be downgraded and the CRG will discuss whether accountability measures are appropriate to address USA Shooting's delayed action.

Organizational Overview

USA Shooting is the USOPC-certified NGB for the sport of shooting and is the United States' national federation representative to the International Shooting Sport Federation (ISSF), the international federation that governs the sport. USA Shooting's mission is to "empower American athletes for Olympic and Paralympic success, grow the community and inspire passion for the shooting sports."³ USA Shooting is based at the U.S. Olympic and Paralympic Training Center in Colorado Springs, Colorado.

Certification History

USA Shooting was originally certified in January 2021.⁴ The CRG's certification review was initiated based on USA Shooting's scheduled quadrennial certification review.

Certification Exceptions⁵

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

Athlete Representation Approval and Exceptions⁶

To date, USA Shooting has not requested any exceptions to the NGB Compliance Standards' athlete representation requirements or the definitions of NGB 10 Year or 10 Year+ Athlete.

Certification Review

Governance and Compliance

The CRG determined that USA Shooting is making significant progress toward fulfilling the governance and compliance-related responsibilities of an NGB, including drafting bylaws that meet the requirements of the NGB Compliance Standards; adopting and enforcing key ethics and compliance-related policies, making these policies publicly available on its website; and defining procedures to address violations of these policies.

During the Compliance department's review of USA Shooting, and supported by the NGB Audit team's compliance audit, it was determined that USA Shooting was not fully meeting the NGB Compliance Standards within the Governance and Compliance area of evaluation. In particular, USA Shooting did not have qualified independent or affiliate board membership as required by the NGB Compliance Standards, had failed to properly manage conflicts of interest at the Board level, and did not have sufficient eligible athlete representation on many of its Designated Committees. In addition, USA Shooting did not have an internal Athletes' Advisory Committee (AAC) that met the requirements of the NGB Compliance Standards or conduct required board development exercises.

Additionally, NGB Audit found that USA Shooting's bylaws, code of conduct, conflict of interest policy, and gifts and entertainment policy were missing required elements of the NGB Compliance Standards. USA Shooting has since adopted a revised code of conduct, conflict of interest policy,

³ [Who We Are](#), USA Shooting webpage.

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

⁵ Refer to the Appendix for details on exception requests to the NGB Compliance Standards.

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

and gifts and entertainment policy to resolve those findings. USA Shooting has also adopted revised bylaws that include most of the required elements, and plans to adopt further revised bylaws to fully resolve this issue in December 2024. NGB Audit will return to test USA Shooting's execution of the new conflicts of interest process in December 2024.

To address these NGB Audit findings, as conditions of this certification recommendation, USA Shooting must ensure that i) its Designated Committees are properly populated with athlete representatives; ii) that it has established an internal AAC that meets the NGB Compliance Standards; iii) that the revised, compliant bylaws are adopted and the board composition is consistent with the revised bylaws; iv) demonstrate compliance with their conflicts of interest policy through NGB Audit's testing as conditions of this certification; and v) that the USA Shooting Board of Directors completes a CEO review, sets CEO performance goals, completes the USOPC Board Performance Assessment, and completes a review of the results of the Board Performance Assessment.

The CRG received athlete feedback through the Athlete Listening Survey conducted between March – June 2024. Athletes reported a high level of dissatisfaction with the NGB. This result, while not ideal, aligns with the general upheaval and historically poor operational performance of the NGB prior to the USOPC's intervention in summer 2023. USA Shooting has made changes to improve its operations, and future Athlete Listening Survey data will allow the CRG and USA Shooting to understand whether these changes are being felt by athletes and improving their experience.

Within the last four years, USA Shooting was the subject of one formal complaint filed with the USOPC's Dispute Resolution Unit. This complaint was heard through arbitration, and arbitrator decided that USA Shooting had followed its published selection criteria.

Financial Standards and Reporting Practices

USA Shooting has made progress toward meeting the NGB Compliance Standards' requirements for Financial Standards and Reporting Practices. The USOPC intervened in August 2023 following indications that the organization was in acute financial distress. USA Shooting has taken positive steps to improve its financial situation, adopting a 2024 budget that more accurately tracked its fiscal situation and improving its financial policies and procedures to put additional controls in place to avoid overspending.

NGB Audit identified some additional areas of concern where USA Shooting was not meeting the NGB Compliance Standards for Financial Standards and Reporting Practices, including that there was no evidence that USA Shooting's Board of Directors was receiving relevant financial reporting. The CRG determined that providing such reporting and ensuring that its presentation to the Board of Directors is documented would be a condition of this certification. In addition, the CRG, consistent with the NGB Compliance Standards and other requirements issued to USA Shooting, determined that USA Shooting must develop a board-approved budget for 2025 that accounts for a staffing plan that supports critical elements of the organization and relies solely on guaranteed funding sources no later than January 31, 2025 and timely submit its 2025 Mid-Year Grant Report to the USOPC and successfully demonstrate its compliance with its funding schedule. USA Shooting must complete all three of these conditions before the CRG would consider upgrading their certification recommendation for USA Shooting to Renewal in Good Standing.

Athlete Protection and Rights

USA Shooting maintains and executes an athlete safety program consistent with the requirements of relevant federal law, as well as with the policies and standards of the USOPC and the U.S. Center for SafeSport (the Center). The USOPC is not aware of any non-compliance issues with the anti-doping rules and requirements of the USOPC and the U.S. Anti-Doping Agency.

The USOPC is not aware of any cases it has received in the past four years concerning USA Shooting 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 USA Shooting that the USOPC was required to report.

In February 2024, the Center conducted its most recent event audit⁷ of USA Shooting's implementation of Center requirements for NGB events. The event audit resulted in one "Partially Implemented" rating, in the category of Communication and Reporting, with minor corrective actions required to USA Shooting's process for communicating its Quality Control System to event organizers and update a policy link in a communication to event participants. In November 2024, the Center confirmed that USA Shooting had satisfactorily completed all corrective actions.⁸

To resolve a finding of the 2023 compliance audit, USA Shooting updated its bylaws and membership waivers to include required anti-doping language. NGB Audit also found that USA Shooting's athlete agreements did not comply with the USOPC's NGB Athlete Agreement Policy; USA Shooting has since made revisions to its athlete agreements to comply with the NGB Athlete Agreement Policy. Finally, the NGB Audit department also made findings related to USA Shooting's background check policy, both in its substance and execution. USA Shooting has since updated its background check policy to include all elements required by the NGB Compliance Standards. To fully remediate the finding, USA Shooting must submit to additional testing of its background check process to demonstrate that it is adequately executing on its policy. NGB Audit will complete this testing in Q2 2024. USA Shooting must successfully demonstrate that it is executing its background check processes as a condition of this certification before the CRG considers an upgrade of the NGB's status.

Sport Performance

USA Shooting is fulfilling obligations in Sport Performance, but there is room for improvement. USA Shooting established selection procedures and executed them to name Team USA athletes for the 2024 Olympic Games, selecting teams that won five Olympic medals and one Paralympic medal. As part of the requirement that USA Shooting develop a strategic plan⁹, USA Shooting must also develop an updated high performance plan.

In its compliance audit, NGB Audit identified findings related to missing elements of USA Shooting's Paralympic classification standards and event sanctioning documents needed to fully comply with the NGB Compliance Standards. USA Shooting revised its Paralympic classification standards to incorporate the missing elements, resolving the finding, and is in the process of revising its event sanctioning documentation to reach full compliance.

⁷ [US Center for SafeSport 2024 Event Audit Report – USA Shooting](#), February 16, 2024.

⁸ [US Center for SafeSport Corrective Action Update – USA Shooting](#), November 13, 2024.

⁹ See Operational Performance section.

Operational Performance

USA Shooting is not yet meeting the NGB Compliance Standards for Operational Performance. The underlying issues that led to the consultancy work between the USOPC and USA Shooting were an indication that the organization did not have sufficient managerial capability to manage the sport. Since the consultancy began, USA Shooting has made good faith efforts to resolve areas of concern and made changes to leadership that have led to an improvement in its managerial capability.

In its 2023 Compliance Audit, the NGB Audit department found that USA Shooting's whistleblower policies and grievance procedures were missing elements required by the NGB Compliance Standards. USA Shooting has revised its whistleblower policy and it now fully meets the NGB Compliance Standards. USA Shooting is in progress with revising its grievance procedures. The CRG has determined that USA Shooting must publish revised grievance procedures that meet the NGB Compliance Standards as a condition of this certification.

As part of the funding contingencies associated with its USOPC funding agreement, USA Shooting must develop a strategic plan with success measures, key performance indicators that can be tracked and validated. This strategic plan requirement also specifies that USA Shooting must establish a high performance plan and organizational staffing plan. For consistency with these requirements, the CRG agreed that development and board approval of these plans are also a condition of this certification.

USA Shooting developed a 2021-2024 Diversity, Equity, and Inclusion (DE&I) Action Plan, and the plan was submitted to the USOPC's DE&I team with sufficient detail to meet the NGB Compliance Standards. Objectives include increasing veteran participation, Native American and Indian-American inclusion efforts, female coach development, and creation of separate national events specific to Paralympic disciplines.

Conclusion

USA Shooting is not currently meeting several of the NGB Compliance Standards; however, the NGB has engaged in good faith efforts to remediate identified issues and change the organization's culture to build a strong foundation for the future. The CRG recognizes that significant progress has been made by USA Shooting since the USOPC began its consultancy, and it is optimistic that USA Shooting's current leadership can continue this progress. With this context, the CRG determined to recommend that USA Shooting's certification as a member organization of the USOPC be renewed with a rating of Renewal with Conditions.

As part of this Renewal with Conditions rating, USA Shooting will have until September 30, 2025, to resolve the conditions identified throughout this recommendation. If USA Shooting successfully meets these conditions, the CRG will recommend that its certification rating be upgraded to Renewal in Good Standing. If USA Shooting does not meet the conditions of this certification by the deadline, its certification rating may be downgraded and the CRG will discuss whether accountability measures, up to and including the initiation of decertification proceedings, are appropriate to address USA Shooting's delayed action.

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.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.¹² 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.

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

¹¹ *NGB Certification Policy*, Section 1.

¹² The CRG uses a four-year lookback period during this review process.