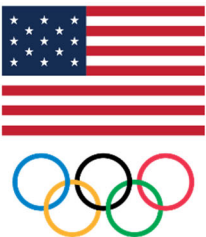


**United States Olympic and Paralympic Committee  
Certification Review Group**



**Certification Renewal Recommendation Report for USA Luge  
November 13, 2024**



**UNITED STATES  
OLYMPIC & PARALYMPIC  
COMMITTEE**

## USA Luge Certification Renewal Executive Summary

In June 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 Luge.<sup>1</sup> The CRG evaluated USA Luge and, based on input from CRG members, as well as the results of NGB Audit department's 2024 compliance audit<sup>2</sup>, recommends a certification status of Renewal with Conditions.

The CRG's review of USA Luge found that the organization is meeting most of 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. A compliance audit conducted by the USOPC's NGB Audit department in 2023 identified several areas where USA Luge was not fully meeting NGB Compliance Standards, including findings related to its management of conflict of interests, its background check policy, and athlete agreements.

During the CRG's review period, USA Luge made a good faith effort to comply with the NGB Compliance Standards and remediated some of its outstanding audit findings by the time of the CRG's recommendation. However, there are issues that remain outstanding and will be considered conditions of USA Luge's certification. The conditions of USA Luge's certification are:

- USA Luge must demonstrate that it is following its conflicts of interest policy and require conflict disclosures from all staff members and other individuals to whom the policy applies.
- USA Luge must successfully demonstrate that it is executing its background check policy in accordance with Standard C.3 a.
- USA Luge must approve its revised Athlete Agreement and Athlete Marketing Agreement to comply with the USOPC's NGB Athlete Agreements Policy.

As a result of this review, the CRG recommends that USA Luge be granted a certification status of Renewal with Conditions with a deadline of December 31, 2024, to fulfill the conditions of certification. In accordance with the NGB Certification Policy, if the CRG determines that USA Luge has successfully addressed the specified conditions within that timeframe, the CRG will recommend that its certification status be upgraded to Renewal in Good Standing. If USA Luge fails to resolve the specified issues to the CRG's satisfaction within that timeframe, its certification rating may be downgraded to Probationary Renewal and the CRG will discuss whether accountability measures are appropriate to address USA Luge's delayed action.

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

<sup>2</sup> [NGB Compliance Audit – USA Luge](#), February 20, 2024.

## **Organizational Overview**

USA Luge is the USOPC-certified NGB for the sport of luge. The mission of USA Luge is “to promote and grow the sport of luge in the United States, and to do whatever possible so that our athletes achieve sustained competitive excellence in the sport of luge in Olympic, World Championship, and other international competitions in a manner consistent with highest standards of sportsmanship.”<sup>3</sup> USA Luge is the United States’ representative to the International Luge Federation. USA Luge’s national office is located in Lake Placid, New York.<sup>4</sup>

## **Certification History**

USA Luge was originally certified in January 2021.<sup>5</sup> This is the first time USA Luge has gone through the certification review process.

## **Certification Exceptions<sup>6</sup>**

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

## **Athlete Representation Approval and Exceptions<sup>7</sup>**

USA Luge has not requested any approvals or exceptions from the Athlete Representation Review Working Group to date.

## **Certification Review<sup>8</sup>**

### ***Governance and Compliance***

The CRG determined that USA Luge is fulfilling the Governance and Compliance-related responsibilities of an NGB. USA Luge has adopted and enforces key ethics and compliance-related policies; has made these policies publicly available on its website; and has defined procedures to address violations of these policies. USA Luge has not been the subject of any compliance-related complaints filed with the USOPC Dispute Resolution Unit (DRU) within the last four years.

As a result of the 2024 compliance audit, USA Luge updated its bylaws to include required elements of governance and compliance standards. In response to the compliance audit and a letter from the Compliance department, USA Luge established an action plan to populate board committees with 33.3% athlete representation and to set up its internal Athletes’ Advisory Council, consistent with the NGB Compliance Standards. USA Luge also updated its code of conduct and must now demonstrate successful implementation of an annual conflict of interest disclosure and review process. The NGB Audit department will test the 2024 disclosure review process once completed by USA Luge to assess compliance. Successfully demonstrating that the NGB can execute against its conflict of interest policy is a condition of certification before the CRG considers an upgrade to good standing.

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<sup>3</sup> [About](#), USA Luge website.

<sup>4</sup> *Id.*

<sup>5</sup> Refer to the Appendix for details on the initial certification.

<sup>6</sup> Refer to the Appendix for details on exception requests to the NGB Compliance Standards.

<sup>7</sup> Refer to the Appendix for details on athlete representation exception requests.

<sup>8</sup> Refer to the Appendix for details on the review standards and process for information related to the Compliance Audit.

The CRG received positive athlete feedback regarding USA Luge's governance, with athletes expressing hope and optimism for the future of the organization. Athletes highlighted that the new head coach and staff structure are resulting in positive outcomes. Athletes mentioned they are working on the selection of athlete representatives to its nomination and governance committee, which they believe will be instrumental in supporting athlete representation.

### ***Financial Standards and Reporting Practices***

USA Luge meets the requirements for an NGB's Financial Standards and Reporting Practices. The organization demonstrates financial operational capability to administer its sport and is financially and operationally transparent with its membership by publishing its audited financial statements and tax forms.

As a result of the 2024 compliance audit, USA Luge updated its financial policies and procedures to include enhanced controls pertaining to documentation retention, approval of credit card transactions, and reviews of credit card activity.

### ***Athlete Protection and Rights***

USA Luge maintains and enforces 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). USA Luge has updated its bylaws to include the required anti-doping language for organizational members as a result of the 2024 compliance audit. USA Luge maintains an anti-doping program consistent with the requirements of the USOPC and the U.S. Anti-Doping Agency. As a result of the 2024 compliance audit, USA Luge revised its Athlete Agreement and Athlete Marketing Agreement to ensure compliance with the USOPC NGB Athlete Agreements policy. USA Luge is in process of formally approving the revisions to the Athlete Agreement and once approval is complete, the condition of certification will be fulfilled.

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

As a result of the 2024 compliance audit, USA Luge updated its athlete safety policy to establish a written process of notifying the USOPC Office of Athlete Safety as required. As a condition of certification, USA Luge must successfully demonstrate that it is executing its background check policy in accordance with Standard C.3 a. The NGB Audit department will conduct additional testing of USA Luge's background checks to assess compliance.

On October 27, 2022, the Center conducted its most recent administrative audit<sup>9</sup> of USA Luge's implementation of policies required by the SafeSport Code and the Minor Athlete Abuse Prevention Policies, which resulted in corrective actions related to education and training. The Center confirmed that USA Luge completed its corrective actions on February 3, 2023.<sup>10</sup>

On March 11, 2023, the Center conducted an event audit<sup>11</sup> of USA Luge's Junior Nationals in Lake Placid, NY. The event audit resulted in findings and corresponding corrective actions in the areas

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<sup>9</sup> [US Center for SafeSport Administrative Audit Report](#) – USA Luge, October 27, 2022.

<sup>10</sup> [US Center for SafeSport Corrective Actions Update](#) – USA Luge, February 3, 2023.

<sup>11</sup> [US Center for SafeSport Event Audit Report](#) – USA Luge, March 11, 2023.

of Education and Training, Communication and Reporting, and Response and Resolution. The Center confirmed that USA Luge completed its corrective actions on August 25, 2023.<sup>12</sup>

### ***Sport Performance***

USA Luge 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. USA Luge established selection procedures and executed them effectively to name and train Team USA athletes for Delegation Events.

### ***Operational Performance***

The CRG determined that USA Luge is meeting most of the Operational Performance standards. The organization demonstrates managerial capability to administer its sport and demonstrates financial sustainability. USA Luge updated its grievance procedures as well as its whistleblower and anti-retaliation policy during the audit remediation period to meet NGB Compliance Standards.

While USA Luge provides equitable support for men and women, the NGB must provide clear and consistent criteria for which athletes can qualify for specific teams, which have varied levels of support. USA Luge has provided a draft version of its athlete support criteria, which NGB Audit has confirmed meets the NGB Compliance Standards.

USA Luge developed a 2021-2024 Diversity, Equity, and Inclusion (DE&I) action plan, and is making progress in its execution, which includes diversifying its athlete pipeline with a focus on racial and ethnic diversity among young athletes.

### **Conclusion**

USA Luge is meeting most of the NGB Compliance Standards but must address the outstanding areas of concern outlined in this report before the CRG considers certifying the organization in good standing. As such, the CRG recommends that USA Luge's certification as a member organization of the USOPC be granted a rating of Renewal with Conditions.

As part of this Renewal with Conditions rating, USA Luge will have until December 31, 2024 to correct the outstanding issues. If USA Luge successfully meets these conditions by the deadline, the CRG may recommend that its certification rating be upgraded to Renewal in Good Standing. If USA Luge does not take satisfactory action to meet the conditions of certification by the deadline, its certification rating may be downgraded to Probationary Renewal and the USOPC will discuss whether accountability measures are appropriate to address USA Luge's delayed action.

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<sup>12</sup> [US Center for SafeSport Corrective Actions Update](#) – USA Luge, September 1, 2023.

## 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.<sup>13</sup> 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.<sup>14</sup>

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.<sup>15</sup> 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.

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<sup>13</sup> See §220521(a) of the Ted Stevens Olympic and Amateur Sports Act.

<sup>14</sup> NGB Certification Policy, Section 1.

<sup>15</sup> The CRG uses a four-year lookback period during this review process.