

UNITED STATES
OLYMPIC & PARALYMPIC
COMMITTEE



NGB Compliance Audit

USA Diving

June 18, 2025

Executive Summary

Background, Scope, and Objectives

The United States Olympic & Paralympic Committee's Audit department (USOPC Audit) completed an audit of USA Diving. The purpose of the audit was to determine if USA Diving 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 Diving. 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 Diving has met 22 of 27 applicable Standards. There are no significant concerns, as the majority of findings are related to updates to formal policies and procedures. Additional details are in the findings below.

NGB Compliance Audit Findings

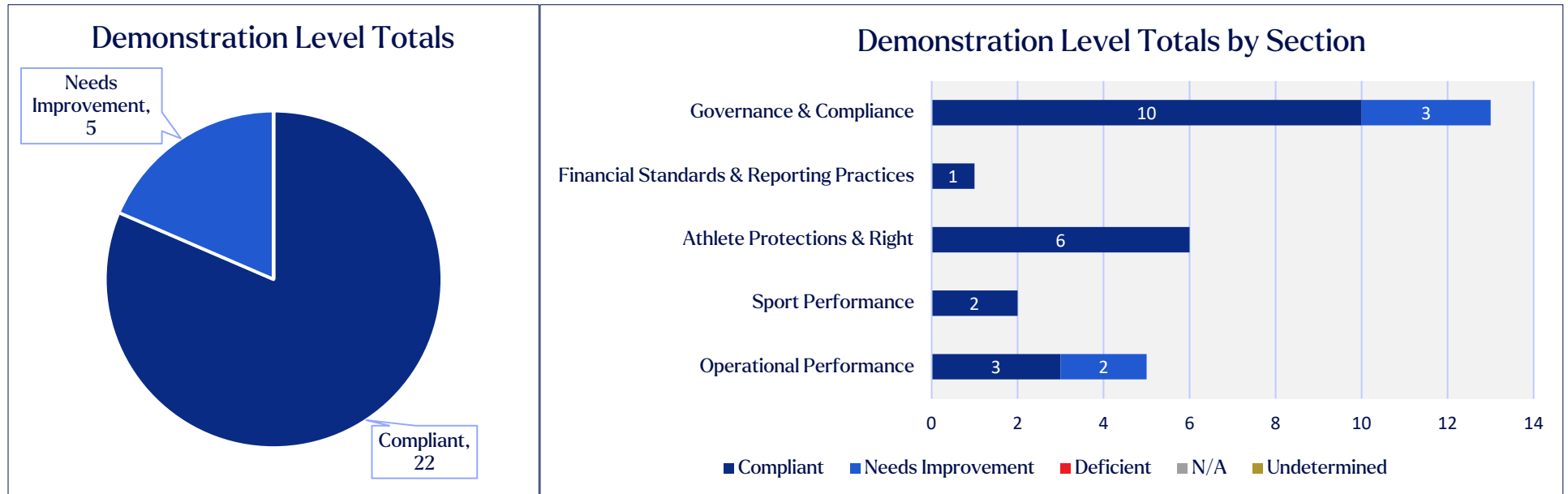
All Standards are evaluated against the 2025 Implementation Guide for Compliance Standards (Implementation Guide). References to the USOPC Bylaws are based on the effective February 1, 2025.

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 a & b	X		
Equal Pay for Team USA	A.7 c	X		
Ombuds' Policy	A.9 a	X		
Total		10	3	0

Needs Improvement		
1	Independent and Affiliate Representation	Management Action Plan
	<p>A.1 c: NGB must have a board structure that includes:</p> <ul style="list-style-type: none"> i. A board position(s) as defined by the USOPC to provide an independent perspective, and ii. A board position for an affiliate member as required by the Act §220522 (12). <p>FINDING: USA Diving's bylaws do not include all the required affiliate member language as required by the Act.</p>	<p>USA Diving will update the bylaws to include the required affiliate member language.</p> <p>Due Date: September 13, 2025</p>
2	Athlete Advisory Council	Management Action Plan
	<p>A.3 a: NGB must have an Athletes' Advisory Council that meets the minimum standards set forth by the USOPC.</p>	<p>USA Diving will update the bylaws or applicable policy to ensure all AAC candidates complete required disclosures prior to election moving forward.</p>

	FINDING: USA Diving does not require all AAC representatives to complete a conflict of interest form prior to election.	Due Date: September 13, 2025
3	Gifts and Entertainment Policy	Management Action Plan
	<p>A.6 c: NGB must adopt and enforce a gift and entertainment policy that meets the minimum standards set forth by the USOPC.</p> <p>FINDING: There are elements missing from USA Diving's Gift & Entertainment Policy in the area of applicability.</p>	USA Diving updated their Gifts and Entertainment policy to include the missing elements. This will be reviewed for compliance during the remediation period.

Financial Standards and Reporting Practices

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

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		
Total		6	0	0

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

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.5 a – d	X		
Strategic Planning	E.6 a	X		
Total		3	2	0

Needs Improvement		
4	Whistleblower and Anti-Retaliation Policy	Management Action Plan
	<p>E.3 a: NGB must adopt and maintain an organizational policy that encourages and provides a mechanism for affiliated individuals to report concerns, including those related to alleged violations of any applicable law, rule, regulation, or adopted policy of the NGB; accounting or financial fraud; or other wrongdoing; and includes anti-retaliation protections.</p> <p>FINDING: There are elements missing from USA Diving's Whistleblower Policy in the following areas: legal and governance requirements, and resources.</p>	<p>USA Diving updated their Whistleblower and Anti-Retaliation policy to include the missing elements. This will be evaluated for compliance during the remediation period.</p>
5	Complaint Resolution and Hearing Procedures	

<p>E.4 a & 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>FINDING: During review of the most recent grievance from 2024, USA Diving did not disclose the members of the hearing panel to all parties prior to the hearing.</p>	<p>USA Diving created a Board of Review procedures checklist to prevent this oversight from happening in the future.</p>
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Findings in this report are currently in remediation. A closure letter will be issued once all findings have been remediated.