



USOPC NGB AUDIT

USA TABLE TENNIS

June 18, 2021



EXECUTIVE SUMMARY

Background, Scope, and Objectives

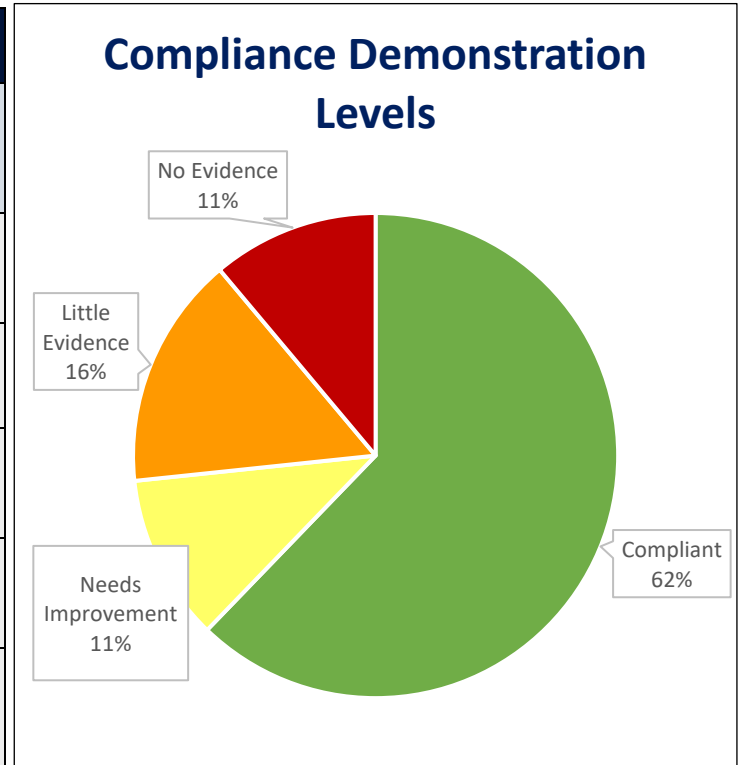
The United States Olympic & Paralympic Committee (USOPC) NGB Audit department (Audit) completed an audit of USA Table Tennis (USATT). The purpose of the audit was to determine if USATT complies with the requirements of the NGB Compliance Standards (Standards) and to conduct testing in areas that present an increased risk to athletes, other members, and/or USATT. The audit focused on the policies and procedures noted in the NGB Compliance Standards in the following sections: Governance and Compliance, Financial Standards and Reporting Practices, Athlete Protections and Rights, Sport Performance, and Operational Performance.

The Audit department used Demonstration Levels included in the version of the Implementation Guide that went into effect on January 1, 2021. To provide auditors with more discretion and flexibility in categorizing findings, the NGB Audit department concluded it was appropriate to modify the existing Demonstration Levels to include the following levels: Compliant, Needs Improvement, and Deficient. These new Demonstration Levels, along with the July 2021 version of the Implementation Guide, will take effect January 1, 2022. Existing Demonstration Levels will continue to be used throughout 2021, but to ensure NGBs audited in 2021 benefit from the new Demonstration Level the Audit department will note both the current and revised Demonstration Levels for each finding in audit reports.

Audit Summary

Based on the audit procedures performed, select policies and procedures were reviewed to determine compliance with the Standards. The conclusion within each standard was based on the criteria met for each standard, as well as the results of any testing conducted. Definitions of demonstration levels are detailed in the Implementation Guide for NGB Compliance Standards (Implementation Guide). Findings and demonstration levels are detailed on the subsequent pages.

Demonstration Level Totals by Section					
NGB Audit Standards Section	Compliant	Needs Improvement	Little Evidence of Compliance	No Evidence of Compliance	Total Number of Standards
Governance and Compliance	6	1	5	1	13
Financial Standards and Reporting Practices	7	0	1	0	8
Athlete Protections and Rights	2	2	0	1	5
Sport Performance	4	1	0	1	6
Operational Performance	9	1	1	2	13



We would like to thank all USATT staff who assisted us throughout this review.

EXECUTIVE SUMMARY (CONT.)

Audit conducted a review of USATT’s policies and procedures in relation to the USOPC Bylaws and Ted Stevens Amateur Sports Act (the Act) as outlined in the Implementation Guide. Audit evaluated 45 Standards in the areas of Governance and Compliance, Financial Standards and Reporting Practices, Athlete Protections and Rights, Sport Performance, and Operational Performance.

Overall, Audit has concluded that USATT met many of the requirements outlined in the Standards. However, there are some areas that are of increased concern. Specifically, USATT does not have a whistleblower policy; testing of USATT’s background check process revealed missing and expired background checks resulting from missing required elements in USATT’s background check policy and procedures; and USATT is not properly managing its conflicts of interest process, which is of particular concern as this is a repeat finding previously identified in the 2019 audit. Finally, USATT’s athlete representation election process does not meet requirements set forth in the USOPC Bylaws. Additional details regarding each of these concerns are outlined in the below findings.

PRIOR AUDIT FOLLOW-UP¹

As part of this review, the NGB Audit team followed up on 13 open findings from the audit dated August 16, 2019. As detailed in the findings in this report, there were three repeat findings identified in this review: two were high-risk and related to conflicts of interest, and one was medium-risk and related to grievance procedures. One-high risk finding related to credit card transactions and expense approvals was partially remediated. Three findings remain open: one high-risk finding relates to the cash receipts process; and two medium-risk findings relate to internal controls and the review and approval of board expenses. Open findings will be included in the remediation period of this audit. Six findings have been remediated and validated by Audit.

NGB AUDIT FINDINGS

All Standards are evaluated against the 2020 Implementation Guide for Audit Standards. Bylaws references are based on the USOPC Bylaws approved in June 2020.

GOVERNANCE AND COMPLIANCE

NGB Audit Standards Section A					
Title	Standard	Compliant	Needs Improvement	Little Evidence	No Evidence
Athlete Representation	A.1 a & b			X	
Board Composition	A.1 c		X		

¹ Prior audit risk ratings are reflective of past risk assessments and may not align with current standards.

International Federation Affiliation	A.1 d	X			
Membership Requirements	A.1 e	X			
Bylaws	A.3 a			X	
Board Development	A.3 b			X	
Board Meeting Minutes	A.3 c	X			
Board Roster	A.3 d	X			
IRS Status	A.4 a	X			
Code of Conduct	A.5 a			X	
Statement of Ethics	A.6 a	X			
Conflicts of Interest Policy	A.6 b				X
Gifts and Entertainment Policy	A.6 c			X	
Total		6	1	5	1

Needs Improvement		
1	Board Composition	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 (a)(11). <p>FINDING: USATT's Bylaws do not state that independent board members must continue to meet the definition of independent perspective for their entire term and any successive term as required by the Implementation Guide.</p>	<p>USATT will update the Bylaws to expressly state that independent Board Members must continue to meet the definition of independent perspective for their entire term and any successive term as required by the Implementation Guide.</p> <p>Due Date: October 4, 2021</p>
2022 Determination Level: Needs Improvement		
Little Evidence of Compliance		
2	Athlete Representation	Management Action Plan
	<p>A.1 a & b:</p> <ul style="list-style-type: none"> a. NGBs must have at least 20% athlete representation on its board of directors as required by the Act §220522(a)(10) and further defined by the USOPC Bylaws, Section 8.8. b. NGBs must have at least 20% athlete representation on all committees as required and defined by the USOPC Bylaws, Section 8.8. <p>FINDING: USATT's AAC is fully responsible for electing the Athlete Representatives on the board rather than an eligible pool of athletes as required by the USOPC Bylaws.</p>	<p>USATT will update the Bylaws to expressly state that that Athlete Representatives on the Board will be elected by the eligible pool of athletes. USATT will enforce the requirement that athlete representatives on designated committees will be selected by USATT with the approval of eligible athlete members or a group of eligible athletes.</p> <p>USATT will hold athlete representative elections no later than September 30, 2021.</p>

	In addition, The USOPC Bylaws require that athlete representatives on designated committees must be selected by the NGB with approval of eligible athlete members or a representative group of eligible athletes. However, USATT's AAC Chair nominates elite athletes for committees and then the positions are appointed by the board.	Due Date: October 4, 2021
2022 Determination Level: Deficient		
3	Bylaws	Management Action Plan
	<p>A.3 a: NGB must have Bylaws or policies and procedures that at least meet the minimum standards for governance practices and comply with the Act §220522 (a)(9-12).</p> <p>FINDING: There are elements missing from USATT's Bylaws in the following areas: conflict of interest requirements, general bylaw requirements, board election, and selection procedures.</p>	<p>USATT will update the Bylaws to meet USOPC requirements in the areas of conflict of interest, general bylaw requirements, board election, and selection procedures.</p> <p>Due Date: October 4, 2021</p>
2022 Determination Level: Needs Improvement		
4	Board Development	Management Action Plan
	<p>A.3 b: The NGB board must conduct the following activities:</p> <ul style="list-style-type: none"> i. Formal onboarding process for board members and committee members, ii. USOPC training to the board members and committee members, iii. At least once per quad, perform a self-evaluation of the board's performance using the USOPC provided resource, and iv. Annual performance evaluation of the CEO/Executive Director. <p>FINDING: USATT does not currently provide onboarding to newly seated committee members.</p> <p>Additionally, due to significant turnover, a performance evaluation of the CEO has not been conducted.</p>	<p>USATT will implement an onboarding process for newly seated committee members. USATT will undertake and complete a full performance evaluation of the CEO.</p> <p>Due Date: October 4, 2021</p>
2022 Determination Level: Deficient		
5	Code of Conduct	Management Action Plan
	<p>A.5 a: NGB must have a comprehensive code of conduct that meets the minimum code standards set forth by the USOPC. The code of conduct must be made available on the NGB's website.</p>	<p>USATT will update the organization's Code of Conduct to meet USOPC requirements for organizational expectations, reporting, resolution, and policy owner.</p>

	FINDING: There are elements missing from USATT’s Code of Conduct in the following areas: organizational expectations, reporting, resolution, and policy owner.	Due Date: October 4, 2021
2022 Determination Level: Deficient		
6	Gifts and Entertainment Policy	Management Action Plan
	<p>A.6 c: NGB must adopt a gift and entertainment policy that meets the minimum policy standards set forth by the USOPC.</p> <p>FINDING: There are elements missing from USATT's Gift and Entertainment policy in the following areas: applicability, disclosures, and policy owner.</p>	<p>USATT will update the organization’s Gift and Entertainment policy to meet USOPC standards in applicability, disclosures and policy owner.</p> <p>Due Date: October 4, 2021</p>
2022 Determination Level: Needs Improvement		
No Evidence of Compliance		
7	Conflicts of Interest Policy	Management Action Plan
	<p>A.6 b: NGB must enforce a conflicts of interest policy that meets the minimum policy standards set forth by the USOPC. The conflict of interest policy must be made available on the NGB’s website.</p> <p>FINDING: There are elements missing from USATT's Conflict of Interest Policy in the following areas: applicability; organizational expectations; disclosure requirements and process; reporting and resolution for potential violations; policy owner; and resources.</p> <p>Additionally, there is no documentation to demonstrate the formal review of completed conflict of interest disclosures and summary report to the board. The controls to ensure forms are annually received and reviewed are not operating effectively. For two of the samples tested, the conflict of interest forms were not completed in a timely manner.</p> <p>There were similar findings noted in the previous USOPC audit. The previous findings noted issues with the conflicts of interest forms not being reviewed and approved by the board or Ethics & Grievance Committee. There were also issues noted with USATT not following their conflicts of interest process consistently.</p>	<p>USATT will update the organization’s conflict of interest policy to meet USOPC standards in applicability, organizational expectations, disclosure requirements and process, reporting and resolution for potential violations, policy owner, and resources. USATT will ensure that conflict of interest forms are completed timely. USATT will implement a procedure to ensure that a formal and effective annual review of conflict of interest disclosures will be conducted by the Chair of the Ethics and Grievance Committee, including a summary report to the board.</p> <p>USATT will ensure that the 2020 Conflicts of Interest disclosures are reviewed and documented in the board minutes. In addition, the 2020 Conflicts of Interest disclosures will be compared to 2019 Conflict of Interest disclosures, documenting any additions or updates.</p> <p>Due Date: October 4, 2021</p>
2022 Determination Level: Deficient		

FINANCIAL STANDARDS AND REPORTING PRACTICES

NGB Audit Standards Section B					
Title	Standard	Compliant	Needs Improvement	Little Evidence	No Evidence
Financial Stability	B.1 a	X			
Financial Policies & Procedures	B.1 b	X			
USOPC Funding	B.1 c			X	
Financial Reporting to Board	B.1 d	X			
Board Approved Budget	B.2 a	X			
Accounting Practices	B.2 b	X			
NGB Provided Documents	B.3 a	X			
NGB Website Information	B.4 a, b & c	X			
Total		7	0	1	0

Little Evidence of Compliance		
8	USOPC Funding	Management Action Plan
	<p>B.1 c: NGB must comply with all USOPC funding agreements, including but not limited to, ensuring adequate controls are in place to ensure USOPC funds are spent appropriately, USOPC funds are not spent on excessive or unnecessary expenses, and amounts that are reported on the final grant reports are accurate.</p> <p>FINDING: USATT tracks the amounts reported on the final grant reports manually but could not provide general ledger details that reconcile with the final grant reports. However, USATT was able to provide sufficient documentation to demonstrate that USOPC funding was spent appropriately.</p> <p>In testing, there were two instances where the per diem amount reimbursed was higher than what was allowed according to USATT's Financial Policies and Procedures. There was also one instance where there was no review of the CEO expenses from the appropriate committee, as required.</p>	<p>USATT will implement financial policies to provide general ledger details that reconcile with USOPC grant reports. USATT will implement procedures to ensure that per diem reimbursements are consistent with established policies, and to ensure that CEO expenses are reviewed by the appropriate committee. USATT will implement procedures to regularly review credit card statement activity.</p> <p>In addition, the CEO's expenses for 2020 will be reviewed for appropriateness and documented.</p> <p>Due Date: October 4, 2021</p>

<p>Additionally, there is no documented review of the credit card statement activity. This was also noted in the previous USOPC audit.</p>	
<p>2022 Determination Level: Deficient</p>	

ATHLETE PROTECTION AND RIGHTS

NGB Audit Standards Section C					
Title	Standard	Compliant	Needs Improvement	Little Evidence	No Evidence
Child Protection and US Center for SafeSport	C.1 a and C.2	X			
USOPC Athlete Safety Requirements	C.3 a				X
Anti- Doping Policies	C.4 a	X			
Anti- Doping Policy Language	C.4 b		X		
Athlete Agreements	C.5 a		X		
Total		2	2	0	1

Needs Improvement		
9	Anti-Doping Policy Language	Management Action Plan
	<p>C.4 b: NGB must have USOPC approved anti-doping language in its Bylaws, membership agreements (if applicable), and license agreements (if applicable).</p> <p>FINDING: USATT's anti-doping language in the Bylaws does not include the reference(s) to WADA.</p> <p>In addition, the Member Code of Conduct does not contain all the required language for members or participants, including a requirement to adhere to the rules, policies, and procedures of the USOPC.</p>	<p>USATT will update bylaws to include appropriate references to WADA. USATT will update the Member Code of Conduct to include all required language for members or participants, including a requirement to adhere to the rules, policies, and procedures of the USOPC.</p> <p>Due Date: October 4, 2021</p>
<p>2022 Determination Level: Needs Improvement</p>		
10	Athlete Agreements	Management Action Plan

	<p>C.5 a: NGB must comply with the USOPC NGB Athlete Agreements Policy.</p> <p>FINDING: USATT's athlete agreement does not contain criteria to obtain basic services and additional services and commitments provided to the athlete, such as financial support.</p>	<p>USATT will update the organization's athlete agreement to include criteria to obtain basic services and additional services and commitments for athletes, such as financial support.</p> <p>Due Date: October 4, 2021</p>
2022 Determination Level: Needs Improvement		
No Evidence of Compliance		
11	USOPC Athlete Safety Requirements	Management Action Plan
	<p>C.3 a: NGB must ensure compliance with policies and standards including but not limited to:</p> <ul style="list-style-type: none"> i. USOPC's NGB and HPMO Athlete Safety Policy ii. Responsible Sport Organization Background Check Policy <p>FINDING: There are elements missing from USATT's Background Check Policy, including: applicability, timing, and type or level of offense.</p> <p>Testing of USATT's background check results showed 11 expired background checks. In addition, USATT's background check listing included one individual who did not have a completed background check and one individual who was no longer affiliated with USATT in the tracking system.</p>	<p>USATT will update the organization's background check policy to include USOPC requirements regarding applicability, timing and type or level of offense. The Background Check listing will be reviewed regularly, but not less than quarterly, by USATT staff for expired results and to ensure that persons within the tracking system are currently affiliated with the organization.</p> <p>Due Date: October 4, 2021</p>
2022 Determination Level: Deficient		

SPORT PERFORMANCE

NGB Audit Standards Section D					
Title	Standard	Compliant	Needs Improvement	Little Evidence	No Evidence
Selection Procedures	D.1 a & D.5 b	X			
Delegation List Submission	D.3 a	X			
High Performance Plan Submission	D.4 a	X			
Event Sanctioning	D.4 b				X

Paralympic Classification	D.4 c		X		
International Federation Standing	D.5 a	X			
Total		4	1	0	1

Needs Improvement		
12	Paralympic Classification	Management Action Plan
	<p>D.4 c: PSO, or if the NGB has a Paralympic program, must adopt the U.S. Paralympics National Classification Policies & Procedures or establish national classification policies and procedures that comply with the U.S. Paralympics National Classification Policies & Procedures and the IPC Athlete Classification Code and International Standards.</p> <p>FINDING: USATT has national Paralympic classification policies and procedures, however, USATT needs to make minor improvements to be compliant.</p>	<p>USATT will review and update the Paralympic classification policies and procedures to ensure compliance with U.S. Paralympics National Classification Policies & Procedures and the IPC Athlete Classification Code and International Standards.</p> <p>Due Date: October 4, 2021</p>
2022 Determination Level: Needs Improvement		
No Evidence of Compliance		
13	Event Sanctioning	Management Action Plan
	<p>D.4 b: If an NGB or its affiliate(s) sanctions events, it must require specific sanctioning standards set forth by the USOPC of the organization or person requesting a sanction.</p> <p>FINDING: USATT's sanctioning document(s) do not have all of the minimum required elements as stated in the Implementation Guide.</p>	<p>USATT will update sanctioning documents to ensure that all elements required by the Implementation Guide are satisfied.</p> <p>Due Date: October 4, 2021</p>
2022 Determination Level: Deficient		

OPERATIONAL PERFORMANCE

NGB Audit Standards Section E					
Title	Standard	Compliant	Needs Improvement	Little Evidence	No Evidence
Managerial Capability	E.1 a		X		

Insurance Coverage	E.2 a	X			
Revenue Diversification	E.3 a	X			
Grievance Procedure	E.4 a & b				X
Whistleblower and Anti-Retaliation Policy	E.5 a				X
USOPC Trademark Protection	E.6 a – d	X			
Diversity and Inclusion Reporting	E.7 a	X			
Gender Equity	E.7 b	X			
Equal Opportunity	E.7 c			X	
Para Inclusive Sport Programs	E.7 d	X			
Diversity – Public Disclosure	E.7 e	X			
Strategic Planning	E.8 a	X			
USOPC Policy Compliance	E.9 a	X			
Total		9	1	1	2

Needs Improvement		
14	Managerial Capability	Management Action Plan
	<p>E.1 a: NGB must have managerial capability to successfully administer its operations and its sport. Managerial capability includes, but is not limited to, management’s authority and ability to operate day-to-day activities, prompt resolution of management or board concerns, and reasonable board, committee, and/or staff turnover.</p> <p>FINDING: Based on conversations with USOPC departments and USATT staff and board members, Audit noted that the board’s management of strategic matters and its engagement among directors is improving. However, USATT’s Board must continue to integrate and engage its newly seated members through constructive discussion that promotes trust and collaboration.</p>	<p>USATT’s Board of Directors is actively seeking to engage all Directors in processes that promote trust and collaboration. To that end, USATT will schedule a virtual offsite for directors to focus and align on the organization’s values and priorities and develop long-term plans to support those values and priorities. The Board Chair is encouraging new board members to actively participate in critical project task forces to create meaningful interaction and collaboration among directors. The Board Code of Conduct and Social Media policy will be reviewed and signed by all Directors to remind them that compliance with both policies is required and to explain the consequences of non-compliance. The USATT Board Chair will also continue to encourage vigorous discussion during board meetings.</p> <p>Due Date: October 4, 2021</p>
	2022 Determination Level: Needs Improvement	
Little Evidence of Compliance		
15	Equal Opportunity	Management Action Plan

	<p>E.7 c: NGB must provide an equal opportunity to amateur athletes, coaches, trainers, managers, administrators, and officials to participate in amateur athletic competition, without discrimination on the basis of race, color, religion, sex, age, or national origin as required by the Act §220524(8).</p> <p>FINDING: USATT does not currently provide anti-discrimination training which outlines equal opportunity to participate as required by the Implementation Guide.</p>	<p>USATT Board will implement anti-discrimination training which outlines equal opportunity to participate as is required by the Implementation Guide.</p> <p>Due Date: October 4, 2021</p>
2022 Determination Level: Needs Improvement		
No Evidence of Compliance		
16	Grievance Procedures	Management Action Plan
	<p>E.4 a & b:</p> <p>a. NGB must provide prompt and equitable resolution of grievances as outlined in the Act §220522(a)(13).</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: There are elements missing from USATT's Grievance Policy and Procedures in the following areas: types of grievances, grievance form, conduct of the proceedings, hearing panel composition, and hearing process.</p> <p>Audit was unable to verify if USATT provided a fair process or if the grievance procedures were followed as supporting documentation regarding evidence of a pre-hearing, hearing, a conflict free panel, and resolution of grievances could not be provided.</p> <p>There was a finding related to grievances noted in the previous USOPC audit. The previous finding noted issues with USATT following their complaint procedures. As Audit was unable to verify if procedures are being followed, this finding remains open.</p>	<p>USATT Board will update the organization's Grievance Policy and Procedures to meet USOPC standards in the types of grievances, grievance form, conduct of the proceedings, hearing panel composition, and the hearing process. USATT procedures will be updated to ensure there is appropriate documentation of evidence of a pre-hearing, a hearing, a conflict free panel, and a resolution of the grievance.</p> <p>Due Date: October 4, 2021</p>
2022 Determination Level: Deficient		
17	Whistleblower and Anti-Retaliation Policy	Management Action Plan
	<p>E.5 a: NGB must adopt and maintain an organizational whistleblower policy that encourages and provides a mechanism for affiliated individuals to report alleged violations of any applicable law, rule, regulation or adopted policy of the NGB,</p>	<p>USATT Board will implement an appropriate Whistleblower and Anti-Retaliation Policy, which must include a process to report and review violations of the policy.</p>

<p>accounting or financial fraud, or other misfeasance and includes an anti-retaliation statement.</p> <p>FINDING: USATT does not have a whistleblower policy.</p> <p>While reviewing grievances, Audit found that USATT received an anonymous complaint. Since they lack a whistleblower policy, this matter was handled as a grievance. Due to the anonymous nature of the report and the fact that it was outside of the timeline as specified in USATT's Grievance Procedures the case was dismissed. If USATT had a whistleblower policy as required, this matter could have been investigated and resolved.</p>	<p>Due Date: October 4, 2021</p>
<p>2022 Determination Level: Deficient</p>	

Findings in this report are currently in remediation. An addendum report will be issued at the end of the remediation period, up to 120 days post audit.

APPENDIX A — DEMONSTRATING COMPLIANCE DEMONSTRATION LEVEL DEFINITIONS

Demonstrating Compliance Level Definitions	
Level	Definition
Compliant	NGB meets the requirements.
Needs Improvement	NGB meets the majority of the requirements but need to make minor improvements to meet all the requirements.
Little Evidence of Compliance	NGB meets some of the requirements but not all of the requirements.
No Evidence of Compliance	NGB does not meet the requirements.

¹ Prior audit risk ratings are reflective of past risk assessments and may not align with current standards.