

UNITED STATES
OLYMPIC & PARALYMPIC
COMMITTEE



NGB Compliance Audit

USA Shooting

May 3, 2024

Executive Summary

Background, Scope, and Objectives

The United States Olympic & Paralympic Committee's (USOPC) NGB Audit department (Audit) completed an audit of USA Shooting. The purpose of the audit was to determine if USA Shooting complies with the requirements of the NGB Compliance Standards (Standards), effective January 1, 2023, and to conduct testing in areas that present an increased risk to athletes, other members, and/or USA Shooting. 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. This is the first time the USOPC has performed an audit of USA Shooting against the Standards.

The Audit team began USA Shooting's audit in May 2023, but the team delayed concluding the audit based on continued compliance concerns regarding many of the same findings outlined in this report. More specifically, many of the audit findings overlapped with the compliance findings outlined in an October 2023 letter requiring specific reforms. In addition, the former Chief Executive Officer started in January 2023, and during most of 2023, the organization experienced significant turnover and financial instability, which raised questions about its continued status as a certified National Governing Body. All findings in this report are as of September 2023. USA Shooting has made many updates since this date, and those updates are included in the Management Action Plans in this report. With the issuance of this report, the Audit and Compliance teams will continue to work with USA Shooting to address the findings in this report and related compliance matters.

Audit Summary

Overall, Audit concluded that USA Shooting has met 19 of 46 applicable Standards. There were also significant concerns raised during the review, including athlete representation, conflicts of interest, USOPC funding, athlete safety, and managerial capabilities. Additional details about the findings are included in the summary below.

Prior Audit Follow-up

As part of this review, Audit followed up on nine open audit findings from the audit dated December 20, 2018. The nine open audit findings correspond to conflicts of interest, financial policies and procedures, USOPC funding, and grievances. None of the remaining open audit findings were corrected during the current audit and as such, all remain open.

NGB Audit Findings

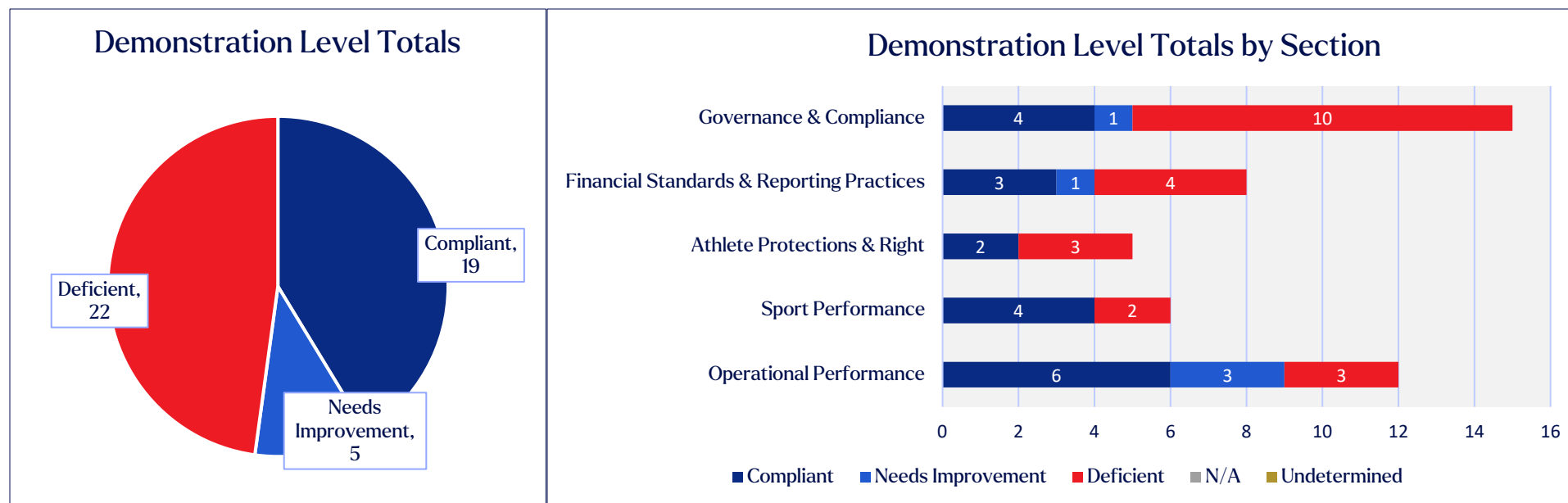
All Standards are evaluated against the 2023 Implementation Guide for Compliance Standards (Implementation Guide). References to the USOPC Bylaws are based on the version approved in March 2021.

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

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|-------------------------------|--|
| 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.1 d | X | | |
| Membership Requirements | A.1 e | X | | |
| Athlete Advisory Council | A.2 a | | | X |
| Board Governance | 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 |
| Conflicts of Interest Policy | A.6 a | | | X |
| Gifts and Entertainment Policy | A.6 b | | X | |
| NGB Annual Reports | A.7 a - c | | | X |
| Ombuds' Policy | A.8 a | | | X |
| Total | | 4 | 1 | 10 |

| Needs Improvement | | |
|-------------------|---|--|
| 1 | Gifts and Entertainment Policy | Management Action Plan |
| | <p>A.6 b: NGB must adopt a gift and entertainment policy that meets the minimum policy standards set forth by the USOPC.</p> <p>FINDING: USA Shooting has a Gift and Entertainment Policy but it is not available on its website.</p> | <p>USA Shooting adopted a Gifts and Entertainment Policy on April 8, 2024, and posted the same on the website on April 10, 2024. This will be reviewed for compliance during the remediation period.</p> |
| Deficient | | |
| 2 | Athlete Representation | Management Action Plan |

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| Policy | <p>A.1 a & b:</p> <p>a. NGBs must have at least 33.3% athlete representation on its board of directors as required by the Act §220522(13) and further defined by the USOPC Bylaws, Section 8.5.3.</p> <p>b. NGBs must have at least 33.3% athlete representation on all committees as required and defined by the USOPC Bylaws, Section 8.5.4 and 8.5.5.</p> <p>FINDING: USA Shooting's Bylaws are missing a majority of the requirements for athlete representatives on the board and committees.</p> | <p>USA Shooting updated its bylaws in December 2023 to meet requirements and submitted them to the USOPC on April 3, 2024. This will be reviewed for compliance during the remediation period.</p> |
| Application | <p>FINDING: USA Shooting does not have at least 33% athlete representation on two of the five committees.</p> <p>The percentage of 10-year athlete representatives is below the required 50% for three committees.</p> <p>USA Shooting could not provide evidence of the qualifying events for all athlete representatives and has an athlete representative who does not meet the eligibility criteria.</p> <p>USA Shooting was unable to provide evidence that an election was held or a list of the athletes eligible to vote.</p> | <p>USA Shooting populated all of its committees with the appropriate amount of athlete representation. This will be reviewed for compliance during the remediation period.</p> <p>USA Shooting will retain athlete representatives' qualifying criteria, election documentation and accurate voter lists for at least the duration of the individual's term of office.</p> <p>Due Date: August 31, 2024</p> |
| 3 | Independent and Affiliate Representation | Management Action Plan |
| Policy | <p>A.1 c: NGB must have a board structure that includes:</p> <p>i. A board position(s) as defined by the USOPC to provide an independent perspective, and</p> <p>ii. A board position for an affiliate member as required by the Act §220522 (12).</p> <p>FINDING: USA Shooting's Bylaws definition of independent perspective for board members does not meet the requirements. Additionally, the bylaws do not provide for at least one available board position for affiliated member(s).</p> | <p>USA Shooting updated its bylaws to exceed the requirements and has populated its board with four (4) independent board positions. This will be reviewed for compliance during the remediation period.</p> |
| Application | <p>FINDING: None of USA Shooting's independent board members meet the definition of independence and the current number of independent directors is not consistent with the bylaw requirements.</p> | <p>Since the conclusion of this audit, USA Shooting updated the board to include four (4) independent board members that meet the definition of independence.</p> |
| 4 | Athlete Advisory Council | Management Action Plan |

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| Policy | <p>A.2 a: NGB must have an Athletes Advisory Council (AAC) that meets the minimum standards set forth by the USOPC.</p> <p>FINDING: USA Shooting's Bylaws do not state that at least two positions on their internal AAC will be designated for Paralympic representation with gender equity included.</p> | <p>USA Shooting updated its bylaws to meet requirements. This will be reviewed for compliance during the remediation period.</p> |
| Application | <p>FINDING: USA Shooting was unable to provide the USAS AAC member list, preventing Audit from determining whether:</p> <ul style="list-style-type: none"> • USA Shooting has an active USAS AAC. • The Team USA Athletes Commission primary and alternate representatives are on the USAS AAC. • There is enough Paralympic representation on the USAS AAC. • If athlete candidates are submitting disclosures indicating whether they have any disqualifying convictions or periods of ineligibility made before the election of athlete representative candidates. • If the USAS AAC completed conflict of interest disclosure forms. | <p>USA Shooting provided a list of the USAS AAC members after the close of the audit. This will be reviewed for compliance during the remediation period.</p> |
| 5 | Board Governance | Management Action Plan |
| | <p>A.3 a: NGB must have Bylaws or board-approved policies and procedures that at least meet the minimum standards for governance practices and comply with the Act §220522 (9-12).</p> <p>FINDING: There are elements missing from USA Shooting's Bylaws in the following areas: board responsibilities, election and selection procedures, and designated committee requirements.</p> | <p>USA Shooting updated the bylaws to meet requirements and submitted them to the USOPC on April 3, 2024. This will be reviewed for compliance during the remediation period.</p> |
| 6 | Board Development | Management Action Plan |
| | <p>A.3 b: The NGB board must ensure the following activities are completed:</p> <ol style="list-style-type: none"> i. Formal onboarding for board members and committee members, ii. USOPC training for 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: Review of USA Shooting's Board Development identified several issues.</p> <p>First, USA Shooting was unable to provide evidence that there is a formal onboarding process for new board and committee members.</p> | <p>USA Shooting implemented formal onboarding for new board and committee members. This will be reviewed for compliance during the remediation period.</p> <p>The current USA Shooting Board has been provided access to USOPC BoardSpan training, with most of the members already completing it. The rest will complete it by the date set forth below.</p> |

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| | <p>Second, only two out of 13 current board members have completed the required USOPC BoardSpan training.</p> <p>Third, a board self-evaluation has not taken place in the previous four years.</p> <p>Last, there is no evidence that written annual CEO evaluations are taking place.</p> | <p>The Board will work with the Nominating and Governance Committee to draft a self-evaluation and will implement by December 31, 2024.</p> <p>USA Shooting will perform a written annual CEO evaluation by the end of the year and going forward.</p> <p>Due Date: BoardSpan Completion – June 1, 2024 Self-Evaluation – December 31, 2024 CEO Evaluation – December 31, 2024</p> |
| 7 | Board Roster | Management Action Plan |
| | <p>A.3 d: NGB must have a list of its current board members on its website, including each member's position, board term, and class.</p> <p>FINDING: USA Shooting has the list of current board members on its website, including each member's position. However, the board terms are not included.</p> <p>Additionally, the board roster positions do not align with USA Shooting's Bylaws.</p> | <p>USA Shooting updated its website in December 2023 to include board terms and the positions align with USA Shooting's Bylaws. This will be reviewed for compliance during the remediation period.</p> |
| 8 | 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>FINDING: There are elements missing from USA Shooting's Codes of Conduct in every required area.</p> | <p>USA Shooting adopted the USOPC template code of conduct on April 8, 2024, to include the required elements and posted it on its website on April 10, 2024. This will be reviewed for compliance during the remediation period.</p> |
| 9 | Conflicts of Interest Policy | Management Action Plan |
| Policy | <p>A.6 a: 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 USA Shooting's Conflict of Interest Policy in the areas of applicability, disclosures, reporting, resolution and resources.</p> | <p>USA Shooting adopted the USOPC template conflict of interest on April 8, 2024, to include the required elements and posted it on its website on April 10, 2024. This will be reviewed for compliance during the remediation period.</p> |

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| Application | <p>FINDING: Testing of USA Shooting's conflict of interest process identified several issues.</p> <p>First, no staff or committee members were required to complete a conflict of interest disclosure form in the past year.</p> <p>Second, conflicts of interest are not properly disclosed, managed, or documented in board meetings.</p> <p>Third, there is no process to review disclosures or provide direction to manage conflicts when required. This is a repeat finding.</p> <p>Last, a review of the conflict of interest forms completed noted several individuals noted potential conflicts on the disclosure forms but did not provide additional details on what the conflicts were. Additionally, one individual noted they were unsure if they had conflicts throughout the form and one board member did not submit a disclosure form.</p> | <p>USA Shooting completed a conflict of interest process. This will be reviewed for compliance during the remediation period.</p> |
| 10 | NGB Annual Reports | Management Action Plan |
| | <p>A.7 a - c: NGB must submit annual reports to the USOPC that include the following information as required by §220522(17) of the Act:</p> <ul style="list-style-type: none"> a. A description of the manner in which the NGB (1) carries out its mission to promote a safe environment in sports that is free from abuse of amateur athletes (including emotional, physical, and sexual abuse), and (2) addresses any sanctions or temporary measures required by the Center; b. A description of any cause of action or complaint filed against the NGB that was pending or settled during the preceding calendar year; and c. A detailed statement of (1) the income and expenses of the organization; and (2) the amounts expended on stipends, bonuses, and services for amateur athletes, organized by the level and gender of the amateur <p>FINDING: USA Shooting did not submit a detailed statement of Athlete Expenditures.</p> | <p>USA Shooting completed recent end of year reporting requirements and will continue to do so moving forward.</p> |
| 11 | Ombuds' Policy | Management Action Plan |
| | <p>A.8 a: NGB must publish the Ombuds' Policy on its website and communicate the availability of the policy to its athletes as set forth in the Act§220509(b).</p> <p>FINDING: USA Shooting has not published the Ombuds' Policy on its website or communicated its availability to its athletes.</p> | <p>USA Shooting updated its website to include the Ombuds' Policy and communicated the information to its elite athletes on April 10, 2024.</p> |

Financial Standards and Reporting Practices

| NGB Compliance Standards Section B | | | | |
|------------------------------------|--------------|-----------|-------------------|-----------|
| Title | Standard | Compliant | Needs Improvement | Deficient |
| 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 | | 3 | 1 | 4 |

| Needs Improvement | | |
|-------------------|--|---|
| 12 | Financial Reporting to the Board | Management Action Plan |
| | <p>B.1 d: NGB Management must provide financial reports to its board, at least three times per year, and confirmation of discussion be included in Board meeting minutes. NGB must provide financial information and documents as reasonably requested by board members.</p> <p>FINDING: While USA Shooting's board meeting minutes reflect discussion of financial updates, USA Shooting was unable to provide the reports that were discussed during those meetings.</p> | <p>USA Shooting will retain financial reports that were discussed during the board meetings.</p> <p>Due Date: August 31, 2024</p> |
| Deficient | | |
| 13 | Financial Stability | Management Action Plan |
| | <p>B.1 a: NGB must demonstrate financial stability based on its four most recent audited financial statements.</p> <p>FINDING: USA Shooting's last four years of audited financial statements had a negative cumulative change in net assets. Additionally, the USOPC has identified other significant financial practices that directly affect the instability of the organization's finances.</p> | <p>USA Shooting will present a budget for the next two years that relies on consistent contributions and income over the last quad. USA Shooting will also provide its FY 2023 audited financials for review in connection with this finding.</p> <p>Due Date: FY 2024 Budget – May 31, 2024 FY 2025 Budget – January 31, 2025</p> |

| | | FY 2023 Audited Financial Statements – August 31, 2024 |
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| 14 | Financial Policies and Procedures | Management Action Plan |
| | <p>B.1 b: NGB must develop and implement financial policies and procedures.</p> <p>FINDING: USA Shooting's financial policies and procedures are missing aspects of all the required elements. Additionally, roles and processes have significantly changed since the financial policies and procedures were last updated.</p> <p>This is a repeat finding from the previous USOPC audit.</p> | <p>USA Shooting adopted a Finance Policy on April 11, 2024, and Financial Procedures Manual on April 8, 2024, to meet requirements and to align with the current roles and processes in place at the organization. This will be reviewed for compliance during the remediation period.</p> |
| 15 | 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: Audit could not confirm the amounts reported to the USOPC in the 2022 final funding report provided by USA Shooting. In sum, USA Shooting was unable to provide reporting that reflected that USOPC funds were spent consistently with the funding reports on their mid-year and year-end grant reports. As a result, Audit was unable to complete testing or verify the accuracy of the provided general ledgers.</p> <p>This is a repeat finding from the previous USOPC audit.</p> | <p>USA Shooting adopted financial policies and procedures that include controls regarding: USOPC funds. USA Shooting has submitted the 2023 final funding report to the USOPC on time with general ledgers that match the amounts reported on the projects. This will be reviewed for compliance during the remediation period.</p> |
| 16 | NGB Provided Documents | Management Action Plan |
| | <p>B.3 a: NGB must annually provide the USOPC's NGB Audit Department with the following:</p> <ul style="list-style-type: none"> i. Its completed IRS Form 990 by the IRS deadlines including extensions, if executed. ii. Its completed audited financial statements no later than the last day of the eighth month following the NGB's year-end. iii. If applicable, its external auditor's letter to management outlining the evaluation of any internal control deficiencies identified during the audit, within the same timeframe outlined in ii above. iv. Its Board-approved budget for the current year. | <p>USA Shooting's Board approved a budget for 2024 and is currently amending it to reflect current numbers.</p> <p>Due Date: May 31, 2024</p> |

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| FINDING: USA Shooting was unable to provide their most recent board-approved budget. | |
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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 and C.2 a | 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 | 0 | 3 |

| Deficient | | |
|-----------|--|--|
| 17 | USOPC Athlete Safety Requirements | Management Action Plan |
| Policy | <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 Athlete Safety Policy ii. Responsible Sport Organization Background Check Policy <p>FINDING: USA Shooting's Background Check Policy is missing many required elements. In addition, USA Shooting does not have a written process to report allegations of prohibited conduct or temporary measures to the USOPC Office of Athlete Safety when required.</p> | <p>USA Shooting adopted the USOPC template Background Check Policy on April 8, 2024, to include the missing required elements and posted the policy on its website on April 10, 2024. USA Shooting has also posted the USA Shooting Athlete Safety Reporting policy on the website on April 10, 2024. These will be reviewed for compliance during the remediation period.</p> |

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| Application | <p>FINDING: Testing identified multiple issues:</p> <p>First, active member coaches and club administrators are not required to complete background checks.</p> <p>Second, multiple staff, contractors, and members of the board of directors do not have current background checks. Many of these individuals have never had a background check completed.</p> <p>Finally, there were multiple individuals who did not have current background checks and attended the most recent USA Shooting event in April 2023.</p> | <p>USA Shooting has been working with the USOPC to update its background check process and ensure required individuals are background checked.</p> <p>Due Date: August 31, 2024</p> |
| 18 | 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: USA Shooting does not have the approved language for NGBs with organization or individual members in its bylaws or a board-approved document.</p> <p>Additionally, USA Shooting does include the required anti-doping language in an agreement or waiver.</p> | <p>USA Shooting updated its bylaws to meet requirements.</p> <p>Additionally, USA Shooting updated its membership waiver to include the required language. This will be reviewed for compliance during the remediation period.</p> |
| 19 | Athlete Agreements | Management Action Plan |
| | <p>C.5 a: NGB must comply with the USOPC NGB Athlete Agreements Policy.</p> <p>FINDING: USA Shooting's athlete agreements do not comply with the USOPC NGB Athlete Agreement Policy. Additionally, due to turnover at the organization, there was no way to confirm that athletes have adequate time to review, understand, and seek advice before signing the agreements.</p> | <p>USA Shooting will work with its AAC to draft an Athlete Agreement that complies with the USOPC Policy.</p> <p>Due Date: August 1, 2024</p> |

Sport Performance

| NGB Compliance Standards Section D | | | | |
|------------------------------------|-----------|-----------|-------------------|-----------|
| Title | Standard | Compliant | Needs Improvement | Deficient |
| Selection Procedures and Process | D.1 a & b | X | | |
| Delegation List Submission | D.2 a | X | | |

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|-----------------------------------|-------|----------|----------|----------|
| High-Performance Plan Submission | D.3 a | X | | |
| Event Sanctioning | D.3 b | | | X |
| Paralympic Classification | D.3 c | | | X |
| International Federation Standing | D.4 a | X | | |
| Total | | 4 | 0 | 2 |

| Deficient | | |
|-----------|--|---|
| 20 | Event Sanctioning | Management Action Plan |
| | <p>D.3 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: USA Shooting's sanctioning documents are missing several required elements.</p> | <p>USA Shooting will update its sanctioning documents to meet the requirements.</p> <p>Due Date: June 1, 2024</p> |
| 21 | Paralympic Classification | Management Action Plan |
| | <p>D.3 c: NGBs with 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: USA Shooting does not have national classification policies and procedures.</p> | <p>USA Shooting posted a Paralympic Classification document on its website on April 11, 2024. This will be reviewed for compliance during the remediation period.</p> |

Operational Performance

| NGB Compliance Standards Section E | | | | |
|---|-----------|-----------|-------------------|-----------|
| Title | Standard | Compliant | Needs Improvement | Deficient |
| Managerial and Board 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 Policies and Training | E.7 c | | | X |
| Para Inclusive Sport Programs | E.7 d | X | | |
| Strategic Planning | E.8 a | | X | |
| USOPC Policy Compliance | E.9 a | X | | |
| Total | | 6 | 3 | 3 |

| Needs Improvement | | |
|-------------------|--|---|
| 22 | Revenue Diversification | Management Action Plan |
| | <p>E.3 a: NGB must have revenue sources above and beyond the USOPC's funding.</p> <p>FINDING: USA Shooting only has two substantive sources of revenue in three out of the four years reviewed. Additionally, USA Shooting's other revenue sources are concentrated in sources that significantly fluctuate.</p> | <p>USA Shooting will present a budget for the next two years that relies on consistent contributions and income over the last quad. USA Shooting will also provide its FY 2023 audited financials for review in connection with this finding.</p> <p>Due Date: FY 2024 Budget – May 31, 2024 FY 2025 Budget – January 31, 2025 FY 2023 Audited Financial Statements – August 31, 2024</p> |
| 23 | Grievance Procedure | 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(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: There are elements missing from USA Shooting's grievance policy in the following areas: types of grievances, process to report grievances, administration of the grievance, hearing procedures and other resources.</p> | <p>USA Shooting adopted hearing procedures to meet these requirements and provided to USOPC on April 3, 2024. This will be reviewed for compliance during the remediation period.</p> |
| 24 | Strategic Planning | Management Action Plan |
| | <p>E.8 a: NGB must maintain and monitor the execution of an organizational strategic plan, in addition to a high-performance plan.</p> | <p>USA Shooting will update its strategic plan to include finalized success measures.</p> <p>Due Date: December 31, 2024</p> |

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| | FINDING: While USA Shooting has a board approved strategic plan with organization-wide initiatives, it includes only draft success measures with no numerical targets. | |
| Deficient | | |
| 25 | Managerial and Board 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: Through discussions with various USOPC departments, Audit identified several concerns related to turnover at the senior management level, substantial conflicts of interest among leadership, and significant financial concerns.</p> | <p>USA Shooting will work to manage turnover to an appropriate level. USA Shooting is also working on mitigating conflicts that have contributed to turnover. USA Shooting is working on its financial position to ensure sustainability.</p> <p>Due Date: December 31, 2024.</p> |
| 26 | 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, accounting or financial fraud, or other misfeasance and includes an anti-retaliation statement.</p> <p>FINDING: USA Shooting's Whistleblower Policy is not posted on the website and there are missing elements in every required area.</p> | <p>USA Shooting adopted the USOPC template Whistleblower and Anti-Retaliation Policy and updated on April 8, 2024, to meet the requirements and posted the policy on its website on April 10, 2024. This will be reviewed for compliance during the remediation period.</p> |
| 27 | Equal Opportunity Policies and Training | 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 §220522(8).</p> <p>FINDING: USA Shooting does not have an equal opportunity clause in its bylaws or board-approved documents.</p> | <p>USA Shooting has included an equal opportunity statement in its Employee Manual and participant waiver. This will be reviewed for compliance during the remediation period.</p> |

Findings in this report are currently in remediation. A closure letter will be issued once all findings have been remediated.