

UNITED STATES
OLYMPIC & PARALYMPIC
COMMITTEE



NGB Compliance Audit

USA Swimming

September 24, 2026

Executive Summary

Background, Scope, and Objectives

The United States Olympic & Paralympic Committee's Audit department (USOPC Audit) completed an audit of USA Swimming. The purpose of the audit was to determine if USA Swimming complies with the requirements of the National Governing Body (NGB) Compliance Standards (Standards), effective January 1, 2026, and to conduct testing in areas that present an increased risk to athletes, other members, and/or USA Swimming. 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. For questions on this report, please contact USOPC.Audit@usopc.org.

Audit Summary

Overall, Audit concluded that USA Swimming has met 26 of 27 applicable Standards and did not identify any significant concerns. There are no significant concerns, as the findings are related to minor updates to policies and procedures. Additional details are in the findings below.

NGB Compliance Audit Findings

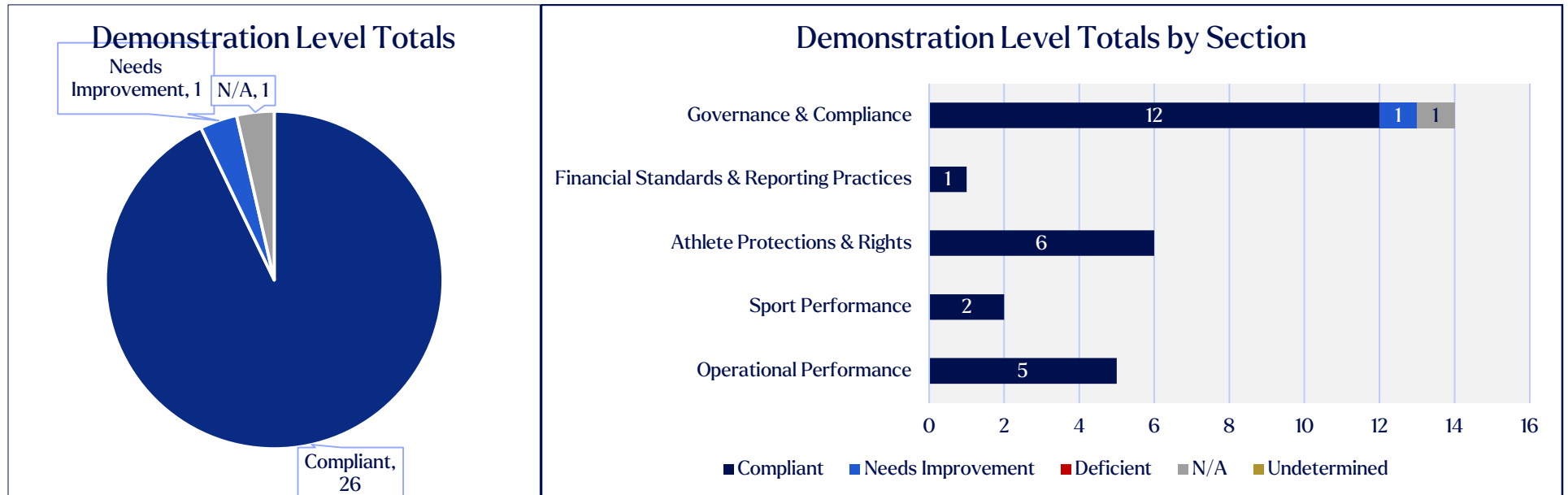
All Standards are evaluated against the 2026 Implementation Guide for Compliance Standards (Implementation Guide). References to the USOPC Bylaws are based on the effective February 1, 2025.

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		
Sport Integrity Policy ¹	A.6 d	N/A		
Demographic & Inclusion Requirements	A.7 a & b	X		
Equal Pay for Team USA	A.7 c	X		
Ombuds' Policy	A.9 a	X		
Total		12	1	0

Needs Improvement		
1	Athlete Advisory Council	Management Action Plan
	A.3a: NGB must have an Athletes Advisory Council that meets the minimum standards set forth by the USOPC. FINDING: USA Swimming's AAC policies and procedures do not state that both the NGB's Team USA AC primary representative and alternate will automatically be members of the NGB AAC. Additionally, USA Swimming did not require candidates to complete a conflict-of-interest form or other required disclosures prior to appearing on the ballot for the 2025 election.	USA Swimming will update the applicable policy or bylaws to state both the NGB's Team USA AC primary and alternate representatives will automatically be members of the NGB AAC. USA Swimming did not require candidates to complete a conflict-of-interest form or other required disclosures prior to appearing on the ballot for the 2025 election. This issue has since been rectified for the 2026 election and will be reviewed as part of the remediation process.

¹ This Standard will not be assessed for audits started prior to July 1, 2026.

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		5	0	0

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