

**UNITED STATES OLYMPIC AND PARALYMPIC COMMITTEE
CERTIFICATION REVIEW GROUP**



**Certification Renewal Recommendation Report for
United States Bowling Congress**
December 16, 2021



**UNITED STATES
OLYMPIC & PARALYMPIC
COMMITTEE**



United States Bowling Congress Certification Renewal Executive Summary

In November 2020, the United States Olympic and Paralympic Committee (USOPC) Certification Review Group (CRG; formerly the Certification Verification Group), in accordance with the USOPC's NGB Certification Policy, began a certification renewal review of the United States Bowling Congress (USBC).¹ The CRG evaluated the USBC and based on input from CRG members and the results of NGB Audit's Consultative Review², recommended a certification status of Renewal in Good Standing.

The CRG's review of the USBC found that the organization is meeting 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 Consultative Review conducted by the USOPC's NGB Audit team in August 2020 found that the USBC did not fully meet the NGB Compliance Standards in all areas, including findings related to required bylaws and policy components, internal financial policies, and background check requirements, among others. The USBC resolved the findings and achieved compliance by the time of the CRG's certification recommendation.

In its discussions of the USBC's interactions with the USOPC, the CRG did not identify any operational concerns or cultural issues that raised concerns or would prevent the organization's continued certification. Overall, in the areas in which CRG members had interacted with the USBC, the CRG had a mostly favorable view of the USBC's operations.

As a result of this review, the CRG recommends a certification status of Renewal in Good Standing for a four-year certification term ending in 2025.

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

² See Appendix for additional information about NGB Audit's Consultative Review and how it differed from a full audit.

Organizational Overview

The United States Bowling Congress Inc., commonly known as US Bowling Congress, is the USOPC-certified NGB for elite bowling in the United States and the United States' member of the International Bowling Federation, the international federation for the sport of bowling. Launched in January 2005, the USBC serves approximately 1.2 million adult and youth members in the United States and has youth, high school, collegiate, and tournament programs and initiatives, to name a few, designed to promote and grow the sport of bowling.³

Certification History

The USBC was originally certified in January 2021.⁴ The CRG's certification review was initiated based on the USBC's scheduled quadrennial certification review. The USBC's certification status has not been referred for review outside of the standard NGB certification review schedule.

Certification Exceptions⁵

The USBC did not request any exceptions from the NGB Compliance Standards during its certification review.

Athlete Representation Approval and Exceptions⁶

The USBC requested that the Athlete Representation Review Working Group (ARRWG) approve nine of its committees as Designated Committees. These committees were:

- Equipment Specifications and Certifications
- Finance
- Nominating
- Legal
- Hearing Panels
- Audit
- Legislation
- National Selection
- Executive Director and Evaluation

The ARRWG approved the USBC's Designated Committees as presented.

The USBC also requested approval of the following committees as Other Committees, which the ARRWG approved:

- Awards and Recognition
- Diversity and Inclusion
- Hall of Fame
- Strategic Planning
- SMART (Scholarship Management Account and Reporting for Tenpins)

The USBC also requested approval of three competitions as qualifying events to expand the pool of 10 Year and 10 Year+ Athletes eligible to serve as athlete representatives. The requested events included the World Bowling World Championships, the PABCON Championships, and the USBC Team Trials (for individuals earning a place on Team USA through performance at this event). The ARRWG approved the USBC's requests to include these as additional qualifying events for 10 Year and 10 Year+ Athlete eligibility.

Certification Review⁷

Governance and Compliance

³ [About USBC](#)

⁴ Refer to the Appendix for additional details on the initial certification.

⁵ Refer to the Appendix for additional details on exception requests to the NGB Compliance Standards.

⁶ Refer to the Appendix for additional details on athlete representation exception requests.

⁷ Refer to the Appendix for additional details on the review standards and process for information related to NGB Audit's Consultative Review of USBC.

The CRG determined that the USBC is fulfilling the Governance and Compliance-related responsibilities of an NGB. The USBC has adopted a code of conduct, a conflict of interest policy, and a gifts and entertainment policy.

During its Consultative Review, the NGB Audit team found that the USBC's bylaws did not include certain elements required by the NGB Compliance Standards. The USBC has updated its bylaws to add these elements to meet the NGB Compliance Standards.

The NGB Audit team also found that the USBC's code of conduct, gifts and entertainment policy, conflicts of interest policy, and statement of ethics were missing some elements required under the NGB Compliance Standards. The USBC revised these documents to resolve these findings and now fully meets the NGB Compliance Standards.

The USBC has been the subject of two Section 10⁸ complaints and a follow-up complaint that was related to the resolution of one of the Section 10 complaints. The initial Section 10 complaint was filed in 2015⁹ by three athletes who alleged that the USBC's grievance procedures lacked fair notice, an opportunity for a hearing, and did not provide for the prompt and equitable resolution of member grievances as required by the Act. As a result of findings made by the hearing panel, the USOPC's Board of Directors placed the USBC on probation for six months beginning in June 2017, during which time the USBC worked with the USOPC's Legal Department to revise its grievance process. The hearing panel accepted the USBC's revised grievance procedures, and the USOPC Board of Directors lifted the probation period in April 2018.

Counsel for one of the complainants from the 2015 Section 10 complaint lodged an inquiry with NGB Services and Legal in December 2018 alleging that the USBC was still not in compliance with its own bylaws, the Act, or the USOPC's Bylaws. Those claims were reviewed by USOPC Legal, which concluded that the allegations of non-compliance were not substantiated.

The second Section 10 complaint, filed in 2018, alleged that the USBC failed to comply with certain provisions of the Act and the USOPC's Bylaws. Specifically, the complaint alleged that the USBC was not free from outside restraint, was not operationally transparent, did not fulfill its responsibilities as an NGB as required by the Act, and failed to fulfill athlete safety requirements because the USBC's definition of the word "athlete" was not consistent with the definition in the Act. A hearing panel dismissed the complaint on June 12, 2018, for the complainant's failure to exhaust available administrative procedures before filing a Section 10 complaint, as was required for Section 10 complaints at that time. There have been no other complaints filed since the 2018 complaint.

The USBC completed a diversity and inclusion scorecard to provide a snapshot of the diversity of its board of directors, standing committees, staff, membership, national team coaches and athletes, and developmental team coaches and athletes.¹⁰ The scorecard is intended to provide a way to identify opportunities for the USBC to increase diversity, equity, and inclusion (DE&I) in amateur bowling and to assist in creating action plans that best deploy its resources for DE&I success. In 2019, the USBC performed well against its own benchmarks for athletes of color on its national teams and developmental national teams; female representation on its board of directors, executive committee, standing committees, among its membership, and its national and developmental national teams; persons with disabilities among its membership; and military veterans on its board of directors and in its membership, meeting at least 85% of its benchmark targets in these areas. The USBC performed moderately well against its own benchmarks for persons of color in NGB membership and military veterans on its standing committees, meeting between 69% and 84% of its benchmark targets in these areas. In all other categories, the USBC had significant

⁸ See USOPC Bylaws, Section 10, which allows any amateur sports organization or a person that belongs to, or is eligible to belong to an NGB, to file a complaint alleging non-compliance with the USOPC's Bylaws and the Act.

⁹ Generally, the CRG uses a four year look back period. While this complaint was filed outside of the lookback period, it is directly related to a follow-up complaint that was filed during the lookback period and thus has been included here.

¹⁰ [USBC Diversity and Inclusion Scorecard](#).

room for improvement, meeting 68% or less of its benchmark targets. The USBC will have the opportunity to address these and other areas of improvement in a DE&I Action Plan for the 2021-2024 quadrennium.

Financial Standards and Reporting Practices¹¹

The CRG also concluded that the USBC is fulfilling its obligations in Financial Standards and Reporting Practices. The USBC demonstrates the financial capability to administer the sport of bowling; is financially transparent; maintains audited accounting records; and made its tax documentation and financial statements publicly available on its website.

NGB Audit found that the USBC's Financial Policies and Procedures Manual was missing written policies for the USBC's budgetary process. The USBC updated its manual to include the budgetary process in April 2021.

Athlete Protection and Rights

The USBC has complied with all applicable athlete safety and U.S. Center for SafeSport requirements and maintained athlete safety and anti-doping policies. The USOPC is not aware of any cases it has received in the past four years concerning the USBC 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 the USBC that the USOPC was required to report. Additionally, NGB Audit verified that the USBC received a rating of "Fully Implemented" for all but one element of its program, Education and Training, for which it received a "Not Implemented" rating, in its most recent audit by the Center in 2019. The USBC took corrective actions to address this finding and the Center accepted the corrective actions in September 2019.

NGB Audit initially noted that the USBC's athlete safety policy required updates to comply with the NGB Compliance Standards but worked with the USBC to determine that athlete safety language was included in multiple documents, not just the one document submitted as part of the Consultative Review process. Taken together, the published documents meet the NGB Compliance Standards.

NGB Audit also found that required references to the World Anti-Doping Agency were missing from USBC's Bylaws, which the USBC addressed to meet the NGB Compliance Standards.

Sport Performance

The USBC is fulfilling its obligations in Sport Performance. Although the USOPC's Sport Performance team has limited interaction with the USBC because the USOPC provides no direct athlete support to its athletes, the organization maintains and executes on a strategic plan that is capable of supporting athletes in achieving sustained competitive excellence and growing the sport and has maintained selection procedures for international competition. The USBC's athletes have performed well in international competition, signifying that its sport performance plan supports its athletes' pursuit of competitive excellence. In the most recent Pan American Games in Lima, Peru, in 2019, the USBC's Team USA athletes took home three gold medals and a bronze medal, contributing to the Team USA's first place overall finish in the medal count.

Operational Performance

The USBC has demonstrated the managerial capacity to administer the sport, maintained adequate insurance to manage its risk, and maintained financial sustainability, thereby fulfilling its Operational Performance obligations.

As a result of the 2015 Section 10 proceedings referenced above, the USBC has adopted a grievance policy that the USBC recently updated to include new certification requirements. The NGB Audit team found

¹¹ As noted in the Appendix, the NGB Audit team did not test the USBC's financial controls or procedures as part of the Consultative Review process.



that the USBC did not have a whistleblower policy and that its grievance procedures required updates to include certain elements required by the NGB Compliance Standards. The USBC published a whistleblower policy and revised grievance procedures in October 2021 that include all of the required elements to meet the NGB Compliance Standards.

While the USBC's Team USA athlete agreement included performance support criteria that met the NGB Compliance Standards for gender equity, that criteria was not yet published in an athlete handbook or on the USBC's website as required. The USBC resolved the issues identified by NGB Audit by revising its athlete handbook and publishing accordingly.

Conclusion

The CRG concluded that the USBC is performing satisfactorily overall, based on input from CRG members and the results of the NGB Audit team's Consultative Review completed in August 2020. The USBC has fully addressed the findings identified during the Consultative Review, and there are no outstanding areas of significant or severe concern affecting its certification status. Accordingly, the CRG recommends that the USBC's certification as a member organization be renewed with a certification status of Renewal in Good Standing.

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 law in late 2020, require the USOPC to certify NGBs¹². 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.¹³

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.¹⁴ 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 Protections and Rights, 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.

In addition to outlining the requirement that all NGBs receive approval for committees that are considered Designated Committees, various provisions of Section 8.5 of the USOPC Bylaws permit NGBs to seek exceptions related to minimum athlete representation requirements on boards and committees. The Athlete Representation Review Working Group evaluates and approves or denies all requests made under Section 8.5.

Consultative Reviews

The [NGB Compliance Standards](#) were published in 2020. NGBs are not required to fully comply with the NGB Compliance Standards until January 1, 2022.

To provide time for NGBs scheduled for certification renewal in 2021 to fully comply with the NGB Compliance Standards, the NGB Audit team conducted Consultative Reviews for those NGBs rather than a full audit, which typically includes testing and more detailed reviews of financial controls and use of USOPC grant money. The Consultative Reviews assessed the NGBs' policies and procedures to assist them in focusing on areas reviewed under the NGB Compliance Standards in preparation for the certification renewal process.

¹² See §220521(a) of the Ted Stevens Olympic and Amateur Sports Act.

¹³ [NGB Certification Policy](#), Section 1.

¹⁴ The CRG uses a four-year lookback period during its review process.



NGB Audit completed a Consultative Review of the USBC in August 2020. All references to NGB Audit's assessment of the USBC's performance are derived from this Consultative Review.