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# United States Olympic Committee

## Audit Division



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Report for:

**USA Shooting**

Review of:

**Compliance Checklist**

Dated:

**December 3, 2018**



December 3, 2018

Keith Enlow  
Chief Executive Officer  
USA Shooting

Dear Keith,

Enclosed is the United States Olympic Committee's (USOC) report on the 2018 Compliance Checklist for USA Shooting (USAS). We want to express our appreciation for the time you spent completing the Checklist and providing documents during the review. Due process concerns as mentioned by USAS' Athlete Rep will be considered during the August 2018 audit.

USAS was compliant in the areas of governance/managerial, financial capabilities, due process and athlete representation, and anti-doping. The review initially identified two deficiencies related to SafeSport policy and athlete representation in SafeSport grievance hearing panels. Prior to issuance of the final report, both deficiencies were remedied.

The report will be presented to the USOC Audit Committee at its next quarterly meeting and be made available on the Team USA website. We hope you found the review process to be helpful. If you have any suggestions, please do not hesitate to share them with us.

Sincerely,

Bridget Toelle, CPA, CIA  
Senior Director, Audit

Rich Wright  
Staff Auditor

cc: Rick Adams                      Rachel Isaacs                      USA Shooting Board of Directors  
Alan Ashley                      Chris McCleary                      Pete Carson  
Wendy Guthrie                      Denise Parker                      Keith Sanderson  
Onye Ikwuakor                      Sara Pflipsen



# COMPLIANCE CHECKLIST REPORT

## USA Shooting

### OBJECTIVE AND SCOPE

The objective of the review is to verify USAS is in compliance with key elements of the Ted Stevens Olympic and Amateur Sports Act, the USOC Bylaws and certain USOC policies, in order to demonstrate ongoing commitment to the values and requirements of membership in the USOC. The scope includes the 2018 Compliance Checklist certified by USAS and the supporting documents provided by USAS. Compliance Checklist procedures are designed to verify that certain NGB policies or processes are in place. This Compliance Checklist does not conclude on the effectiveness of any policies or processes questioned in this report. Additional audit procedures are completed on select NGBs each year to verify various policies and processes are being followed.

The following chart shows all the requirements in the Compliance Checklist and corresponding status for USAS. For any deficiencies, see the explanations and action plans after the chart.

	Question	Status
<b>Governance/Managerial</b>		
1	Do you have a code of conduct for your employees, members, board of directors and officers?	Compliant
2	Do you have a strategic plan that is capable of supporting athletes in achieving sustained competitive excellence, and in growing the sport?	Compliant
3	Do you have your current bylaws posted on your website?	Compliant
<b>Financial Capability</b>		
4	Are you recognized by the IRS as a tax-exempt organization?	Compliant
5	Are you incorporated under the laws of a state of the United States or the District of Columbia as a not-for-profit corporation?	Compliant
6	Do you have your three most recent IRS Form 990s on your website?	Compliant
7	Have you completed and posted on your website your three most recent annual audited financial statements?	Compliant
8	Do you have written financial policies and procedures?	Compliant
9	Do you have an approval and/or review process for cash disbursements?	Compliant
10	Do you provide frequent (monthly or quarterly) financial statements to your board or designated committee?	Compliant
11	Do you have a board-approved annual budget?	Compliant
12	Have you spent USOC funds as required by the funding agreements in the previous 12 months?	Compliant
<b>Due Process and Athlete Representation</b>		
13	Do you provide procedures for the prompt and equitable resolution of grievances of your members?	Compliant
14	Do your grievance procedures provide for fair notice and opportunity for a hearing to any athlete, coach, trainer, manager, administrator or official before declaring the individual ineligible to participate?	Compliant

15	Do you require at least 20% athlete representation on grievance panels?	Compliant
16	Do you have at least 20% athlete representation on your board of directors?	Compliant
17	Do you have at least 20% athlete representation on your budget committee?	Compliant
18	Do you have at least 20% athlete representation on your selection committee, which prepares, approves or implements selection of international, Olympic, Paralympic and Pan American Games team members, including athletes, coaches, administrators and sport staff?	Compliant
<b>SafeSport</b>		
19	Do you have USOC SafeSport language in your bylaws that provides jurisdictions to the U.S. Center for Safe Sport?	Compliant
20	Do you have a USOC-compliant Athlete Safety Policy?	Compliant
21	Do you have a grievance process that is materially free of bias and conflicts of interest for SafeSport allegations, and includes the opportunity for review by a disinterested individual or body?	Compliant
22	Does your policy require criminal background checks, at least every two years, for those individuals that are formally authorized, approved or appointed (a) to a position of authority over, or (b) to have frequent contact with athletes?	Compliant
23	Does your policy require education and training specific to SafeSport for those individuals that are formally authorized, approved or appointed (a) to a position of authority over, or (b) to have frequent contact with athletes?	Compliant
<b>Anti-Doping</b>		
24	Do you inform Athletes, Athlete Support Personnel and other Persons in your sport of the USOC National Anti-Doping Policy and of the USADA Protocol?	Compliant
25	Unless otherwise agreed by USADA, at least quarterly do you provide USADA with an updated list of athletes, proposed by your NGB, to be included in the USADA RTP? With respect to each athlete on such list and such additional athletes as may be designated by USADA for inclusion in the USADA RTP, do you provide USADA with initial contact information which shall, at a minimum, include accurate residential, mailing and email addresses (if available) and phone numbers for each athlete?	Compliant
26	At least six months prior to the commencement of the most recent applicable Olympic or Paralympic Games, did you provide USADA with a list of all athletes that may have reasonably been selected to represent the U.S. in such Games?	Compliant
27	Do you have an identified staff member to act as a liaison with USADA?	Compliant

## DEFICIENCIES

<p><b><i>Do you have a USOC-compliant Athlete Safety Policy?</i></b></p> <p>USAS was deemed deficient for the following:</p> <p>USAS' policy does not specifically state it applies to include athletes designated to the USADA registered testing pool and individuals formally authorized, approved, or appointed to a position of authority over or to have frequent contact with athletes.</p>
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USAS does not have a requirement that affiliated clubs require SafeSport training and background checks. At present, training is only mentioned as "available" in the section entitled "Training", page 7 of the SafeSport policy and background checks are not mentioned. This requirement needs to be explicitly stated as individuals at affiliated clubs are formally authorized, approved, or appointed to a position of authority over or to have frequent contact with athletes.

USAS needs to add language on page 38 of its SafeSport policy regarding 20% athlete representation on hearing panels. Additional information related to the 20% athlete representation can be found in the box below.

**USAS Action Plan:** *USAS will implement changes as mandated before 8/16/18.*

**USOC Status Update:** USOC Audit verified the updated USA Shooting SafeSport Policy, as presented on the USAS website, to ensure the following:

- Applicability of the policy to athletes designated to the USADA testing pool.
- Requirement of individuals at affiliated clubs who are formally authorized, approved, or appointed to a position of authority over or to have frequent contact with athletes, to complete background checks and training.
- Addition of 20% athlete representation on SafeSport hearing panels

USAS is compliant with this requirement as of the USOC follow up date of November 30, 2018.

***Do you require at least 20% athlete representation on grievance panels?***

USAS' grievance panels for SafeSport hearings and red light finding appeals do not require 20% athlete representation. USAS is compliant for all other grievances/appeals in requiring 20% athlete representation on hearing panels. In order for USAS to be compliant with this requirement, all grievance panels must meet the 20% athlete representation requirement.

**USAS Action Plan:** *USAS will implement changes as mandated before 8/16/18.*

**USOC Status Update:** USOC Audit verified the updated USA Shooting SafeSport Policy, as presented on the USAS website, included 20% athlete representation on USAS SafeSport Review Panels.

USAS is compliant with this requirement as of the USOC follow up date of November 30, 2018.

## **CONCLUSION**

With USAS' remedies to the initial deficiencies identified during the USOC Compliance Review, it is now fully compliant with the USOC's 2018 Compliance Checklist.