



USOPC NGB AUDIT

USA ARCHERY

ADDENDUM REPORT

March 8, 2022

EXECUTIVE SUMMARY

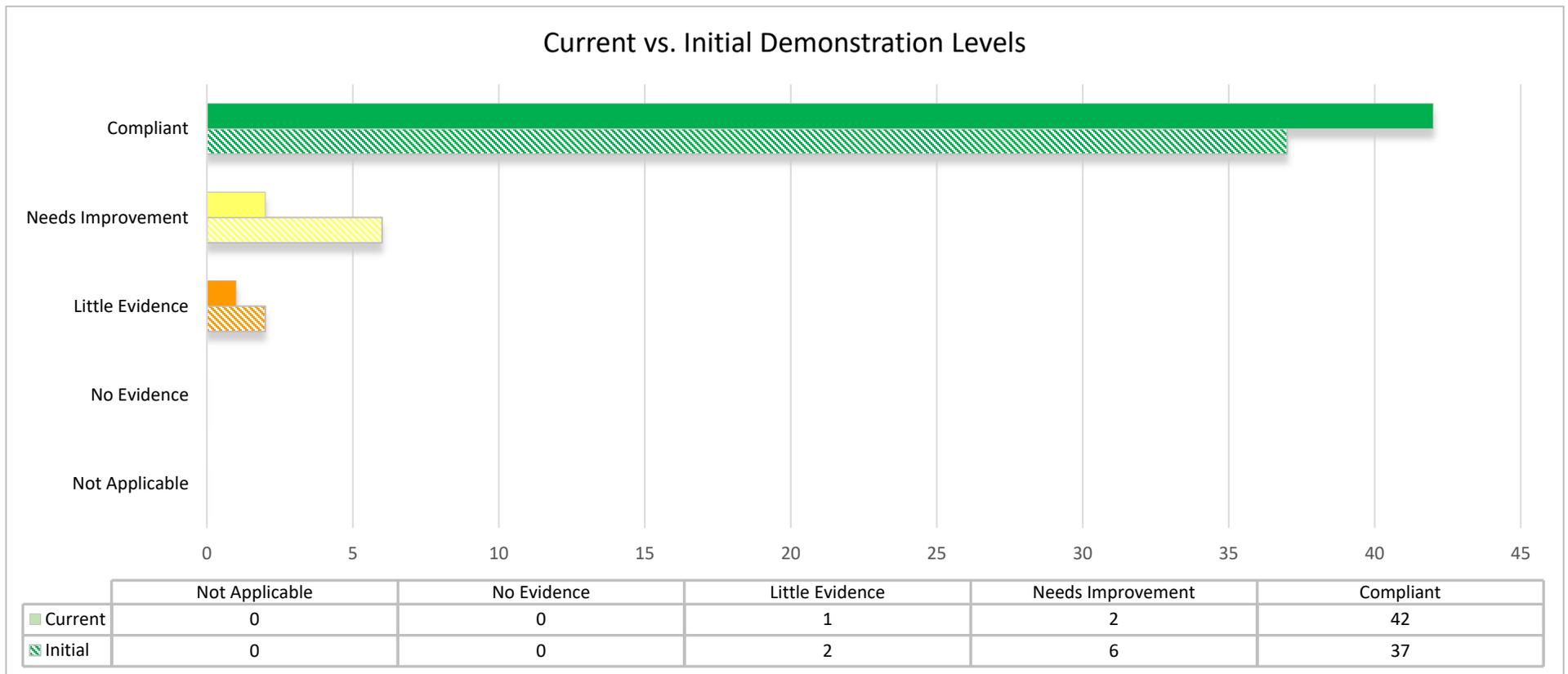
Background, Scope, and Objectives

The United States Olympic & Paralympic Committee’s (USOPC) NGB Audit department (Audit) completed an audit of USA Archery on May 26, 2021. The purpose of the audit was to determine if USA Archery 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 USA Archery. The audit focused on the policies and procedures in the areas of Governance and Compliance, Financial Standards and Reporting Practices, Athlete Protections and Rights, Sport Performance, and Operational Performance.

Following the audit, NGBs have 120 days, unless otherwise specified, to provide evidence of remediation to Audit. Based on the evidence provided, Audit has assigned a Follow-up Demonstration Level¹ of Compliant, Needs Improvement, Little Evidence of Compliance, or No Evidence of Compliance. Details are provided in the findings below.

DEMONSTRATION LEVEL COMPARISON

The below charts present the updated distribution of compliance demonstration levels. For further detail not provided in this addendum report, please refer to the Audit report posted on TeamUSA.org.



¹See Appendix A

Follow-up Summary

Based on the evidence of remediation provided, USA Archery has remediated five findings. As of February 16, 2022, USA Archery is 93% compliant. Additional details are outlined below.

NGB AUDIT FINDINGS - FOLLOW-UP STATUS

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

| Needs Improvement | | |
|---|---|--|
| 1 | Athlete Representation – A.1 a & b | Management Action Plan |
| | <p>FINDING: USA Archery's Bylaws state that athlete representatives on all committees can be selected by the board of directors not the elite athlete members as stated by the USOPC Bylaws. While USA Archery does have athlete representatives on the board and committees, USA Archery must ensure athletes are selected in accordance with USOPC Bylaws.</p> | <p>The USA Archery Bylaws will be updated to state that all athlete representatives on all committees will be selected by eligible athletes (i.e., AAC and Para AAC) as stated by the USOPC Bylaws. By the end of 2021, USA Archery will select athlete representatives to be seated on all applicable committees consistent with section 8.5.4 of USOPC Bylaws.</p> <p>Due Date: December 31, 2021</p> |
| <p>Follow-up Level: Compliant</p> | | |
| <p>USA Archery updated the bylaws to include the required elements and is now compliant.</p> | | |
| Little Evidence of Compliance | | |
| 2 | Code of Conduct – A.5 a | Management Action Plan |
| | <p>FINDING: There are elements missing from USA Archery's Code of Conduct in the following areas: organizational expectations, resolution, and resources.</p> <p>The code of conduct included references to USA Archery's grievance procedures for resolution, but more detail should be added to ensure that the process for reporting code of conduct violations is easily understood.</p> | <p>USA Archery will update the Code of Conduct to comply with the USOPC Code of Conduct checklist to state specifically: a. who investigates potential violations; b. who makes the determination on potential violations, including athlete involvement, if required; c. provides an opportunity for a hearing if the determination limits the individual's right to participate; and d. investigations and decisions will be conducted by parties free from conflicts of interest.</p> <p>Due Date: September 1, 2021</p> |
| <p>Follow-up Level: Compliant</p> | | |
| <p>USA Archery updated the code of conduct to include the required elements and is now compliant.</p> | | |

| 3 | Conflicts of Interest Policy – A.6 b | Management Action Plan |
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| | <p>FINDING: During the testing of USA Archery’s conflict of interest disclosure forms, two out of the ten individuals selected did not disclose potential conflicts. In addition, there is an unsuitably high-risk level for conflicts of interest with minimal management over the conflicts disclosure process.</p> <p>USA Archery must execute its existing Conflict of Interest Policy and procedure for managing and resolving actual, potential, and perceived conflicts of interest. The policy and procedure must also be updated to include penalties for non-compliance with the policy, e.g., removal from Board or committee, a process by which the Ethics Committee provides directives to address conflicts of interest, and that the Ethics Committee’s directives must be followed as a condition of membership.</p> <p>There was a similar finding noted in the previous USOPC audit. The previous finding noted issues with the Ethics Committee’s review process of the disclosure forms and the review process of the CEO’s disclosure form. These issues were remediated during our 2021 Audit. The 2019 audit also identified that some individuals tested did not disclose potential conflicts and that there is a high-risk level regarding conflicts among members of USA Archery. These issues remain outstanding. As such, this 2019 audit finding was partially remediated.</p> | <p>USA Archery will review the Ethics Committee Conflict of Interest review guidelines, the Code of Ethics and the Board Member Policy within the USA Archery bylaws to align processes for how board members may be disciplined and/or removed from the board should they fail to disclose conflicts and/or if their level of conflicts change post-election as permitted by the Colorado Revised Nonprofit Corporation Act.</p> <p>USA Archery’s Ethics Committee will also review all conflict of interest disclosures, provide direction for managing any actual, potential, or perceived conflicts, and document the Ethics Committee’s directives and individuals’ acknowledgment of those directives.</p> <p>Due Date: September 1, 2021</p> |
| <p>Follow-Up Level: Little Evidence of Compliance</p> | | |
| | <p>USA Archery made the required updates to the conflict of interest policy. However, the 2022 conflict disclosure forms are not due until March. Until the forms are submitted and reviewed, Audit is unable to determine whether the unsuitably high level of conflicts continue to exist or are being properly managed and whether other aspects of this finding have been remediated. This finding remains open pending the result of the disclosure and review process.</p> | |

FINANCIAL STANDARDS AND REPORTING PRACTICES

USA Archery had no findings in the May 26, 2021 audit in the area of Financial Standards and Reporting Practices.

ATHLETE PROTECTION AND RIGHTS

| Needs Improvement | | |
|-------------------|-------------------------------------|------------------------|
| 4 | Anti-Doping Policy Language – C.4 b | Management Action Plan |
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| <p>FINDING: USA Archery has the required anti-doping language for NGBs with organization members but does not have the required anti-doping language for NGBs with individual members.</p> | <p>USA Archery will update anti-doping language to include the required anti-doping language for NGBs with individual members.</p> <p>Due Date: September 1, 2021</p> |
| <p>Follow-up Level: Compliant</p> | |
| <p>USA Archery updated the bylaws to include the required anti-doping language and is now compliant.</p> | |

SPORT PERFORMANCE

| Needs Improvement | | |
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| 5 | Event Sanctioning – D.4 b | Management Action Plan |
| | <p>FINDING: USA Archery’s event sanctioning document does not have the proper anti-doping protocol as required by the IF.</p> | <p>USA Archery’s event sanctioning agreement has been updated to include the proper anti-doping protocol as required by the IF.</p> <p>Due Date: September 1, 2021</p> |
| <p>Follow-up Level: Compliant</p> | | |
| <p>USA Archery updated the event sanctioning documents to include the required elements and is now compliant.</p> | | |

OPERATIONAL PERFORMANCE

| Needs Improvement | | |
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| 6 | Managerial Capability – E.1 a | Management Action Plan |
| | <p>FINDING: Through discussions with various USOPC departments, Audit learned of athlete concerns that due to a perceived fear of retaliation they were hesitant to file complaints about USA Archery through the organization. According to the Implementation Guide, a factor in considering managerial capability is a reasonable volume of grievances or whistleblowing reports. Given the concerns reported to the USOPC and the low volume of complaints it is reasonable to conclude that the volume of grievances is low given the concerns reported to the USOPC.</p> | <p>USA Archery has invested in and conducted several athlete educational trainings over the course of the past 3 years related to high-performance culture development, including the development of a High-Performance Ethos, with athlete, coach, and staff participation. However, given this finding USA Archery will develop and document a communication and training plan to remind the AAC, Para AAC, and athlete members of the High-Performance Ethos, grievance procedures, and anti-retaliation policies in place. USA Archery will maintain these efforts on an ongoing basis and will provide its communication and training plan by September 1, 2021.</p> |

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| | | Due Date: September 1, 2021 |
| Follow-up Level: Needs Improvement | | |
| USA Archery implemented its management action plan and conducted athlete educational trainings. However, after discussion with concerned parties, it was determined additional action is needed. Specifically, USA Archery needs to complete an assessment to identify the cause of the concerns and develop an action plan to address the issue. The assessment and action plan need to be reviewed and approved by the board. Audit will monitor progress on an ongoing basis until the issue has been adequately resolved. | | |
| 7 | Whistleblower and Anti-Retaliation Policy – E.5 a | Management Action Plan |
| | FINDING: There are elements missing from USA Archery's Whistleblower and Anti-Retaliation Policy in the following areas: applicability, compliance with the Act, USOPC Bylaws, and definition of retaliation. | USA Archery will update the Whistleblower Policy to comply with the Act and USOPC bylaws. More specifically, USA Archery will denote the policy also applies to athletes and will define retaliation. Due Date: September 1, 2021 |
| Follow-up Level: Compliant | | |
| USA Archery updated their whistleblower and anti-retaliation policy to include the required elements and is now compliant. | | |
| 8 | Grievance Procedures – E.4 a & b | Management Action Plan |
| | FINDING: In one complaint tested, USA Archery provided for a fair process, however, an Administrative Grievance was filed when it should have been filed as a SafeSport Violation per USA Archery's Bylaws. USA Archery's Bylaws do not specify that only complaints which fall under the U.S. Center for SafeSport's (the Center) exclusive jurisdiction will be sent to the Center when filed through USA Archery. There is an outstanding finding related to expediated grievances noted in the previous USOPC audit. The USOPC was unable to test USA Archery's handling of expediated complaints because an expediated complaint has not been filed since the 2019 audit. | USA Archery will update the USA Archery bylaws to clarify that SafeSport complaints that do not fall under the USCSS's exclusive jurisdiction will be filed with the USA Archery Board of Justice, and that each type of grievance will be categorized appropriately by the Board of Justice. Due Date: September 1, 2021 |
| Follow-up Level: Needs Improvement | | |
| USA Archery updated their bylaws to include the required element. However, as no new grievances have been filed, USA Archery has not had the opportunity to demonstrate compliance with other aspects of this finding. | | |

Updates on findings which have not been remediated will be provided in the NGB Certification Report.

We would like to thank the USA Archery staff for their cooperation throughout the audit process.

APPENDIX A — FOLLOW-UP DEMONSTRATION LEVEL DEFINITIONS

| Follow-up Demonstration Level Definitions | |
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| Level | Definition |
| Compliant | NGB has implemented the action plan and now meets the requirements. |
| Needs Improvement | NGB has implemented part of the action plan but still needs to make minor improvements to meet all the requirements. |
| Little Evidence of Compliance | NGB has implemented part of the action plan but still has significant progress to make to meet all the requirements. |
| No Evidence of Compliance | NGB has not implemented the action plan and does not meet the requirements. |