



# USOPC NGB AUDIT

## USA CLIMBING

### ADDENDUM REPORT

May 16, 2022

## EXECUTIVE SUMMARY

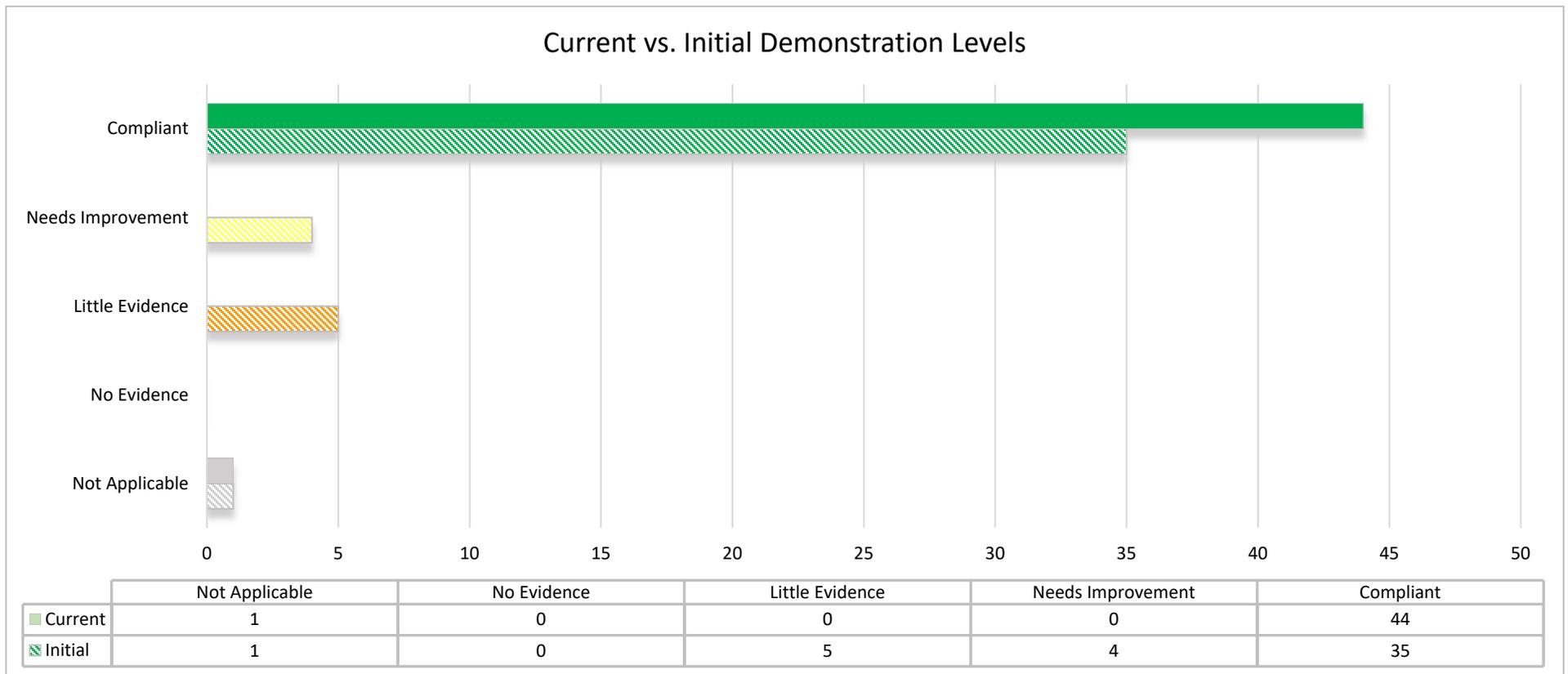
### Background, Scope, and Objectives

The United States Olympic & Paralympic Committee’s (USOPC) NGB Audit department (Audit) completed an audit of USA Climbing on September 15, 2021. The purpose of the audit was to determine if USA Climbing 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 Climbing. 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 Level<sup>1</sup> 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.



<sup>1</sup>See Appendix A

## Follow-up Summary

Based on the evidence of remediation provided, USA Climbing has remediated nine findings. As of April 27, 2022, USA Climbing is compliant with all applicable Standards. Additional details are outlined below.

## Subsequent Corrections

After the publication of the final report on September 15, 2021, it was brought to the attention of Audit that further clarification is required on the Conflicts of Interest Policy (A.6 b) finding. To note, USA Climbing's Conflict of Interest Policy does not list the requirement that the Chair of the Ethics Committee review conflict disclosures; it is, however, their current process. In addition, USA Climbing was able to provide evidence that the Ethics Committee reviewed 4 of 10 disclosure forms tested. In light of the other aspects of the finding, the corrections did not affect the determination level of Little Evidence of Compliance.

## 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

Little Evidence of Compliance		
1	Conflicts of Interest Policy – A.6 b	Management Action Plan
	<p><b>FINDING:</b> There are elements missing from USA Climbing's Conflict of Interest Policy in the following areas: disclosures, reporting, and resolution. Additionally, the current version of the Policy is not posted on the website.</p> <p>During testing of annual disclosures, there were three instances where a disclosure form was not completed, one instance where a copy of the completed form was lost, and one instance where the completion date could not be verified.</p> <p>Although USA Climbing's Conflict of Interest Policy requires the Chair of the Ethics Committee to review disclosures, there is no documentation confirming the review took place*.</p> <p>*See Subsequent Correction section above</p>	<p>USA Climbing has posted the conflicts of interest (COI) policy on its website.</p> <p>Since the time of the audit, USA Climbing has implemented an online COI submission process that requires the completed COI form to be uploaded upon obtaining or renewing a membership which is subject to review and approval by USA Climbing's Membership Coordinator. Individuals with incomplete COI forms will not be allowed to participate in any capacity.</p> <p>USA Climbing will update the COI policy to add more specificity reflecting the current process for reviewing disclosures, who receives reports of potential COI violations, who makes the determination on potential violations, and that a complaint of a COI violation will be investigated by disinterested parties.</p> <p>USA Climbing will work with the Chair of the Ethics Committee to design a standardized practice for documenting the results of the review of</p>

	<p>each form and returning the documentation to USA Climbing's Membership Coordinator for storage.</p> <p><b>Due Date:</b> December 31, 2021</p>
<p><b>Follow-up Level: Compliant</b></p>	
<p>USA Climbing updated the conflicts of interest policy to include required elements and posted the policy on the website. Audit conducted follow-up testing and noted that required conflict disclosure forms are complete and properly reviewed. USA Climbing is now compliant.</p>	

## FINANCIAL STANDARDS AND REPORTING PRACTICES

Little Evidence of Compliance		
2	USOPC Funding – B.1 c	Management Action Plan
	<p><b>FINDING:</b> USA Climbing completed and submitted the final grant report within the established deadlines. However, the High-Performance General Ledger did not match the expenses reported on the 2020 final grant report. As a result, USA Climbing spent less than they reported.</p> <p>Of the expenses tested, original receipts were not provided for two expenses, one expense was missing documented approval, and six of the credit card reconciliations were not submitted according to USA Climbing's Financial Policies and Procedures.</p> <p>In addition, two expenses reviewed were Value-In-Kind (VIK) funding received from outside sources, however, USA Climbing did not report any additional sponsorship or value-in-kind funding from outside sources on the final grant report submitted to the USOPC.</p>	<p>USA Climbing has implemented an invoice review process, which includes invoice payments on autopay.</p> <p>USA Climbing is in the process of implementing a credit card expense management tool (Divvy) which streamlines receipt collection for credit card expenses and approvals, ensuring accurate and complete record-keeping that is aligned with USA Climbing's Fiscal Policies and Procedures. Likewise, USA Climbing's Fiscal Policies and Procedures will be updated to reflect any changes in required financial approvals.</p> <p>For the 2021 funding report submission, USA Climbing will perform a reconciliation check to the General Ledger and ensure that value-in-kind expenses are reported separately.</p> <p><b>Due Date:</b> March 31, 2022</p>
<p><b>Follow-up Level: Compliant</b></p>		
<p>USA Climbing implemented the invoice review process and credit card expense management tool to ensure accurate and complete record-keeping. In addition, Audit verified that the general ledger reconciled to the final funding report and completed expense testing, which did not identify any concerns. USA Climbing is now compliant.</p>		

## ATHLETE PROTECTION AND RIGHTS

Needs Improvement		
3	Anti-Doping Policy Language – C.4 b	Management Action Plan
	<p><b>FINDING:</b> USA Climbing's Bylaws contain the required language for NGBs with individual members. However, USA Climbing's Anti-Doping Policy does not reference policies and rules adopted by the USOPC, as required.</p>	<p>USA Climbing will update its anti-doping policy to include the USOPC-approved anti-doping language that references the policies and rules adopted by the USOPC.</p> <p><b>Due Date:</b> September 30, 2021</p>
<p><b>Follow-up Level: Compliant</b></p>		
<p>USA Climbing updated the anti-doping policy to include references to policies and rules adopted by the USOPC and is now compliant.</p>		
Little Evidence of Compliance		
4	USOPC Athlete Safety Requirements – C.3 a	Management Action Plan
	<p><b>FINDING:</b> USA Climbing has a policy that requires notification to the Office of Athlete Safety for all required elements, except for any temporary measure(s) (imposed or removed) affecting participants who receive a benefit or service from the USOPC.</p> <p>Additionally, USA Climbing's Background Check Policy does not contain all the required elements in the following areas: applicability and types of offenses.</p>	<p>USA Climbing will update its SafeSport policy to include notification to the Office of Athlete Safety for any temporary measure(s) (imposed or removed) affecting participants who receive a benefit and/or service from the USOPC. Additionally, USA Climbing will update its background check policy to include all required elements surrounding applicability and types of offenses.</p> <p><b>Due Date:</b> September 30, 2021</p>
<p><b>Follow-up Level: Compliant</b></p>		
<p>USA Climbing updated its SafeSport and background check policies to include the required elements and is now compliant.</p>		

## SPORT PERFORMANCE

Little Evidence of Compliance		
5	Event Sanctioning – D.4 b	Management Action Plan
	<p><b>FINDING:</b> USA Climbing's sanctioning documents do not have all the minimum required elements.</p>	<p>Since the time of the audit, USA Climbing has updated its requirements in all types of host agreements to reflect that host facilities, at a minimum, must have personnel with current First Aid and CPR certifications to provide medical supervision. Host agreements for championship events now require that one or more licensed EMT's be on-site when there are competitors on site.</p>

<b>Follow-up Level: Compliant</b>	
USA Climbing updated the Local Host Facility Agreement to include the missing requirement and is now compliant.	

## OPERATIONAL PERFORMANCE

<b>Needs Improvement</b>		
6	Grievance Procedures – E.4 a & b	Management Action Plan
	<p><b>FINDING:</b> There are elements missing from USA Climbing's grievance procedures, including the types of grievances, hearing panel composition, and conduct of proceedings.</p> <p>Additionally, in one of the grievances tested, USA Climbing did not send the notice of the charges and documented remedy requested to the respondent within 14 business days, as required by USA Climbing's Grievance Procedures.</p>	<p>USA Climbing will update its grievance policy to address alleged non-compliance with USOPC Bylaws and to reflect examples of what might be considered grounds for dismissal of a grievance.</p> <p>USA Climbing will update its code of ethics and conflicts of interest Policy to include hearing panel members.</p> <p>USA Climbing will provide communication to the Judicial Committee on the grievance policy and specifically highlight the need to send the notice of the charges and documented requested remedy to the respondent within 14 business days.</p> <p><b>Due Date:</b> September 30, 2021</p>
<b>Follow-up Level: Compliant</b>		
USA Climbing updated the grievance procedures to include the required elements. In addition, Audit conducted testing on grievances filed and noted that notice of charges was properly provided and documented. USA Climbing is now compliant.		
7	Whistleblower and Anti-Retaliation Policy – E.5 a	Management Action Plan
	<p><b>FINDING:</b> There are elements missing from USA Climbing's Whistleblower and Anti-Retaliation Policy including enforcement and types of alleged violations.</p>	<p>USA Climbing will update its whistleblower policy to include more information about enforcement procedures, as well as examples of alleged violations.</p> <p><b>Due Date:</b> October 31, 2021</p>
<b>Follow-up Level: Compliant</b>		
USA Climbing updated the whistleblower and anti-retaliation policy and grievance policy to include the required elements and is now compliant.		
8	Equal Opportunity – E.7 c	Management Action Plan

	<p><b>FINDING:</b> While USA Climbing provides an equal opportunity to participate as required, they do not provide anti-discrimination training.</p>	<p>USA Climbing has added an attestation to the USA Climbing Anti-Discrimination Policy to its membership application.</p> <p>Annual Diversity, Equity, and Inclusion training for board members took place at the July 2021 Board meeting.</p> <p>USA Climbing is developing an Anti-Discrimination annual training for its staff.</p> <p><b>Due Date:</b> December 31, 2021</p>
<p><b>Follow-up Level: Compliant</b></p>		
<p>USA Climbing conducted anti-discrimination training and included their anti-discrimination policy in their membership agreement. USA Climbing is now compliant.</p>		
<p><b>Little Evidence of Compliance</b></p>		
9	Gender Equity – E.7 b	Management Action Plan
	<p><b>FINDING:</b> USA Climbing has established performance criteria that are the same for all national or event team athletes who are on the Delegation Event program. However, the criteria to qualify for Elite Athlete Health Insurance are not published online or in an athlete handbook.</p>	<p>USA Climbing will update the athlete agreement to outline the criteria for qualifying for Elite Athlete Health Insurance.</p> <p><b>Due Date:</b> October 31, 2021</p>
<p><b>Follow-up Level: Compliant</b></p>		
<p>USA Climbing updated the athlete agreement published on the website to include criteria to qualify for Elite Athlete Health Insurance and is now compliant.</p>		

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

## APPENDIX A — FOLLOW-UP DEMONSTRATION LEVEL DEFINITIONS

Follow-up Demonstration Level Definitions	
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.