



USOPC NGB AUDIT

USA VOLLEYBALL

July 15, 2022



EXECUTIVE SUMMARY

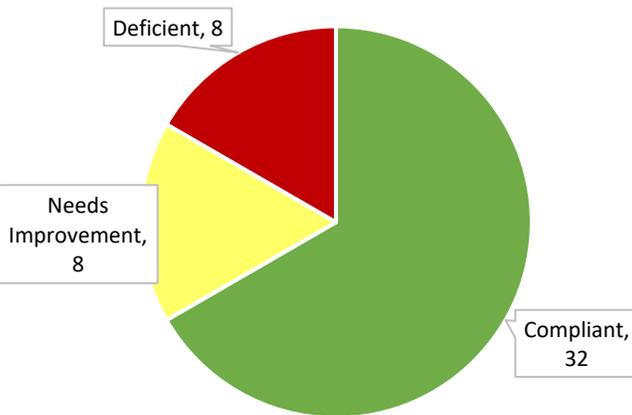
Background, Scope, and Objectives

The United States Olympic & Paralympic Committee’s (USOPC) NGB Audit department (Audit) completed an audit of USA Volleyball. The purpose of the audit was to determine if USA Volleyball 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 Volleyball. 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. It should be noted that this is the first time the USOPC has performed an audit against all standards found in the NGB Compliance Standards which were effective January 1, 2022.

Audit Summary

Based on the audit procedures performed, select policies and procedures were reviewed to determine compliance with the Standards. The conclusion within each standard was based on the criteria met for each standard, as well as the results of any testing conducted. Definitions of demonstration levels are below, with additional guidance for each standard detailed in the Implementation Guide for NGB Compliance Standards (Implementation Guide). Findings and demonstration levels are detailed on the subsequent pages.

Compliance Demonstration Levels



Demonstration Totals by Section



Compliance Demonstration Level Definitions

Compliant	The NGB, through its written policies and procedures, as well as 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, as well as 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.

We would like to thank all USA Volleyball staff who assisted us throughout this review.

EXECUTIVE SUMMARY (CONT.)

Audit conducted a review of USA Volleyball’s policies and procedures in relation to the USOPC Bylaws and Ted Stevens Amateur Sports Act (the Act) as outlined in the Implementation Guide for NGB Compliance Standards. Audit evaluated 48 Standards in the areas of Governance and Compliance, Financial Standards and Reporting Practices, Athlete Protections and Rights, Sport Performance, and Operational Performance.

Overall, Audit concluded that USA Volleyball has met 32 of 48 Standards. However, there are two areas of increased concern. Specifically, USA Volleyball’s Conflicts of Interest Policy is not comprehensive given it only requires the board of directors to submit a disclosure form annually. Further, the policy is not consistently followed. Additionally, USA Volleyball does not have appropriate athlete representation on three designated committees. Additional details are in the findings below.

PRIOR AUDIT FOLLOW-UP

A prior audit was conducted by the USPOC Audit team dated December 9, 2013. There were no open findings

NGB AUDIT FINDINGS

All Standards are evaluated against the 2022 Implementation Guide for NGB Compliance Standards. Bylaws references are based on the USOPC Bylaws approved in March 2021.

GOVERNANCE AND COMPLIANCE

NGB Audit 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.1 d	X		
Membership Requirements	A.1 e	X		
Athlete Advisory Council	A.2 a		X	
Bylaws	A.3 a		X	
Board Development	A.3 b	X		
Board Meeting Minutes	A.3 c	X		
Board Roster	A.3 d	X		

IRS Status	A.4 a	X		
Code of Conduct	A.5 a			X
Statement of Ethics	A.6 a		X	
Conflicts of Interest Policy	A.6 b			X
Gifts and Entertainment Policy	A.6 c	X		
NGB Annual Reports	A.7 a - c	X		
Ombuds' Policy	A.8 a		X	
Total		8	4	4

Needs Improvement		
1	Athlete Advisory Council	Management Action Plan
	<p>A.2 a: NGB must have an Athletes Advisory Council (AAC) that meets the minimum standards set forth by the USOPC.</p> <p>FINDING: USA Volleyball does not require all AAC representatives to complete a conflict of interest form or to submit any other disclosures prior to their election.</p> <p>In addition, USA Volleyball's USOPC AAC alternate representative is not automatically a member of the NGB's AAC.</p>	<p>USA Volleyball will work with the AAC to ensure that all AAC candidates complete required disclosures prior to election. Additionally, all AAC members will be required to annually complete a conflict of interest form.</p> <p>USA Volleyball will add the USOPC AAC alternate representative to the internal AAC and will update the AAC Manual to reflect this change.</p> <p>Due Date: November 1, 2022</p>
2	Bylaws	Management Action Plan
	<p>A.3 a: NGB must have Bylaws or board-approved policies and procedures that at least meet the minimum standards for governance practices and comply with the Act §220522 (9-12).</p> <p>FINDING: There are elements missing from USA Volleyball's Bylaws in the following areas: general bylaw requirements, board responsibilities, board member requirements, and designated committee requirements.</p>	<p>USA Volleyball will work with its Board Governance Committee to add the missing elements to the bylaws.</p> <p>Due Date: November 1, 2022</p>
3	Statement of Ethics	USOPC Response
	<p>A.6 a: NGB must have a comprehensive written statement or policy of ethics that meets the minimum standards set forth by the USOPC. The standards can be found in the implementation guide.</p> <p>FINDING: USA Volleyball's Code of Ethics is specific to coaches and there is no statement of ethics applicable to all employees and members.</p>	<p>For the audit period of 2022, USA Volleyball's Code of Ethics does not meet the standard. However, as of January 1, 2023, this will no longer be a requirement; thus no remediation action is required.</p>

4	Ombud's Policy	Management Action Plan
	<p>A.8 a: NGB must publish the Ombuds' Policy on its website and communicate the availability of the policy to its athletes as set forth in the Act§220509(b).</p> <p>FINDING: USA Volleyball did not include an anti-retaliation statement with the Ombuds' policy posted on their website.</p>	<p>USA Volleyball will include a specific anti-retaliation statement on its website with the Ombud's policy as required.</p> <p>Due Date: September 1, 2022</p>
Deficient		
5	Athlete Representation	Management Action Plan
	<p>A.1 a & b:</p> <p>a. NGBs must have at least 33.3% athlete representation on its board of directors as required by the Act §220522(13) and further defined by the USOPC Bylaws, Section 8.5.3.</p> <p>b. NGBs must have at least 33.3% athlete representation on all committees as required and defined by the USOPC Bylaws, Section 8.5.</p> <p>FINDING: USA Volleyball 's Bylaws are not compliant with the USOPC's requirements in the following areas:</p> <p>First, there is no requirement that 20% of board members be composed of 10-year athletes.</p> <p>Second, it is not stated that at least 50% of board athlete representatives must have obtained eligibility through competing at an event that is on the Delegation Event program.</p> <p>Third, the bylaws do not require that athletes serving on designated committees be selected by the NGB AAC.</p> <p>Fourth, there are no athlete representation requirements outlined for other committees.</p> <p>USA Volleyball does not have the required athlete representation on the following committees:</p> <ul style="list-style-type: none"> Audit, Finance, and Budget Committee Ethics and Eligibility Committee Governance Committee 	<p>USA Volleyball will work with its Board Governance Committee and Board to add following to the bylaws:</p> <p>Add a statement that 20% of Board members must be composed of 10-year athletes.</p> <p>Add a statement that 50% of Board athlete representatives must have attained eligibility through competing at an event that is on the Delegation Event program.</p> <p>Add a statement that the athletes serving on designated committees be selected by the NGB AAC.</p> <p>Ensure that athlete representation requirements are outlined for all committees.</p> <p>USA Volleyball will continue its efforts to solicit athlete participation and will fill committee positions to meet the athlete representation requirements.</p> <p>Due Date: November 1, 2022</p>
6	Independent and Affiliate Representation	Management Action Plan

	<p>A.1 c: NGB must have a board structure that includes:</p> <ul style="list-style-type: none"> i. A board position(s) as defined by the USOPC to provide an independent perspective, and ii. A board position for an affiliate member as required by the Act §220522 (12). <p>FINDING: USA Volleyball's Bylaws definition of independent perspective for board members does not meet the requirements. In addition, the bylaws do not provide for at least one available board position for affiliated member(s).</p>	<p>USA Volleyball will work with its Board Governance Committee to reword the language of the independent director position in the bylaws to meet the requirements.</p> <p>In addition, USA Volleyball will create a board seat or the option for a seat to be immediately available for any affiliated members should an affiliate organization be identified.</p> <p>Due Date: November 1, 2022</p>
7	Code of Conduct	Management Action Plan
	<p>A.5 a: NGB must have a comprehensive code of conduct that meets the minimum code standards set forth by the USOPC. The code of conduct must be made available on the NGB's website.</p> <p>FINDING: There are elements missing from USA Volleyball's Code of Conduct in the following areas: applicability, organizational expectations, reporting, resolution, policy owner, and resources.</p>	<p>USA Volleyball will update the Code of Conduct to include the missing requirements.</p> <p>Due Date: October 1, 2022</p>
8	Conflict of Interest	Management Action Plan
	<p>A.6 b: NGB must enforce a conflicts of interest policy that meets the minimum policy standards set forth by the USOPC. The conflict of interest policy must be made available on the NGB's website.</p> <p>FINDING: There are elements missing from USA Volleyball's Conflict of Interest Policy in the following areas: applicability, organizational expectations, disclosures, reporting, resolution, and policy owner.</p> <p>USA Volleyball's conflict of interest forms were not completed annually, did not include the option to disclose conflict(s) and were not reviewed. Additionally, only board members are required to complete the form.</p>	<p>USA Volleyball will add the missing items to its conflicts of interest policy and implement conflict of interest forms that include disclosures.</p> <p>USA Volleyball will ensure conflicts of interest forms are completed for all required members and will automate annual completion as part of the USA Volleyball membership process. In addition, USA Volleyball will ensure all forms are properly reviewed.</p> <p>Due Date: November 1, 2022</p>

FINANCIAL STANDARDS AND REPORTING PRACTICES

NGB Audit Standards Section B				
Title	Standard	Compliant	Needs Improvement	Deficient

Financial Stability	B.1 a	X		
Financial Policies & Procedures	B.1 b	X		
USOPC Funding	B.1 c		X	
Financial Reporting to Board	B.1 d	X		
Board-Approved Budget	B.2 a	X		
Accounting Practices	B.2 b	X		
NGB Provided Documents	B.3 a	X		
NGB Website Information	B.4 a, b & c	X		
Total		7	1	0

Needs Improvement		
9	USOPC Funding	Management Action Plan
	<p>B.1 c: NGB must comply with all USOPC funding agreements, including but not limited to, ensuring adequate controls are in place to ensure USOPC funds are spent appropriately, USOPC funds are not spent on excessive or unnecessary expenses, and amounts that are reported on the final grant reports are accurate.</p> <p>FINDING: Two expenses were not approved consistent with the financial policies and procedures.</p> <p>USA Volleyball slightly overstated high performance payroll expenses on the final grant report. Further, management identified one expense that was inappropriately reported against two projects causing an additional overstatement.</p>	<p>USA Volleyball has modified the systematic controls to ensure all CEO expense reports are routed to the CFO for approval.</p> <p>In addition, funding reports will be completed by the finance department representative to the national teams. Prior to the final submission of the funding reports, the financial information will be reviewed by either the controller or CFO. These specific controls will also be added to the Internal Control document.</p> <p>Lastly, the final funding reports for 2021 will be corrected and re-submitted to the USOPC.</p> <p>Due Date: October 1, 2022</p>

ATHLETE PROTECTION AND RIGHTS

NGB Audit Standards Section C				
Title	Standard	Compliant	Needs Improvement	Deficient
Child Protection and US Center for SafeSport	C.1 a and C.2	X		
USOPC Athlete Safety Requirements	C.3 a		X	
Anti-Doping Policies	C.4 a	X		
Anti-Doping Policy Language	C.4 b			X
Athlete Agreements	C.5 a	X		

Total	3	1	1
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Needs Improvement		
10	USOPC Athlete Safety Requirements	Management Action Plan
	<p>C.3 a: NGB must ensure compliance with policies and standards including but not limited to:</p> <ul style="list-style-type: none"> i. USOPC’s NGB and HPMO Athlete Safety Policy ii. Responsible Sport Organization Background Check Policy <p>FINDING: USA Volleyball does not have a written process to report potential allegations or temporary measures to the USOPC Office of Athlete Safety when required.</p>	<p>USA Volleyball will modify its background check review policy to add a written process for reporting to the USOPC Office of Athlete Safety when required.</p> <p>Due Date: October 1, 2022</p>
Deficient		
11	Anti-Doping Policy Language	Management Action Plan
	<p>C.4 b: NGB must have USOPC approved anti-doping language in its Bylaws, membership agreements (if applicable), and license agreements (if applicable).</p> <p>FINDING: USA Volleyball's Bylaws do not contain the required anti-doping language for NGBs with organizational members.</p> <p>Additionally, the Code of Conduct does not contain all the required anti-doping language.</p>	<p>USA Volleyball will work with its Board Governance Committee to add the required anti-doping language to its Bylaws.</p> <p>In addition, USA Volleyball will add the required anti-doping language to its Code of Conduct.</p> <p>Due Date: October 1, 2022</p>

SPORT PERFORMANCE

NGB Audit Standards Section D				
Title	Standard	Compliant	Needs Improvement	Deficient
Selection Procedures and Process	D.1 a - c	X		
Delegation List Submission	D.2 a	X		
High-Performance Plan Submission	D.3 a	X		
Event Sanctioning	D.3 b			X
Paralympic Classification	D.3 c			X
International Federation Standing	D.4 a	X		

Total	4	0	2
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Deficient		
12	Event Sanctioning	Management Action Plan
	<p>D.3 b: If an NGB or its affiliate(s) sanctions events, it must require specific sanctioning standards set forth by the USOPC of the organization or person requesting a sanction.</p> <p>FINDING: USA Volleyball's sanctioning document(s) do not have any of the required elements.</p>	<p>USA Volleyball will work with its Board and its Regions to add the required elements to relevant policies.</p> <p>Due Date: November 1, 2022</p>
13	Paralympic Classification	Management Action Plan
	<p>D.3 c: PSO, or if the NGB has a Paralympic program, must adopt the U.S. Paralympics National Classification Policies & Procedures or establish national classification policies and procedures that comply with the U.S. Paralympics National Classification Policies & Procedures and the IPC Athlete Classification Code and International Standards.</p> <p>FINDING: USA Volleyball does not have national classification policies and procedures that comply with the U.S. Paralympics National Classification Policies & Procedures and the IPC Athlete Classification Code and International Standards.</p>	<p>USA Volleyball will work with its Paralympic team, coaches, and athletes to adopt the required national classification policies and procedures.</p> <p>Due Date: November 1, 2022</p>

OPERATIONAL PERFORMANCE

NGB Audit Standards Section E				
Title	Standard	Compliant	Needs Improvement	Deficient
Managerial and Board Capability	E.1 a	X		
Insurance Coverage	E.2 a	X		
Revenue Diversification	E.3 a	X		
Grievance Procedure	E.4 a & b			X
Whistleblower and Anti-Retaliation Policy	E.5 a		X	
USOPC Trademark Protection	E.6 a – d	X		
Diversity and Inclusion Reporting	E.7 a	X		
Gender Equity	E.7 b	X		

Equal Opportunity	E.7 c	X		
Para Inclusive Sport Programs	E.7 d	X		
Diversity – Public Disclosure	E.7 e	X		
Strategic Planning	E.8 a		X	
USOPC Policy Compliance	E.9 a	X		
Total		10	2	1

Needs Improvement		
14	Whistleblower and Anti-Retaliation Policy	Management Action Plan
	<p>E.5 a: NGB must adopt and maintain an organizational whistleblower policy that encourages and provides a mechanism for affiliated individuals to report alleged violations of any applicable law, rule, regulation or adopted policy of the NGB, accounting or financial fraud, or other misfeasance and includes an anti-retaliation statement.</p> <p>FINDING: There are elements missing from USA Volleyball's Whistleblower and Anti-Retaliation Policy in the following areas: applicability, reporting, and enforcement.</p>	<p>USA Volleyball will add the missing elements regarding applicability, reporting, and enforcement to its Whistleblower and Anti-Retaliation Policy.</p> <p>Due Date: November 1, 2022</p>
15	Strategic Planning	Management Action Plan
	<p>E.8 a: NGB must maintain and monitor the execution of an organizational strategic plan, in addition to a high-performance plan.</p> <p>FINDING: While USA Volleyball has a strategic plan that includes athletic and organization-wide initiatives, periodic updates are not documented.</p>	<p>USA Volleyball will continue to develop and implement a reporting system for strategic plan progress. USA Volleyball will create a documented report that will be presented to the board, at least annually.</p> <p>Due Date: November 1, 2022</p>
Deficient		
16	Grievance Procedures	Management Action Plan
	<p>E.4 a & b:</p> <p>a. NGB must provide prompt and equitable resolution of grievances as outlined in the Act §220522(14).</p> <p>b. NGB must provide fair notice and opportunity for a hearing to any amateur athlete, coach, trainer, manager, administrator, or official before declaring the individual ineligible to participate as outlined in the Act §220522(8).</p> <p>FINDING: There are elements missing from USA Volleyball's grievance policy and procedures in the following areas: types of grievances, manner of filing the</p>	<p>USA Volleyball will update its bylaws and/or create a grievance policy to include types of grievances, manner of filing the complaint, administration of the grievance, hearing panel composition, hearing procedures, and resources.</p> <p>Due Date: November 1, 2022</p>

	complaint, administration of the grievance, hearing panel composition, hearing procedures, and resources.	
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Findings in this report are currently in remediation. An addendum report will be issued at the end of the remediation period, up to 120 days post-audit.