

USOPC NGB AUDIT

USA WEIGHTLIFTING

ADDENDUM REPORT

August 25, 2022

EXECUTIVE SUMMARY

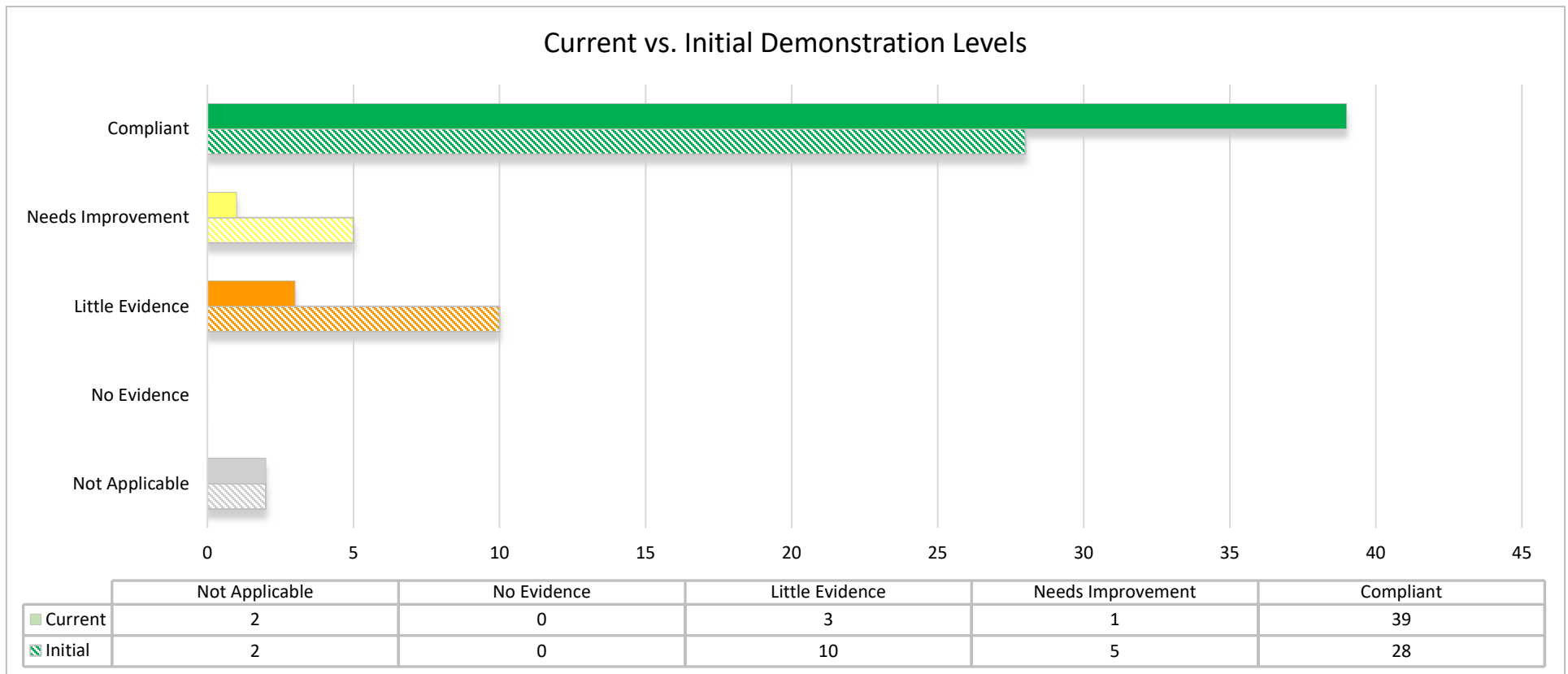
Background, Scope, and Objectives

The United States Olympic & Paralympic Committee’s (USOPC) NGB Audit department (Audit) completed an audit of USA Weightlifting on November 22, 2021. The purpose of the audit was to determine if USA Weightlifting 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 Weightlifting. 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 Weightlifting has remediated 11 findings. As of August 23, 2022, USA Weightlifting is 87% compliant. In addition, USA Weightlifting remediated one prior audit finding from 2018 regarding the prompt resolution of grievances. 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	Bylaws – A.3 a	Management Action Plan
	FINDING: There are elements missing from USA Weightlifting's Bylaws in the following areas: general bylaw requirements, conflict of interest requirements, and board criteria.	USA Weightlifting updated the bylaws to include minor changes to be compliant with USOPC standards. A copy of the updated bylaws has been provided to NGB Audit; no further action is needed.
	Follow-up Level: Compliant	
	USA Weightlifting updated the bylaws to include the required elements and is now compliant.	
2	Gifts and Entertainment Policy – A.6 c	Management Action Plan
	FINDING: USA Weightlifting's Gifts and Entertainment Policy does not list the policy owner.	USA Weightlifting will update its gift & entertainment policy to include policy owner. Due date: December 31, 2021
	Follow-up Level: Compliant	
	USA Weightlifting updated the gifts and entertainment policy to include the policy owner and is now compliant.	
Little Evidence of Compliance		
3	Athlete Representation – A.1 a & b	Management Action Plan
	FINDING: While elections were conducted consistent with requirements, USA Weightlifting's Bylaws do not specify that National Team athlete directors will be elected by a pool of elite athletes eligible to run as National Team athlete directors.	USA Weightlifting added clarifying language to the bylaws to address this finding. A copy of the updated bylaws has been provided to NGB Audit; no further action is needed.

	<p>Additionally, the bylaws do not state that athlete representatives on the Audit & Finance Committee, the Ethics Committee, and the Judicial Committee will be approved by a representative group of athletes.</p>	
Follow-up Level: Compliant		
USA Weightlifting updated the bylaws to include the required language and is now compliant.		
4	Board Composition – A.1 c	Management Action Plan
	<p>FINDING: USA Weightlifting's Bylaws do not require an affiliate board position be added if an affiliate organization is identified.</p> <p>Additionally, USA Weightlifting's Bylaws meet most of the requirements for the definition of independent perspective, however, they do not state that independent board members must continue to meet the definition of independent perspective for their entire term and any successive term.</p>	<p>USA Weightlifting has added to its bylaws the provision for the affiliate director and updated the definition of independent perspective to meet requirements. A copy of the updated bylaws has been provided to NGB Audit; no further action is needed.</p>
Follow-up Level: Compliant		
USA Weightlifting updated the bylaws to include the required language and is now compliant.		
5	Board Development – A.3 b	Management Action Plan
	<p>FINDING: USA Weightlifting does not currently conduct onboarding for new committee members.</p>	<p>USA Weightlifting will conduct committee training.</p> <p>Due Date: March 7, 2022</p>
Follow-up Level: Little Evidence of Compliance		
USA Weightlifting has not provided evidence that onboarding for new committee members has been conducted.		
6	Code of Conduct – A.5 a	Management Action Plan
	<p>FINDING: There are elements missing from USA Weightlifting's Code of Conduct in the following areas: applicability, policy owner, and resources.</p>	<p>USA Weightlifting will add further detail to this policy to meet the requirements of the USOPC.</p> <p>Due Date: March 1, 2022</p>
Follow-up Level: Compliant		
USA Weightlifting updated the code of conduct to include the required elements and is now compliant.		
7	Conflicts of Interest Policy – A.6 b	Management Action Plan

<p>FINDING: There are elements missing from USA Weightlifting's Conflict of Interest Policy in the following areas: applicability, disclosures, resolution, and policy owner.</p> <p>Of the conflict of interest disclosures tested, there were two instances where an annual disclosure form was not completed, six instances where evidence of review was not documented, and two instances where an undisclosed, perceived conflict existed.</p> <p>Additionally, there have been instances where committee members awarded contracts to their personal businesses without appropriate disclosure or independent review.</p>	<p>USA Weightlifting will update its conflict of interest policy to include the missing elements.</p> <p>USA Weightlifting has addressed serious conflict of interest issues arising from its Masters Committee and its operations. In addition, USA Weightlifting will refine its processes and forms to ensure all conflicts of interest are declared. Further, an escalation process has been implemented to address disclosure forms that are overdue. Lastly, the ethics committee minutes will be enhanced to document the review of disclosure forms.</p> <p>Due Date: January 31, 2022</p>
<p>Follow-up Level: Little Evidence of Compliance</p>	
<p>While USA Weightlifting made updates to the conflict of interest policy, it is still missing two required elements.</p> <p>Additionally, through follow-up testing of conflict of interest disclosures, Audit validated that processes have been updated to resolve the majority of the finding. However, three forms had no documented evidence of review, and one form was not submitted timely.</p> <p>Lastly, improvements have been made to the management of conflicts related to the masters committee. However, additional oversight from the national office is needed for the management of contracts and potential conflicts in the committee.</p>	

FINANCIAL STANDARDS AND REPORTING PRACTICES

Needs Improvement		
8	NGB Provided Documents – B. 3 a	Management Action Plan
	<p>FINDING: USA Weightlifting engaged their external auditor early in the year and performed continuous follow-up in an attempt to complete their audited financials within the required timeline. However, due to delays by the external auditor, they were unable to provide them within the required timeline.</p>	<p>USA Weightlifting provided their audited financial statements to NGB Audit on November 17, 2021; no further action is needed.</p>
<p>Follow-up Level: Compliant</p>		
<p>As stated above, USA Weightlifting provided the audited financial statements as required and is now compliant.</p>		
Little Evidence of Compliance		
9	Financial Policies and Procedures – B.1 b	Management Action Plan

	<p>FINDING: USA Weightlifting's financial policies and procedures are missing required elements including cash management and banking, contract requirements, and budgetary process.</p>	<p>USA Weightlifting is currently in the process of updating the financial policies and procedures. They will be implemented by January 1, 2022.</p> <p>Due Date: January 1, 2022</p>
<p>Follow-up Level: Compliant</p>		
<p>USA Weightlifting updated the financial policies and procedures to include the required elements and is now compliant.</p>		
10	USOPC Funding – B.1 c	Management Action Plan
	<p>FINDING: USA Weightlifting completed and submitted their final grant report within the established deadlines. However, the International Relations General Ledger did not match the expenses reported on the 2020 final report.</p> <p>Of the expenses tested, original receipts were not provided for two expenses.</p> <p>Additionally, four expenses tested did not have evidence of approval because no monthly review of payroll expenditures was performed during 2020.</p>	<p>USA Weightlifting requested original documentation regarding the USOPC International Relations grant, which the USOPC was unable to provide. Therefore, USA Weightlifting has implemented appropriate processes to track grant funding from all sources.</p> <p>USA Weightlifting is updating expense submission processes to ensure original receipts are retained.</p> <p>The payroll process is undergoing revisions to include a regular review by someone other than the Director of Finance.</p> <p>Due Date: March 15, 2022</p>
<p>Follow-up Level: Needs Improvement</p>		
<p>While follow-up testing identified that expenses had sufficient support, including receipts and invoices, the International Relations General Ledger did not match the reported expenses on the 2021 final grant report. Lastly, USA Weightlifting has yet to implement additional controls over the payroll process.</p>		

ATHLETE PROTECTION AND RIGHTS

<p>Needs Improvement</p>		
11	Anti-Doping Policy Language – C.4 b	Management Action Plan
	<p>FINDING: USA Weightlifting's bylaws include anti-doping language; however, they are missing a reference to policies and rules adopted by WADA.</p> <p>Additionally, the waiver which puts participants on notice is missing language referencing all other policies and rules adopted by the IWF, USADA, and the USOPC.</p>	<p>USA Weightlifting used language in its bylaws which was provided by USADA in 2017. USA Weightlifting has updated its bylaws language to add "WADA" as required. In addition, the waiver has been updated to include missing language. A copy of the updated bylaws and wavier has been provided to NGB Audit; no further action is needed.</p>
<p>Follow-up Level: Compliant</p>		

	USA Weightlifting updated the bylaws and membership waiver to include the required language and is now compliant.	
Little Evidence of Compliance		
12	USOPC Athlete Safety Requirements – C.3 a	Management Action Plan
	<p>FINDING: There are elements missing from USA Weightlifting's Background Check Policy, including the requirement to screen required individuals upon the commencement of a new role and the requirement to complete a supplemental, partial, background check in off-years.</p> <p>Testing of USA Weightlifting's background check results revealed that two independent committee members who were required to complete a background check had not.</p>	<p>USA Weightlifting already completes a supplemental background check in off years but will update the background check policy to reflect this practice and include the screening requirement prior to the start of a new role.</p> <p>In addition, USA Weightlifting will update the committee member onboarding process to ensure background checks are completed.</p> <p>Due Date: March 1, 2022</p>
Follow-up Level: Little Evidence of Compliance		
	USA Weightlifting updated the background check policies to include the required elements. However, additional testing indicated not all committee members have completed background checks as required.	

SPORT PERFORMANCE

Needs Improvement		
13	High-Performance Plan Submission – D.4 a	Management Action Plan
	<p>FINDING: USA Weightlifting submitted their 2021 High-Performance plan after extended deadlines granted by the Sport Performance team.</p>	<p>USA Weightlifting submitted the 2022 high-performance plan within the required timeline (with a granted extension) and will continue to work with USOPC Sport Performance to ensure timely submission of future high-performance plans.</p> <p>Due Date: Ongoing</p>
Follow-up Level: Compliant		
	As stated above, USA Weightlifting submitted the 2022 high-performance plan within the required timeline and is now compliant.	

OPERATIONAL PERFORMANCE

Little Evidence of Compliance		
14	Grievance Procedure – E.4 a & b	Management Action Plan

	<p>FINDING: There are elements missing from USA Weightlifting's grievance procedures, including types of grievances, manner of filing the complaint, administration of the grievance, hearing panel composition, and hearing process.</p> <p>Additionally, USA Weightlifting Bylaws do not reflect the current process to handle ethics complaints.</p>	<p>USA Weightlifting updated the bylaws to include the types of grievances that can be filed, how the grievance is filed, and submission of supporting documents to the hearing panel. While other noted missing elements are currently included in USA Weightlifting documents outside of the bylaws, they will be added to the bylaws to clarify the process.</p> <p>USA Weightlifting will update the bylaws to clarify how ethics complaints are handled.</p> <p>Due Date: March 1, 2022</p>
<p>Follow-up Level: Compliant</p>		
<p>USA Weightlifting updated their bylaws and implemented supplemental grievance procedures to include the required elements and is now compliant. The bylaws have been updated to reflect the current process to handle ethics complaints.</p>		
15	<p>Whistleblower and Anti-Retaliation Policy – E.5 a</p>	<p>Management Action Plan</p>
	<p>FINDING: While USA Weightlifting relied on the USOPC’s template, there are elements missing from their whistleblower and anti-retaliation policy in the following areas: applicability, expectations, and enforcement.</p>	<p>USA Weightlifting will make the required changes to the whistleblower and anti-retaliation policy.</p> <p>Due Date: March 1, 2022</p>
<p>Follow-up Level: Compliant</p>		
<p>USA Weightlifting updated the whistleblower and anti-retaliation policy to include the required elements and is now compliant.</p>		

Additional updates on findings that have not been remediated will be provided in the NGB Certification Report.

We would like to thank the USA Weightlifting 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.