

USOPC NGB AUDIT

USA WRESTLING

November 16, 2022



EXECUTIVE SUMMARY

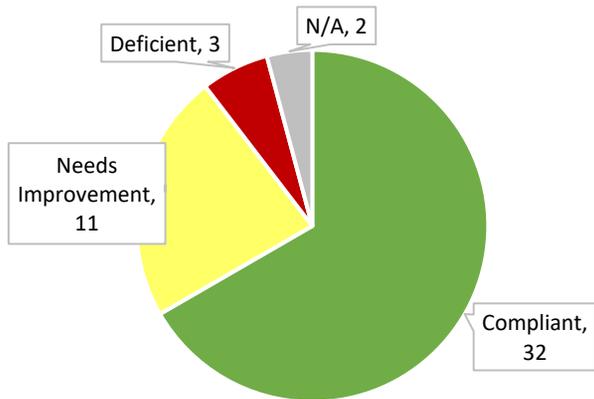
Background, Scope, and Objectives

The United States Olympic & Paralympic Committee’s (USOPC) NGB Audit department (Audit) completed an audit of USA Wrestling. The purpose of the audit was to determine if USA Wrestling 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 Wrestling. 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. This is the first time the USOPC has performed an audit against all standards found in the NGB Compliance Standards.

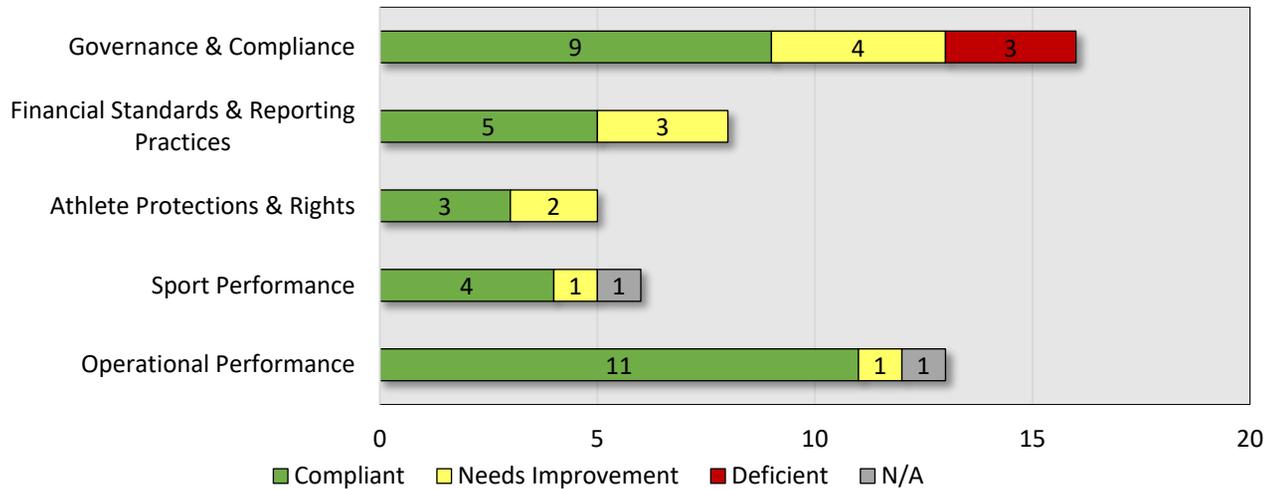
Audit Summary

Based on the audit procedures performed, select policies and procedures were reviewed to determine compliance with the Standards effective January 1, 2022. 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 Wrestling staff who assisted us throughout this review.

EXECUTIVE SUMMARY (CONT.)

Audit conducted a review of USA Wrestling’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 Wrestling has met 32 of 48 Standards. There is one area of increased concern regarding USA Wrestling’s athlete representation and election process, which do not meet the requirements. Additional details are outlined in the issue below.

PRIOR AUDIT FOLLOW-UP

As part of this review, the NGB Audit team followed up on three open audit findings from the audit dated September 7, 2017. All three findings were remediated.

NGB AUDIT FINDINGS

All Standards are evaluated against the 2022 Implementation Guide for 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		9	4	3

Needs Improvement		
1	Bylaws	Management Action Plan
	<p>A.3 a: NGB must have Bylaws or policies and procedures that at least meet the minimum standards for governance practices and comply with the Act §220522 (a)(9-12).</p> <p>FINDING: There are elements missing from USA Wrestling's Bylaws in the following areas: board responsibilities, board member requirements, and designated committee requirements.</p>	<p>USA Wrestling will update the bylaws to comply with requirements in the following areas: board responsibilities, board member requirements, and designated committee requirements.</p> <p>Due Date: March 31, 2023</p>
2	Board Development	Management Action Plan
	<p>A.3 b: The NGB board must conduct the following activities:</p> <ul style="list-style-type: none"> i. Formal onboarding process for board members and committee members, ii. USOPC training to the board members and committee members, iii. At least once per quad, perform a self-evaluation of the board's performance using the USOPC-provided resource, and iv. Annual performance evaluation of the CEO/Executive Director. <p>FINDING: USA Wrestling's four new board and committee members did not all receive formal onboarding.</p>	<p>USA Wrestling began formal onboarding on September 1, 2022; letters with instructions have been sent to all board members. USA Wrestling is implementing committee letters that will be sent this membership year. The process will be tracked in the USA Wrestling membership system, in the board portal section.</p> <p>Due Date: January 31, 2023</p>
3	Board Roster	Management Action Plan
	<p>A.3 d: NGB must have a list of its current board members on its website, including each member's position and term.</p> <p>FINDING: USA Wrestling has a list of its current board members on its website, however, it does not list each member's term.</p>	<p>USA Wrestling will update the website to include the board term for each board member.</p> <p>Due Date: January 31, 2023</p>
4	Ombuds' 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 Wrestling published the Ombud's policy on its website. However, while the AAC Chair confirmed that the policy availability was discussed during an athlete town hall, documentation was not provided that showed communication to all relevant athletes.</p>	<p>USA Wrestling has updated the website to include an anti-retaliation statement in the Ombuds' policy. Additionally, USA Wrestling will communicate the policy to athletes and document the communication of the Ombuds' policy.</p> <p>Due Date: January 31, 2023</p>

	Additionally, no anti-retaliation statement was included in the Ombuds' policy posted on USA Wrestling's website.	
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 Wrestling worked with the Athlete Representation Review Working Group to expand the athlete representative pool and adjust the board composition requirements. However, there were multiple issues related to athlete representation that the approved exceptions did not resolve.</p> <p>USA Wrestling's bylaws are not compliant with the USOPC's requirements in the following areas:</p> <p>First, the bylaws do not specify that at least 50% of athletes serving as board members must have competed in events or disciplines that are on a delegation event program at the time of their election.</p> <p>Second, there is no requirement that the nine athlete board representatives and six at large athlete board representatives will be directly elected by 10-year athletes.</p> <p>Third, composition and eligibility requirements for athlete representatives on designated committees does not comply.</p> <p>A review of current athlete representatives found the following:</p> <p>The Officials Committee has less than 33% athlete representation.</p> <p>Two individuals do not meet the criteria to be considered an actively engaged athlete, as they did not compete in a qualifying event within the 24 months preceding their appointment.</p> <p>Lastly, the voter pool for the most recent AAC member election did not meet the requirements.</p>	<p>USA Wrestling will update the bylaws to include the required language.</p> <p>In addition. USA Wrestling will ensure all committees have the correct representation by athletes who meet the definitions.</p> <p>USA Wrestling AAC will address voter pool issues for athlete elections including AAC member elections.</p> <p>Due Date: March 31, 2023</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 (a)(12). <p>FINDING: While USA Wrestling's board of directors meets the requirements for this standard, the functional governing body, the Executive Committee, does not seat an affiliated member or an independent member as required.</p>	<p>USA Wrestling will schedule two additional board meetings each membership year and ensure the board has proper organizational oversight. Additionally, the bylaws will be updated to ensure responsibilities for the board and Executive Committee are appropriate.</p> <p>Due Date: August 31, 2023</p>
7	Board Meeting Minutes	Management Action Plan
	<p>A.3 c: NGB must make its Board of Directors meeting minutes for the three most recent years available on its website. At its request, prior meeting minutes must be provided to the USOPC.</p> <p>FINDING: USA Wrestling does not publish meeting minutes in an easily identifiable location, and it could not be verified that the last three years of meeting minutes are available online.</p> <p>Additionally, the Executive Committee, which performs many responsibilities typically performed by a board, only has the most recent executive committee meeting minutes available online.</p> <p>Lastly, the 2022 minutes, for both the Board and the Executive Committee, do not include conflict of interest declarations.</p>	<p>USA Wrestling created a new “Board Minutes” tab on the main menu with the three most recent year’s board minutes. In addition, the minutes for the Executive Committee for the last 3 years will be posted.</p> <p>USA Wrestling has been verbally confirming the conflict of interest statement since January 2022. However, it will begin ensuring that the same is reflected in the minutes beginning in October 2022. A reminder of this directive was sent to the Board Chair and Committee Chairs on October 3, 2022. A copy of the e-mail was provided to NGB Audit.</p> <p>Due Date: January 31, 2023</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		5	3	0

Needs Improvement		
8	Financial Policies and Procedures	Management Action Plan
	<p>B.1 b: NGB must develop and implement financial policies and procedures.</p> <p>FINDING: USA Wrestling's financial policies and procedures include most of the required elements, however, payroll procedures are not discussed.</p>	<p>USA Wrestling will update the Financial Procedures to include payroll procedures.</p> <p>Due Date: January 31, 2023</p>
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 incurred for senior training camps were incorrectly applied to the International Tours grant. The discrepancy did not result in funds owed back to the USOPC.</p>	<p>USA Wrestling met with the USOPC High-Performance Team and requested that training and competition grants be combined, and all other grant projects are clearly defined to help prevent incorrect classification going forward.</p>
10	NGB Website Information	Management Action Plan
	<p>B.4 a - c:</p> <p>a. NGB must make its Bylaws and the Bylaws for all consolidated entities available on its website in a reasonable and accessible location to all individuals.</p> <p>b. NGB must make its three most recent IRS Form 990s available on its website in a reasonable and accessible location to all individuals by the IRS deadline, or extension deadline provided by the IRS.</p> <p>c. NGB must make its three most recent audited financial statements available on its website in a reasonable and accessible location to all individuals no later than the last day of the eight-month following the NGB's year-end.</p> <p>FINDING: USA Wrestling has completed its 2021 audited financials and IRS form 990, however, they did not post them on the website within the required timeframe.</p>	<p>USA Wrestling has posted all required financial documents on the website and will ensure deadlines are met in the future.</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	2	0

Needs Improvement		
11	USOPC Athlete Safety Requirements	Management Action Plan
	<p>C.3 a: NGB must ensure compliance with policies and standards including but not limited to: USOPC’s NGB and HPMO Athlete Safety Policy ii. Responsible Sport Organization Background Check Policy</p> <p>FINDING: USA Wrestling 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 Wrestling provided a draft Athlete Safety Communication Policy to Audit. Once reviewed by Audit, it will be finalized.</p> <p>Due Date: March 31, 2023</p>
12	Anti-Doping Policies	Management Action Plan
	<p>C.4 a: NGB must ensure compliance with anti-doping policies and standards including, but not limited to, the USOPC’s National Anti-Doping Policy and the USADA Protocol.</p> <p>FINDING: USA Wrestling does not have an anti-doping policy for enforcing sanctions issued by any applicable agency.</p>	<p>USA Wrestling provided a draft Anti-doping Policy to Audit. Once reviewed by Audit, it will be finalized.</p> <p>Due Date: March 31, 2023</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	N/A		
International Federation Standing	D.4 a	X		
Total		4	1	0

Needs Improvement		
13	Delegation List Submission	USOPC Response
	<p>D.2 a: NGB must timely provide the listing of recommended athletes, teams, and team officials for the Delegation Event teams to the USOPC (Act §220523(a)(6))</p> <p>FINDING: There was one instance of a medical provider traveling to the Tokyo Games without a current background check and USA Wrestling’s permission. However, once there, the medical provider was allowed to treat athletes.</p>	<p>USA Wrestling did not provide a management action plan. Audit will ensure corrective action has been taken prior to the Pan American Games.</p> <p>Due Date: June 30, 2023</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	N/A		
Diversity – Public Disclosure	E.7 e	X		
Strategic Planning	E.8 a	X		
USOPC Policy Compliance	E.9 a	X		
Total		11	1	0

Needs Improvement		
14	Gender Equity	Management Action Plan
	<p>E.7 b: NGB must provide equitable support and encouragement for participation by women where separate programs for male and female athletes are conducted on a national basis as required by the Act §220524(6).</p> <p>FINDING: USA Wrestling has established performance criteria that provides equitable support for all men’s and women’s national team athletes. However, as the agreements</p>	<p>USA Wrestling has drafted an explanation of EAHI and provided the draft to Audit. Once reviewed by Audit, the explanation and the criteria to qualify for services and financial support will be posted on the website.</p> <p>Due Date: January 31, 2023</p>

	do not detail who is eligible to receive Elite Athlete Health Insurance (EAHI), and the criteria to qualify for services and financial support is not published on USA Wrestling's website or in an athlete handbook, this information is not clearly communicated to athletes.	
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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.