



**Certification Renewal Recommendation Report for
USA Field Hockey**
September 14, 2022



**UNITED STATES
OLYMPIC & PARALYMPIC
COMMITTEE**



USA Field Hockey Certification Renewal Executive Summary

In January 2022, the United States Olympic and Paralympic Committee (USOPC) Certification Review Group (CRG), in accordance with the USOPC's NGB Certification Policy, began a certification renewal review of USA Field Hockey (USAFH).¹ The CRG evaluated USAFH and, based on input from CRG members and the results of NGB Audit's 2021 report², recommends a certification status of Renewal in Good Standing.

The CRG's review of USAFH found that the organization is meeting the USOPC's NGB Compliance Standards in the five core areas of evaluation for certification: Governance and Compliance, Financial Standards and Reporting Practices, Athlete Protections and Rights, Sport Performance, and Operational Performance. NGB Audit's 2021 Compliance Audit identified areas where USAFH was not yet fully meeting the USOPC's NGB Compliance Standards, such as missing elements in the organization's bylaws and other policies, but USAFH resolved the identified issues to meet the NGB Compliance Standards by the time of the CRG's recommendation.

CRG members agreed that USAFH is presently meeting the requirements and expectations for an NGB. In its discussions of USAFH's interactions with the USOPC, the CRG did not identify any operational concerns or cultural issues that would prevent the organization's continued certification. Overall, in the areas in which CRG members had interacted with USAFH, the CRG had a favorable view of USAFH's operations.

As a result of this review, the CRG recommends that USAFH be granted a certification status of Renewal in Good Standing for a four-year certification term ending in 2026.

¹ See Appendix for more information about the certification process, including a link to the NGB Certification Policy.

² [NGB Audit Report](#) and [NGB Audit Addendum Report](#)



Organizational Overview

USAFH is the USOPC-certified NGB for field hockey and the United States' national federation recognized by the International Hockey Federation, the international governing body for field hockey and indoor field hockey. USAFH's mission is to "grow the game, serve members, and succeed internationally."³ A full-time staff of thirty run the NGB, which serves over 30,000 members.⁴ USAFH is headquartered in Colorado Springs, Colorado.

Certification History

USAFH was originally certified in January 2021.⁵ The CRG's certification review was initiated based on USAFH's scheduled quadrennial certification review. USAFH's certification status has not been referred for review outside of the standard NGB certification review schedule.

Certification Exceptions⁶

USAFH did not request any exceptions from the NGB Compliance Standards during its certification review.

Athlete Representation Approval and Exceptions⁷

USAFH did not request any approvals or exceptions from the Athlete Representation Review Working Group (ARRWG) during its certification review.

Certification Review⁸

Governance and Compliance

The CRG determined that USAFH is fulfilling the Governance and Compliance-related responsibilities for an NGB. USAFH has adopted and enforces a code of conduct, conflict of interest policy, and gifts and entertainment policy, has made these policies publicly available on its website, and has defined procedures to address violations of these policies. In addition, USAFH has not been the subject of any compliance-related investigations or complaints filed with the Dispute Resolution Unit in the last four years.

NGB Audit found that USAFH's bylaws required updates to fully meet the NGB Compliance Standards, including related to its processes for the selection and election of athlete representatives. USAFH revised its bylaws to include all elements required by the NGB Compliance Standards and USAFH's board of directors approved these updates in August 2021.

NGB Audit also found that USAFH's code of conduct and conflict of interest policy were missing elements required by the NGB Compliance Standards. Furthermore, only employees and board members were required to complete the conflict of interest disclosure forms. To remediate these findings, USAFH updated its code of conduct and conflict of interest policy to include all required elements and the conflict disclosure process was expanded to all required parties.

In its testing of conflict of interest disclosures, NGB Audit identified a sampled disclosure that did not include all potential conflicts and evidence of review was not provided for any of the forms. USAFH revised its

³ [About USAFH](#), USAFH Website.

⁴ [USAFH Organizational Chart](#) and [Careers](#), USAFH Website.

⁵ Refer to the Appendix for details on the initial certification.

⁶ Refer to the Appendix for details on exception requests to the NGB Compliance Standards.

⁷ Refer to the Appendix for details on athlete representation exception requests.

⁸ Refer to the Appendix for details on the review standards and process for information related to NGB Audit's Report on USAFH.



annual disclosure review process to resolve these deficiencies. NGB Audit's re-testing of the disclosure review process found that USAFH executed its revised process and met the NGB Compliance Standards.

The CRG received positive athlete feedback relating to USAFH's governance-related progress. Athlete feedback indicated that although the audit was time intensive, it was a good measure of USAFH's effectiveness and compliance. Additionally, from an athlete perspective, the audit provided a clear definition for internal AAC composition, and the internal AAC has also helped formalize direction and improved communication between the national team and the board of directors.

Financial Standards and Reporting Practices

The CRG determined that USAFH demonstrates financial operational capability to administer its sport and is financially and operationally transparent, maintaining accountability to its members and to the USOPC.

NGB Audit found that USAFH needed to include additional details in its financial policies to outline the organization's financial controls to fully meet NGB Compliance Standards. USAFH revised its financial policies and procedures to remediate the finding and reach full compliance. NGB Audit's testing for USAFH's USOPC funding also found that USAFH had recorded an expense to the incorrect grant year. To remediate the finding, USAFH implemented controls to ensure vendor invoices are submitted and paid timely. NGB Audit tested the additional controls and concluded that USAFH fully met the NGB Compliance Standards.

Athlete Protection and Rights

USAFH maintains and enforces an athlete safety program consistent with the requirements of relevant federal law, as well as with the policies and standards of the USOPC and the U.S. Center for SafeSport (the Center). It also maintains an anti-doping program consistent with the requirements of the USOPC and the U.S. Anti-Doping Agency.

The USOPC is not aware of any cases it has received in the past four years concerning USAFH that should have been reported to the Center but were not reported in accordance with the Center's reporting requirements. For its part, the USOPC has reported all matters to the Center relating to USAFH that the USOPC was required to report.

The CRG reviewed USAFH's most recent Administrative Audit from the Center that was conducted in April 2022. The Center found that USAFH must "offer Minor Athlete training" and "training to parents regarding prevention and reporting of child abuse" in addition to ensuring "that all board and committee members have up-to-date training...and are trained on an annual basis."⁹ Furthermore, USAFH was required to "communicate...the reporting mechanism for alleged sexual, physical, and emotional misconduct" and "provide a written protocol for how they will communicate their Quality Control System to its event directors/event organizers," along with "updating its online reporting page and online reporting form to explicitly state how violations of the MAAPP can be reported."¹⁰ USAFH resolved the Center's findings and the Center confirmed USAFH's full compliance as of July 2022.¹¹ An Event Audit of the 2021 National Field Hockey Festival by the Center resulted in no findings¹².

NGB Audit found that USAFH had to make minor updates to its anti-doping policy language in its bylaws. Although the organization had the proper language for individual members, the USAFH bylaws were missing required language for organizational members. The USAFH board of directors approved a bylaws

⁹ [US Center for SafeSport Administrative Audit Report – USA Field Hockey](#), April 27, 2022.

¹⁰ *Id.*

¹¹ [US Center for SafeSport Corrective Action Update – USA Field Hockey](#), July 12, 2022..

¹² [US Center for SafeSport Event Audit Report – National Field Hockey Festival](#), November 25-26, 2021.



revision to include the required language and the anti-doping language now meets the NGB Compliance Standards.

NGB Audit also found that USAFH's background check process required improvement to meet NGB Compliance Standards. To remediate the finding, USAFH automated background screening notifications sent to applicable individuals. NGB Audit conducted follow-up testing and concluded that the updated process functions effectively, and that the sample of tested background checks are up to date.

Sport Performance

USAFH is fulfilling its obligations in Sport Performance. The organization maintains and executes on a strategic plan that supports athletes in achieving sustained competitive excellence and grows the sport. USAFH established clear selection procedures and executed them effectively to name and train Team USA athletes for Delegation Events.

In the 2021 Compliance Audit, NGB Audit found that the men's National Team Selection Procedures were submitted to the USOPC past the due date. The CRG recognized that staffing shortages could have affected the efficiency of the NGB to meet the deadline. To ensure the timely submission of selection procedures, USAFH implemented a process that includes an additional staff member to manage submission. USAFH successfully submitted 2023 Pan American Games selection procedures by the USOPC deadline, demonstrating compliance and the efficacy of its new process.

Regarding event sanctioning, USAFH's sanctioning document initially did not include the proper anti-doping protocol set forth by its international federation. During the remediation period, however, the compliance standard no longer required the international federation's anti-doping protocol. With this change, NGB Audit re-evaluated USAFH's event sanctioning document, and concluded that the organization was compliant without corrective action.

Operational Performance

The CRG determined that USAFH is meeting all the Operational Performance standards. The organization demonstrates managerial capability to administer its sport, keeps current insurance policies, demonstrates financial sustainability, maintains grievance procedures, and enforces a whistleblower and anti-retaliation policy.

NGB Audit found that USAFH had a board-approved strategic plan and appropriately tracked progress against the plan; however, the plan did not include success measures as required by the NGB Compliance Standards. Furthermore, USAFH's periodic updates to the board were not documented. To remediate the finding, USAFH created and added measurable success metrics as well as provides annual progress updates to the board of directors, which is documented in board meeting minutes.

NGB Audit found that USAFH's grievance procedures required revision to meet the NGB Compliance Standards and resolve inconsistencies between grievance procedure-related language published separately in a standalone document and in the USAFH bylaws. USAFH revised its grievance procedures, and the revised procedures fully meet the NGB Compliance Standards. In its 2021 review, NGB Audit noted two findings related to USAFH's grievance procedures from a 2018 audit that had remained open, one related to non-compliance with the Act regarding prompt resolution of grievances and one related to providing fair notice. NGB Audit could not test to validate USAFH's implementation of its grievance procedures during the 2021 audit because no new grievances had been filed to evaluate USAFH's progress.

NGB Audit also found that performance criteria existed within individual player agreements, but that criteria were not published online or within the athlete handbook. USAFH remediated this issue by adding a



template player agreement to the athlete handbook. NGB Audit concluded that USAFH met the NGB Compliance Standards with this revision.

USAFH maintains a 2021-2024 Diversity, Equity, and Inclusion (DE&I) Action Plan that describes its DE&I vision and strategy for the coming years. USAFH submitted its action plan to the USOPC with sufficient detail, meeting the NGB Compliance Standards. USAFH's action plan contains five objectives with specific initiatives that target diverse audiences. The action plan also includes success measures and timelines respective to each objective. The objectives range from resource sharing, establishing the SHINE program to bolster inclusion within the sport, as well as engage strategic partners and provide public reports. Furthermore, USAFH aims to establish a Paralympic field hockey program, All-Starz, to create additional opportunities for those involved in adaptive sport.

Conclusion

The CRG concluded that USAFH is performing satisfactorily overall based on input from the CRG members and the results of NGB Audit's 2021 Compliance Audit. USAFH addressed all identified deficiencies and there are no outstanding areas of concern affecting its certification status. Accordingly, the CRG recommends that USAFH's certification as a member organization be renewed with a rating of Renewal in Good Standing.



Appendix

Certification Renewal Process

The USOPC believes in a culture of strong governance, ethics, and compliance among the NGBs that, as member organizations of the USOPC, make up the Olympic and Paralympic movement. Recent amendments to the Ted Stevens Olympic and Amateur Sports Act, which became effective in late 2020, require the USOPC to certify NGBs.¹³ The USOPC determined that as of January 1, 2021, all member organizations would be certified, and their certifications would be reviewed for renewal on a rolling basis every four years.¹⁴

Governed by the USOPC's [Certification Renewal Policy](#), the NGB certification review process is supported by a cross-functional body of professionals at the USOPC, the Certification Review Group (CRG), who interact with NGBs in their day-to-day work. These professionals evaluate an NGB's operations across multiple functional areas to provide a holistic review of an NGB's performance and culture.¹⁵ In addition to enumerated standards for NGB performance described in the Act, the Bylaws, and the USOPC's [NGB Compliance Standards](#), the CRG considers departmental observations about an NGB's operations that may not be identified in a formal audit scenario but are relevant to consider when evaluating an NGB's overall performance.

Certification Standards, Exceptions, and Review Components

As described in Section 8.4.1 of the [USOPC Bylaws](#), NGBs must satisfy certification requirements in five core areas: Governance and Compliance, Financial Standards and Reporting Practices, Athlete Safety, Sport Performance, and Operational Performance. The USOPC Implementation Guide for NGB Compliance Standards provides NGBs with specific guidance for how they will be evaluated in each of these core areas.

Section 8.4.2 of the USOPC Bylaws permits an NGB to submit a request for limited exceptions to any of the NGB Compliance Standards which, as a result of its overall structure or other extenuating circumstances, cannot or need not be reasonably met. The CRG evaluates all requests received and grants or denies such limited exceptions.

Various provisions of Section 8.5 of the USOPC Bylaws permit NGBs to seek exceptions related to minimum athlete representation requirements on boards and designated committees as well as exceptions or additions to which of its committees are considered designated committees. The Athlete Representation Review Working Group evaluates and approves or denies all requests made under Section 8.5.

¹³ See §220521(a) of the Ted Stevens Olympic and Amateur Sports Act.

¹⁴ NGB Certification Policy, Section 1.

¹⁵ The CRG uses a four-year lookback period during this review process.