
United States Olympic Committee

Audit Division



Report for:
USA Roller Sports

Review of:
Compliance Checklist

Dated:
December 21, 2018



UNITED STATES OLYMPIC COMMITTEE
1 Olympic Plaza
Colorado Springs, CO
80909

December 21, 2018

Eric Steele
Executive Director
USA Roller Sports

Dear Eric,

Enclosed is the United States Olympic Committee's (USOC) report on the 2018 Compliance Checklist for USA Roller Sports (USARS). We want to express our appreciation for the time you spent completing the Checklist and providing documents during the review.

USARS was compliant in the areas as it specifically relates to the compliance checklist report for the questions outlined below in the following areas: due process and anti-doping. The review initially identified one deficiency in governance/managerial, two deficiencies in financial capabilities, and two deficiencies related to SafeSport. Prior to issuance of the final report, all five deficiencies were remedied. There are also additional observations in the report that when implemented, would clarify the grievance process regarding the General Rules, ensure compliance for SafeSport 2018 requirements and inform athletes, athlete support personnel and other persons in USARS about the USOC National Anti-Doping Policy and of the USADA protocol.

The report will be presented to the USOC Athlete and NGB Engagement Committee and be made available on the Team USA website. We hope you found the review process to be helpful. If you have any suggestions, please do not hesitate to share them with us.

Sincerely,

Bridget Toelle, CPA, CIA
Vice President, NGB Audit and Compliance

Rich Wright
Staff Auditor

cc: Rick Adams Chris McCleary Kay Gallatin
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COMPLIANCE CHECKLIST REPORT

USA Roller Sports

OBJECTIVE AND SCOPE

The objective of the review is to verify USARS is in compliance with key elements of the Ted Stevens Olympic and Amateur Sports Act, the USOC Bylaws and certain USOC policies, in order to demonstrate ongoing commitment to the values and requirements of membership in the USOC. The scope includes the 2018 Compliance Checklist certified by USARS and the supporting documents provided by USARS. Compliance Checklist procedures are designed to verify that certain NGB policies or processes are in place. This Compliance Checklist does not conclude on the effectiveness of any policies or processes reviewed. Audit procedures are completed on select NGBs each year to verify various policies and processes are being followed.

The following chart shows all the requirements in the Compliance Checklist and corresponding status for USARS. For any deficiencies, see the explanations and action plans after the chart.

	Question	Status
Governance/Managerial		
1	Do you have a code of conduct for your employees, members, board of directors and officers?	Compliant
2	Do you have a strategic plan that is capable of supporting athletes in achieving sustained competitive excellence, and in growing the sport?	Compliant
3	Do you have your current bylaws posted on your website?	Compliant
Financial Capability		
4	Are you recognized by the IRS as a tax-exempt organization?	Compliant
5	Are you incorporated under the laws of a state of the United States or the District of Columbia as a not-for-profit corporation?	Compliant
6	Do you have your three most recent IRS Form 990s on your website?	Compliant
7	Have you completed and posted on your website your three most recent annual audited financial statements?	Compliant
8	Do you have written financial policies and procedures?	Compliant
9	Do you have an approval and/or review process for cash disbursements?	Compliant
10	Do you provide frequent (monthly or quarterly) financial statements to your board or designated committee?	Compliant
11	Do you have a board-approved annual budget?	Compliant
12	Have you spent USOC funds as required by the funding agreements in the previous 12 months?	Compliant
Due Process and Athlete Representation		
13	Do you provide procedures for the prompt and equitable resolution of grievances of your members?	Compliant

14	Do your grievance procedures provide for fair notice and opportunity for a hearing to any athlete, coach, trainer, manager, administrator or official before declaring the individual ineligible to participate?	Compliant
15	Do you require at least 20% athlete representation on grievance panels?	Compliant
16	Do you have at least 20% athlete representation on your board of directors?	Compliant
17	Do you have at least 20% athlete representation on your budget committee?	Compliant
18	Do you have at least 20% athlete representation on your selection committee, which prepares, approves or implements selection of international, Olympic, Paralympic and Pan American Games team members, including athletes, coaches, administrators and sport staff?	Compliant
SafeSport		
19	Do you have USOC SafeSport language in your bylaws that provides jurisdictions to the U.S. Center for Safe Sport?	Compliant
20	Do you have a USOC-compliant Athlete Safety Policy?	Compliant
21	Do you have a grievance process that is materially free of bias and conflicts of interest for SafeSport allegations, and includes the opportunity for review by a disinterested individual or body?	Compliant
22	Does your policy require criminal background checks, at least every two years, for those individuals that are formally authorized, approved or appointed (a) to a position of authority over, or (b) to have frequent contact with athletes?	Compliant
23	Does your policy require education and training specific to SafeSport for those individuals that are formally authorized, approved or appointed (a) to a position of authority over, or (b) to have frequent contact with athletes?	Compliant
Anti-Doping		
24	Do you inform Athletes, Athlete Support Personnel and other Persons in your sport of the USOC National Anti-Doping Policy and of the USADA Protocol?	Compliant
25	Unless otherwise agreed by USADA, at least quarterly do you provide USADA with an updated list of athletes, proposed by your NGB, to be included in the USADA RTP? With respect to each athlete on such list and such additional athletes as may be designated by USADA for inclusion in the USADA RTP, do you provide USADA with initial contact information which shall, at a minimum, include accurate residential, mailing and email addresses (if available) and phone numbers for each athlete?	Compliant
26	At least six months prior to the commencement of the most recent applicable Olympic or Paralympic Games, did you provide USADA with a list of all athletes that may have reasonably been selected to represent the U.S. in such Games?	Compliant
27	Do you have an identified staff member to act as a liaison with USADA?	Compliant

DEFICIENCIES

Do you have a code of conduct for your employees, members, board of directors and officers?

USARS' Code of Conduct currently only applies to officials. USARS needs to expand the current code to ensure it applies to employees, members, board of directors and officers.

USARS Action Plan: *USARS has been completing this practice previously, however there is some language confusion regarding our current code and if it is a conduct or ethics code or both. USARS will review the language, secure any changes via Executive Board or Committee vote and have implementation ready to go by the 90-day action plan window in December of 2018.*

USOC Status Update: USOC Audit verified USARS' updated Code of Conduct included all required named entities. USARS is compliant with this requirement as of November 1, 2018.

Have you completed and posted on your website your three most recent annual audited financial statements?

USARS does not have its 2017 audited financials completed and uploaded to its website.

USARS Action Plan: *USARS received our draft version of the audited financials and will have the final draft posted to the website, no later than September 30, 2018.*

USOC Status Update: Auditor verified USARS posted the 2017 audited financials report to its website. USARS is compliant with this requirement as of September 24, 2018.

Do you have a board-approved annual budget?

USARS does not presently have a 2018 board approved budget.

USARS Action Plan: *USARS experienced some problems with new accounting software which lead to the delay in getting an approved budget. The proposed budget will be voted on during the November board meeting.*

USOC Status Update: USARS submitted its board approved 2018 budget. USARS is compliant with this requirement as of December 10, 2018.

Do you have a USOC-compliant Athlete Safety Policy?

USARS was deemed deficient for the following:

While USARS grants jurisdiction to the Center in the Bylaws, it is missing from its SafeSport policy. According to the USOC NGB Athlete Safety Policy, an NGB's policy must account for the SafeSport Entity's person jurisdiction and the fact that all such individuals are subject to such jurisdiction, policies, and procedures.

USARS has reporting instructions in its Bylaws for directly reporting to the Center. However, USARS' SafeSport policy does not explicitly state that reporting must go to the Center.

USARS Action Plan: *USARS will review the language of the policy, update and submit for Executive Board/Committee Approval with implementation to be completed by the 90-day window.*

USOC Status Update: USARS submitted updates to its webpage regarding SafeSport jurisdiction and reporting requirements in accordance with the Compliance Checklist. USOC Audit verified the updated webpages and USARS is compliant for this issue as of December 21, 2018.

Does your policy require criminal background checks, at least every two years, for those individuals that are formally authorized, approved or appointed (a) to a position of authority over, or (b) to have frequent contact with athletes?

While USARS does require background checks, the policy does not require background checks to be completed at least every two years.

USARS Action Plan: *Currently USARS in practice does meet this requirement, however there is no documented language supporting it via our public communication medium (website). USARS will update this language and post promptly to meet the 90-day window from this Action Plan.*

USOC Status Update: Auditor verified USARS added language requiring background checks every two years to its SafeSport webpage. USARS is compliant as of November 19, 2018.

ADDITIONAL OBSERVATIONS

During the review we identified additional areas for improvement. The additional observations do not impact the compliant status but could impact it in the future.

Do you provide procedures for the prompt and equitable resolution of grievances of your members?

USARS' grievance procedures are outlined in the Bylaws and General Rules; however, the General Rules and Bylaws contradict each other. According to USARS, an update to the Bylaws will occur later in 2018. The revision of the Bylaws will state the Bylaws supersede the General Rules.

Do you have a USOC-compliant Athlete Safety Policy?

Auditor completed a review of USARS' SafeSport program based on requirements as of the compliance review date of August 2, 2018. Auditor also identified that as of August 2, 2018, USARS' SafeSport Policy is not yet in compliance with the SafeSport Policy requirements which must be in place by September 2018.

- Ensure named entities from the Covered Individuals list is included in the SafeSport policy.
- Update SafeSport policy language to align with the Bylaws in referencing the General Rules.
- Policy should specify background checks and training will be completed before contact with athletes begins and in any event within 60 days of the new role. Publish a list of people included in the background check and SafeSport training requirements.
- Publish if the background check requirement does not apply to certain or all people under 18 years of age.
- Ensure the policy states background checks are required at least every two years.

Additionally, it is not yet required in USOC Athlete Safety Policy, however NGBs must comply with the

Protecting Youth Victims from Sexual Abuse and Safe Sport Authorization Act of 2017. The legislation requires that any reports of child abuse go to the US Center for SafeSport, however the NGB Policy did not specifically require this at the time of review. NGB should update policies to ensure they comply.

Do you inform Athletes, Athlete Support Personnel and other Persons in your sport of the USOC National Anti-Doping Policy and of the USADA Protocol?

USARS has Anti-Doping language in its Bylaws which informs athletes of the USADA Protocol, but it is missing references to the USOC National Anti-Doping Policy. USARS needs to reference the USOC National Anti-Doping to its Bylaws in Section 3.

CONCLUSION

With USARS' remedies to the initial deficiencies identified during the USOC Compliance Review, it is now fully compliant with the USOC's Compliance Checklist. The Compliance Checklist does not conclude on the effectiveness of any policies or processes reviewed. Additional audit procedures are completed on select NGBs each year to verify various policies and processes are being followed.