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**United States Olympic Committee**  
**NGB Compliance and Audit Department**



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Report for:  
**USA Team Handball**

Review of:  
**Compliance Checklist**

Dated:  
**April 15, 2019**



April 15, 2019

Bob Djokovich  
Dee Miller  
Interim Co-Chief Executive Officers  
USA Team Handball

Dear Bob and Dee,

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

USATH was compliant as it specifically relates to the compliance checklist report for the questions outlined below in the following area: governance/managerial. The initial review identified seven deficiencies in the following areas: financial capability; due process and athlete representation; SafeSport; and anti-doping. USATH is working to remedy the deficiencies but did not fully remedy within the allotted timeframe. There are also additional observations in the report that when implemented, would improve the SafeSport policy language, and compliance for SafeSport 2018 requirements.

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 Compliance and Audit

Rich Wright  
Staff Auditor

cc: Rick Adams                      Chris McCleary                      David Thompson  
Wendy Guthrie                      Denise Parker  
Onye Ikwuakor                      Sara Pflipsen



# COMPLIANCE CHECKLIST REPORT

## USA Team Handball

### OBJECTIVE AND SCOPE

The objective of the review is to verify USATH 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 USATH and the supporting documents provided by USATH. Compliance Checklist procedures are designed to verify that certain NGB policies are in place. This Compliance Checklist does not conclude on the effectiveness of any policies reviewed. Additional 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 USATH. For any deficiencies, see the explanations and action plans after the chart.

	Question	Status
<b>Governance / Managerial</b>		
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
<b>Financial Capability</b>		
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?	Deficient
12	Have you spent USOC funds as required by the funding agreements in the previous 12 months?	Compliant
<b>Due Process and Athlete Representation</b>		
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?	Deficient
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
<b>SafeSport</b>		
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?	Deficient
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?	Deficient
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?	Deficient
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?	Deficient
<b>Anti-Doping</b>		
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?	Deficient

## DEFICIENCIES

### ***Do you have a board-approved annual budget?***

USATH could not provide a board approved annual budget.

**USATH Action Plan:** *The Board is near to approving a balanced budget and it is expected to be passed by December 15<sup>th</sup>, 2018.*

**USOC Status Update:** USATH informed the USOC that a budget has been approved but documentation was not provided to the USOC. This deficiency remains because documentation was not provided to the USOC.

### ***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?***

While USATH does provide for fair notice in Sec 14.10 of its Bylaws, this only relates to grievances involving right to compete. USATH needs to add fair notice language to its grievance procedures and explain fair notice so that it applies to all grievances.

**USATH Action Plan:** *The Bylaws have been and are still under revision and this need will be made known to Steve Smith of Bryan Cave LLC and Michael Lenard, who are working in collaboration to make the Bylaws in full compliance with TSOSA and the USOC. The Board is appointing an active liaison to this revision process to assure it is on track for completion. We anticipate that revision to be presented and approved by the Board by January 15, 2019.*

**USOC Status Update:** On March 12, 2019, USATH informed the USOC that “complaint procedures and forms for documenting complaints are in the approval process.” This deficiency remains because the complaint procedures need to be finalized.

### ***Do you have a USOC-compliant Athlete Safety Policy?***

USATH is deficient for the following reasons:

- USATH policy does not specifically state it applies to athletes designated to the USADA registered testing pool; individuals formally authorized, approved, or appointed to a position of authority over or to have frequent contact with athletes; and covered individuals.
- USATH does not require officials, staff volunteers, independent contractors, local club SafeSport champions, or local club administrators who are authorized, approved, or appointed to a position of authority over or to have frequent contact with athletes, to complete a background check. According to the USOC's NGB Athlete Safety Policy, individuals that are formally authorized, approved, or appointed to a position of authority over or to have frequent contact with athletes are required to complete background checks.
- USATH does not require staff volunteers, independent contractors, local club SafeSport champions, or local club administrators who are authorized, approved, or appointed to a position of authority over or to have frequent contact with athletes, to complete SafeSport training. According to the USOC's NGB Athlete Safety Policy, individuals that are formally authorized, approved, or appointed to a position of authority over or to have frequent contact with athletes are

required to complete SafeSport training.

**USATH Action Plan:** *USA Team Handball has formed a Safe Sport Project working group to ensure we are implementing the requirements of the policy and keeping our athletes safe. Communications have been sent to our entire membership to inform them of their required compliance with the Background Check and Safe Sport Policies.*

**USOC Status Update:** According to USATH, as of March 12, 2019, USATH “[had] formed a Safe Sport Project working group to ensure we are implementing the requirements of the policy and keeping our athletes safe.” USATH is currently “looking at a new Membership Platform that has features allowing [them] to better monitor [their] leadership and membership compliance for Background Checks and Safe Sport, this will help [them] a great deal. The process of getting this system up and running has just begun, however.” USATH sent communications to their “entire membership to inform them of their required compliance to the Background and SafeSport Policies.” Although work has been performed, this deficiency remains because USATH’s Athlete Safety Policy has not been updated to address the reasons above.

***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?***

The USATH SafeSport policy does not have a clear grievance process for SafeSport allegations. Additionally, USATH's SafeSport Policy does not point to its existing due process grievance procedures for SafeSport complaints.

**USATH Action Plan:** *The Board of Directors passed a SafeSport Resolution June 20, 2017 and in that resolution the CEO is authorized to make edits to make the document to be in compliance with USOC expectations. We have been promised language that has been used by other NGBs that is deemed in compliance so that edits can be made to our SafeSport Policy to bring it into compliance with the need listed above. Anticipated date of completion will be on or about January 1, 2019.*

**USOC Status Update:** This deficiency remains because the USOC did not receive documentation that USATH’s SafeSport policy was updated.

***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?***

USATH is deemed deficient for the same reason as noted in the SafeSport Policy deficiency regarding background requirements.

**USATH Action Plan:** *USATH will commit to expand the pool of individuals required to have background checks and to be current with their SafeSport certification to include NT coaches, club coaches and team officials in sanctioned events, referees, medical trainers, Board of Directors, Staff, Committee Chairs, Club SafeSport Champions and those that are formally authorized, approved or appointed to a position of authority or to have frequent contact with athletes. The SafeSport working group is detailing actions that are needed to streamline our Background Check and SafeSport training to ensure 100% compliance.*

**USOC Status Update:** Please see the USOC status above for the SafeSport Policy deficiency.

***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?***

USATH is deemed deficient for the same reason noted in the SafeSport Policy deficiency regarding education and training requirements.

**USATH Action Plan:** *USATH will commit to expand the pool of individuals required to have SafeSport education and training and to be current with their SafeSport certification to include NT coaches, club coaches and team officials in sanctioned events, referees, medical trainers, Board of Directors, staff, Committee Chairs, Club SafeSport Champions and those that are formally authorized approved or appointed to a position of authority or to have frequent contact with athletes. The SafeSport working group is detailing actions that are needed to streamline our Background Check and SafeSport training to ensure 100% compliance.*

**USOC Status Update:** Please see the USOC status above for the SafeSport Policy deficiency.

***Do you have an identified staff member to act as a liaison with USADA?***

USATH does not have a current staff member listed as a liaison with USADA.

**USATH Action Plan:** *On December 1, USATH CEO will notify USADA that he will serve as the liaison for USADA but while not codified, this has been the line of communication for the last four years. However, this position may be delegated to a High Performance or Technical Director when and if that person, he or she, is in place.*

**USOC Status Update:** This deficiency remains because the USOC did not receive a status update to determine if action has been taken.

## **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 have a USOC-compliant Athlete Safety Policy?***

Auditor completed a review of USATH's SafeSport policy based on requirements as of the compliance review date of October 27, 2018. Auditor also identified as of that date, USATH has not yet brought it's SafeSport policies into compliance with the requirements which must be in place by December 2018 and if those policies are not updated by that date, it will be considered deficient.

USATH's SafeSport policy should specify background checks and SafeSport training will be completed before contact with athletes begins and in any event within 60 days of the new role.

USATH's SafeSport policy should include USATH tracking and periodic checks for compliance.

USATH's SafeSport policy should include a publication of a list, updated at least annually, of those

groups of people included in the background check and SafeSport training requirement.

If applicable, USATH's SafeSport should clearly publish if the background check requirement does not apply to certain or all people under 18 years of age.

USATH's SafeSport policy should state that its training is based on the Center's information.

Additionally, it is not yet required in the USOC's NGB Athlete Safety Policy, however USATH must comply with the Protecting Youth Victims from Sexual Abuse and Safe Sport Authorization Act of 2017.

## **CONCLUSION**

USATH must improve its financial capability; due process and athlete representation; SafeSport; and anti-doping policies to be fully compliant with the USOC's Compliance Checklist. The Compliance Checklist does not conclude on the effectiveness of any policies reviewed. Additional audit procedures are completed on select NGBs each year to verify various policies and processes are being followed.