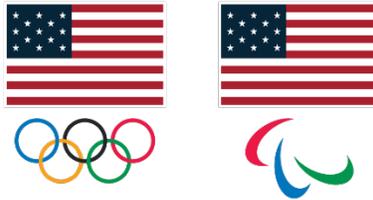


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# United States Olympic & Paralympic Committee

## Audit & Organizational Advancement



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**Report for:**  
**Logan University -**  
**USA Paralympic Powerlifting**

**Review of:**  
**2019 Compliance Checklist**

**Dated:**  
**March 31, 2020**



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

March 31, 2020

Kelley Humphries  
Executive Director  
Logan University - USA Paralympic Powerlifting

Dear Kelley,

Enclosed is the United States Olympic & Paralympic Committee's (USOPC) report on the 2019 Compliance Checklist for Logan University - USA Paralympic Powerlifting (USAPP). We want to express our appreciation for the time you and your staff spent completing the Checklist and providing documents during the review.

USAPP was compliant as it specifically relates to the compliance checklist report for the questions outlined below in the following areas: financial capability; due process and athlete representation; and anti-doping. There were initially four deficiencies identified in the following areas: governance/managerial; due process and athlete representation; and anti-doping. However, with updates to its policies, USAPP remedied three deficiencies and have one remaining in the area of governance/managerial.

As of September 13, 2019, the USOPC Board approved the revised NGB and HPMO Athlete Safety Policy. In an effort to align the Compliance Checklist process with the NGB and HPMO Athlete Safety Policy, eliminate redundancies, and ensure clarity as it relates to what entity is solely responsible for auditing SafeSport requirements, the auditing of athlete safety requirements now falls under the jurisdiction of the U.S. Center for SafeSport.

The report will be presented to the USOPC Athlete and NGB Engagement Committee and be made available on TeamUSA.org. 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,

Audit & Organizational Advancement Team

cc: Rick Adams                      Chris McCleary                      Chelsi Figley  
Wendy Guthrie                      Denise Parker  
Onye Ikwuakor



# 2019 COMPLIANCE CHECKLIST REPORT

Logan University – USA Paralympic Powerlifting

## OBJECTIVE AND SCOPE

The objective of the review is to verify USAPP is in compliance with key elements of the Ted Stevens Olympic and Amateur Sports Act, the USOPC Bylaws and certain USOPC policies, in order to demonstrate ongoing commitment to the values and requirements of the USOPC. The scope includes the 2019 Compliance Checklist certified by USAPP and the supporting documents provided by USAPP. Compliance Checklist procedures are designed to verify that certain NGB and HPMO 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 and HPMOs 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 USAPP. 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 your current bylaws posted on your website?	Deficient
3	Are you compliant with the insurance requirements as set forth in Exhibit 2 of the most recent PPA?	Compliant
4	Have you submitted, in a timely fashion, data and information on the participation of women, individuals with disabilities and racial and ethnic minorities in your athletic activities and administration?	Compliant
5	Have you submitted to the USOPC for review and approval a plan to encourage the participation of men, women, individuals with disabilities and racial and ethnic minorities in your amateur athletic activities and administration?	Compliant
<b>Financial Capability</b>		
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	Have you spent USOPC funds as required by the funding agreements in the previous 12 months?	Compliant
<b>Due Process and Athlete Representation</b>		
12	Do you provide procedures for the prompt and equitable resolution of grievances of your members?	Compliant

13	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
14	Do you have a Paralympic Sport Advisory Group that includes a combination of coaching staff, high performance staff and at least 20% Paralympic athlete representation to craft and approve selection procedures and to serve in an advisory capacity for high performance planning?	Compliant
<b>Athlete Safety</b>		
15	Do you have a USOPC-compliant Athlete Safety Policy?	*Transitioned to U.S. Center for SafeSport
<b>Anti-Doping</b>		
16	Do you inform Athletes, Athlete Support Personnel and other Persons in your sport of the USOPC National Anti-Doping Policy and of the USADA Protocol?	Compliant
17	Unless otherwise agreed by USADA, at least quarterly do you provide USADA with an updated list of athletes, proposed by your HPMO, 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
18	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
19	Do you have an identified staff member to act as a liaison with USADA?	Compliant

\*The U.S. Center for SafeSport has taken jurisdiction over the auditing of Athlete Safety requirements for High Performance Management Organizations. To that end, as of 9/13/2019, the USOPC will no longer review Athlete Safety requirements which fall under the Center's jurisdiction.

## DEFICIENCIES

<p><b>2. Do you have your current bylaws posted on your website?</b></p> <p>USAPP is revising its Bylaws and they are not currently posted online.</p> <p><b>USAPP Action Plan:</b> Per university policies Bylaws will be posted once approved at the next board meeting (June 2020).</p> <p><b>USOPC Status Update:</b> This question will remain deficient as USAPP does not plan to update its Bylaws until June 2020.</p>
<p><b>5. Have you submitted to the USOPC, for review and approval, a plan to encourage the participation of men, women, individuals with disabilities, and racial and ethnic minorities in your amateur athletic activities and administration?</b></p>

According to USOPC's Diversity & Inclusion (D&I) department, USAPP did not submit a plan.

**USAPP Action Plan:** *Within the current High Performance Plan (HPP), items identified to be for the diversity initiative will be sent to the Diversity contact at the USOPC to determine if they are in compliance. If it is determined they are, the amended HPP will be sent to the USOPC compliance contact for final approval.*

**USOPC Status Update:** USAPP has submitted a D&I Plan and is considered compliant as of March 24, 2020.

**13. 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 USAPP's Complaint Procedures clearly state that fair notice and an opportunity for a hearing will be provided for code of conduct violations, it is unclear if complaints filed regarding any administrative grievance or the opportunity to participate will be provided fair notice and heard by USAPP. The Complaint Form in Appendix A of the Complaint Procedures states "this form must be used when filing a complaint with Logan University involving an alleged denial of an opportunity to compete", however it would be clearer to state that fair notice and an opportunity for a hearing will be provided for all types of complaints.

**USAPP Action Plan:** *Logan will add the suggested wording above to the complaint form to provide the needed clarity as well as the wording provided by the compliance contact.*

**USOPC Status Update:** USAPP has updated its Complaint Procedures and the Complaint form to address this deficiency and is considered compliant as of March 18, 2020.

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

USAPP's submitted its Code of Conduct as support for its USADA notification process. While this document includes information on alcohol and drug abuse, it does not inform athletes, athlete support personnel, and other persons of the USOPC National Anti-Doping Policy and the USADA Protocol.

**USAPP Action Plan:** *Logan will add the information above to the code of conduct to provide the information to the needed parties as well as the information provided by the compliance contact.*

**USOPC Status Update:** USAPP has updated its code of conduct to address this deficiency and is considered compliant as of March 18, 2020.

## CONCLUSION

USAPP must improve its governance/managerial to be fully compliant with the USOPC's Compliance Checklist. The Compliance Checklist does not conclude on the effectiveness of any policies reviewed. Additional audit procedures are completed on select NGBs and HPMOs each year to verify various policies and processes are being followed.