
United States Olympic Committee
NGB Compliance and Audit Department



Report for:
USA Archery

Review of:
Compliance Checklist

Dated:
May 15, 2019



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Rod Menzer
Chief Executive Officer
USA Archery

Dear Rod,

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

USAA was compliant as it specifically relates to the compliance checklist report for the questions outlined below in the following areas: governance / managerial; financial capability; due process and athlete representation; SafeSport; and anti-doping. The compliance review initially identified three deficiencies related to due process and athlete representation and one deficiency related to SafeSport. Prior to issuance of the final report, all deficiencies were remedied.

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 Julio Mazzoli
Wendy Guthrie Denise Parker Brady Ellison
Onye Ikwuakor Sara Pflipsen



COMPLIANCE CHECKLIST REPORT

USA Archery

OBJECTIVE AND SCOPE

The objective of the review is to verify USA Archery (USAA) 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 USAA and the supporting documents provided by USAA. 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 USAA. 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 provide procedures for the prompt and equitable resolution of grievances of your members?

USAA's grievance procedures do not require that Board of Justice or Ethics Committee members will be disinterested in hearing panels. Section 15.8 of the USAA bylaws requires individuals identified by the Board of Justice, and appointed to hearing panels, to be free from conflict of interest.

USAA Action Plan: USA Archery will update section 15.8 of the USA Archery Bylaws to state all members assigned to the hearing panel will be disinterested.

USOC Status Update: USAA updated Section 15.8 of its Bylaws to state all members assigned to the hearing panel must be disinterested. USAA is compliant with this requirement as of the USOC follow-up date of April 25, 2019.

Do you have at least 20% athlete representation on your budget committee?

USAA does meet the 20% athlete representation (reps) requirement in practice, however, athlete reps are appointed without approval by athletes or an athlete representative group as described in the USOC's Bylaws, Section 8.8.5.

USAA Action Plan: USA Archery will update section 9.4 of the USA Archery bylaws to state: *In all instances the athlete representatives will be elected by the athletes and may subsequently be appointed to standing committees, task forces and subcommittees by the Board of Directors.*

USOC Status Update: USAA updated Section 9.4 of its Bylaws to require 20% athlete representation on all committees and task forces. This update also directs for athlete reps to be appointed/approved by the USAA Athletes Advisory Council and Para Athlete Advisory Council. USAA is compliant with this requirement as of April 25, 2019.

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?

USAA was deemed deficient for the same reason as above.

USAA Action Plan: USA Archery will update section 9.4 of the USA Archery bylaws to state: *In all instances the athlete representatives will be elected by the athletes and may subsequently be appointed to standing committees, task forces and subcommittees by the Board of Directors.*

USOC Status Update: As stated above, USAA updated Section 9.4 of its Bylaws to require 20% athlete representation on all committees and task forces. This update also directs for athlete reps to be appointed/approved by the USAA Athletes Advisory Council and Para Athlete Advisory Council. USAA is compliant with this requirement as of April 25, 2019.

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?

USAA was deemed deficient in due process above.

USAA Action Plan: *USA Archery will update section 15.8 of the USA Archery Bylaws to state all members assigned to the hearing panel will be disinterested.*

USOC Status Update: USAA updated Section 15.8 of its Bylaws to state all members assigned to the hearing panel must be disinterested. USAA is compliant with this requirement as of the USOC follow-up date of April 25, 2019.

CONCLUSION

With remedies to the deficiencies initially identified during the USOC Compliance Review, USAA is 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 the effectiveness of select policies and processes.