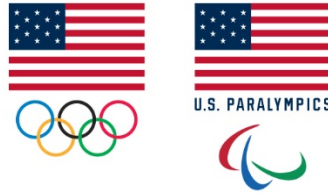


---

# United States Olympic & Paralympic Committee

## Audit & Organizational Advancement



---

**Report for:**  
**USA Team Handball**

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

**Dated:**  
**November 20, 2019**





# 2019 COMPLIANCE CHECKLIST REPORT

## USA Team Handball

### OBJECTIVE AND SCOPE

The objective of the review is to verify USA Team Handball 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 membership in the USOPC. The scope includes the 2019 Compliance Checklist certified by USA Team Handball and the supporting documents provided by USA Team Handball. 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 USA Team Handball. 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
4	Are you compliant with the insurance requirements as set forth in Exhibit 2 of the most recent PPA?	Compliant
5	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
6	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>		
7	Are you recognized by the IRS as a tax-exempt organization?	Compliant
8	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
9	Do you have your three most recent IRS Form 990s on your website?	Compliant
10	Have you completed and posted on your website your three most recent annual audited financial statements?	Compliant
11	Do you have written financial policies and procedures?	Compliant
12	Do you have an approval and/or review process for cash disbursements?	Compliant
13	Do you provide frequent (monthly or quarterly) financial statements to your board or designated committee?	Compliant
14	Do you have a board-approved annual budget?	Compliant

15	Have you spent USOPC funds as required by the funding agreements in the previous 12 months?	Compliant
16	Do you maintain accurate accounting records in accordance with accounting principles generally accepted in the USA (GAAP)?	Compliant
<b>Due Process and Athlete Representation</b>		
17	Do you provide procedures for the prompt and equitable resolution of grievances of your members?	Compliant
18	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
19	Do you require at least 20% athlete representation on grievance panels?	Compliant
20	Do you have at least 20% athlete representation on your board of directors?	Compliant
21	Do you have at least 20% athlete representation on your budget committee?	Compliant
22	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
23	If you govern or operate a Paralympic Sport, 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>		
24	Do you have language in your bylaws that provides jurisdictions to the U.S. Center for Safe Sport?	Compliant
25	Do you have a USOPC-compliant Athlete Safety Policy?	Compliant
<b>Anti-Doping</b>		
26	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
27	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
28	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
29	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?***

USA Team Handball has a Code of Ethics which applies to volunteers and staff; however, it is not clear if members, Board of Directors or officers are included in this group.

***USA Team Handball Action Plan:*** *The Code of Conduct for the Board of Directors and Staff has been revised. There is an existing Code of Conduct that needs to be revised for the general membership and national team athletes. We believe it is necessary for all covered individuals such as national team coaches, medical staff, team leaders, team managers, and key volunteers should adhere to a role specific Code of Conduct, and all covered individuals must complete the necessary documentation. Submission of revised Code of Conduct(s) in 30 days, 9 September 2019.*

**USOPC Status Update:** USA Team Handball updated its Code of Conduct to include all required entities. Auditor verified USA Team Handball is compliant as of November 6, 2019.

***Do you have your three most recent IRS Form 990s on your website?***

USA Team Handball does not have its 2017 Form 990 posted online. With a fiscal year end of June 30, 2018, the form should be available on the website.

***USA Team Handball Action Plan:*** *990 will be posted on the USA Team Handball website in the next 25 days, 6 September 2019*

**USOPC Status Update:** USA Team Handball completed and posted its 2017 IRS Form 990 to its website and was verified compliant on November 6, 2019.

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

USA Team Handball does not have its 2018 audited financial statements posted online. With a fiscal year end of June 30, 2018, the financial statements should be available on the website.

***USA Team Handball Action Plan:*** *Audits in question will be posted on the USA Team Handball website in the next 25 days, 6 September 2019.*

**USOPC Status Update:** USA Team Handball completed and posted its 2018 Audited Financials to its website and was verified compliant on November 6, 2019.

***Do you have written financial policies and procedures?***

USA Team Handball did not submit a financial policies and procedures document for review.

***USA Team Handball Action Plan:*** *USA Team Handball will review and revise the financial policies and procedures for the organization to align with NGB Best Practices and submit these for review to the Audit Division. Submission is 58 days, 11 October 2019*

**USOPC Status Update:** USA Team Handball published a new Financial Policies & Procedures

document and was verified compliant on November 6, 2019.

***Do you have an approval and/or review process for cash disbursements?***

USA Team Handball did not submit a financial policies and procedures document for review.

***USA Team Handball Action Plan:*** Cash disbursement will be included in the revised financial policies and procedures. USA Team Handball has historically had very few cash transactions. Submission is 58 days, 11 October 2019.

**USOPC Status Update:** USA Team Handball published a new Financial Policies & Procedures document, which contains an approval and/or review process for cash disbursements and was verified compliant on November 6, 2019.

***Do you provide frequent (monthly or quarterly) financial statements to your board or designated committee?***

USA Team Handball did not provide any documents to support monthly reporting to the Board.

***USA Team Handball Action Plan:*** USA Team Handball has contracted with the Altruic Accounting Firm and will work with the Audit Committee to ensure this documentation will be presented to the Board of Directors on at least a quarterly basis. This financial review process will begin by 11 October 2019.

**USOPC Status Update:** USA Team Handball's new process requires quarterly financial reports to its Board. USA Team Handball submitted its third quarter financials report. Auditor verified USA Team Handball is compliant as of November 7, 2019.

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

USA Team Handball did not provide a Board approved budget for review.

***USA Team Handball Action Plan:*** USA Team Handball does have an annual budget that the Board of Directors has approved for 2019. Submission is 25 days, 6 September 2019.

**USOPC Status Update:** USA Team Handball submitted its Board approved 2019 Budget. Auditor verified USA Team Handball is compliant as of November 7, 2019.

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

Article 14, Section 14.8 of the Bylaws does not clearly specify that all members of a hearing panel will be disinterested individuals. Additionally, Judicial Committee members may be called to participate on a hearing panel.

While Article 14, Section 14.7 requires the Judicial Committee to "...identify individuals who would be fair and impartial...", it is not explicitly stated that Judicial Committee members, who may be appointed to a hearing panel, should be disinterested.

***USA Team Handball Action Plan:*** USA Team Handball will revise its current Bylaws regarding hearing

*panel language and ensure that hearing panel individuals are disinterested. Additionally, individuals appointed to the Judicial Committee (Ethics Committee) will be members who are disinterested persons without conflict of interest to the individuals or situations being heard. The Bylaw revision, review, and approval will occur by the Board of Directors. Submission to Audit Division by 4 November 2019.*

**USOPC Status Update:** USA Team Handball submitted its updated Bylaws addressing this issue. Auditor verified USA Team Handball is compliant as of November 15, 2019.

***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?***

USA Team Handball was deemed deficient for the following:

USA Team Handball provides fair notice for "Complaints Involving Selection to Participate in a Competition", in Section 14.10, however, fair notice should be afforded for all grievances.

In its SafeSport Policy, USA Team Handball could avoid offering an opportunity for a hearing prior to a provisional or permanent suspension. According to section 16 of the SafeSport Policy the "accused individual will face an immediate and precautionary suspension of their membership," in the case a complaint is lodged against a member.

***USA Team Handball Action Plan:*** Section 14.10, "Selection to Participate in a Competition," USA Team Handball will expand the definition of the covered individuals to ensure all grievances are afforded fair notice.

*Section 16, USA Team Handball will research best practices for dealing with 'alleged individuals with a sexual complaint' and 'a non-sexual complaint' for determining an immediate and precautionary suspension of their membership. USA Team Handball intends to address these complaints differently, and revise the policy language, and process and procedures in Section 16. All sexual complaints will be referred directly to the US Center for Safe Sport, step by step grievance procedures with an investigative component will need to be designed and implemented for non-sexual complaints and adjudicated on a case by case basis. The language for the policy will be reviewed and approved by the Board of Directors. Submission to the Audit Division by 4 November 2019.*

**USOPC Status Update:** USA Team Handball submitted its updated Bylaws addressing this issue. Auditor verified USA Team Handball is compliant as of November 15, 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?***

It is not clear in Sec 8.1.2 of USA Team Handball Bylaws, that athlete representatives chosen for Ad Hoc Committees, including the Selection Procedures Committee, are approved or directly elected by Elite Athlete members, as required by USOPC Bylaw Section 8.8.5.

***USA Team Handball Action Plan:*** Section 8.1.2, of the Bylaws, USA Team Handball will develop an Athlete Advisory Council internal to the organization, whose function will be to elect or appoint athletes to

*Ad Hoc Committees including Selection Procedures Committees. A proposal will be developed and presented for Board of Directors approval to create an USA Team Handball Athlete Advisory Council to address the requirements of the USOPC Bylaws 8.8.5 and will be completed by 4 November 2019.*

**USOPC Status Update:** USA Team Handball submitted its updated Bylaws addressing this issue. Auditor verified USA Team Handball is compliant as of November 15, 2019.

***Do you have a USOPC-compliant Athlete Safety Policy?***

USA Team Handball was deemed deficient for the following:

The policy's prohibited conduct definitions do not match or directly reference the U.S. Center for SafeSport (Center's) definitions.

The USA Team Handball SafeSport Policy, Procedures & Strategy (Policy) does not specifically apply to named covered individuals or individuals formally authorized, approved, or appointed to a position of authority over or to have frequent contact with athletes. Only "Directors, Employees and Members of USA Team Handball " are identified. Athletes designated to the USADA registered testing pool (RTP) and other named entities are missing.

The Policy does not grant jurisdiction to the Center.

The Policy does not have procedures for reporting violations outside the jurisdiction of the Center to USA Team Handball.

The Policy does not contain grievance procedures or reference existing grievance procedures in Article 14 of the Bylaws. The Policy should clearly reference the Bylaws or explain a separate process in the policy.

The Policy states, " USA Team Handball coaches and administrators who will come into contact with minors (any individual under 18) are required to undergo a confidential background check, at his or her own expense, every two years." Otherwise no other entities were identified as requiring a background check. Additionally, background checks were not required to be completed before contact with athletes begins and in any event within 60 days of the new role.

The Policy identified some members who are required to complete Education & Training, but this list appears to exclude other entities: volunteers, chaperones, medical personnel, trainers, etc.

The Policy does not contain a clear list of individuals covered by the policy.

The Policy does not include an explanation for how the NGB conducts tracking and periodic checks for compliance for background checks and education & training.

The Policy does not clearly publish if the background check requirement does not apply to certain or all individuals under 18 years of age.

***USA Team Handball Action Plan:*** *USA Team Handball Athlete Safety Policy will be revised to included prohibited conduct definitions clearly reference the US Center for Safe Sport definitions.*



*The Athlete Safety Policy will expand to include the following covered individuals:*

*(Directors, Employees, Members,) National Team Athletes, Coaches, Referees Medical Staff, Key Volunteers (Team Officials, Team Leaders, Delegation Leader, etc).*

*USA Team Handball will include best practices language that designates covered individuals for the US Center for Safe Sport jurisdictions.*

*USA Team Handball will revise the Article 14 grievance procedures to include Safe Sport complaints and follow the existing Article 14 grievance procedures.*

*USA Team Handball will revise its policy to require background checks for Athletes over the age of 18, Coaches, Referees, Medical Staff, Team Officials, and Key Volunteers before they can have contact with athletes.*

*USA Team Handball will revise its Athlete Safety education and training policy to include all covered individual as stated above.*

*USA Team Handball is in process of implementing a new membership management system (Sport 80) that will create a system that tracks compliance for background checks and Safe Sport Education and Training.*

*USA Team Handball will revise its policy to address Background Check for individuals who are 18 years of age or younger.*

*These Athlete Safety Policies will be reviewed and approved by the USA Team Handball Board of Directors by 4 November 2019.*

**USOPC Status Update:** USA Team Handball submitted its updated Athlete Safety Policy addressing this issue. Auditor verified USA Team Handball is compliant as of November 15, 2019.

## **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?***

USA Team Handball accounts for arbitration procedures in Bylaw, Article 4, Section 4.1 (B), however makes no reference to binding arbitration in its grievance procedures (Article 14). It would provide clarity if USA Team Handball agrees to binding arbitration in its grievance procedures.

***USA Team Handball Action Plan:*** USA Team Handball will update its bylaws to account for binding arbitration in its grievance procedures, Article 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?**

USA Team Handball's Bylaws, Article 5, Section 5.5 "Suspension and Termination of Membership", states that "A member shall have the right to a hearing prior to termination," but does not include suspensions as indicated in the title of this section.

**USA Team Handball Action Plan:** USA Team Handball will update Section 5.5 of Article 5 to include suspensions regarding membership.

**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?**

According to the Ted Stevens Olympic and Amateur Sports Act, NGBs must provide an opportunity for a hearing to an amateur athlete, coach, trainer, manager, administrator, or official before declaring the individual ineligible to participate. The USOPC is concerned that USA Team Handball's automatic disqualification rule may be inconsistent with that requirement.

The USOPC recognizes that USA Team Handball has adopted the position that successful completion of a background check is a membership requirement and no hearing is required when an applicant is automatically disqualified from membership based on a background check finding. However, because an individual must be a member with USA Team Handball to participate, this interpretation could be challenged. If such a challenge was raised, the USOPC would support that challenge being heard by a Section 10 hearing panel, for its consideration and final resolution.

**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?**

USA Team Handball does inform members of their obligation to adhere to anti-doping rules of the USOPC, IHF, and USADA in its Bylaws, however it is not inclusive of all the anti-doping policies. The USOPC recommends including compliance with USADA Protocol, the USOPC National Anti-Doping Policy, stating that all members agree to comply with the anti-doping rules, and all athlete members agree to submit to drug testing.

**USA Team Handball Action Plan:** USA Team Handball will update its USADA notification language to include references to the USADA Protocol and the USOPC National Anti-Doping Policy and that all members agree to comply with the anti-doping rules, and all athlete members agree to submit to drug testing.

## CONCLUSION

With updated to its policies, USA Team Handball is 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 each year to verify various policies and processes are being followed.