
United States Olympic Committee

Audit Division



Report for:
USA Field Hockey

Review of:
Compliance Checklist

Dated:
December 10, 2018



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Simon Hoskins
Executive Director
USA Field Hockey

Dear Simon,

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

Field Hockey was compliant in the areas of governance/managerial and financial capabilities. The review initially identified four deficiencies related to due process, SafeSport and anti-doping. Prior to issuance of the final report, all of the deficiencies were remedied.

The report will be presented to the USOC Audit Committee at its next quarterly meeting 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
Senior Director, Audit

Andrea Andrews, CIA
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cc: Rick Adams Rachel Isaacs Bree Gillespie
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COMPLIANCE CHECKLIST REPORT

USA Field Hockey

OBJECTIVE AND SCOPE

The objective of the review is to verify Field Hockey 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 Field Hockey and the supporting documents provide by Field Hockey. 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 questioned in this report. 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 Field Hockey. 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?

The Field Hockey Bylaws Section 17.13 only applies to protected competition. The policy should include submitting binding arbitration to American Arbitration Association (AAA) regarding the opportunity to participate in any amateur athletic competition. Submitting to binding arbitration is considered part of an equitable resolution process.

Field Hockey Action Plan: *USA Field Hockey would like to be provided best practices from the USOC regarding the arbitration process with a plan to amend our bylaws by January 1, 2019 to incorporate.*

USOC Status Update: USA Field Hockey has amended its Bylaws to account for prompt and equitable resolution of grievances, to include the ability to appeal a decision of the Board of Directors, to the American Arbitration Association (AAA), in the event the decision involves the opportunity to participate or to seek to participate in any competition, as referred to in and in accordance with applicable provisions of the Sports Act and the USOC Bylaws. Field Hockey is compliant with this requirement as of December 10, 2018.

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?

Field Hockey's Bylaws do not provide for fair notice because it doesn't require a notice of charges and requested remedy be sent to the respondent at the time of complaint.

Field Hockey Action Plan: *USA Field Hockey would like to be provided best practices from the USOC regarding the fair notice process with a plan to amend our bylaws by January 1, 2019 to incorporate.*

USOC Status Update: USA Field Hockey has amended its Bylaws to provide for fair notice of charges and requested remedy to respondents of a complaint. Field Hockey is compliant with this requirement as of December 10, 2018.

Do you have a USOC-compliant Athlete Safety Policy?

Field Hockey was deemed deficient because based on review of the Field Hockey SafeSport Policy, it is unclear whether or not the SafeSport reports follow the procedures outlined in Article 17 of Field Hockey's Bylaws. The USOC's NGB ASP requires that NGB's ASP include or reference grievance procedures.

Field Hockey Action Plan: *USA Field Hockey will adjust the Athlete Safety Plan to incorporate the updated Grievance Process (Article 17) within the USA Field Hockey Bylaws by January 1, 2019.*

USOC Status Update: USA Field Hockey has amended its Athlete Safety Policy to provide for clarification that grievances filed under the purview of SafeSport will follow the hearing process as laid out in the Bylaws. Field Hockey is compliant with this requirement as of December 10, 2018.

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?

According to USADA, Field Hockey did not provide an updated list in the second quarter of 2018. Therefore, Field Hockey is not in compliance with this requirement. Even if the list of athletes does not change, USADA requires a verification of the athletes in the RTP.

Field Hockey Action Plan: *USA Field Hockey will ensure that all RTP lists are submitted on time to USADA. We are requesting that all USADA communications include our Senior Membership Manager and SafeSport Representative to ensure that we are in compliance.*

USOC Status Update: USA Field Hockey has submitted its 4th quarter RTP list to USADA as required. Field Hockey is compliant with this requirement as of December 10, 2018.

CONCLUSION

With USA Field Hockey's remedies to the initial deficiencies identified during the USOC Compliance Review, it is now fully compliant with the USOC's Compliance Checklist.