
United States Olympic Committee
Audit Division



Report for:
United States Equestrian Federation, Inc.

Review of:
Compliance Checklist

Dated:
March 20, 2019



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

March 20, 2019

William S Moroney
Chief Executive Officer
United States Equestrian Federation, Inc.

Dear William,

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

USEF was compliant in the areas of governance/managerial, financial capabilities, due process and athlete representation, SafeSport, and anti-doping. The review initially identified two deficiencies related to due process and athlete representation and one deficiency related to anti-doping. 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 Compliance and Audit

Rich Wright
Staff Auditor

cc: Rick Adams Chris McCleary Allison Brock
Wendy Guthrie Denise Parker Murray Kessler
Onye Ikwuakor Sara Pflipsen



COMPLIANCE CHECKLIST

United States Equestrian Federation, Inc

OBJECTIVE AND SCOPE

The objective of the review is to verify USEF is in compliance with key elements of the Ted Stevens Olympic and Amateur Sports Act (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 USEF and the supporting documents provided by USEF. 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 USEF. 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 have at least 20% athlete representation on your budget committee?

Budget and Finance Committee athlete reps did not meet the following requirement: at least one-half shall have competed in the NGB's events or disciplines that are on the sport's program in the Olympic or Pan American Games. Currently, zero of the two athlete reps have not competed in USEF's events or disciplines on the sport's program in the Olympic or Pan American Games.

USEF Action Plan:

Deficiency has been cured. The USOC cited a deficiency because neither of the two athlete reps on the Budget & Finance Committee have competed in USEF's events or disciplines on the sport's program in the Olympic or Pan American Games. The USOC confirmed that they now include Para in the disciplines in the Olympic/Pan Am Games sport program. Para Dressage Athlete Kate Shoemaker is now one of the two athlete reps serving on the Budget & Finance Committee thereby satisfying the USOC requirements.

The Budget & Finance Committee list can be found at <https://www.usef.org/about-us/councils-committees/426> Ms. Shoemaker's qualifying event is the FEI World Equestrian Games Tryon 2018 where she earned a bronze medal. For more information, see <https://www.usef.org/media/press-releases/news-flash-kate-shoemaker-solitaer-40-earn>.

Additionally, USEF has consulted with the USOC over the years concerning the challenges associated with finding a sufficient number of athletes who are willing to serve on Designated Committees and who have competed in the NGB's events or disciplines that are on the sport's program in the Olympic or Pan American Games. The disciplines include Dressage, Eventing, Para Dressage, and Show Jumping. Historically, the USOC has not included Para as a discipline within the Olympic/Pan Am Games sport program. USEF agrees with the USOC's current position and hereby requests that the USOC issue a formal interpretation of the same.

USOC Status Update: USOC NGB Compliance and Audit reviewed the make-up of the USEF Budget and Finance Committee, to show inclusion of Ms. Shoemaker, a Para Dressage athlete. The inclusion of a Paralympic athlete meets the USOC Bylaw criteria for 50% of athlete reps on committees to have competed in USEF's events or disciplines on the sport's program in the Olympic, Pan American, Paralympic, or Para-Pan Games

USEF is compliant with this requirement as of the USOC follow-up date of March 4, 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?

Not all of the 2016 Ad Hoc Selections Groups athlete reps met the following requirement: at least one-half shall have competed in the NGB's events or disciplines that are on the sport's program in the Olympic or Pan American Games.

USEF Action Plan:

Deficiency has been cured. The final approval for the selection of USEF's team members, including

human and equine athletes, coaches, administrators and sport staff for the Olympic Games and Pan Am Games will be done by an Ad Hoc Group consisting of two Board members and at least one athlete who shall have competed in the NGB's events or disciplines that are on the sport's program in the Olympic or Pan American Games. The disciplines include Dressage, Eventing, Para Dressage, and Show Jumping.

USOC Status Update: USOC NGB Compliance and Audit reviewed the make-up of the USEF Ad Hoc Selections Group, to show appropriate inclusion of athletes. The inclusion of athletes who meet the USOC Bylaw criteria for 50% of athlete reps on committees to have competed in USEF's events or disciplines on the sport's program in the Olympic, Pan American, Paralympic, or Para-Pan Games.

USEF is compliant with this requirement as of the USOC follow-up date of March 4, 2019.

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?

USEF has anti-doping information in its National Team Agreement. But the Agreement does not apply to athlete support personnel and other required named persons. Additionally, the National Team Agreement does not include all the language USADA recommends for putting members on notice. USEF should have the USADA recommended language in its Bylaws and update the National Team Agreement to ensure all applicable individuals are made aware of the USOC National Anti-Doping Policy and the USADA Protocol.

USEF Action Plan:

Deficiency has been cured in part and will be fully cured on January 12, 2019 when the Board of Directors meets next and has an opportunity to amend the Bylaws to incorporate USADA's recommended language. The membership agreement and athlete agreement will be revised to incorporate the recommended language within 30 days from submission of this Action Plan. Template Agreements with athlete support personnel have already been modified to incorporate the recommended language.

USOC Status Update:

USOC NGB Compliance and Audit reviewed updated athlete agreements and amended USEF Bylaws which has incorporated the USADA recommended language.

USEF is compliant with this requirement as of the USOC follow-up date of March 4, 2019.

CONCLUSION

With USEF's remedies to the initial deficiencies identified during the USOC Compliance Review, USEF is now fully compliant with the USOC's 2018 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.