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# United States Olympic & Paralympic Committee

## Audit & Organizational Advancement



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**Report for:**  
**USA Judo**

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

**Dated:**  
**January 9, 2020**



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

January 9, 2020

Keith Bryant  
Chief Executive Officer  
USA Judo

Dear Keith,

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

USA Judo 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; and athlete safety. There were initially two deficiencies identified athlete safety and anti-doping; however, with updates to its policies, USA Judo remedied the deficiency in athlete safety, with one remaining in anti-doping. There are also additional observations in the report that when implemented will improve athlete representation, and anti-doping information availability to membership.

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,

Bridget Toelle, CPA, CIA  
Vice President  
Audit & Organizational Advancement

Rich Wright  
Staff Auditor

cc: Rick Adams                      Chris McCleary                      Mark Hill  
Wendy Guthrie                      Denise Parker                      Nick Kossor  
Onye Ikwuakor



# 2019 COMPLIANCE CHECKLIST REPORT

USA Judo

## OBJECTIVE AND SCOPE

The objective of the review is to verify USA Judo 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 Judo and the supporting documents provided by USA Judo. 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 Judo. 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?	Deficient
29	Do you have an identified staff member to act as a liaison with USADA?	Compliant

## DEFICIENCIES

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

USA Judo was deemed deficient for the following:

There is no direct NGB contact listed on its website.

The policy did not grant jurisdiction to the U.S. Center for SafeSport.

The policy does not allow for anonymous reporting.

The policy does not include grievance procedures or reference existing grievance procedures in Article 14 of the Bylaws. The athlete safety policy should clearly point to the Bylaws or explain a separate process in the policy.

Additionally, the policy does not explicitly prohibit filing fees for athlete safety related reports, where the Bylaws, Section 14.4 requires filing fees to file a complaint.

### ***USA Judo Action Plan:***

- *USA Judo will add the name of a specific staff person to accompany the existing phone number listed for any athlete safety questions or concerns.*
- *USA Judo will add the granting of jurisdiction to the US Center for SafeSport where appropriate.*
- *Anonymous reporting is in place and the technical glitch on the USA Judo website to do so has been fixed.*
- *The USA Judo Board has approved the necessary amendments to Article 14 of USA Judo's bylaws. Those amendments will be posted on the USA Judo website for 30 days before becoming officially amended, per the protocol established within the USA Judo Bylaws.*

**USA Judo Status Update:** USA Judo updated its athlete safety policy to address the elements of this finding. USA Judo is compliant as of January 6, 2020.

### ***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?***

This deficiency was identified during the 2018 Compliance Checklist: According to USADA, Judo submitted their long list of athletes for the 2016 Rio Games on April 25, 2016 (or approximately 4 months out from competition) which did not meet the minimum requirement of at least 6 months prior to competition in accordance with USOPC National Anti-doping Policy, Section 4.7.

USA Judo will not be able to remedy this deficiency until 6 months prior to the next Olympic Games.

## 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 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?***

While USA Judo has 20% athlete representation on its selection committee, USA Judo's Bylaws do not explain how these athlete representatives are appointed/elected to these positions. USA Judo explained the High Performance Selection Committee is the same as the Athlete Performance Committee, however, terminology should be streamlined to avoid confusion.

***USA Judo Action Plan:*** This will be brought before the USA Judo Board of Directors to determine on name for the Athlete Performance or High Performance Committee and appropriate documents and information will be updated as appropriate.

***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?***

USA Judo's Paralympic Sport Advisory Group is also its Selection Committee and has an observation above.

***USA Judo Action Plan:*** This observation/suggestion will be included in the discussion regarding the semantics of the Athlete/High Performance Committee and amended if/how the USA Judo Board of Directors determine appropriate.

***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 Judo does inform its athletes, athlete support personnel and other persons in the sport of their obligations, via its Membership form, however the form should be updated to include the USOPC National Anti-Doping Policy.

***USA Judo Action Plan:*** USA Judo will update appropriate documents with the updated USOPC National Anti-Doping Policy.

## CONCLUSION

USA Judo must improve its anti-doping policies 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 each year to verify various policies and processes are being followed.