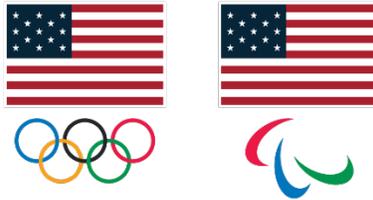


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# United States Olympic & Paralympic Committee

## Audit & Organizational Advancement



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**Report for:**  
**USA Boccia**

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

**Dated:**  
**April 3, 2020**



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

April 3, 2020

James Thomson  
President  
USA Boccia

Dear James,

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

USA Boccia was compliant as it specifically relates to the compliance checklist report for the questions outlined below in the following areas: due process and athlete representation and anti-doping. There were initially five deficiencies identified in the following areas: governance/managerial and financial capability. However, with updates, USA Boccia remedied three deficiencies and have two remaining deficiencies. There is also an additional observation in the report that, when implemented, will improve its grievance procedures.

As of September 13, 2019, the USOPC Board approved the revised NGB and HPMO Athlete Safety Policy. In an effort to align the Compliance Checklist process with the NGB and HPMO Athlete Safety Policy, eliminate redundancies, and ensure clarity as it relates to what entity is solely responsible for auditing SafeSport requirements, the auditing of athlete safety requirements now falls under the jurisdiction of the U.S. Center for SafeSport.

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,

Audit & Organizational Advancement Team

cc: Rick Adams                      Chris McCleary                      Patrick Parkes  
Wendy Guthrie                      Denise Parker                      Lorin Fiehler  
Onye Ikwuakor



# 2019 COMPLIANCE CHECKLIST REPORT

USA Boccia

## OBJECTIVE AND SCOPE

The objective of the review is to verify USA Boccia 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 the USOPC. The scope includes the 2019 Compliance Checklist certified by USA Boccia and the supporting documents provided by USA Boccia. Compliance Checklist procedures are designed to verify that certain HPMP policies are in place. This Compliance Checklist does not conclude on the effectiveness of any policies reviewed. Additional audit procedures are completed on select HPMPs 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 Boccia. 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 your current bylaws posted on your website?	Compliant
3	Are you compliant with the insurance requirements as set forth in Exhibit 2 of the most recent PPA?	Compliant
4	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
5	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?	Deficient
<b>Financial Capability</b>		
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?	Deficient
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	Have you spent USOPC funds as required by the funding agreements in the previous 12 months?	Compliant
<b>Due Process and Athlete Representation</b>		
12	Do you provide procedures for the prompt and equitable resolution of grievances of your members?	Compliant

13	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
14	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>		
15	Do you have a USOPC-compliant Athlete Safety Policy?	*Transitioned to U.S. Center for SafeSport
<b>Anti-Doping</b>		
16	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
17	Unless otherwise agreed by USADA, at least quarterly do you provide USADA with an updated list of athletes, proposed by your HPMP, 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
18	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
19	Do you have an identified staff member to act as a liaison with USADA?	Compliant

\*The U.S. Center for SafeSport has taken jurisdiction over the auditing of Athlete Safety requirements. To that end, as of 9/13/2019, the USOPC will no longer review Athlete Safety requirements which fall under the Center's jurisdiction.

## DEFICIENCIES

**5. 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?**

According to USOPC's Diversity & Inclusion department, USA Boccia did not submit a plan.

**USA Boccia Action Plan:** We will contact the Diversity and Inclusion Director to complete and post our D&I plan by the 90-day deadline.

**USOPC Status Update:** As of March 31, 2020, Audit has not received any verification that a D&I plan was submitted by USA Boccia.

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

USA Boccia did not have its 2018 IRS Form 990 posted to its website.

**USA Boccia Action Plan:** *USA Boccia does have the 2018 IRS Form 990 and will post on website.*

**USOPC Status Update:** Audit verified that the 2018 990s are posted to USA Boccia's Website and they are compliant as of March 18, 2020.

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

USA Boccia did not have its three most recent annual audited financial statements posted to its website.

**USA Boccia Action Plan:** *We are contacting our USOPC contact to inquire about an exemption from the USOPC to complete a financial audit. According to the board president this was approved years ago, but we do not have documentation.*

**USOPC Status Update:** USA Boccia does not appear to have an active exemption on file for the requirement of audited financials. A financial audit was not completed in the 90-day remedy period and they are still considered deficient.

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

USA Boccia did not submit written financial policies and procedures for review.

**USA Boccia Action Plan:** *USA Boccia will utilize the USOPC template to complete and post our financial policies and procedures by the 90-day deadline.*

**USOPC Status Update:** USA Boccia submitted a Financial Policies and Procedures document for review and is compliant with this requirement as of March 12, 2020.

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

USA Boccia was deemed deficient above for a lack of financial policies and procedures.

**USA Boccia Action Plan:** *USA Boccia will utilize the USOPC template to complete and post our financial policies and procedures by the 90-day deadline.*

**USOPC Status Update:** USA Boccia has implemented Financial Procedures which include a cash disbursement process. This deficiency is satisfied as of March 18, 2020.

## **ADDITIONAL OBSERVATION**

During the review we identified an additional area for improvement. The additional observation does not impact the compliant status but could impact it in the future.

**13. 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 Boccia's Bylaws, Article 12, Section 12.9 states that respondents shall be afforded basic due rights process, however, USA Boccia needs to clearly define how notice is provided.

**USA Boccia Action Plan:** *We have a committee updating our bylaws for the 2020 membership vote and the Director will share with them the suggestion below.*

**USOPC Status Update:** USA Boccia is in the process of revising their bylaws, with an expected completion date in July 2020.

## **CONCLUSION**

USA Boccia must improve its governance/managerial and financial capability 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 HPMOs each year to verify various policies and processes are being followed.