
United States Olympic Committee
NGB Compliance and Audit Department



Report for:
USA Water Polo

Review of:
Compliance Checklist

Dated:
March 22, 2019



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

March 22, 2019

Chris Ramsey
Chief Executive Officer
USA Water Polo

Dear Chris,

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

USAWP was compliant in the areas of governance/managerial, financial capabilities, due process and athlete representation, and anti-doping. The review initially identified two deficiencies related to athlete representation and one deficiency related to SafeSport. 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 Michael Graff
Wendy Guthrie Denise Parker Jessica Steffens
Onye Ikwuakor Sara Pflipsen Christy Sicard
Scott Aubin



COMPLIANCE CHECKLIST REPORT

USA Water Polo

OBJECTIVE AND SCOPE

The objective of the review is to verify USAWP 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 USAWP and the supporting documents provided by USAWP. Compliance Checklist procedures are designed to verify that certain National Governing Body (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 USAWP. 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?

While USAWP does meet the 20% requirement in practice, its bylaws do not require committees to include 20% athlete representation (USOC Bylaws, 8.8.1) or that these athlete representatives should be elected by athletes (USOC Bylaws, 8.8.5).

USAWP Action Plan: *As noted above, USA Water Polo is in compliance with the 20% athlete representation requirement as stated in the USOC Bylaws. In addition, the athlete representative is elected by athletes as listed in USOC Bylaws 8.8.5. We understand your recommendation to specifically state this additional information in our Bylaws to ensure consistency. At our upcoming December 2018 Board Meeting, we will move to make these additions to our Bylaws to specifically define our current practice which is compliant with USOC Bylaws.*

USOC Status Update: USOC NGB Compliance and Audit reviewed submitted Bylaw updates, which have been approved by the Board of Directors and are available on the website, which address the need for required 20% athlete representation on all committees.

USAWP is compliant with this requirement as of the USOC follow-up date of February 27, 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?

USAWP was deemed deficient for the same reason as above.

USAWP Action Plan: *As noted above, USA Water Polo is in compliance with the 20% athlete representation requirement as stated in the USOC Bylaws. In addition, the athlete representative is elected by athletes as listed in USOC Bylaws 8.8.5. We understand your recommendation to specifically state this additional information in our Bylaws to ensure consistency. At our upcoming December 2018 Board Meeting, we will move to make these additions to our Bylaws to specifically define our current practice which is compliant with USOC Bylaws.*

USOC Status Update: As stated above, USOC NGB Compliance and Audit reviewed submitted Bylaw updates, which have been approved by the Board of Directors and are available on the website, which address the need for required 20% athlete representation on all committees.

USAWP is compliant with this requirement as of the USOC follow-up date of February 27, 2019.

Do you have a USOC-compliant Athlete Safety Policy?

USAWP charges a filing fee for all grievances. SafeSport reports follow the same grievance process and therefore a filing fee would be charged for SafeSport reports. According to the USOC's NGB Athlete Safety Policy no filing fee can be charged for SafeSport reports. USAWP should add language to exclude any SafeSport grievance (sexualized or non-sexualized) requiring a filing fee.

USAWP Action Plan: *Currently, any and all reports or grievances made directly to the Center OR referred by USAWP to the Center may be made anonymously and will not be charged a filing fee. These reports, made to or referred to the Center, are often referred to as "SafeSport Reports." The policy is not clear whether any alleged violation, including non-sexual, promulgated by USAWP are referred to as*

“SafeSport Reports.” We would like clarification of this requirement to ensure compliance. If needed, at our December 2018 board meeting, we can move to make additions to our reporting and grievance procedures regarding filing fees for non-sexualized allegations.

USOC Status Update: USOC NGB Compliance and Audit reviewed changes to the USAWP website concerning reports submitted regarding SafeSport Code violations. The website now specifically states that no fees or costs are associated with reporting prohibited conduct.

USAWP is compliant with this requirement as of the USOC follow-up date of February 27, 2019.

CONCLUSION

With USAWP's remedies to the initial deficiencies identified during the USOC Compliance Review, USAWP 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.