

**UNITED STATES OLYMPIC AND PARALYMPIC COMMITTEE
CERTIFICATION REVIEW GROUP**



**Certification Recommendation Report for
the United States Association of Blind Athletes
Goalball and Football 5-a-side
December 10, 2021**



**UNITED STATES
OLYMPIC & PARALYMPIC
COMMITTEE**



United States Association of Blind Athletes NGB Certification

In August 2020, the United States Olympic and Paralympic Committee (USOPC) sought applicants for organizations to serve as the National Governing Body (NGB) for the sports of goalball and football 5-a-side. The USOPC received an application from one organization for both sports, the United States Association of Blind Athletes (USABA), which is the home of USA Goalball and an established football 5-a-side program. Following two public hearings and an audit conducted by the USOPC's NGB Audit team, the USOPC's Certification Review Group (CRG; formerly the Certification Verification Group), in accordance with the principles outlined in the USOPC's NGB Certification Policy, began a certification review of the USABA. Based on the findings of NGB Audit's Certification Audit, the information presented by USABA management in the public hearings, and input from CRG members, the CRG recommends that the USABA become the NGB for both goalball and football 5-a-side with a certification status of Certified in Good Standing.

The CRG's review of the USABA found that the organization is meeting the USOPC's NGB Compliance Standards in the five core areas of evaluation for certification: Governance and Compliance, Financial Standards and Reporting Practices, Athlete Protections and Rights, Sport Performance, and Operational Performance. While the Certification Audit conducted by the USOPC's NGB Audit team found that the USABA did not fully meet the NGB Compliance Standards in all areas of evaluation initially and the organization's bylaws and several of its policies required updates, among other findings, USABA management presented reasonable action plans and executed them to address the outstanding issues and reach compliance.

In its discussions of the USABA's interactions with the USOPC, the CRG did not identify any operational concerns or cultural issues that raised concerns or would prevent the organization's certification. Overall, in the areas in which CRG members had interacted with the USABA as a High Performance Management Organization (HPMO), the CRG had a favorable view of its operations.

As a result of this review, the CRG recommends that the USABA be granted a certification status of Certified in Good Standing for a four-year certification term through 2025.

Organizational Overview

The USABA is the USOPC-recognized HPMO for goalball in the United States and is the United States' member of the International Blind Sports Federation (IBSA), the international federation for the sports of goalball and football 5-a-side. The USABA, through its involvement with multiple sports, including goalball and football 5-a-side, aims to provide sports opportunities that “allow people who are blind and visually impaired to develop independence through competition, without unnecessary restrictions.”¹ The USABA currently fields men’s and women’s national teams to represent the United States in goalball at the Paralympic Games, the Parapan American Games, and other international competitions. The USABA is developing a high performance program for football 5-a-side to begin international tournament play by 2022, in anticipation of a Paralympic Games debut for a U.S. team at the Los Angeles 2028 Paralympic Games.

Certification History

The USABA sought NGB status and certification for the sports of goalball and football 5-a-side for the first time in August 2020. Prior to this, the USABA was recognized as an HPMO for the sport of goalball by the USOPC, but was not certified.

Certification Exceptions²

The USABA did not request any exceptions from the NGB Compliance Standards in its application for NGB certification.

Athlete Representation Approval and Exceptions³

The USABA has not yet appeared before the Athlete Representation Review Working Group (ARRWG). The USABA will present to the ARRWG before January 1, 2022, when the USOPC’s new athlete representation requirements go into effect.

The USABA did not request any exceptions from the athlete representation requirements in its application or during its public hearings. However, USABA management did indicate that the organization may prepare exception requests to expand the pool of eligible athlete representatives, particularly as it relates to football 5-a-side.

Certification Review⁴

Governance and Compliance

The CRG determined that the USABA is fulfilling the Governance and Compliance-related responsibilities of an NGB. The USABA has adopted and enforces a code of conduct, a conflict of interest policy, and a gift and entertainment policy.

NGB Audit found that USABA’s bylaws needed revisions to include required elements, including language related to board election and selection procedures, committee requirements, and athlete representation. USABA management established a working group to revise its bylaws and the bylaw revisions to meet the NGB Compliance Standards were adopted in November 2021.

NGB Audit also found that the USABA’s code of conduct, statement of ethics, and conflict of interest policy required updates to include elements required under the NGB Compliance Standards. The USABA revised

¹ [About Us](#), USABA Official Webpage

² Refer to the Appendix for additional details on exception requests in the certification process.

³ Refer to the Appendix for additional details on athlete representation exception requests.

⁴ Refer to the Appendix for additional details on the review standards.

these policies to fully meet the NGB Compliance Standards and posted them publicly on the organization's website.

NGB Audit's testing identified deficiencies in the USABA's conflict of interest disclosure process. The USABA was unable to provide documentation that real-time conflict disclosures were made, addressed appropriately, and recorded in ethics committee meeting minutes as required by its conflict of interest policy. Additionally, NGB Audit identified three conflict of interest forms which were not completed and potential conflicts which were not disclosed. NGB Audit identified similar deficiencies in its 2019 audit of the USABA. NGB Audit will conduct testing to assess whether these deficiencies have been resolved through the application of the USABA's new conflicts of interest policy.

NGB Audit's testing also found that two of the seven USABA board and committee members tested for compliance did not receive onboarding materials as required by the NGB Compliance Standards. Following NGB Audit's report, the board and committee members received the required onboarding materials to complete their trainings.

The USABA completed a diversity and inclusion scorecard to provide a snapshot of the diversity of its board of directors, standing committees, staff, national team coaches and athletes, and developmental team coaches and athletes.⁵ The scorecard is intended to provide a way to identify opportunities for the USABA to increase diversity, equity, and inclusion (DE&I) in its sports and to assist in creating action plans that best deploy its resources for DE&I success. In 2019, the USABA performed well against its own representation benchmarks for women among its standing committee members, its national and developmental national team athletes, and its part-time employees and interns; persons with disabilities among its standing committees, professional staff, national and developmental national team athletes, and developmental national team non-athletes; and military veterans among its board of directors, standing committees, and its national team and developmental national team non-athletes. In these areas, the USABA met or exceeded 85% of its target benchmarks. The USABA performed moderately well against its own benchmarks for people of color among its national and developmental national team athletes, meeting 75% of its benchmark target in both categories. In other areas where the USABA was measured against its benchmarks, the organization met less than 68% of its benchmark targets and had significant room for improvement. The USABA will have the opportunity to address these and other areas of improvement in a DE&I action plan for the 2021-2024 quadrennium.

Financial Standards and Reporting Practices

The CRG determined that the USABA is fulfilling its obligations related to its Financial Standards and Reporting Practices. The USABA demonstrates the financial capability to administer its sport; is financially transparent; maintains audited accounting records; and made its financial statements and tax documentation publicly available on its website.

In its review of the USABA's USOPC funding, NGB Audit found multiple inconsistencies with the USABA's USOPC grant reconciliation. NGB Audit was unable to determine if several of the expenses tested were appropriate, recorded in the correct grant year, or had proper approval because supporting documentation was missing, and the expenses were subsequently disallowed. The USABA was found to owe the USOPC \$2,501 to reimburse these disallowed expenses, which it repaid. Following the Certification Audit, USABA management transitioned its financial accounting duties to a vendor that has worked with NGBs in the past and it has led to a "substantial improvement in financial controls and recordkeeping," according to the organization.

NGB Audit also found that the USABA's financial policies and procedures related to its internal controls needed updates to include elements required by the NGB Compliance Standards. USABA staff and its Audit and Finance Committee revised the organization's financial policies and they now meet the NGB Compliance Standards.

⁵ [USABA 2019 Diversity and Inclusion Scorecard](#)

Athlete Protections and Rights

The USABA has complied with applicable athlete safety and U.S. Center for SafeSport (the Center) requirements. The USOPC is not aware of any cases it has received in the past four years concerning the USABA that should have been reported to the Center but were not reported in accordance with the Center's reporting requirements. For its part, the USOPC has reported all matters to the Center relating to the USABA that the USOPC was required to report. Additionally, NGB Audit reviewed the USABA's most recent audit by the Center in 2020. The USABA received a rating of "Fully Implemented" in one area of review and "Partially Implemented" for its other six areas of review. The Center confirmed by letter in February 2021 that the USABA implemented all necessary corrective actions identified in the audit and is fully compliant.

At the time of the Certification Audit, NGB Audit verified with the United States Anti-Doping Agency (USADA) that the USABA had not made submissions for its Registered Testing Pool for the third and fourth quarters of 2020. The USABA followed up with USADA to correct the issue and is now fully compliant with its anti-doping requirements.

Additionally, NGB Audit found that the USABA's background check policy, bylaws, and membership agreement were missing elements required by the NGB Compliance Standards. The USABA has since published revised versions of each of these documents that fully meet the NGB Compliance Standards.

Sport Performance

The USABA is fulfilling its obligations in Sport Performance. The organization maintains and executes on strategic plans that are capable of supporting athletes in both goalball and football 5-a-side in achieving sustained competitive excellence and growing the sports, has established clear selection procedures for international competition, and has successfully conducted trials to fulfill those selection procedures for goalball.

NGB Audit initially found that the USABA's national classification policy required revisions to comply with the NGB Compliance Standards. The USABA revised its national classification policy in 2021 and the organization is now fully compliant with the NGB Compliance Standards in this area.

Operational Performance

The USABA has demonstrated the managerial capacity to administer the sport, maintained adequate insurance to manage its risk, and maintained financial sustainability, thereby fulfilling its Operational Performance obligations.

NGB Audit found that some of the USABA's policies evaluated as part of Operational Performance, including its grievance policy and whistleblower policy, required revisions to include elements required by the NGB Compliance Standards. Additionally, the USABA's whistleblower policy was not posted publicly. The USABA published revised versions of these policies in November 2021 and all operational policies required to be posted publicly are now available on the USABA website.

NGB Audit also found that the USABA had not documented its distribution of athlete support criteria to its athletes as required by the NGB Compliance Standards. USABA management provided documentation of notifications sent to the relevant athlete pools in 2021 to explain the requirements to qualify for direct athlete support and will send additional notifications regarding the 2022 criteria once they are finalized, satisfying the requirements of the NGB Compliance Standards.

Conclusion

The CRG has concluded that the USABA is performing satisfactorily overall and has met the requirements in the five core areas of evaluation for NGB certification based on the CRG's evaluation of the organization, the results of the NGB Audit team's Certification Audit, and the USABA's action to address issues identified by the Certification Audit. The USABA addressed the significant deficiencies identified in the Certification



Audit and there are no outstanding areas of concern affecting its certification status. Accordingly, the CRG recommends that the USABA's certification as a member organization of the USOPC be granted with a certification status of Certified in Good Standing.

Appendix

Certification Process

The USOPC believes in a culture of strong governance, ethics, and compliance among the NGBs that, as member organizations of the USOPC, make up the Olympic and Paralympic movement. Recent amendments to the Ted Stevens Olympic and Amateur Sports Act, which became law in late 2020, require the USOPC to certify NGBs⁶. The USOPC determined that as of January 1, 2021, all member organizations would be certified and their certifications would be reviewed for renewal on a rolling basis every four years.⁷

Governed by the USOPC's [NGB Certification Policy](#), the NGB certification review process is supported by a cross-functional body of professionals at the USOPC, the Certification Review Group (CRG), who interact with NGBs in their day-to-day work. These professionals evaluate an NGB's operations across multiple functional areas to provide a holistic review of an NGB's performance and culture.⁸ In addition to enumerated standards for NGB performance described in the Act, the Bylaws, and the USOPC's [NGB Compliance Standards](#), the CRG considers departmental observations about an NGB's operations that may not be identified in a formal audit scenario but are relevant to consider when evaluating an NGB's overall performance.

In the case of an organization applying to become an NGB for the first time, the USOPC accepts applications from amateur sports organizations seeking to become the NGB for a particular sport during a public call for applications. Following a 30-day application period, the CRG will select an organization to move forward as an NGB candidate. The NGB candidate will participate in two public hearings and a Certification Audit conducted by the NGB Audit team. The CRG uses the information obtained from the organization's application, the public hearing, the Certification Audit, and any interactions with the organization and its management team to inform its certification recommendation.

Certification Standards, Exceptions, and Review Components

As described in Section 8.4.1 of the [USOPC Bylaws](#), NGBs must satisfy certification requirements in five core areas: Governance and Compliance, Financial Standards and Reporting Practices, Athlete Protections and Rights, Sport Performance, and Operational Performance. The USOPC Implementation Guide for NGB Compliance Standards provides NGBs with specific guidance for how they will be evaluated in each of these core areas.

Section 8.4.2 of the USOPC Bylaws permits an NGB to submit a request for limited exceptions to any of the NGB Compliance Standards which, as a result of its overall structure or other extenuating circumstances, cannot or need not be reasonably met. The CRG evaluates all requests received and grants or denies such limited exceptions.

In addition to outlining the requirement that all NGBs receive approval for committees that are considered Designated Committees, various provisions of Section 8.5 of the USOPC Bylaws permit NGBs to seek exceptions related to minimum athlete representation requirements on boards and committees. The Athlete Representation Review Working Group evaluates and approves or denies all requests made under Section 8.5.

⁶ See §220521(a) of the Ted Stevens Olympic and Amateur Sports Act.

⁷ [NGB Certification Policy](#), Section 1.

⁸ The CRG uses a four-year lookback period during its review process.