BACKGROUND CHECK POLICY

Policy Owner: General Counsel
Effective Date: November 5, 2026

I. POLICY STATEMENT

USA Football (USAFB) is committed to providing a safe environment for all participants. This policy establishes comprehensive background check requirements and procedures to ensure the safety and protection of all athletes and other participants in USAFB programs and activities.

II. SCOPE AND REQUIRED INDIVIDUALS

The following groups of individuals, 18 years of age and older, who are authorized, approved, or appointed by USAFB to have regular contact with or authority over Minor Athletes must have background checks completed prior to the commencement of the applicable role, training, event, or competition:

- USA Football Staff
- USA Football Board of Directors
- USA Football Committees and Councils
- USA Football Volunteers
- USA Football Athletic Trainers
- USA Football Medical Providers
- USA Football Contracted Staff
- USA Football Officials
- USA Football National Team/National Team Development Program Coaches
- USA Football ID Holders and Affiliate Organizations Participating in USA Football Events
- Adult athletes, training partners and guides 18 years of age or older selected by USA Football for participation in national or international teams, Delegation Events, or training activities at any Olympic & Paralympic Training Center, USOPC High-Performance Training Center, or USAFB Training Site

- Individuals authorized or nominated by USA Football to work with athletes or other sport participants at any USA Football Training Site or competition event where USAFB athletes are present
- Assistants or personal care assistants who are funded, have a contractual obligation with, or are credentialed by USA Football, or otherwise have regular contact with USA Football athletes
- Media personnel credentialed by USA Football who have unsupervised one-on-one interactions with athletes
- Any other individuals who are authorized, approved, or appointed by USA Football to have regular contact with or authority over athletes as determined by USA Football, in its discretion

III. BACKGROUND CHECK REQUIREMENTS

A. Timing Requirements

All required individuals must complete and pass an approved USAFB background check through NCSI:

1. Prior to commencement of a new role or competition for all applicable individuals
2. Full background checks (renewal searches) will be conducted on all applicable individuals every two (2) years using the background check search components referenced in Section IV
3. Recheck searches will be conducted approximately twelve (12) months after the initial registration date using multi-jurisdictional databases, sex offender registries, and SafeSport Disciplinary Records

B. Training Site Requirements

USAFB requires criminal background checks for all required individuals at its training sites.

C. Third-Party and Vendor Requirements

- Third-party vendors/contractors - All contracts with third-party vendors and contractors must include background check requirements where applicable
- Community organizations - All agreements with community organizations must include background check requirements where applicable

IV. BACKGROUND CHECK SEARCH COMPONENTS

A. Standard USOPC Compliant Screening Package

All background checks will be conducted through NCSI and include the following searches:

1. Social Security Number validation
2. Name and address history records

3. Two independent Multi-Jurisdictional Criminal Database searches covering 50 states plus DC, Guam, and Puerto Rico
4. Federal District Courts search for the district(s) where the individual currently lives or has lived during the past seven years
5. County Criminal Records for the county (or counties) where the individual currently lives or has lived during the past seven years
6. Two Sex Offender Registry database searches of all available states, plus DC, Guam, and Puerto Rico
7. Multiple National Watch Lists
8. SafeSport Disciplinary Records, in accordance with USOPC background check requirements

B. Search Coverage Period

All searches will cover:

- The last seven (7) years of history, OR
- The longest period available if information is not available for seven (7) years, OR
- The longest period allowed by applicable law, if less than seven (7) years

C. Additional Add-on Searches (as applicable)

- Motor vehicle records search (covering last 3 years)
- International criminal search (for individuals with international residence history, in accordance with USOPC requirements)
- Education verification (one time only, on initial screening if required for position)
- Professional license/certification verification (for medical roles)

V. CRIMINAL OFFENSE CRITERIA AND RED-LIGHT DESIGNATIONS

A reportable record or disclosure that contains a disposition or resolution of a criminal proceeding, other than an adjudication of not guilty, for any of the below criminal offenses will be flagged as a Red-Light, meaning it does not meet the initial screening criteria and the individual will be subject to USAFB's policies and procedures to determine eligibility:

A “disposition or resolution of a criminal proceeding, other than an adjudication of not guilty” includes, but is not limited to, an adjudication of guilt or admission to a criminal violation, a plea to the charge or a lesser included offense, a plea of no contest, any plea analogous to an Alford or Kennedy plea, a diversionary program, deferred adjudication, deferred prosecution, disposition of supervision, conditional dismissal, juvenile delinquency adjudication, or similar arrangement, and any pending charges.

CRL-1. Any Felony

Any felony conviction, regardless of the nature or timing of the offense.

CRL-2. All Sexual Crimes and Criminal Offenses of a Sexual Nature

Including but not limited to:

- Rape
- Child molestation
- Sexual battery
- Lewd conduct
- Possession and distribution of child pornography
- Possession and distribution of obscene material
- Prostitution
- Indecent exposure
- Public indecency
- Any sex offender registrant

CRL-3. Any Drug Related Offenses

Any criminal offense involving controlled substances, illegal drugs, or drug-related activities.

CRL-4. Harm to a Minor and Vulnerable Persons

Including but not limited to:

- Child abandonment
- Child endangerment/neglect/abuse
- Contributing to the delinquency of a minor
- DUI with a minor

CRL-5. Violence Against a Person

Including:

- Crimes involving a deadly weapon
- Domestic violence
- Crimes of violence that are amended to disorderly conduct
- All weapons offenses except minor hunting violations

CRL-6. Stalking, Harassment, Blackmail, Threats

Including:

- Stalking
- Harassment
- Blackmail
- Violation of a protection order
- Threats of any nature

CRL-7. Destruction of Property

Including:

- Arson
- Vandalism
- Criminal mischief

CRL-8. Animal Abuse, Cruelty, or Neglect

Any offense involving the mistreatment, abuse, cruelty, or neglect of animals.

CRL-9. Driving Under the Influence or Driving While Intoxicated

Any lesser crime of Driving Under the Influence (DUI) or Driving While Intoxicated (DWI) in the past one (1) year, or two (2) or more DUI or DWI offenses in the past ten (10) years. A DUI involving a minor is addressed under CRL-4.

Note: Criminal offenses include "Attempted Crimes" in all of the above classifications and pending charges for criterion offenses.

A felony means any criminal offense punishable by imprisonment for more than one year, regardless of how the offense is characterized by the jurisdiction.

An individual who is currently sanctioned by the United States Anti-Doping Agency (USADA) is ineligible for the duration of the sanction. That ineligibility is governed by USADA's procedures and is not subject to appeal under this Policy.

Other Potential Disqualifiers

Even if an individual receives a Green Light, the Review Panel may determine that the individual is disqualified, or may limit or condition the individual's participation, if the individual has:

1. Been held liable for civil penalties or damages involving sexual or physical abuse of a minor;
2. Been subject to any court order involving sexual or physical abuse of a minor, including a domestic order or order of protection;
3. A history with another organization (employment, volunteer, or otherwise) of complaints of sexual or physical abuse of minors;

4. Resigned, been terminated, been banned, or been asked to resign from a position, paid or unpaid, because of complaints of sexual or physical abuse of minors;
5. Been suspended, restricted, placed on probation, or declared ineligible by a school, league, athletic organization, governing body, the U.S. Center for SafeSport, or a similar entity, where the underlying conduct bears on the safety of athletes or other participants;
6. A history of other behavior that indicates the individual may be a danger to athletes or other participants; or
7. Failed to disclose information as required by this Policy.

A determination based on an Other Potential Disqualifier is made under Section VI and may be appealed under Section VII. It is not an automatic disqualifier.

VI. BACKGROUND CHECK REPORT REVIEW PROCESS

A. Red-Light/Green-Light Determination

NCSI will provide initial determinations based on USAFB's criterion offenses:

- Green Light (Clear) - Individual's record does not contain any criterion offenses
- Red-Light (Flagged) - Individual's record contains one or more criterion offenses as defined in Section V
- Incomplete - Individual fails to provide necessary information or background screen cannot be completed

B. Review Procedures

When a background check results in a Red-Light designation:

1. NCSI Pre-Adverse Action Process - NCSI will automatically send a pre-adverse action notice to the individual on behalf of USAFB, providing opportunity to review records and dispute accuracy.
2. USAFB Assessment – The USA Football Background Check Review Panel (“Review Panel"), consisting of the Compliance Team, will conduct a comprehensive review considering:
   - Nature and severity of the offense(s)
   - Time elapsed since the offense(s)
   - Pattern of behavior
   - Relevance to the role and contact with athletes
   - Evidence of rehabilitation
   - Risk to athlete safety and program integrity
3. Determination of Access Level - The Review Panel will determine the individual's level of access and involvement, which may include:

- Full approval with no restrictions
- Conditional approval with supervision requirements
- Limited access with specific restrictions
- Denial of participation

For any background check that yields a flagged result and requires Review Panel evaluation, USAFB will issue written documentation of the Review Panel's final decision. This written notification will clearly indicate the individual's approved access level, any conditions or restrictions imposed, or the reason for denial of the participation.

4. Adverse Action Process - If USAFB elects to take adverse action, NCSI will send the adverse action notice and required documentation to the individual.

C. Information Received After a Cleared Background Check

A Green Light remains valid until the background check expires unless USAFB becomes aware of information that may affect the individual's eligibility, whether through the individual's own disclosure, a report, the media, a public record, another organization, or otherwise. In that event, USAFB may:

1. Send the individual a written inquiry, requesting an explanation of the information and disclosure of any current suspension, restriction, probation, ineligibility determination, or other limitation imposed by a school, league, athletic organization, governing body, the U.S. Center for SafeSport, or a similar entity, with a stated deadline for response;
2. Require a new or supplemental background check at any time;
3. Refer the matter to the Review Panel, which will apply Sections V and VI; and
4. Impose temporary measures while the review is pending, consistent with Section VI of the USA Football Grievance Policy.

Failure to respond to an inquiry by the stated deadline may result in suspension of the individual's participation until the review is complete. Information involving possible sexual misconduct, child abuse, or other matters that must be reported under the Response and Resolution Policy will be reported as that policy requires, and USAFB will not delay a required report to complete an inquiry. A Review Panel decision under this Section may be appealed under Section VII.

VII. APPEALS OF BACKGROUND CHECK DETERMINATION

A. Appeals Based on Accuracy of Background Check Results

- Individuals may request reinvestigation of inaccurate information in accordance with the Fair Credit Reporting Act (FCRA)
- NCSI is authorized to reinvestigate and correct any inaccuracies as necessary

- All communications regarding corrections or disputes will be handled by NCSI

B. Appeal to the Review Panel

Any individual who has been issued a "Red-Light" may appeal the decision to the Review Panel if their disqualifier falls under the following criteria:

Any misdemeanor involving:

- Any drug related offenses;
- Destruction of property, including arson, vandalism, and criminal mischief; and
- Animal abuse, cruelty, or neglect;
- Weapons offenses that do not involve violence against a person, force, or threat of force;
- Any lesser crime of Driving Under the Influence (DUI) or Driving While Intoxicated (DWI) in the past one (1) year, or two (2) or more DUI or DWI offenses in the past ten (10) years (CRL-9).

C. Automatic Disqualifiers

The following are automatic disqualifiers. The Review Panel will not grant an exception for an automatic disqualifier. Disputes about whether a record pertains to the individual are handled by NCSI under Section VII(A):

- Any felony (Defined as all crimes punishable by greater than one year in jail or prison, regardless of how characterized by jurisdiction. If range, alternate sentencing, or indeterminate sentencing with an outer range greater than one year);

Any misdemeanor involving:

- All sexual crimes, criminal offenses of a sexual nature to include but not limited to; rape, child molestation, sexual battery, lewd conduct, possession and distribution of child pornography, possession and distribution of obscene material, prostitution, indecent exposure, public indecency, and any sex offender registrant*;
- Harm to a minor or vulnerable person, including, but not limited to, offenses such as child abandonment, child endangerment/neglect/abuse, contributing to the delinquency of a minor, and DUI with a minor*;
- Violence against a person, force, or threat of force (including crimes involving a deadly weapon and domestic violence);
- Stalking, harassment, blackmail, violation of a protection order, and/or threats;

*If the "Red Light" determination is based on sexual misconduct or child abuse, an appeal request may be available under the U.S. Center for SafeSport's policies and procedures. The individual should contact the U.S. Center for SafeSport, to obtain information regarding any opportunity for and how to initiate an appeal.

D. Review Panel Appeal Process

Should an individual initiate an appeal with USAFB, the individual must do the following:

1. Provide an email to compliance@usafootball.com with the subject line "Background Check Appeal."
2. Within the email, provide their full name, contact email, phone number and brief description of the position sought with USAFB.
3. Provide a reasonable description of the grounds for disqualification and any information that might be useful for the Review Panel to know, including references and individual contributions to the game of football.

Upon receiving an appeal, the Review Panel will evaluate the circumstances surrounding the disqualifying matter, the dates in which the matter occurred, and the overall impact of the matter on the relevant USA Football program, event or position sought. The Review Panel may take up to 30 days to process the appeal once it is received. The Review Panel will provide the individual with its written decision, which will state whether the individual may seek further review under Section VII(E).

In the event a similar appeal has already been conducted by another National Governing Body and that appeal resulted in disqualification of the individual, USAFB shall, to the extent it is able, uphold the same determination.

An individual will have seven (7) days from the date that they were notified by NCSI of the Red-Light determination to inform USAFB of the intent to appeal. Individuals who fail to request an appeal within the seven-day time limit or do not prevail on appeal will not be permitted to re-apply for a period of one (1) year.

Questions may be directed to legal@usafootball.com. Only logistical questions and questions about the process will be answered. Questions concerning whether or not an appeal will be successful will not be answered until the Review Panel has made its decision.

Appeal under this Section is not available for determinations relating to employment, independent contractor engagements, or other roles that do not involve participation in amateur athletic competition. Those determinations are handled by Human Resources, and the Review Panel's decision is final.

F. Ongoing Duty to Disclose

Each individual subject to this Policy must disclose to the General Counsel (legal@usafootball.com), within [seven (7)] days, any arrest, charge, plea, or conviction for a criminal offense listed in Section V, and any ban or sanction imposed by another National Governing Body, sport organization, or the U.S. Center for SafeSport. Failure to disclose, or intentional misrepresentation of criminal history, may result in denial or revocation of participation and is a violation of the USA Football Code of Conduct.

VIII. SECONDARY REVIEW OF USA FOOTBALL DETERMINATION

In accordance with the United States Olympic & Paralympic Committee (USOPC) Background Check Procedures, USAFB is required to notify the USOPC Security and Athlete Safety Office when an individual's background check reveals certain disqualifying offenses and USAFB intends to allow the individual to reside, train, or compete at a U.S. Olympic & Paralympic Training Center or participate in a Delegation Event and/or NOC/NPC Event. In such cases, a secondary review by the USOPC is required under the USOPC Background Check Policy, the matter is subject to the USOPC's Dispute Resolution Hearing Procedures, and USAFB will comply with the USOPC's determination. If the list below differs from Section VII.C of the USOPC Background Check Procedures, the USOPC Background Check Procedures control.

Disqualifying offenses include:

Any felony involving:

1. Violence against a person within the previous ten (10) years;
2. Violent crimes involving weapons (including armed robbery and aggravated assault with a weapon) within the previous ten (10) years; and
3. Animal abuse, cruelty or neglect.

As well as any felony or misdemeanor involving:

4. All sexual crimes and criminal offenses of a sexual nature to include, but not limited to: rape, child molestation, sexual battery, lewd conduct, possession or distribution of child pornography, possession and distribution of obscene material, and any sex offender registrant (excluding prostitution, indecent exposure, and public indecency);
5. Drug offenses including: drug distribution, intent to distribute, manufacturing, trafficking, or sale within the previous seven (7) years (excluding crimes for drug use or possession); and
6. Harm to a minor or vulnerable person, including, but not limited to: offenses such as child abandonment, child endangerment/neglect/abuse, contributing to the delinquency of a minor, providing alcohol to a minor, and DUI with a minor.

Delegation Events include the Olympic, Paralympic, Pan American, and Parapan American Games. NOC/NPC Events include the Youth Olympic, World Beach, and Youth Parapan American Games, and other international sporting events as designated by the USOPC.

IX. REPORTING TO THE USOPC OFFICE OF ATHLETE SAFETY

USAFB will notify the USOPC Security and Athlete Safety Office as soon as possible, and no later than 24 hours, after learning of an allegation of prohibited conduct, consistent with Appendix B (Athlete Safety

Policy) of the USA Football MAAPP and the Response and Resolution Policy. Any temporary measure(s) imposed by USAFB in response to an allegation will be included in the required notification. Any such notification shall be submitted by email to athlete.safety@usopc.org.