GRIEVANCE POLICY

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

I. Definitions

Complaint. An informal expression of dissatisfaction that can be resolved promptly by USA Football without a formal investigation (may escalate to a Grievance).

Complainant. The individual who is filing a Grievance.

Grievance. A formal notification of an alleged policy violation which shall be resolved by USA Football through a formal investigation process.

ID Holder. Any athlete, coach, or official who maintains a USA Football ID in good standing.

Protected Individual ("Individual"). The person(s) eligible to file a Grievance with USAFB through this Grievance Policy. This Policy applies exclusively to the below categories. Any person(s) intending to file a Grievance or Complaint under this Policy must belong to at least one of the following categories:

a) Team USA Football ID Holders
- Coach
- Official
- Athlete

b) Employees

c) Board of Directors

d) Officers

e) Committee & Council Members

f) Volunteers (as designated as subject to this policy by USAFB) with Board of Directors delegated powers or substantial decision-making authority

g) Any good faith reporter

h) Any other reasonable parties (i.e., witnesses, victims)

Respondent. The individual(s) who is allegedly responsible for the act or omission that are the subject of the Grievance.

II. Introduction

The USA Football ("USAFB") Grievance Policy is afforded to our community to uphold an environment that is fair and equitable, providing for clarity and consistency in the resolution of Grievances. This policy provides Protected individuals a process to raise concerns, ensure their rights are protected, and resolve issues effectively.

This Policy complies with USAFB Bylaws, Policies, Rules, and Regulations, in addition to the Ted Stevens Olympic and Amateur Sports Act ("Act"), the Bylaws of the U.S. Olympic & Paralympic Committee ("USOPC"), and USOPC's NGB Compliance Standards. If any USAFB Bylaw, policy, or procedure provides for a hearing, that hearing shall be conducted in accordance with this Grievance Policy unless explicitly provided otherwise.

This Policy is designed to promote equity and fairness; accordingly, it must not be used as a means for retaliation or punitive action. If you believe you have been a victim of retaliation, please refer to USAFB's Whistleblower and Anti-Retaliation Policy.

III. Types of Grievances

The USAFB Grievance Policy supports the following types of Grievances as defined by the USAFB Bylaws:

a) **Administrative**. Any Protected Individual may file a Grievance pertaining to any matter within the jurisdiction of USAFB, including but not limited to any alleged violation of (i) any USAFB Policy, Rule or Regulation, (ii) any provision of USAFB's Bylaws, (iii) alleged non-compliance of USOPC Bylaws, or NGB Compliance Standards, and/or (iv) alleged non-compliance of the Ted Stevens Act.

b) **Right to Participate.** Any Protected Individual may file a Grievance pertaining to any alleged denial, or alleged threat of denial, of that Individual's opportunity to participate or compete in a Protected Competition or USAFB sanctioned competition. This includes the opportunity of any athlete, coach, trainer, manager, administrator, or official to participate in amateur athletic competition, consistent with the Act.

c) **Field of Play**. An Athlete may file a Grievance related to a competition **only** if a field of play decision was (a) outside the officials' authority to make it or (b) the product of fraud, corruption, partiality, or other misconduct of the official.

This Grievance Policy **excludes** the following types of Grievances:

a) **Anti-Doping Violations.** A decision concerning a doping violation adjudicated by the independent anti-doping organization designated by the USOPC to serve as the U.S.

National Anti-Doping Organization (currently the United States Anti-Doping Agency) shall not be reviewable through, or the subject of, this Grievance Policy.

b) **U.S. Center for SafeSport Matters.** A matter or decision under the jurisdiction of the U.S. Center for SafeSport shall not be reviewable through, or the subject of, this Grievance Policy. Allegations of emotional, physical, and sexual misconduct are subject to the policies and protocols of the USAFB Response and Resolution Policy, the USAFB Minor Athlete Abuse Prevention Policies ("MAAPP"), including its Appendix B (Athlete Safety Policy), and the U.S. Center for SafeSport.

- If a complaint alleges violation(s) of both, or a combination of, USAFB's policies and U.S. Center for SafeSport policies, then the allegations will be resolved through the U.S. Center for SafeSport process. Any portion of the Complaint which remains within USAFB's Jurisdiction will be stayed pending the result of U.S. Center for SafeSport's ruling.

c) **Interaction with Law Enforcement**. Any complaint arising out of conduct or a matter that has been referred to, or is being investigated by, any law enforcement or similar agency may be stayed pending the outcome of that agency's process, unless the complaint raises issues or concerns that require immediate resolution.

d) **ID Holder Status.** The failure to maintain Good Standing, which may include failure to pay, by an ID Holder shall not be reviewable through this policy.

e) Background Check Determinations. Determinations under the USA Football Background Check Policy, including appeals to the Background Check Review Panel and the Background Check Appeal Panel, are resolved exclusively under that Policy and are not reviewable through this Grievance Policy. Nothing in this exclusion limits any right to arbitration under Section IX of this Policy and the Act.

IV. Procedure to Report Grievances

a) **Notice of Grievance Form.** The Complainant (or the Complainant's parent or legal guardian if a minor) shall file the Notice of Grievance Form (See Attachment A), unless otherwise specified within this policy. The grievance shall set forth the following in clear and concise language:

i. the Complainant's full name and USA Football ID number, if any;

ii. the identity, to the extent known by the Complainant, the Individual(s) who is allegedly responsible for the act or omission that is the subject of the Grievance;

iii. the alleged grounds of violation or noncompliance (i.e., the specific rule, regulation, policy, provisions of the Act, or US Olympic Committee Bylaws, or NGB Compliance Standard the Complainant alleges has been violated);

iv. brief description of any supporting evidence and/or documentation;

v. the remedy requested;

vi. if the Grievance needs to be expedited pursuant to Section IV(g); and

vii. Agreement by the Complainant that the statements made therein, to the best of their knowledge, are true, complete, and accurate.

Note: USAFB may serve as the 'Complainant' in the Grievance process.

b) **Filing of Grievance Form.** The completed Grievance Policy Filing Form (with any supporting evidence and/or documentation attached) must be submitted via the online form. Copies of all submissions will be directed to the General Counsel (compliance@usafootball.com).

c) **Grievances Involving Selection to Participate in a Competition.** Where a Grievance is filedinvolvingselectionofanindividualtoparticipateinacompetition, the Complainant shall include with the Grievance a list of all other individuals, together with their contact information, that may be adversely affected by a decision rendered on the Grievance. The Hearing Panel shall determine which additional individuals must receive notice of the Grievance.. Any individual so notified then shall have the option to participate in the proceeding as a party. If an individual is notified of the Complaint, then that individual shall be bound by the decision of the Hearing Panel, even if the individual chose not to participate as a party. This subsection applies equally to a Grievance involving the non-selection of an individual or the removal of an individual from a team or roster. Review of a Grievance involving selection, non-selection, or removal shall be limited to whether USAFB complied with its published Selection Procedures and criteria; the Hearing Panel shall not substitute its own judgment for that of the Selection

Committee or coaching staff on matters of competitive performance, positional need, or athletic judgment.

d) **Deficiency Dismissal.** A Grievance not submitted in accordance with these reporting procedures may be dismissed. If the deficiency(ies) can be rectified, USAFB will provide the Complainant with notice of the defect(s) and provide a reasonable period of time to cure such defect(s). If the Complainant fails to cure within the time period provided, USAFB may dismiss the Grievance. USAFB shall provide written notification of Grievance dismissal. If dismissed for failure to comply with any of the above requirements, the Complainant may re-file a new Grievance that cures such deficiencies.

e) **Compliance**. Within fourteen (14) days after receipt of a Complaint, the Compliance Team will determine:

i. Whether the complaint complies with this policy, including whether the complaint is within the statute of limitations or whether the Complainant has standing to file the complaint;

ii. Whether the underlying facts and circumstances referenced in the Complaint give rise to an issue that is appropriate for resolution under this Policy; and

iii. iii. Whether the complaint involves matters over which USAFB does or does not have the authority or ability to remedy.

f) **Statute of Limitations.** Complaints must be filed within the following timeframes: i. Administrative Complaint – 60 days since the occurrence of the alleged violation or grievance, except as provided below.

ii. Disciplinary Complaint – 60 days since the occurrence of the alleged violation or grievance, except as provided below.

iii. Field of Play- 60 days since the occurrence of the alleged violation or grievance, except as provided below.

iv. Complaints alleging misconduct under USAFB's Response and Resolution Policy, the MAAPP (including its Appendix B, Athlete Safety Policy), or SafeSport related matters are not subject to any statute of limitations.

g) **Expedited Procedures.** Upon the request of a party, the Judicial Committee may determine it is necessary to expedite the proceeding in order to resolve a matter relating to a competition that is so scheduled that compliance with regular procedures would not be likely to produce a sufficiently early decision to do justice to the affected parties. The Judicial Committee is authorized to order that the Complaint be heard and decided not less than ten (10) business days prior to the scheduled competition. In such a case, the Hearing Panel is authorized to hear and decide the Grievance pursuant to such procedures as are necessary, but fair to the parties involved.

V. Informal Resolution.

a) Upon receipt of the submitted Grievance Notice the Compliance Team will review and qualify the matter as either a Grievance or a Complaint.

b) In the event the matter should be classified as a Complaint, or that the Grievance may be resolved through an Informal Resolution process, flexibility will be permitted in achieving a satisfactory outcome without the need for a Hearing Panel.

c) **Exception:** Informal Resolution shall not be utilized for matters that must be reported to, and/or are under the jurisdiction of, the U.S. Center for SafeSport, USADA, USOPC, law enforcement or any other relevant oversight body.

VI. TEMPORARY MEASURES:

USAFB may, at any point before the matter is final, impose Temporary Measures. Generally, Temporary Measures are implemented based on the severity of the Complaint, the evidentiary support for the Complaint, and/or the perceived risk(s) to athletes or the sports community.

a) A Temporary Measure shall be effective immediately upon notice, unless otherwise stated, and will remain in effect until expressly removed.

b) Temporary Measures set forth by the U.S. Center for SafeSport orUSOPC will supersede any Temporary Measures set forth by USAFB and adopted immediately upon issuance.

c) Temporary Measures that do not materially affect the Respondent's opportunity to participate are not subject to review and may not be appealed.

d) Any Temporary Measures by USAFB that materially affect the Respondent's opportunity to participate, must first be reviewed by the Judicial Committee.

e) Upon issuance of a Temporary Measure that affects the Respondent's opportunity to participate, the Respondent has seven (7) days to request a hearing in written form (e-mail is acceptable). If the Respondent does not make such a request in seven (7) days, the temporary measure is no longer subject to review.

VII. Hearing Panel

Upon the filing of a Grievance, the Chair of the Judicial Committee, after consultation with the other Judicial Committee members, shall appoint three (3) disinterested and impartial individuals to serve as the Hearing Panel for the matter (the "Hearing Panel").

Disinterested Individual shall be defined as an individual who does not have a material interest, directly or indirectly, in the outcome of the hearing or a material relationship with a person who has such an interest.

a) The Hearing Panel will be comprised of at least one (1) athlete representative who shall meet the Athlete Representation requirements of USAFB Bylaw Section 7.03(a)(i); and two (2) additional individuals who may or may not be ID Holders b) USAFB will make a good faith effort to ensure the Hearing Panel includes at least one member who possesses a legal background.

c) Prior to appointment, each proposed Hearing Panel Member shall review and acknowledge the USA Football Conflict-of-Interest and Ethics Policy and disclose any potential conflicts. The disclosure shall address, at minimum:

i. any personal, professional, or financial relationship with the Complainant or Respondent;

ii. any affiliation with a team, program, or organization connected to either party; and

iii. any prior knowledge of or involvement in the underlying matter.

d) Upon completion of Conflict of Interest disclosures and confirmation that no disqualifying conflicts exist, the Chair of the Judicial Committee shall finalize appointments and identify an individual to serve as Chair of the Hearing Panel.

i. Judicial Committee members, with exception of the Chair, may be appointed to the Hearing Panel.

e) Within three (3) business days of panel appointment, the Chair of the Judicial Committee shall disclose the names and general qualifications of the appointed panelists to the Complainant and Respondent solely for the purpose of identifying any conflict of interest known to the parties that was not captured through the panel's self-disclosure process.

f) Each party shall have five (5) business days from receipt of panelist names to submit a written conflict of interest objection to the Chair of the Judicial Committee. Any objection must identify the specific bases for the alleged conflict with particularity.

Generalized objections or objections made for the purpose of delay shall not be considered.

g) The Complainant, Respondent, and their respective representatives shall hold the identities of the panelists in strict confidence during the objection window and throughout the pendency of the proceeding. Disclosure of panelist identities outside the formal process shall constitute a separate violation subject to disciplinary action.

h) Authority to rule on any Conflict of Interest objection shall be vested as follows: i. As a general matter, the Judicial Committee shall rule collectively on any Conflict of Interest objection, except that any member of the Judicial

Committee serving on the Hearing Panel shall be recused from participation in that ruling;

ii. Where both non-Chair members are serving on the Hearing Panel, the Chair of the Judicial Committee shall have sole authority to rule on any Conflict-of- Interest objection;

iii. Escalation: in the event the Chair is unavailable or otherwise disqualified, the objection shall be referred to the USAFB Chief Operating Officer for final determination. The ruling on any Conflict-of-Interest objection shall be final and not subject to further appeal within this process. If a conflict is sustained, the Chair of the Judicial Committee (or the designated escalation officer if the Chair is unavailable) shall appoint a replacement panelist, and the parties shall have three (3) business days to raise objections to the replacement. If no timely objection is filed, or if all objections are resolved, the panel shall be deemed constituted and the hearing shall proceed

i) The Hearing Panel shall have the responsibility to search for facts, collect evidence and gather documentation as needed to ensure a thorough understanding and exploration of the matter.

VIII. Administration of the Grievance

In any hearing conducted pursuant to this Policy, the parties shall be provided with the following fair process considerations:

8.01 Pre-Hearing Process

a) **Notice of Grievance.** The notice of the charges or alleged violation(s), with specificity and in writing with the supporting documentation filed by the Complainant, and proposed actions, possible consequences or remedy requested if found to be a sufficient indication of a possible violation, shall be delivered to the Respondent no later than fourteen (14) business days after USAFB receipt, without just cause for delay;

b) **Answer or Request to Dismiss.** Within ten (10) business days upon receipt of the Notice of Grievance, the Respondent may submit an answer, such as a reason why the matter should not be taken on by USAFB via written response to the Notice of Grievance;

i. **Response.** Within five (5) business days upon receipt of an Answer or Request to Dismiss, USAFB will notify the Respondent of decision and will provide the Complainant with a copy of the Answer or Request to Dismiss filed, the decision, and the rationale for the dismissal, if applicable.

ii. **Default.** If the Respondent fails to file a reply to the complaint within the time period set forth herein, the Hearing Panel may enter default against the Respondent. The entry of a default shall constitute an admission by the Respondent of the facts set forth in the complaint. However, the Respondent shall have the right to be heard on the issue of any sanction. For good cause shown, a default may be set aside by the Chair of the Hearing Panel, and a Respondent may be permitted to file a reply prior to a decision being rendered by the Hearing Panel.

c) **Summary Dismissal.** After the time for responding to the Grievance has expired, or after receipt of responses from Respondent(s), whichever is sooner, the Hearing Panel may decide to dismiss the Grievance on such grounds as it deems appropriate, including but not limited to, the Grievance does not fall within the jurisdiction of the Hearing Panel, the Grievance fails to state a claim upon which relief may be granted, the time limitation period has expired, the Grievance is moot, the Grievance was satisfactorily resolved through an informal resolution process, and/or the Grievance fails to identify a Respondent. All parties shall be notified should there be a summary dismissal. There is no appeal from a dismissal by the Hearing Panel; however, the Complainant may refile if the deficiency can be resolved.

d) **Notice of Hearing.** If a hearing is deemed warranted by the Hearing Panel, the Respondent and Complainant shall both be informed of the alleged violations within thirty (30) business days of the filing of the Notice of Grievance. The Notice of Hearing shall include the following:

i. hearing date which provides for a reasonable time between receipt of the notice of Grievance and the hearing with respect to the allegations, within which to prepare a defense. The hearing date shall not exceed ninety (90) days after the Grievance filing, without just cause for delay;

ii. notice of the opportunity to have a hearing before a panel consistent with the composition requirements of Section VII(a);

iii. notice of the identity of all witnesses provided no later than five (5) business days in advance of the hearing, and

iv. distribution of evidence by each party no later than ten (10) business days in advance of the hearing to provide for a reasonable time to prepare one's position in the matter.

8.02 Confidentiality of the Hearings.

a) All proceedings before the Hearing Panel are confidential.

b) All proceedings regarding an alleged violation shall be and remain confidential except:

i. Information that is necessary to disclose in the course of an investigation to witnesses, parties, counsel and other persons directly involved in the proceedings;

ii. Information disclosed pursuant to court order or subpoena; iii.

Information disclosed to law enforcement agencies and child protection agencies;

iv. Information disclosed to parties; and,

v. Information disclosed by USAFB in response to disclosure by other parties or witnesses in the proceedings.

c) All ID Holders and other Protected Individuals acknowledge and agree that USAFB and its agents, employees, lawyers, officers, and ID Holders have the ability to communicate information to ID Holders relating to disciplinary matters or conduct that may affect such ID Holders, subject to all relevant laws, regulations and USOPC requirements.

d) The release of confidential information gained from these proceedings, unless specifically permitted, is a separate violation and may result in disciplinary action.

e) The name of the Respondent, date of determination, disposition of a complaint and the USAFB Bylaw or policy violation, if any, may be published by USAFB.

f) USAFB shall not be responsible for any release of confidential information by parties, witnesses, or other non-USAFB or non-USAFB related individuals who may possess or disseminate such information.

g) Nothing in this Policy prohibits a survivor from sharing their story publicly, which shall not include any recording.

8.03 Conduct of the Proceeding

a) the hearing may be conducted in person or by video conference at a time and place (if applicable) selected by the chair of the Hearing Panel. The chair will endeavor to select a place and time that is convenient and equitable to the majority of the persons so as to make it practicable for all parties to attend;

b) the right to be assisted in the presentation of one's case at a hearing, including the assistance of legal counsel; provided all fees are paid by the party seeking assistance and the Hearing Panel is notified no later than five (5) business days in advance of the hearing. This notice must include the name, address, phone number, and email address of the counsel.

c) the Hearing Panel shall rule on all motions and other matters raised in the proceedings within their jurisdiction. The Hearing Panel shall set such timelines and other rules regardingthe proceeding and the conduct of the hearing as it deems necessary.

d) the parties shall be given a reasonable opportunity to present and examine evidence, the right to call witnesses to testify at the hearing, including the right to have individuals under the control of a Respondent attend; and to confront and cross-examine witnesses, and to present argument;

e) members of the Hearing Panel shall have the right to question witnesses or the parties to the proceeding at any time;

f) the burden of proof shall be on the Complainant, which burden shall be at least a "preponderance of the evidence" unless an applicable rule of law provides for a higher burden of proof;

g) any party may have a record made of the hearing. A court reporter may be present at the hearing at the request of a party. The court reporter shall be paid for by the party requesting the court

reporter, or if mutually agreed, the cost may be equally divided. Any transcript shall be paid for by the party requesting the transcript.

8.04 Post Hearing

a) a decision shall be determined by a majority of the Hearing Panel. The Hearing Panel's decision shall be in writing and distributed to the parties. The written decision, with reasons therefore, based solely on the evidence of record, shall be handed down within ten (10) business days following the conclusion of the hearing, unless additional time is needed by the Hearing Panel;

b) including a written notice of arbitration procedures, if the decision is adverse to the person charged, and the prompt and fair adjudication of any appeal;

c) Include any sanctions the Hearing Panel may deem necessary as part of their decision.

8.05 Sanctioning Guidelines

a) The Hearing Panel shall consider all relevant testimony, evidence and documents and render a decision and apply sanctions based on an evaluation of the violation regardless of a party's competitive/coaching level, achievements within the sport, or other factors not directly related to the violation.

b) Sanctions imposed by the Hearing Panel will be reasonable and proportionate to the violation and surrounding circumstances and designed to promote participant welfare.

General considerations when imposing sanctions include:

i. Nature and severity of the violation;

ii. Ages of the individuals involved;

iii. Any record or pattern of behavior;

iv. Voluntary disclosure of the violation, cooperation, or demonstration of remorse; v. Disposition by law enforcement, if any;

vi. Perceived or real impact on the concerned parties;

vii. Likelihood of rehabilitation; and,

viii. Ability to affect positive change.

c) Types of Sanctions. The Hearing Panel may impose a wide range of disciplinary sanctions. The forms of sanctions include but are not limited to the following:

i. Private Censure: The Hearing Panel may issue a private censure. Generally, these sanctions take the form of a warning letter setting forth the specific violation and/or action or inaction that led to the finding of the misconduct or violation, the specific expectation of conforming behavior, and the sanction should a party's behavior or conduct fail to conform.

ii. Public Reprimand: The Hearing Panel may issue a public reprimand in whatever form, transmission or publication warranted when it determines that the safety of an athlete(s) warrants such publication.

iii. Removal from sanctioned activity. The Hearing Panel may remove the Respondent from a specific event or series of events, or for a specified period of time.

iv. Warning with recommendation. The Hearing Panel may issue a warning letter, as set forth above, and mandate a review of behavior within a period of time, or require a party to implement a specific policy or modify a behavior.

v. Educational remedy. The Hearing Panel may mandate a party to take and complete an educational course(s) or demonstrate compliance with a USAFB policy.

vi. Probation. The Hearing Panel may place a party on probation for a period of time whereby the individual's behavior will be monitored by the appropriate legal and/or USAFB reporting systems, and ID Holder privileges restricted.

vii. Suspension. The Hearing Panel may suspend a party for a period of time whereby the individual does not have any of the rights and privileges associated with USAFB, including the right to be involved in activities or participate in USAFB sanctioned activities. The suspension notification will detail the criteria by which the suspension will be reviewed, lifted, or converted to an alternate sanction.

viii. Revocation of Local Affiliated Organization1 ("LAO") Status. The Hearing Panel may terminate the affiliation of a LAO, whereby the LAO may no longer host USAFB sanctioned events or register/compete a team of athletes in USAFB sanctioned competitions. Note: USAFB does not have LAOs at this time.

ix. Permanently Ineligible for USAFB ID. The Hearing Panel may ban for life an individual's USAFB ID, by which that individual may no longer be affiliated with USAFB or participate in USAFB sanctioned activities.

x. Other Relief. The Hearing Panel may impose other types of relief deemed appropriate to the violations and/or circumstances of the matter, including, but not limited to, the issuance of a private or public apology or restitution/fine, expulsion with right to apply for reinstatement.

xi. When a Hearing Panel imposes a sanction with executory provisions (for example, probation or suspension), the Hearing Panel shall be deemed to have a continuing authority to enforce the executory provisions and, upon the Respondent's failure to fulfill same, to impose such other penalties as the Hearing Panel may determine to be proper.

IX. Arbitration

USAFB agrees to submit to binding arbitration in any controversy involving the opportunity of any amateur athlete, coach, trainer, manager, administrator, or official to participate in amateur athletic competition upon the demand of the USOPC or any aggrieved amateur athlete, coach, trainer, manager, administrator, or official using a provider of arbitration and mediation services designated by the USOPC Dispute Resolution Unit, with the concurrence of the Team USA Athletes'

Commission and the National Governing Bodies' Council, as required by §220522(4)(B) of the Act.

X. Points of Contact

Individuals in need of further information, guidance and/or enforcement in relation to the Grievance Policy may contact the following:

Judicial Committee (judicial@usafootball.com)

USAFB Help Desk: Phone: (317)-614-7750

Compliance (compliance@usafootball.com)

In addition, the USOPC Ethics & Compliance team can serve as a secondary resource for questions or concerns regarding this Policy. The USOPC Ethics & Compliance team may be contacted at:

Integrity Hotline: 877-404-9935

USOPC Integrity Portal: https://usopc.ethicspoint.com

ForAthleteswithQuestionsRegarding the USAFBGrievancePolicy:

The Athlete Ombuds provides cost-free, independent and confidential advice regarding athlete rights; resolving disputes or Grievances; and any sport rule, policy, or process, including NGB-athlete agreements, codes of conduct or team selection procedures. The

Athlete Ombuds can also help athletes connect with legal counsel or mental health resources, if needed. Athletes may contact the Athlete Ombuds at:

PHONE:(719)866-5000

EMAIL: ombudsman@usathlete.org

WEBSITE: www.usathlete.org

Attachment A

Click on Hyperlink Below

Grievance Policy Form