

## USA Football Safe Sport Policy

### INTRODUCTION

There are many reasons to play football. It encourages a healthy lifestyle, builds self-confidence, and teaches important life lessons about teamwork and discipline. Football players, and athletes in general, also do better off the field. They learn goal-setting, teamwork and time management skills; they are less likely to use cigarettes, drugs and alcohol; they have higher graduation rates and are more likely to attend college.

Unfortunately, youth sports (including football) can also be a high-risk environment for misconduct, including child physical and sexual abuse.

**USA Football (USAFB) is committed to protecting and improving the development and safety of athletes and participants involved in football.**

USAFB publishes this policy as a resource to guide the development, implementation and internal review of effective athlete safety and misconduct prevention strategies for USAFB programs and events, and as a model for youth and amateur football organizations. This policy is to be followed by all USAFB staff, not only the coaches and staff that are interacting with athletes.

Misconduct may damage an athlete's psychological well-being. Athletes who have been mistreated experience social embarrassment, emotional turmoil, psychological scars, loss of self-esteem and negative impacts on family, friends and the sport. Misconduct often hurts an athlete's competitive performance and may cause him or her to stop participating in sports entirely.

Here, we identify six primary types of misconduct:

- Bullying
- Harassment
- Hazing
- Emotional Misconduct
- Physical Misconduct
- Sexual Misconduct, including Child Sexual Abuse

**All forms of misconduct are intolerable and in direct conflict with USA Football's ideals.**

## WHAT'S IN THE POLICY?

USA Football has adopted six strategies recommended by the Centers for Disease Control (CDC) to recognize, reduce and respond to child physical and sexual abuse and other types of misconduct in sport.<sup>1</sup> These strategies include:

Strategy 1: Defining Misconduct .....	4
SEXUAL MISCONDUCT.....	4
CHILD SEXUAL ABUSE .....	6
PHYSICAL MISCONDUCT .....	7
EMOTIONAL MISCONDUCT .....	8
BULLYING .....	8
HARASSMENT.....	9
HAZING .....	10
WILLFULLY TOLERATING MISCONDUCT.....	10
Strategy 2: Screening Staff, Volunteers and Contractors.....	12
Persons Required to Submit to a Criminal Background Check.....	12
Duty of Full Disclosure .....	12
Criminal Background Check Process .....	13
Strategy 3: Sex Abuse Prevention and Other Misconduct Training and Education.....	16
Persons Required to Complete a Sexual Abuse Prevention Course.....	16
Strategy 4: Supervision of Athletes and Participants.....	18
ONE-ON-ONE INTERACTIONS .....	18
Appropriate One-On-One Interactions: .....	18
Individual Meetings .....	18
Individual Training Sessions .....	18
Prohibited One-On-One Interactions:.....	18
PHYSICAL CONTACT WITH ATHLETES.....	18
Common Criteria for Appropriate Physical Contact.....	19
Safety.....	19

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<sup>1</sup> See Saul J, Audage NC. *Preventing Child Sexual Abuse Within Youth-serving Organizations: Getting Started on Policies and Procedures*. Atlanta (GA): Centers for Disease Control and Prevention, National Center for Injury Prevention and Control; 2007.

Celebration .....	19
Consolation .....	19
Prohibited Physical Contact:.....	20
Violations.....	20
ELECTRONIC COMMUNICATIONS AND SOCIAL MEDIA POLICY .....	20
Email, Texts, Instant Messaging, and Similar Electronic Communications.....	21
Electronic Imagery .....	21
Request to Discontinue All Electronic Communications or Imagery .....	21
Misconduct .....	21
Violations.....	21
LOCKER ROOMS AND CHANGING AREAS.....	22
Monitoring .....	22
Mixed-Gender Teams.....	22
Use of Cell Phones and Other Mobile Recording Devices .....	23
TRAVEL.....	23
Local Travel .....	23
Team Travel.....	24
Travel Notification .....	25
Mixed-Gender and Mixed-Age Travel .....	25
Coach and Staff Responsibilities.....	25
Chaperone Responsibilities .....	26
Strategy 5: Responding to Abuse, Misconduct and Policy Violations.....	28
Reporting Policy .....	28
Reporting Procedure .....	29
Confidentiality, Anonymous Reporting and Bad Faith Allegations.....	30
How Reports Are Handled .....	30
Disciplinary Rules and Procedures .....	32
Strategy 6: Monitoring USA Football’s Policy .....	34
Appendix A: USA Football’s Background Check Criterion Offenses.....	35
Appendix B: Incident Report Form .....	38
Appendix C: Incident Investigation Report Form .....	40

## Strategy 1: Defining Misconduct

### Overview

In the event that any staff member or volunteer observes inappropriate behaviors, suspected physical or sexual abuse, or misconduct, it is the personal responsibility of each staff member and volunteer to immediately report his or her observations to an immediate supervisor or a USAFB senior executive (e.g., Executive Director, Senior Director or General Counsel).

USAFB is committed to creating a safe and positive environment for staff and athletes' physical, emotional and social development and to ensuring that it promotes an environment free of misconduct.

**Staff members and volunteers should not attempt to evaluate the credibility or validity of child physical or sexual abuse allegations as a condition for reporting to appropriate law enforcement authorities.** Instead, it is the responsibility of each staff member and volunteer to immediately report suspicions or allegations of child physical or sexual abuse to an immediate supervisor or a USAFB senior executive (e.g., Executive Director, Senior Director or General Counsel).

USAFB recognizes that the process for training and motivating athletes will vary with each coach and athlete, but it is nevertheless important for everyone involved in sport to support the use of motivational and training methods that avoid misconduct.

### Application

This Policy applies to USAFB staff members, volunteers and contractors (collectively, "USAFB Staff") as well as to athletes and participants.

USAFB staff members, athletes and participants shall refrain from all forms of misconduct, which include:

- 1) Sexual misconduct, including child sexual abuse
- 2) Physical misconduct
- 3) Emotional misconduct
- 4) Bullying
- 5) Harassment
- 6) Hazing

### SEXUAL MISCONDUCT

- (1) Any touching or non-touching sexual interaction that is (a) nonconsensual or forced, (b) coerced or manipulated, or (c) perpetrated in an aggressive, harassing, exploitative or threatening manner;

- (2) Any sexual interaction between an athlete and an individual with evaluative, direct or indirect authority. Such relationships involve an imbalance of power and are likely to impair judgment or be exploitative; or
- (3) Any act or conduct described as sexual abuse or misconduct under federal or state law (e.g. sexual abuse, sexual exploitation, rape).

**Note: An imbalance of power is always assumed between a coach and an athlete or a staff member and their supervisor.**

### ***Types of Sexual Misconduct***

Types of sexual misconduct include:

- (1) sexual assault,
- (2) sexual harassment,
- (3) sexual abuse, or
- (4) any other sexual intimacies that exploit an athlete. **Minors cannot consent to sexual activity with an adult** and all sexual interaction between an adult and a minor is strictly prohibited.

### ***Exceptions***

None

### ***Examples***

Examples of sexual misconduct prohibited under this Policy include, without limitation:

- (1) **Touching offenses.** Behaviors that include:
  - (a) fondling an athlete's breasts or buttocks
  - (b) exchange of reward in sport (e.g., team placement, scores, feedback) for sexual favors
  - (c) genital contact
  - (d) sexual relations or intimacies between persons in a position of trust, authority and/or evaluative and supervisory control over athletes or other sport participants.
- (2) **Non-touching offenses.** Behaviors that include:
  - (a) a coach discussing his or her sex life with an athlete
  - (b) a coach asking an athlete about his or her sex life
  - (c) coach requesting or sending a nude or partial-dress photo to athlete
  - (d) exposing athletes to pornographic material
  - (e) sending athletes sexually explicit or suggestive electronic or written messages or photos (e.g. "sexting")
  - (f) deliberately exposing an athlete to sexual acts
  - (g) deliberately exposing an athlete to nudity (except in situations where locker rooms and changing areas are shared)

- (h) sexual harassment; specifically, the sexual solicitation, physical advances, or verbal or nonverbal conduct that is sexual in nature, and
  - a. is unwelcome, offensive or creates a hostile environment, and the offending individual knows or is told this
  - b. is sufficiently severe or intense to be harassing to a reasonable person in the context.

#### CHILD SEXUAL ABUSE

- (1) Any sexual activity with a child where consent is not or cannot be given. This includes sexual contact with a child that is accomplished by deception, manipulation, force or threat of force, regardless of the age of the participants, and all sexual interactions between an adult and a child, regardless of whether there is deception or the child understands the sexual nature of the activity.

**Note concerning peer-to-peer child sexual abuse:** Sexual contact between minors also can be abusive. Whether or not a sexual interaction between children constitutes child sexual abuse turns on the existence of an aggressor, the age difference between the children, and/or whether there is an imbalance of power and/or intellectual capabilities.

- (2) Any act or conduct described as child sexual abuse under federal or state law.

#### **Exceptions**

None

### **Examples**

Sexually abusive acts may include sexual penetration, sexual touching or non-contact sexual acts such as verbal acts, sexually suggestive electronic or written communications, exposure or voyeurism.

## **PHYSICAL MISCONDUCT**

- (1) Contact or non-contact conduct that results in, or reasonably threaten to, cause physical harm to an athlete or other sport participants; or
- (2) Any act or conduct described as physical abuse or misconduct under federal or state law (e.g. child abuse, child neglect, assault).

### **Exceptions**

Physical misconduct does not include professionally-accepted coaching methods of skill enhancement, physical conditioning, team building, appropriate discipline or improving athlete performance. For example, hitting, punching, and kicking are well-regulated forms of contact in combat sports, but have no place in swimming.

### **Examples**

Examples of physical misconduct prohibited by this Policy include, without limitation:

- (1) **Contact offenses.** Behaviors that include:
  - (a) punching, beating, biting, striking, choking or slapping an athlete;
  - (b) intentionally hitting an athlete with objects or sporting equipment;
  - (c) providing alcohol to an athlete under the legal drinking age (under U.S. law);
  - (d) providing illegal drugs or non-prescribed medications to any athlete;
  - (e) encouraging or permitting an athlete to return to play pre-maturely following a serious injury (e.g., a concussion) and without the clearance of a medical professional;
  - (f) prescribing dieting or other weight-control methods (e.g., weigh-ins, caliper tests) without regard for the nutritional well-being and health of athlete.
- (2) **Non-contact offenses.** Behaviors that include:
  - (a) isolating an athlete in a confined space (e.g., locking an athlete in a small space);
  - (b) forcing an athlete to assume a painful stance or position for no athletic purpose (e.g. requiring an athlete to kneel on a harmful surface);
  - (c) withholding, recommending against or denying adequate hydration, nutrition, medical attention or sleep.

**Note: Bullying, harassment and hazing, defined below, often involve some form of physical misconduct.**

## EMOTIONAL MISCONDUCT

- (1) A pattern of deliberate, non-contact behavior that has the potential to cause emotional or psychological harm to an athlete. Non-contact behaviors include:
  - a) verbal acts
  - b) physical acts
  - c) acts that deny attention or support
- (2) Any act or conduct described as emotional abuse or misconduct under federal or state law (e.g. child abuse, child neglect).

### **Exception**

Emotional misconduct does not include professionally-accepted coaching methods of skill enhancement, physical conditioning, team building, discipline or improving athletic performance.

### **Examples**

Examples of emotional misconduct prohibited by this policy include, without limitation:

- (1) **Verbal Acts.** A pattern of verbal behaviors that (a) attack an athlete personally (e.g., calling them worthless, fat or disgusting) or (b) repeatedly and excessively yelling at a particular participant or participants in a manner that serves no productive training or motivational purpose.
- (2) **Physical Acts.** A pattern of physically aggressive behaviors, such as (a) throwing sport equipment, water bottles or chairs at, or in the presence of, participants; or (b) punching walls, windows or other objects.
- (3) **Acts that Deny Attention and Support.** A pattern of (a) ignoring an athlete for extended periods of time or (b) routinely or arbitrarily excluding participants from practice.

**Note: Bullying, harassment, and hazing, defined below, often involve some form of emotional misconduct.**

## BULLYING

- (1) An intentional, persistent and repeated pattern of committing or willfully tolerating physical and non-physical behaviors that are intended, or have the reasonable potential, to cause fear, humiliation or physical harm in an attempt to socially exclude, diminish or isolate the targeted athlete(s), as a condition of membership
- (2) Any act or conduct described as bullying under federal or state law

### **Exceptions**

Bullying does not include group or team behaviors that (a) are meant to establish normative team behaviors, or (b) promote team cohesion. For example, bullying does not include verbal admonitions to encourage team members to train harder and to push through a difficult training regimen.

### **Examples**

Examples of bullying prohibited by this Policy include, without limitation:

- (1) **Physical behaviors.** Behaviors that include (a) hitting, pushing, punching, beating, biting, striking, kicking, choking, or slapping an athlete; (b) throwing at, or hitting an athlete with, objects such as sporting equipment.
- (2) **Verbal and emotional behaviors.** Behaviors that include (a) teasing, ridiculing, intimidating; (b) spreading rumors or making false statements; or (c) using electronic communications, social media, or other technology to harass, frighten, intimidate or humiliate (“cyber bullying”).

## **HARASSMENT**

- (1) A repeated pattern of physical and/or non-physical behaviors that (a) are intended to cause fear, humiliation or annoyance, (b) offend or degrade, (c) create a hostile environment or (d) reflect discriminatory bias in an attempt to establish dominance, superiority or power over an individual athlete or group based on gender, race, ethnicity, culture, religion, sexual orientation, gender expression or mental or physical disability; or
- (2) Any act or conduct described as harassment under federal or state law

### **Exceptions**

None

### **Examples**

Examples of harassment prohibited by this Policy include, without limitation:

- (1) **Physical offenses.** Behaviors that include (a) hitting, pushing, punching, beating, biting, striking, kicking, choking or slapping an athlete or participant; (b) throwing at or hitting an athlete with objects including sporting equipment.
- (2) **Non-physical offenses.** Behaviors that include (a) making negative or disparaging comments about an athlete’s sexual orientation, gender expression, disability, religion, skin color, or ethnic traits; (b) displaying offensive materials, gestures, or symbols; (c) withholding or reducing playing time to an athlete based on his or her sexual orientation.

## HAZING

- (1) Coercing, requiring, forcing or willfully tolerating any humiliating, unwelcome or dangerous activity that serves as a condition for (a) joining a group or (b) being socially accepted by a group's members; or
- (2) Any act or conduct described as hazing under federal or state law

### **Exception**

Hazing does not include group or team activities that (a) are meant to establish normative team behaviors or (b) promote team cohesion.

### **Examples**

Examples of hazing prohibited by this Policy include, without limitation:

- (1) requiring, forcing or otherwise requiring the consumption of alcohol or illegal drugs
- (2) tying, taping or otherwise physically restraining an athlete
- (3) sexual simulations or sexual acts of any nature
- (4) sleep deprivation, otherwise unnecessary schedule disruption or the withholding of water and/or food
- (5) social actions (e.g. grossly inappropriate or provocative clothing) or public displays (e.g. public nudity) that are illegal or meant to draw ridicule
- (6) beating, paddling or other forms of physical assault
- (7) excessive training requirements focused on individuals on a team

**Comment:** Activities that fit the definition of hazing are considered to be hazing regardless of an athlete's willingness to cooperate or participate.

## WILLFULLY TOLERATING MISCONDUCT

It is a violation of this Safe Sport Policy if a USAFB Staff member knows of misconduct, but takes no action to intervene on behalf of the athlete(s), participant(s), USAFB Staff member(s).

## REPORTING

Although these policies are designed to reduce child sexual abuse and other misconduct, it can still occur. USAFB Staff members, volunteers and participants of USA Football shall follow the reporting procedures set forth in USA Football's Reporting Policy. **USA Football does not investigate suspicions or allegations of child physical or sexual abuse, or attempt to evaluate the credibility or validity of such allegations, as a condition of reporting suspicions or allegations to the appropriate law enforcement authorities.**

**VIOLATIONS**

Violations of the Safe Sport Policy shall be reported pursuant to our [Reporting Policy](#) and will be addressed under our Disciplinary Rules and Procedure.

## **Strategy 2: Screening Staff, Volunteers and Contractors**

As one part of an overall strategy for screening USAFB staff members and/or volunteers, USA Football conducts a criminal background check on its employees, and certain independent contractors, volunteers and temporary workers. USAFB uses a criminal background check to gather information about an applicant's prior criminal history. The information revealed by the criminal background check may disqualify an applicant from serving as a staff member, contractor and/or volunteer (collectively, "USAFB Staff"). Making a reasonable effort to obtain past criminal behaviors reduces the chance that athletes and other participants will come in contact with potentially dangerous individuals.

### **Persons Required to Submit to a Criminal Background Check**

- 1) All employees shall consent to, and pass, a criminal background check before performing services for USAFB and at an interval not exceeding two years. (See Appendix A for a description of criterion offenses.)
  - 2) All volunteers, temporary workers and independent contractors shall consent to, and pass, a criminal background check before performing services for USAFB and at an interval not exceeding two years if the volunteer, temporary worker or independent contractor:
    - a) Is working or volunteering *for* USAFB (eg., we hired, recruited or retained the person. It is our volunteer, not another group's volunteer);
    - b) May not *always* be directly supervised by a USAFB employee (e.g., the volunteer recording player heights and weights does not need a background check); and
      - i. Has more contact with youth players than the general public (e.g., access to the playing field or locker rooms, and/or has physical contact with players);
      - ii. Has access to confidential personal or financial information or USAFB trade secrets.
- OR
- 3) All adult participants in a USAFB event or USAFB program where such adults are supervising minors and/or staying in accommodations paid for by USAFB.

### **Duty of Full Disclosure**

Each applicant has the affirmative duty to disclose his or her criminal history. Failing to disclose or intentionally misrepresenting an arrest plea or conviction history in an application or any other information provided by an applicant during the screening process is grounds for employment, volunteer and/or membership revocation or

restriction, regardless of when the offense is discovered. The duty to disclose is relevant in the following situations:

- 1) If an applicant (1) is arrested, (2) pleads or (3) is convicted of a crime other than a traffic offense during the screening process, the applicant is required to disclose such information immediately.
- 2) In the event a person is serving as an employee, contractor or volunteer and (1) is arrested, (2) pleads or (3) is convicted after the completion of the screening process, he or she has an affirmative duty to disclose such information immediately to his or her supervisor or USAFB senior executive (e.g., Executive Director, General Counsel). Breach of this affirmative duty is grounds for termination.
- 3) Any applicant who has been banned by another sport or youth organization, as temporarily or permanently ineligible, must self-disclose this information. A failure to disclose is a basis for disqualification for potential applicants or termination for existing employees/volunteers.

### **Criminal Background Check Process**

- 1) All applicants who qualify under Section A above will be asked to undergo a criminal background check with USAFB's approved third party vendor that complies with the Fair Credit Reporting Act before providing services for USAFB. Through this criminal background check, USAFB will utilize reasonable efforts to ascertain past criminal history of an applicant. An applicant must receive a green light score (described below) from the background check vendor before s/he may perform services for USAFB.
- 2) USAFB's criminal background check vendor will, at a minimum and without limitation:
  - a) Perform a national search of state criminal repositories for evidence of criterion offenses (listed in Appendix A);
  - b) Perform a search of state sexual offender registries; and
  - c) Verify a person's identification against his or her social security number or other personal identifier.

USAFB's criminal background check vendor may also check motor vehicle records of employees and contractors who will operate motor vehicles as part of their job responsibilities.

- 3) USAFB's criminal background check vendor will return a "red light" or "green light" score.
  - a) A **green light** score means that the background check vendor located no records that would disqualify the applicant. A green light score, however, is not a certification of safety or permission to bypass/ignore other screening efforts.

Other disqualifying factors may exist, and can be revealed through an interview, reference checks and a completed application.

Note: A “green light” finding does not mean that an individual is safe to work with children. Instead a “green light” indicates that no criminal history was found that would disqualify the individual from working with children.

- b) A **red light** finding means the criminal background check revealed criminal records which suggest the applicant “does not meet the criteria” and is not suitable for organization employment or volunteer assignment. Individuals who are subject to disqualification under a “red light” finding may challenge the accuracy of the reported information reported by the criminal background check vendor.
- c) **Appeal.** Any disqualified individual has the right to dispute the findings of the criminal background check directly with USAFB’s approved criminal background check vendor. A disqualified individual may not appeal the automatic disqualification or the results of the findings of the criminal background check vendor to USAFB. USAFB will accept the findings of the approved criminal background check vendor.

4) Notice of findings will be provided to:

- a) USAFB legal counsel;
- b) Where relevant, USAFB Human Resources and the Executive Director; and
- c) Other designated individuals, where necessary to protect the safety of minors. Whenever possible, all that will be communicated is that the applicant is or is not eligible to participate in USAFB activities.

5) **USAFB Action.** If any employee or prospective employee receives a red light determination, USA Football will make an individualized determination looking at the facts and circumstances of the previous offense(s) in light of the current or prospective employee’s responsibilities at USAFB before taking action.

USAFB will not engage in an individualized determination for volunteers or temporary workers. If its criminal background check vendor issues a red light, that individual will be ineligible to participate in USAFB activities unless and until USAFB’s background check vendor issues a green light.

6) **Confidentiality.** Unless a red light is issued, USAFB is not privy to any information submitted by an employee or prospective employee to the background check provider or any information found by the provider. When a red light is issued, the background check provider will send USAFB information supporting the basis for its

red light decision and USAFB will engage in the individualized determination. All materials sent to USAFB under these circumstances shall be kept confidential among USAFB's legal team, human resources team, and the Executive Director. Records are secured onsite, either in paper or electronic copy, for a period of seven years after the applicant is no longer affiliated with USA Football, whichever date is later.

USA Football will review its disqualifiers every two years or as otherwise required or modified by law.

### **Strategy 3: Sex Abuse Prevention and Other Misconduct Training and Education**

It is USAFB's policy that employees, contractors and/or volunteers (collectively, "USAFB Staff") are required to report abuse and misconduct. To do so, USAFB Staff should have a basic understanding of sexual abusers, as well as "grooming," the most common strategy offenders use to seduce their victims. Using a combination of attention, affection and gifts, offenders select a child, win the child's trust (and the trust of the child's parent or guardian), manipulate the child into sexual activity, and keep the child from disclosing abuse.

Accordingly, all employees and certain volunteers and/or contractors must complete an awareness training concerning misconduct in sport before performing services for USA Football. Misconduct in sport includes:

- 1) Bullying
- 2) Harassment
- 3) Hazing
- 4) Emotional misconduct
- 5) Physical misconduct, and
- 6) Sexual misconduct, including child sexual abuse

An abuse awareness training course includes the following elements:

- 1) Provides definitions for, and effects of, child physical and sexual abuse
- 2) Identifies risk opportunities for child physical and sexual abuse
- 3) Addresses common myths about offenders
- 4) Outlines patterns, behaviors and methods of operation of sexual predators
- 5) Requires testing consistent with existing standards of care and legislation, where applicable

USA Football recommends the United State Olympic Committee's Safe Sport training available online at no cost at <http://training.safesport.org/Account/Register>.

Persons Required to Complete a Sexual Abuse Prevention Course:

- 1) All employees shall take a sexual abuse prevention ("SAP") course that includes the elements discussed above and pass a certification quiz before performing services for USAFB. The course must be repeated and the certification quiz must be passed at least every two years.
- 2) All volunteers, temporary workers, contractors and adult participants shall take an approved sex abuse prevention training course and pass an examination before performing services for USAFB and at an interval not exceeding two years when the volunteer, temporary worker or independent contractor:

a) Has routine contact with or supervision over minor athletes and participants.

OR

b) USAFB is paying for his/her accommodation; AND

c) And such accommodation is at the same facility where USAFB is responsible for any minor participant(s).

## **Strategy 4: Supervision of Athletes and Participants**

During training and competition, USA Football strives to create two-deep leadership and minimize one-to-one interactions to create a safe training environment and to protect athletes and participants.

### **ONE-ON-ONE INTERACTIONS**

#### **Appropriate One-On-One Interactions:**

##### **Individual Meetings**

An individual meeting may be necessary to address an athlete's concerns, training program, or competition schedule. Under these circumstances, coaches, staff members and/or volunteers (collectively, "USAFB Staff") are to observe the following guidelines:

- 1) Any individual meeting should occur when others are present and where interactions can be easily observed
- 2) Where possible, an individual meeting should take place in a publicly visible and open area
- 3) If an individual meeting is to take place in an office, the door should remain unlocked and open
- 4) If a closed-door meeting is necessary, USAFB Staff member must inform another USAFB Staff member and ensure the door remains unlocked

##### **Individual Training Sessions**

An individual training session(s) with an athlete or participant may also be desired or necessary. Under these circumstances, written permission of a minor athlete's parents or guardians is required in advance of the individual training session(s), and USA Football encourages parents and guardians to attend the training session.

#### **Prohibited One-On-One Interactions:**

Except as set forth above, minor athletes and participants will not be left unattended or unsupervised during USA Football activities and USAFB Staff are prohibited from being alone with an individual athlete or participant in any room or building.

### **PHYSICAL CONTACT WITH ATHLETES**

Appropriate physical contact between athletes and USAFB Staff, particularly coaches, is a productive and inevitable part of football. Athletes are more likely to acquire advanced physical skills through appropriate physical contact. However, guidelines for appropriate physical contact reduce the potential for misconduct in sport.

USA Football adheres to the following principles and guidelines in regards to physical contact with our athletes:

### **Common Criteria for Appropriate Physical Contact**

Physical contact with athletes – for safety, consolation and celebration – has multiple criteria in common which make them both safe and appropriate. These include:

- 1) the physical contact takes place in public
- 2) there is no potential for, or actual, physical or sexual intimacies during the physical contact
- 3) the physical contact is for the benefit of the athlete, not to meet an emotional or other need of an adult

### **Safety**

The safety of our athletes is paramount and in many instances we make the athletic space safer through appropriate physical contact. Examples include:

- 1) spotting an athlete so that they will not be injured by a fall or piece of equipment
- 2) positioning an athlete's body so that they more quickly acquire an athletic skill, get a better sense of where their body is in space, or improve their balance and coordination
- 3) making athletes aware that they might be in harm's way because of other athletes practicing around them or because of equipment in use
- 4) releasing muscle cramps

### **Celebration**

Sports are physical by definition and we recognize participants often express their joy of participation, competition, achievement and victory through physical acts. We encourage these public expressions of celebration, which include:

- 1) greeting gestures such as high-fives, fist bumps, and brief hugs
- 2) congratulatory gestures such as celebratory hugs, "jump-arounds" and pats on the back for any form of athletic or personal accomplishment

### **Consolation**

It may be appropriate to console an emotionally distressed athlete (e.g., an athlete who has been injured or has just lost a competition). Appropriate consolation includes publicly:

- 1) embracing a crying athlete
- 2) putting an arm around an athlete while verbally engaging them in an effort to calm them down ("side hugs")
- 3) lifting a fallen athlete off the playing surface and "dusting them off" to encourage them to continue competition

### **Prohibited Physical Contact:**

Prohibited forms of physical contact, which ***shall be reported immediately*** under our Reporting Policy include, without limitation:

- 1) asking or having an athlete sit in the lap of a USAFB Staff member
- 2) lingering or repeated embraces of athletes that go beyond the criteria set forth for acceptable physical contact
- 3) slapping, hitting, punching, kicking or any other physical contact meant to discipline, punish or achieve compliance from an athlete
- 4) “cuddling” or maintaining prolonged physical contact during any aspect of training, travel or overnight stay
- 5) playful, yet inappropriate contact that is not a part of regular training, (e.g., tickling or “horseplay” wrestling)
- 6) continued physical contact that makes an athlete obviously uncomfortable, whether expressed or not
- 7) any contact that is contrary to a previously expressed personal desire for decreased or no physical contact, where such decreased contact is feasible in a competitive training environment.

### **Violations**

Violations of this policy ***must be reported*** to a supervisor or USA Football senior executive (e.g., Executive Director or General Counsel).

**Some forms of physical contact may constitute child physical or sexual abuse that *must be reported* to appropriate law enforcement authorities.**

### **ELECTRONIC COMMUNICATIONS AND SOCIAL MEDIA POLICY**

As part of USA Football’s emphasis on athlete safety, all electronic communications between USAFB Staff and an athlete must be professional in nature and for the purpose of communicating information about football activities.

**As with any communication, the content of any electronic communication should be readily available to share with the athlete’s family. At the request of a parent or guardian, any email, electronic text, social media or similar communication will copy or include the athlete’s parents or guardians.**

### **Facebook, Twitter, Blogs and Similar Sites**

USAFB Staff may not have current athletes of USA Football’s Team join a personal social media page. It is encouraged that all communications and football development staff create a USA Football “alter ego” social media account (e.g., “John Doe – USA Football National Teams Coordinator”). This account will be subject to inspections by USAFB and must be used for any communication with current USAFB athletes or their parents. The

account will be associated with the USAFB staff members @USAFootball.com email address.

Athlete members over age 13 and parents may friend the official USA Football's Team page and USAFB Staff's USAFB alter ego accounts. Coaches and USAFB Staff may "follow" each other. USAFB Staff may communicate with their athletes' solely through official USA Football social media sites or through their USAFB alter ego accounts. All posts, messages, text, or media of any kind between USAFB Staff and athlete must be professional in nature and for the purpose of communicating information about USAFB activities, for football-oriented motivational purposes or to respond appropriately to athlete's posts about football related activities.

### **Email, Texts, Instant Messaging, and Similar Electronic Communications**

Athletes and USAFB Staff may use email and texts to communicate. All email and text content between USAFB Staff and athlete must be professional in nature and for the purpose of communicating information about USAFB activities. Email from USAFB Staff to any athlete should come from USAFB's email system whenever possible (the return email address will contain "@USAFootball.com").

### **Electronic Imagery**

From time to time, digital photos, videos of practice or competition, and other publicly obtainable images of the athlete – individually or in groups – may be taken. These photos and/or videos may be submitted to local, state or national publications, used in marketing or promotional videos, posted on USAFootball.com or USAFB-associated websites, or offered to families seasonally in an electronic form. It is the default policy of USA Football to allow such practices as long as the athlete or athletes are in public view and such imagery is both appropriate and in the best interest of the athlete and USA Football.

### **Request to Discontinue All Electronic Communications or Imagery**

The parents or guardians of an athlete may request in writing that their child not be contacted by any form of electronic communication by USAFB Staff (photography or videography).

### **Misconduct**

Social media and electronic communications can also be used to commit misconduct (e.g., emotional, sexual, bullying, harassment, and hazing). Such communications by coaches, staff, volunteers, administrators, officials, parents or athletes will not be tolerated and are considered violations of our Safe Sport Policy and Employee Handbook.

### **Violations**

Violations of USA Football's Electronic Communications and Social Media Policy should be reported to your immediate supervisor or a USA Football senior executive (e.g., Executive

Director, General Counsel) for evaluation. Complaints and allegations will be addressed under USA Football's Disciplinary Rules and Procedure.

### **LOCKER ROOMS AND CHANGING AREAS**

USA Football is concerned with locker room activities between minors, minors and adults, adults being alone with individual minors in locker rooms and changing areas, with non-official or non-related adults having unsupervised access to minor participants and with inappropriate behavior among adults in locker rooms.

#### **Monitoring**

USA Football has predictable and limited use of locker rooms and changing areas (e.g., immediately before and following practices and competitions). This allows for direct and regular monitoring of locker room areas. While constant monitoring inside of locker rooms and changing areas might be the most effective way to prevent problems, we understand that this would likely make athletes uncomfortable and may even place our staff at risk for unwarranted suspicion.

USA Football has staggered practices, with different groups arriving and departing throughout the day. It is therefore not practical to constantly monitor locker rooms and changing areas over this extended course of time. While we do not post staff members inside or at the doors of the locker rooms and changing areas, we do make occasional sweeps of these areas. Staff members conduct these sweeps, with women checking on female-designated areas, and men checking on male-designated areas.

Coaches and staff make every effort to recognize when an athlete goes to the locker room or changing area during practice and competition and, if they do not return in a timely fashion, we will check on the athlete's whereabouts.

We discourage parents from entering locker rooms and changing areas unless it is truly necessary. In those instances, it should only be a same-sex parent. If this is necessary, parents should let the coach or USAFB staff member know about this in advance. If an athlete needs assistance with his or her uniform or gear (for example, a child under the age of eight), or an athlete's disability warrants assistance, then we ask that parents let the coach or a USAFB staff member know beforehand that he or she will be helping the athlete.

#### **Mixed-Gender Teams**

If the team consists of both male and female athletes, both female and male privacy rights must be given consideration and appropriate arrangements made. Where possible, USA Football has the male and female players dress/undress in separate locker rooms and then convene in a single dressing room before the game or team meeting. Once the game is finished, the players may come to one locker room and then the male and female

players proceed to their separate dressing rooms to undress and shower (separately), if available. If separate locker rooms are not available, then the athletes will take turns using the locker room to change.

### **Use of Cell Phones and Other Mobile Recording Devices**

Cell phones and other mobile devices with recording capabilities, including voice recording, still cameras and video cameras increase the risk for different forms of misconduct in locker rooms and changing areas. As a result, **THERE WILL BE NO USE OF A DEVICE'S RECORDING CAPABILITIES IN THE LOCKER ROOMS OR CHANGING AREAS.**

Violations of this policy will be addressed under the Disciplinary Rules and Procedures and may result in the sanctions as set forth therein, including temporary suspension from competition.

### **TRAVEL**

USA Football has established policies to guide our travel, minimize one-on-one interactions and reduce the risk of misconduct. Adherence to these travel guidelines will increase athlete safety and improve the competitive experience while keeping travel a fun and enjoyable experience.

We distinguish between travel to training, practice and local competition ("local travel"), and team travel involving overnight travel to an activity that is planned and supervised by USA Football.

#### **Local Travel**

Local travel occurs when USA Football does not sponsor, coordinate, or arrange for travel. For local travel, athletes or their parents/guardians (for minor athletes) are responsible for making all travel arrangements. In these instances it is the responsibility of the athlete or his/her parents/guardians (for minor athletes) to ensure the person transporting the athlete maintains all safety and legal requirements, including, but not limited to, a valid driver's license, proper insurance, well maintained vehicle, and compliance with all state laws.

In an effort to minimize one-on-one interactions, USA Football staff members, coaches and/or volunteers, who are not also acting as a parent, should not drive alone with an unrelated athlete and should only drive with at least two other athletes or another adult at all times, unless otherwise agreed to in writing by the athlete's parent or guardian in advance of travel. In any case where a staff member and/or volunteer is involved in the

athlete's local travel, a parental release is required in advance. Efforts must be made to ensure that staff and/or volunteers are not alone with an athlete or participant, by, e.g., picking the athletes up in groups.

Coaches, staff members and volunteers who are also an athlete's guardian may provide shared transportation for any athlete(s). We encourage guardians to pick up their athlete first and drop off their athlete last in any shared or carpool travel arrangement. We also recommend completing a shared travel declaration form signed by the parents/guardians of any minor athlete who is being transported as part of such a carpool arrangement.

### **Team Travel**

Team travel is overnight travel that occurs when USA Football sponsors, coordinates or arranges for travel so that our teams can compete locally, regionally, nationally or internationally. Because of the greater distances, coaches, staff, volunteers and chaperones will often travel with the athletes. However, no coach, staff member, or volunteer will engage in team travel without the proper safety requirements in place, including valid drivers' licenses, proper insurance, well-maintained vehicles and compliance with all state laws.

USA Football makes efforts to provide adequate supervision through coaches and other adult chaperones.

Appropriate adult-to-athlete ratios will depend on the age of athletes and other participants.  
Evaluate your program to determine supervisory needs

For team travel, hotels and air travel will be booked in advance by USA Football. Athletes will share rooms, with 2-4 athletes assigned per room depending on accommodations. USA Football will also notify hotel management should any special arrangements be warranted. For instance, we will ask hotels to block pay per view channels and we will request an additional large room or suite so that our members and athletes may socialize as a group. Meetings do not occur in hotel rooms, and we will reserve a separate space for adults and athletes to socialize.

We encourage family members who wish to stay in the team hotel to do so. If family members do not stay in the team hotel, we encourage all athletes to call parents and guardians regularly and allow for any unscheduled calls by either the athlete or parent/guardian.

## **Travel Notification**

When possible, USA Football will provide reasonable advance notice before team travel. Notice will include the dates, location and duration of competition. Travel notice will also include designated team hotels for overnight stays as well as a contact person within USA Football. This individual will be the point of contact to confirm your intention to travel and to help with travel details.

USA Football will post specific travel itineraries when they become available. These will include a more detailed, hour-by-hour itinerary as well as contact information for team travel chaperones.

## **Mixed-Gender and Mixed-Age Travel**

USA Football is made up of male and female athletes across various ages. Athletes will only share a room with other athletes of the same sex and age group. Athletes will also be grouped by age and sex for the purposes of assigning an appropriate chaperone. We will make every effort to provide these groups at least one chaperone of the same sex. However, we rely on parents to serve as chaperones and may be limited in providing this match.

Regardless of gender, a coach or other USAFB Staff shall not share a hotel room or other sleeping arrangement with an athlete (unless the coach or USAFB Staff is the parent, guardian, sibling or spouse of that particular athlete). Where an adult is registered both as a coach and an athlete member of USA Football, and is functioning primarily as a coach, he or she may share sleeping arrangements with another registered coach.

## **Coach and Staff Responsibilities**

During team travel, coaches and staff members will help athletes, fellow coaches and staff members adhere to policy guidelines, including, without limitation, the Travel Policy, Locker Rooms and Changing Areas Policy and Reporting Policy.

If USAFB Staff transports an athlete or other organization member in their private car for team travel, a copy of the coach's or staff member's valid driver's license is required.

When not practicing, training, competing, or preparing for competition, coaches and staff will monitor the activities of athletes, fellow coaches and staff during team travel. USAFB Staff will:

- 1) prepare athletes for team travel and make athletes aware of all expectations.  
Supplemental information will be given to parents/guardians of athletes who are

considered inexperienced travelers, new or relatively new to team travel, or who are under the age of 14

- 2) familiarize themselves with all travel itineraries and schedules before the initiation of team travel
- 3) conform to, and monitor for others' adherence, the Safe Sport Policy and all policies during team travel
- 4) encourage minor athletes to participate in regular, at least daily, scheduled communications with their parents/guardians
- 5) help athletes be on time for all team commitments (as possible)
- 6) assist with team travel logistical needs (as possible)
- 7) support chaperones and/or participate in the monitoring of athletes for adherence to curfew restrictions set based on age and competition schedule as listed in travel itinerary
- 8) ensure athletes are complying with hotel room restrictions based on gender or age bracket requirements
- 9) make certain that athletes are not alone in a hotel room with any adult apart from a family member; this includes coaches, staff and chaperones
- 10) not use drugs or alcohol in the presence of minors or be under the influence of alcohol or drugs while performing their coaching or other duties
- 11) immediately report any concerns about physical or sexual abuse, misconduct, or policy violations
- 12) notify parents before taking any disciplinary action against a minor athlete if the athlete is traveling without his or her parents.

### **Chaperone Responsibilities**

Chaperones accompany team travel to ensure that the athletes, coaches, staff, and volunteers adhere to the USA Football's policy guidelines.

If a chaperone has not undergone a criminal background check and USA Football's awareness training, the chaperone will not be permitted to have any one-on-one interactions with athletes or other youth participants. If a chaperone has undergone a criminal background check and awareness training, he or she may have appropriate one-on-one interactions as outlined in USA Football's Safe Sport Policy.

If a chaperone will be operating a private car for team travel, a copy of the chaperone's valid driver's license is required.

Chaperones will monitor the activities of all coaches, staff members, volunteers and athletes during team travel. Specifically, chaperones will:

- 1) familiarize themselves with all travel itineraries and schedules before team travel
- 2) monitor for adherences to USAFB policies during team travel
- 3) encourage minor athletes to participate in regular, at least daily, scheduled communications with their parents/guardians
- 4) help athletes be on time for all team commitments (as possible)
- 5) assist coaches, staff and other volunteers with team travel logistical needs (as possible)
- 6) monitor athletes for adherence to curfew restrictions set based on age and competition schedule as listed in travel itinerary
- 7) ensure athletes comply with hotel room restrictions based on gender or age bracket requirements
- 8) not use drugs or alcohol in the presence of minors or be under the influence of alcohol or drugs while performing their chaperone duties
- 9) make certain that athletes are not alone in a hotel room with any adult apart from a family member; this includes coaches, staff and chaperones
- 10) immediately report any concerns about sexual and physical abuse, misconduct or policy violations to a USA Football supervisor or senior executive (e.g., Executive Director, General Counsel).

## Strategy 5: Responding to Abuse, Misconduct and Policy Violations

### Reporting Policy

Every USA Football employee, staff member and/or volunteer must report:

- (1) misconduct as defined in USA Football's Safe Sport Policy, and
- (2) suspicions or allegations of child physical or sexual abuse.

**As a matter of policy, USA Football does not investigate suspicions or allegations of child physical or sexual abuse or attempt to evaluate the credibility or validity of such allegations as a condition for reporting to the appropriate law enforcement authorities.**

### Reporting Child Physical or Sexual Abuse

#### *Child Physical or Sexual Abuse*

Staff members and/or volunteers at USA Football are required to report suspicions or allegations of child sexual abuse by a colleague or co-worker, to:

- (1) their immediate supervisor,
- (2) a USA Football senior executive (e.g., Executive Director, General Counsel), and
- (3) where applicable, **appropriate law enforcement authorities.**

### Grooming

Because sexual abusers "groom" children for abuse – the process used by offenders to select a child, to win the child's trust (and the trust of the child's parent or guardian), to manipulate the child into sexual activity and to keep the child from disclosing abuse – it is possible that a staff member and/or volunteer may witness behavior intended to groom a child for sexual abuse. All questions or concerns related to inappropriate, suspicious or suspected grooming behavior should be directed to an immediate supervisor or a USA Football senior executive (e.g., Executive Director, General Counsel).

### Peer-to-Peer Sexual Abuse

Approximately 1/3 of all child sexual abuse occurs at the hands of other children and the obligation to report extends to peer-to-peer child sexual abuse. Whether or not a sexual interaction between children constitutes child sexual abuse turns on the existence of an aggressor, the age difference between the children, and/or whether there is an imbalance of power or intellectual capabilities. **If you have any concerns that an interaction between children may constitute sexual abuse, report it to the appropriate law enforcement authorities and a USA Football director or attorney immediately.**

### Reporting Misconduct and Policy Violations

If any staff member and/or volunteer receives an allegation or observes misconduct or other inappropriate behavior, such as grooming, that is not reportable to the appropriate

law enforcement authorities, it is the responsibility of each staff member and/or volunteer to report their observations to:

- (1) his or her immediate supervisor, or
- (2) a USA Football senior executive (e.g., Executive Director, General Counsel).

USA Football also encourages parents, athletes and other sport participants to communicate violations of USA Football's Safe Sport Policy and/or allegations and suspicions of child physical and sexual abuse to a USA Football staff member. Where applicable, parents should also report to the appropriate law enforcement authorities.

## **Reporting Procedure**

### **To Whom to Report**

Staff members and volunteers may report to any supervisor or USA Football senior executive (e.g., Executive Director, General Counsel) with whom they are comfortable sharing their concerns. A staff member and/or volunteer may, and in many cases must, report any allegation of child physical or sexual abuse to relevant law enforcement authorities.

### **How to Report**

USA Football will take a report in the way that is most comfortable for the person initiating a report including an anonymous, in-person, verbal or written report. Regardless of how you choose to report, it is helpful to USA Football for individuals to provide, at a minimum, (1) the name of the complainant(s); (2) the type of misconduct alleged and the name(s) of the individual(s) alleged to have committed the misconduct.

### **Reporting Form**

Individuals reporting child physical or sexual abuse or other misconduct may complete an Incident Report Form. Information on this form will include:

- 1) the name(s) of the complainant(s)
- 2) the type of misconduct alleged
- 3) the name(s) of the individual(s) alleged to have committed the misconduct
- 4) the approximate dates the misconduct was committed
- 5) the names of other individuals who might have information regarding the alleged misconduct
- 6) a summary statement of the reasons to believe that misconduct has occurred

USA Football will withhold the complainant's name on request, to the extent permitted by law.

A copy of USA Football's Reporting Form can be found in Appendix B.

## **Confidentiality, Anonymous Reporting and Bad Faith Allegations**

### **Confidentiality**

To the extent permitted by law, and as appropriate, USA Football will keep confidential the complainant's name on request, not make public the names of potential victims, the accused perpetrator or the people who made a report of child physical and sexual abuse to the authorities.

### **Anonymous Reporting**

USA Football recognizes it can be difficult for an athlete, teammate, friend or family member to report an allegation of misconduct and strives to remove as many barriers to reporting as possible. **Anonymous reports may be made without the formality of completing an Incident Report Form:**

- 1) by completing the Reporting Form without including their name
- 2) by expressing concerns verbally to a USA Football staff member
- 3) through email, texts or notes left for a USA Football staff member.

**However, anonymous reporting may make it difficult for USA Football to investigate or properly address allegations.**

All suspicions of child physical or sexual abuse will be reported to the appropriate law enforcement authorities.

### **“Whistleblower” Protection**

Regardless of outcome, USA Football will support the complainant(s) and his or her right to express concerns in good faith. USA Football will not encourage, allow or tolerate attempts from any individual to retaliate, punish, allow or in any way harm any individual(s) who reports a concern in good faith. Such actions against a complainant will be considered a violation of our Safe Sport Policy and grounds for disciplinary action.

### **Bad-Faith Allegations**

A report of abuse, misconduct or policy violations that is malicious, frivolous or made in bad faith is prohibited. Such reports will be considered a violation of our Safe Sport Policy and grounds for disciplinary action. Depending on the nature of the allegation, a person making a malicious, frivolous or bad-faith report may also be subject to civil or criminal proceedings.

### **How Reports Are Handled**

#### **Suspicious or Allegations of Child Physical or Sexual Abuse**

#### ***Reporting to Law Enforcement and/or Child Protective Services***

An independent investigation can harm youth and/or interfere with the legal investigative process. USA Football, its staff members and/or volunteers **do not attempt to evaluate the credibility or validity of child physical or sexual abuse as a condition for reporting to appropriate law enforcement authorities.** As necessary, however, USA Football may ask a few clarifying questions of the minor or person making the report to adequately report the suspicion or allegation to law enforcement authorities.

For mandatory reporting laws, visit [www.childwelfare.gov](http://www.childwelfare.gov).

### ***Immediate Suspension or Termination***

When an allegation of child physical or sexual abuse is made against a staff member, youth and/or volunteer, USA Football may immediately remove that individual from contact with any children in the program until the allegation has been investigated by an official agency. As necessary, USA Football may suspend or change the assignment of a staff member and/or volunteer.

A staff member or volunteer's failure to report to a supervisor or a USA Football senior executive (e.g., Executive Director, General Counsel) is a violation of this policy and grounds for termination of a staff member and/or dismissal of a volunteer.

### **Misconduct and Policy Violations**

USA Football addresses internally alleged policy violations and misconduct – bullying, harassment, hazing, emotional, physical and sexual – that are not reportable under relevant state or federal law. Staff members and/or volunteer must report policy violations and misconduct to an immediate supervisor or USA Football senior executive (e.g., Executive Director, General Counsel).

USA Football may also investigate allegations of child physical or sexual abuse that are reportable, if such investigation does not interfere with any ongoing criminal investigation or prosecution for abuse. Such allegations may include:

- 1) Emotional abuse
- 2) Abuse reported outside the relevant statutes of limitation
- 3) Allegations of abuse that were reported to authorities, but: (a) legal authorities did not press criminal charges; (b) criminal charges were filed, but not pursued to trial; or (c) the alleged offender was acquitted at trial

### **NOTIFICATION**

Following USA Football's notice of a credible allegation that results in the removal of an employee, coach or other volunteer, USA Football may consider the circumstances in which it will notify other parents of athletes with whom the accused individual may have had contact. In USA Football's discretion, as appropriate, and after consultation with counsel, USA Football may notify its staff members, contractors, volunteers, parents, and/or athletes of any allegation of child physical or sexual abuse or other criminal behavior that (1) law enforcement authorities are actively investigating; or (2) that USA Football is

investigating internally. Advising others of an allegation may lead to additional reports of child physical or sexual abuse and other misconduct.

### **Disciplinary Rules and Procedures**

While USA Football endeavors to provide support and guidance to participants on a day-to-day basis, it is also important for USA Football to have a formal procedure for disciplinary action to address alleged violations of its policies and other inappropriate behaviors.

### **APPLICATION**

This Policy is used to address the following allegations against staff members, athletes, participants and/or volunteers:

- 1) Violations of USA Football's policies
- 2) Child abuse (physical or sexual), where USA Football's actions will not undermine an ongoing legal investigation or criminal prosecution

**USA Football will not enter into an investigation that undermines a pending legal investigation or criminal prosecution.**

### **DISCIPLINARY RULES**

On receipt of an allegation, USA Football will determine in its discretion the appropriate steps to address the conduct based on several factors, including (i) the age of the complainant or victim, (ii) the age of the accused and (iii) the nature, scope and extent of the allegations.

USA Football will address allegations against a staff member and/or volunteer under relevant organizational policies (e.g., Employment Policies and Procedures, Bylaws).

USA Football's disciplinary response will depend on the nature and seriousness of the incident, and in extreme cases, misconduct will result in summary dismissal. USA Football may undertake a formal investigation and hearing at its discretion. Before taking any disciplinary action, however, USA Football will offer the accused an opportunity to respond.

If the accused individual is a minor, USA Football will contact his or her parents or guardians.

### **DISCIPLINARY ACTION**

Sanctions for violations of the Safe Sport Policy will be proportionate and reasonable under the circumstances. In addition to day-to-day guidance, USA Football may take the following disciplinary actions, without limitation:

- 1) Inform the individual's direct-line supervisor or in the case of a minor, the minor's parent or guardian
- 2) Provide the individual with guidance, redirection and instruction

- 3) Temporary suspension from competition
- 4) File a formal incident report
- 5) Issue a verbal warning
- 6) Issue a written and/or final written warning
- 7) Implement a limited access agreement (e.g., limiting an individual's access to certain buildings or to youth)
- 8) Provide informed supervision, where at least one staff member is informed of the allegation and is instructed to supervised vigilantly the accused individual in his or her interactions with the program and/or organization
- 9) Engage in restorative practices (i.e., creation of a respectful and safe dialogue when a misunderstanding or harm has occurred)
- 10) Suspend or terminating employment or membership

### **ONGOING EMPLOYMENT AND/OR PARTICIPATION**

On receipt of a credible and specific allegation of child abuse or other serious misconduct (e.g., physical and sexual abuse as defined in this Safe Sport Policy), USA Football may immediately suspend or terminate the accused individual to ensure participant safety.

### **COMPLAINANT PROTECTION**

Regardless of outcome, USA Football will support the complainant(s) and his or her right to express concerns in good faith. USA Football will not encourage or tolerate attempts from any individual to retaliate, punish, or in any way harm any individual(s) who reports a concern in good faith. Such actions themselves will be grounds for disciplinary action.

### **BAD-FAITH ALLEGATIONS**

Any individual who alleges misconduct under the Safe Sport Policy that, upon review, is determined to be malicious, frivolous or made in bad faith will be a violation of our Safe Sport Policy. Bad-faith reports may also be subject to criminal or civil proceedings.

### **MEDIA POLICY**

The Executive Director is the official spokesperson for USA Football. The Director of Communications serves as the sole media contact. All media contact and response should be through the Director of Communications.

Individuals' rights to privacy and confidentiality will be respected for all persons involved in any allegations of misconduct. USA Football respects each individual's right to his/her good reputation and will not proactively identify individuals accused of misconduct unless an allegation has been made in the public forum, law enforcement agency or court has determined there is sufficient reason to believe the accusation is valid, and/or USA Football has taken action to punish or remove the alleged offender.

## Strategy 6: Monitoring USA Football's Policy

By monitoring the interactions among staff, volunteers, athletes, and other, USA Football works to prevent, recognize and respond to inappropriate and harmful behaviors as set forth in our Safe Sport Policy, while reinforcing appropriate behaviors.

### **MONITORING COMPLIANCE WITH POLICIES AND PROCEDURES**

USA Football monitors for compliance with its policies and procedures, including without limitation its Awareness Training, Travel, Locker Room and Changing Areas, and Physical Contact Policies.

### **MONITORING METHODS**

USA Football utilizes multiple monitoring methods to observe how individuals are interacting, including without limitation (1) formal supervision, including regular evaluations; and (2) informal supervision, including regular and random observation (e.g., roving and checking interactions throughout practices), and (3) maintaining frequent contact with staff members, volunteer and athletes who interact off-site.

### **RESPONDING TO INTERACTIONS**

While USA Football has a formal reporting policy, staff members and volunteers should be prepared to respond immediately to inappropriate or harmful behavior, potential risk situations and potential boundary violations.

Staff members and volunteers will redirect inappropriate behaviors to promote positive behaviors, confront inappropriate or harmful behaviors, and report behaviors if necessary.

### **REPORTING**

Staff members and volunteers are required to report policy violations, misconduct and physical and sexual abuse consistent with USA Football's Reporting Policy. **USA Football does not investigate suspicions or allegations of child physical or sexual abuse or attempt to evaluate the credibility or validity of such allegations as a condition for reporting to appropriate law enforcement authorities.**

## Appendix A: USA Football's Background Check Criterion Offenses

### A. Criterion Offenses for USA Football Employees (staff, interns, applicable contractors and vendors)

Reportable convictions, registrations or pending dispositions, or disclosures of convictions, registrations or pending dispositions for any of the following criminal offenses or registrations will prompt a determination that an applicant 'does not meet' the criminal background screening criteria and a red light determination will be issued:

Criminal offenses are defined on the basis of exposure to the offense for which the defendant was convicted, pled guilty or pled *nolo contendere*. If pled down, then the crime to which the defendant ultimately pled. Felony offenses are 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, outer range is greater than one year.

- R1. Offenses: (a) Any felony of violence regardless of the amount of time since the offense, or (b) one(1) non-violent felony within the past ten years, or more than one(1) non-violent felony regardless of the amount of time since the offenses.
- R2. Any lesser crime involving force or threat of force against a person within the past ten years or more than one(1) regardless of the amount of time since the offenses.
- R3. Any crime(felony or lesser) of a sexual nature or classified as a sex offense including but not limited to "victimless" crimes of a sexual nature such as prostitution, pornography, indecent exposure; and crimes in which sexual relations is an element regardless of the amount of time since the offense.
- R4. Any lesser crime involving controlled substances (not paraphernalia or alcohol) within the past ten years or more than one (1) regardless of the amount of time since the offenses.
- R5. Any crime (felony or lesser) involving cruelty to animals regardless of the amount of time since the offenses.
- R6. Any sex offender registrant.
- R7. Any crime (felony or lesser) involving harm to a minor regardless of the amount of time since the offense.
- R8. Any lesser crime involving financial misappropriation or theft, including but not limited to embezzlement, fraud, and extortion within the past ten

years, or more than one (1) regardless of the amount of time since the offenses.

- R9. Any combination of two (2) or more offenses defined in R1(b), R2, R4, or R8 regardless of the amount of time since the offenses.

Criminal offenses include “Attempted Crimes” in the above classifications.

**B. Criterion Offenses for USA Football Volunteers, Clinicians, Heads Up Football<sup>SM</sup>, and Short Term Hires**

Reportable convictions, registrations or pending dispositions, or disclosures of convictions, registrations or pending dispositions for any of the following criminal offenses or registrations will prompt a determination that an applicant ‘does not meet’ the criminal background screening criteria and a red light determination will be issued:

Criminal offenses are defined on the basis of exposure to the offense for which the defendant was convicted, pled guilty or pled *nolo contendere*. If pled down, then the crime to which the defendant ultimately pled. Felony offenses are 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, outer range is greater than one year.

- R1. Offenses:

(a) Any felony of violence regardless of the amount of time since the offense, or

(b) one (1) non-violent felony within the past ten years, or more than one (1) non-violent felony regardless of the amount of time since the offenses.

- R2. Any lesser crime involving force or threat of force against a person within the past ten years or more than one(1) regardless of the amount of time since the offenses.

- R3. Any crime(felony or lesser) of a sexual nature or classified as a sex offense including but not limited to “victimless” crimes of a sexual nature such as prostitution, pornography, indecent exposure; and crimes in which sexual relations is an element regardless of the amount of time since the offense.

- R4. Any lesser crime involving controlled substances (not paraphernalia or alcohol) within the past ten years or more than one (1) regardless of the amount of time since the offenses.

- R5. Any crime (felony or lesser) involving cruelty to animals regardless of the amount of time since the offenses.
- R6. Any sex offender registrant.
- R7. Any crime (felony or lesser) involving harm to a minor regardless of the amount of time since the offense.
- R8. Any combination of two (2) or more offenses defined in R1(b), R2, or R4, regardless of the amount of time since the offenses.

Criminal offenses include “Attempted Crimes” in the above classifications.

### **OTHER POTENTIALLY DISQUALIFYING FACTORS**

Even if an applicant passes a criminal background check, other factors may disqualify an applicant. An individual may be disqualified and prohibited from providing services for USA Football 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 any sexual or physical abuse of a minor, including but not limited to domestic order or protection
- 3) A history with another organization (employment, volunteer, etc.) of complaints of sexual or physical abuse of minors
- 4) Resigned, been terminated or been asked to resign from a position - paid or unpaid – due to complaint(s) of sexual or physical abuse of minors
- 5) A history of other behavior that indicates they may be a danger to USA Football participants.

## Appendix B: Incident Report Form

USA Football strongly encourages the reporting of misconduct. USA Football appreciates your willingness to report inappropriate behavior. Please provide as much information as possible.

1. Name of the individual you are reporting (first and last): \_\_\_\_\_

2. Age: \_\_\_\_\_

3. Gender:  Male  Female

4. Address: \_\_\_\_\_

5. Position(s) this individual holds or held:

Head coach

Assistant coach

Employee

Volunteer

Official

Other/Not sure

6. Team/Organization where individual works and/or volunteers or worked/volunteered previously: \_\_\_\_\_

7. Type of offense (i.e., what happened?): \_\_\_\_\_

8. Where did the incident or incidents take place (city, state, and any other available location information): \_\_\_\_\_

9. Please describe what happened (who, what when, where): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Victim's Information:** If you are the victim and wish to remain anonymous, you may do so. In that case, please enter only your age, city, state and team affiliation.

10. Name: \_\_\_\_\_

11. Age: \_\_\_\_\_

12. Team/Organization affiliation (if any): \_\_\_\_\_  
\_\_\_\_\_

13. Contact phone number (note, if the victim is under age 18, please provide contact information for his parent/guardian): \_\_\_\_\_  
\_\_\_\_\_

14. Contact email address (note, if the victim is under age 18, please provide contact information for his parent/guardian): \_\_\_\_\_  
\_\_\_\_\_

15. Gender:  Male  Female

**Reporter's Information:** You may remain anonymous if you wish. However, providing your information is vastly helpful to a swift and effective investigation. A person reporting alleged misconduct should not be fear retribution and/or consequence when filing a report he or she believes to be true.

16. Name: \_\_\_\_\_

17. Phone number: \_\_\_\_\_

18. Email address: \_\_\_\_\_

19. Team/Organization affiliation (if any): \_\_\_\_\_  
\_\_\_\_\_

20. Relationship to victim (if any):

- Self
- Parent/Guardian
- Other family member
- Friend or acquaintance
- Team member, coach or volunteer
- Other or prefer not to say

### Appendix C: Incident Investigation Report Form

<b>Incident:</b>	
<b>Reported By:</b>	
<b>Date:</b>	
<b>Individuals (s) Involved:</b>	

<b>Investigated By:</b>	
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<b>Location of Incident:</b>	
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<b>Summary of Complaint:</b>	
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Incident Investigation Report Form (Page 2)

<b>Statements Provided By:</b>	
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<b>Conclusion:</b>	
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<b>Recommendation:</b>	
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**ACTION TAKEN:**

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