

Policy Name: USOPC Background Check Policy

Date of Issuance: 9/30/2025

Policy Owner: SVP, Chief of Security and Athlete

Services

Applies to: BOD, USOPC Staff, and Others (as

below)

Purpose:

The U.S. Olympic & Paralympic Movement is committed to the safety of athletes and participants involved in sport. The USOPC requires background checks in order to (a) foster a safe environment at the Olympic, Paralympic, Pan American, and Parapan American Games (collectively the "Delegation Events") and at the Youth Olympic, World Beach and Youth Parapan American Games, and other international sporting events as designated by the USOPC (collectively the "NOC/NPC Events"), as well as Olympic & Paralympic Training Centers and Training Sites; (b) create a safe living, training, and competition environment for athletes and other individuals associated with NGBs; and (c) protect persons at risk, including, but not limited to, minors and vulnerable adults.

This policy sets forth the standards the USOPC has incorporated into its background check policy and outlines the guidelines for the use of background checks for Delegation and/or NOC/NPC Events, at Olympic & Paralympic Training Centers, and for interactions with the media, third-party contractors and partner programs.

NOTE: Due to reporting and other limitations, information from a background check should not be relied upon as the sole basis for selection, but rather, as an important indicator in the overall selection process.

Policy Statement:

I. Application

This policy applies to the following¹:

- A. All USOPC employees, coaches, independent contractors, staff, volunteers, board members, committee and task force members, individuals placed with the USOPC as part of an academic program (including, but not limited to, interns, externs, fellows and clinical students) and other individuals authorized or credentialed by the USOPC to work with athletes or other sport participants, including, but not limited to, Personal Care Assistants (PCAs), while at an Olympic & Paralympic Training Center, Delegation, and/or NOC/NPC Event to which the USOPC sends athletes.
- B. All individuals that Olympic & Paralympic Training Centers formally authorize, approve or appoint to (a) serve in a position of authority over or (b) have regular

¹ Individuals referenced in this section have 45 days after reaching the age of majority (18 years of age), to come into compliance with this background check policy.

- contact with athletes². This shall include, but is not limited to, Olympic & Paralympic Training Center *s*taff, officials, coaches, board members, coordinators, trainers, independent contractors, volunteers³, and medical personnel.⁴
- C. All athletes and alternates, training partners, and guides 18 years of age or older who are selected to participate in the Delegation and/or NOC/NPC Events.
- D. All athletes and alternates, training partners,⁵ and guides 18 years of age or older that are selected by an NGB to train at any Olympic & Paralympic Training Center⁶, or USOPC High Performance Training Center.
 - a. Individuals in this category must have a valid background check during the entirety of their program or camp at the Olympic & Paralympic Training Centers. Program and camp rosters submitted to OPTC Operations must include the expiration dates of background checks for individuals who are subject to this requirement
- E. Members of the U.S. Games Delegation who have regular contact with athletes shall include, but is not limited to, coaches, Games Staff (including medical personnel), executives, service providers, guides and volunteers.
- F. Individuals authorized by the USOPC who have regular contact with athletes at USOPC games operational sites. (Examples: independent contractors food service, custodial, security, team processing staff and non-accredited performance staff with village guest pass.)
- G. All Sport Medicine Providers also have to comply with the Sports Medicine Provider Credentialing Policy. See <u>USOPC Sports Medicine Provider Credentialing Policy</u>.
- H. Other individuals who have regular contact with athletes as determined by the USOPC, at its sole discretion.

II. Timeframe

A. For new employees/contractors, full background checks will be completed prior to the first day of work.

B. At a minimum, full background checks will be conducted on all applicable individuals every two years using at least the background check search components referenced in Section III.A of the Background Check Procedures.

² For the purposes of this policy, things to consider when determining regular contact are: direct access to athletes, frequency of contact, public vs non-public spaces, and access to sensitive information.

³ This policy may not apply to volunteers and others who only have incidental and observable contact with athletes at events.

 $^{^4}$ All international athletes, coaches, and other personnel utilizing or residing at OPTC facilities for less than 14 days will be exempt from process.

⁵ International training partners (i.e. at Delegation events) are exempt from process.

⁶ Individuals unaffiliated with an NGB or USOPC who use community facilities that the USOPC has oversight over are exempt from this background check policy only if they remain under the supervision of USOPC or NGB staff while utilizing the facilities.

C. A supplemental, partial, background check will be conducted in the off years using at least the background check search components referenced in Section III.B of the Background Check Procedures.

III. <u>Background Check Search Components</u>

- **A.** Full Background Checks. All full background check screens will include at least the following search components:
 - 1. Social Security Number validation;⁷
 - 2. Name and address history records;
 - 3. Multi-Jurisdictional Criminal Database searches covering 50 states plus DC, Guam, and Puerto Rico:
 - 4. Federal District Courts search for each name used and district where the individual currently lives or has lived during the past seven years, going back the length of time records are available and reportable;
 - 5. County Criminal Records for each name used and county where the individual currently lives or has lived during the past seven years, going back the length of time records are available and reportable for each county searched;
 - 6. National Sex Offender Registry database search of all available states, plus DC, Guam, and Puerto Rico;
 - 7. Multiple National Watch Lists;
 - 8. SafeSport Disciplinary Records;
 - 9. NCSI Homeland Security Search or an internationals records search equivalent for individuals who have lived outside of the United States for six consecutive months within the past seven years. Foreign citizens who are on a current U.S. visa to enter the United States are exempt from this requirement.⁸
 - 10. Motor Vehicle Records of at least a 3-year history in the state of licensure; (if driving is required for position);
 - 11. Education Verification and final degree received (one time only, on initial screening if required for position; USOPC only);
 - 12. Credit History Check (for USOPC Executive Team members and USOPC employees who work in Finance or Audit; USOPC only); and

⁷ Or suitable alternative identification verification process as determined by the background check vendor.

⁸ International record checks vary from country to country. The background check vendor will provide comparable search components depending on the laws of that specific country. U.S. military service and diplomatic members who have lived abroad may be exempt from the international record check if they resided on a U.S. government compound. Canadian citizens who have a Level 1, 2 or 3 Criminal Record Check conducted within a year of their participation are exempt from the Homeland Security Search.

- 13. Professional License/Certification Verification for certain medical roles. See USOPC Sports Medicine Provider Credentialing Policy.
- **B. Supplemental Background Checks.** For individuals on a two-year background check cycle, supplemental background check screens, will be conducted one year after the initial two-year background check screen ("off-year"), will be conducted on individuals directly employed by the USOPC. All supplemental off-year background check screens will be conducted using at least the following search components:
 - 1. Multi-Jurisdictional criminal database covering 50 states plus DC, Guam, and Puerto Rico
 - 2. Sex Offender Registry database searches of all available states, plus DC, Guam, and Puerto Rico; and
 - 3. SafeSport Disciplinary Records.

IV. U.S. Olympic & Paralympic Training Sites

Each U.S. Olympic & Paralympic Training Site shall require criminal background checks in compliance with the background search components in Section III.A of the Background Check Procedures for those individuals it formally authorizes, approves or appoints (a) to serve in a position of authority over athletes, or (b) to have regular contact with athletes. Upon request by the USOPC, the Training Sites must provide certifications to establish that the mandated background checks were conducted in accordance with the USOPC Background Check Procedures and this policy.

V. Media

Individuals affiliated with the media, who are authorized or credentialed by the USOPC to access a Training Center, Training Site, or attend a Delegation and/or NOC/NPC Event, are required to undergo a criminal background check if they have unsupervised one-on-one interactions with athletes.

VI. <u>Third-Party Vendors/Contractors</u>

Contracts with third-party vendors/contractors that are (a) in a position of authority over or (b) in regular contact with athletes must include the background check requirements set forth in this policy. The contracts shall also specify that certification must be provided by the vendor/contractor upon request by the USOPC, to establish that the mandated

⁹ License and/or certification verifications will be required for individuals in the following medical roles: Medical Doctor (MD), Doctor of Osteopathic Medicine (DO), Chiropractor (DC), Physician Assistant (PA), Acupuncturist, Massage Therapist, Physical Therapist, and Certified Athletic Trainer.

background checks were conducted in accordance with the USOPC Background Check Procedures and this policy.

V. <u>Partner Programs</u>

When partnering with community organizations for events, the USOPC shall ensure that the partnership agreement includes language regarding background check requirements. The agreements shall also specify that certification must be provided by the community organization upon request by the USOPC, to establish that the mandated background checks were conducted in accordance with the USOPC Background Check Procedures and this policy.

VI. <u>Background Check Report Review</u>

- A. Primary Review of USOPC-Initiated Background Checks: The Background Check Procedures list the criminal offenses (Section IV.B) and driving-related information (Section V.A.) that will result in the flagging of an individual's background check report. All flagged reports shall be reviewed by the USOPC and are subject to the USOPC's Dispute Resolution Hearing Procedures to determine if and to what degree the individual will be: (a) affiliated with the USOPC, (b) granted access to an Olympic & Paralympic Training Center, (c) permitted to participate in a Delegation and/or NOC/NPC Event, or (d) granted driving privileges in accordance with the Background Check Policy and Procedures.
- B. Secondary Review of NGB Determinations: Section VII.C of the Background Check Procedures lists the criminal offenses that may trigger a secondary review by the USOPC. A secondary review is only required when a decision by an NGB would allow an individual not otherwise covered by this policy to reside, train or compete at an Olympic & Paralympic Training Center¹⁰, or participate in a Delegation and/or NOC/NPC Event, despite being flagged by the background check screen for one of the crimes referenced in Section VII.C of the Background Check Procedures. In such an event, the flagged background check report and resulting NGB decision will be forwarded to the USOPC for review and be subject to the USOPC's Dispute Resolution Hearing Procedures to determine if and to what degree the individual will be: (a) affiliated with the USOPC, (b) granted access to an Olympic Training Center, or (c) permitted to participate in a Delegation and/or NOC/NPC Event.

¹⁰ The USOPC, at its discretion, may require that any individual who requests access, or has been provided access, to an Olympic & Paralympic Training Center undergo a background check in accordance with this policy. Individuals unaffiliated with an NGB or USOPC who use community facilities that the USOPC has oversight over are exempt from this background check policy only if they remain under the supervision of USOPC or NGB staff while utilizing the facilities.

VII. Revision History

Publication Type	Policy Approver	Enabling Action	Publication Date	Next Scheduled Review	Revision Summary
Initial Publication	Board of Directors	Board Vote; December 13, 2019	December 13, 2019	N/A	N/A – initial publication
Policy Revision	Board of Directors	Board Vote; March 13-14, 2024	Projected March 14, 2024	2025	Revised to include: - Updated nomenclature - Added language specifying that individuals employed by the USOPC must obtain a background check prior to first day of work.
Policy Revision: access to sensitive information	SVP, Chief of Security and Athlete Services	Board Vote: September 25, 2025	Projected September 30, 2025	N/A	Revised to include anyone who has access to sensitive information is subject to the background check requirement.
Procedure update: OPTC rosters	SVP, Chief of Security and Athlete Services	Board Vote: September 25, 2025	Projected September 30, 2025	N/A	All rosters submitted to USOPC Operations for camps and programs at Olympic & Paralympic Training Centers must include background check expiration dates for individuals subject to the background check requirement.
Policy Revision: community users of facilities	SVP, Chief of Security and Athlete Services	Board Vote: September 25, 2025	Projected September 30, 2025	N/A	Individuals unaffiliated with an NGB or USOPC who use community facilities that the USOPC has oversight over are exempt from this background check policy only if they remain under the supervision of USOPC or NGB staff while utilizing the facilities.
Policy Revision: background check search components	SVP, Chief of Security and Athlete Services	Board Vote: September 25, 2025	Projected September 30, 2025	N/A	Included list of background check search components as they are outlined in the Procedures document.
Procedure update: Canadian background checks	SVP, Chief of Security and Athlete Services	Board Vote: September 25, 2025	Projected September 30, 2025	N/A	Canadian citizens who have a Level 1, 2 or 3 Criminal Record Check conducted within a year of their participation may use this in place of

					an international background check.
Procedure update: U.S. military service and diplomatic members	SVP, Chief of Security and Athlete Services	Board Vote: September 25, 2025	Projected September 30, 2025	N/A	U.S. military service and diplomatic members who lived abroad for more than six consecutive months in the past seven years may be exempt from the Homeland Security Search or equivalent if they resided on a U.S. government compound.