

TEAM TENNESSEE

ATHLETE SAFEGUARDING PROGRAM POLICIES

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Introduction

These Team Tennessee Athlete Safeguarding Program Policies define the framework that Tennessee Golf Foundation ("TGF") will follow to help protect Minor Athletes participating in their State Junior Team Program in connection with In-Program events and activities.

The USGA established the U.S. National Development Program to help foster future generations of American golfers. USGA manages and oversees the USNDP National Teams while state or regional golf associations manage and oversee the USNDP State Junior Team within their territory. Each state or regional associations operating a USNDP State Junior Team Program are required to adopt and enforce these Athlete Safeguarding Program Policies in connection with their participation in the U.S. National Development Program.

These Policies are based on the USGA Athlete Safeguarding Program. The Prevention Policies and Education and Training Policy are based on the Minor Athlete Prevention Policies ("MAAPP") which is a collection of proactive prevention and training policies for the U.S. Olympic & Paralympic Movement developed by the U.S. Center for SafeSport (the "Center"). The MAAPP limits one-on-one interactions between adults and minor athletes. The Background Check Policy includes the same screening criteria as the U.S. Olympic & Paralympic Committee ("USOPC") Background Policy. Although neither the USGA nor the Association are not subject to the authority of the Center or the U.S. Olympic & Paralympic Committee, both the USGA and Association are committed to ensuring its Prevention Policies and Education and Training Policy conform with the MAAPP and its Background Check Policy includes the same USOPC screening criteria in connection with USNDP State Junior Team Program and In-Program activities and events.

This Athlete Safeguarding Program is administered by Tennessee Golf Foundation and applies to Team Tennessee. The program is referred to herein as the "Team Tennessee Athlete Safeguarding Program" or the "Athlete Safeguarding Program".

Capitalized terms used in the policies are defined in the Glossary.

Glossary of Terms

Adult Participant is any adult (18 years of age or older) who is:

1. An employee or board member of the Tennessee Golf Foundation.

2. Authorized, approved, or appointed by the Tennessee Golf Foundation in connection with the State Junior Team, the State Program or State Program-related Event to have Regular Contact with or Authority Over Minor Athletes, including adult athletes, caddies, coaches, captains, team managers, chaperones, Association staff, including interns, Association board members, State Committee members, medical professionals, trainers, transportation drivers, contract personnel, and volunteers.

3. Within the governance or disciplinary jurisdiction of the Foundation or the State Committee in connection with the State Team or State Program.

Adult Participant Personal Care Assistant (PCA) is defined as an Adult Participant who assists an athlete requiring help with activities of daily living (ADL) and preparation for athletic participation. This support can be provided by a Guide for Blind for visually impaired athletes or can include assistance with transfer, dressing, showering, medication administration, and toileting. Personal Care Assistants are different for every athlete and should be individualized to fit their specific needs. When assisting a Minor Athlete, Adult Participant PCAs must be authorized by the athlete's custodial parent/legal guardian annually.

For a PCA to be considered an Adult Participant, the PCA must have Regular Contact with additional Minor Athlete(s) besides the Minor Athlete for whom they provide care, or the PCA must be hired by the Association.

Association means the Tennessee Golf Foundation.

Authority Over is defined as one person's position over another person is such that, based on the totality of the circumstances, they have the power or right to direct, control, give orders to, or make decisions for that person.

Center means the U.S. Center for SafeSport which, pursuant to the Protecting Young Victims from Sexual Abuse and Safe Sport Authorization Act of 2017, develops resources and policies to safeguard athletes from bullying, harassment, hazing, physical abuse, emotional abuse, sexual abuse, and sexual misconduct. The Safe Sport Authorization Act also provides that the Center has the exclusive authority to respond to reports of allegations of sexual abuse and sexual misconduct within the United States Olympic & Paralympic Committee and their recognized National Governing Bodies (NGBs). For clarity, the USGA is not recognized as an NGB under the Safe Sport

Authorization Act. However, these Prevention Policies developed by the USGA and adopted by Association are intended to provide the same protections set forth within the MAAPP to Minor Athletes participating on a State Team or in the State Program during In-Program activities.

Close-in-age Exception is defined as an exception applicable to certain policies when an Adult Participant does not have Authority Over a Minor Athlete and is not more than four years older than the Minor Athlete (e.g., a 19-year-old and a 16-year-old).

Coach is a person who is authorized to instruct or train athletes, based on supervisory, evaluative or other authority over that athlete. Once a Coach-Athlete relationship is established, a Power Imbalance is presumed to exist throughout the relationship, regardless of age.

Dual Relationship is defined as an exception applicable to certain policies when an Adult Participant has a dual role or relationship with a Minor Athlete outside of the State Team or State Program, and the Minor Athlete's custodial parent/guardian has provided written consent at least annually authorizing the exception. Examples of Dual Relationships include, but are not limited to, family members, mental health professionals, teachers, medical professionals, and family friends. For clarity, custodial parents/guardians do not require written consent; however, if a non-custodial parent, such parent will require written consent.

Event includes any of the following In-Program activities relating to a State Team or the State Program which are sanctioned by the Association:

1. Competitions;
2. Training, including practices, camps, and clinics;
3. Travel and transportation;
4. Lodging;
5. Pre/post competition meals or outings sponsored by the Association;
6. Off-site outings for teambuilding, socialization, or fundraising sponsored by the Association;
7. Awards banquets; and
8. Mental health or medical treatment.

Facility means any golf course, golf club, or facility that the Association owns, leases, rents or is otherwise utilized by the Association in connection with a State Team or the State Program for In-Program practice, training or competition.

Familial Dual Relationship is a relationship between family members where the person in position of authority over a Minor Athlete is considered immediate family such as a parent, grandparent, sibling or in-law or related by blood such as an uncle or aunt.

In-Program. Activities related to participation in golf. Examples include, but are not limited to: competition, practices, meetings, camps/clinics, training/instructional

sessions, pre/post event meals or outings, team travel, video review, team- or golf-related team building activities, celebrations, award ceremonies, banquets, team- or golf-related fundraising or community services, golf education, competition site visits, conventions, conferences, summits and/or workshops.

In-Program Contact constitutes any contact (including communications, interactions, or activities) between an Adult Participant and any Minor Athlete(s) related to participation in golf. The Association does not allow any other interactions except for In-Program Contact.

Examples of In-Program Contact include, but are not limited to: competition, practices, camps/clinics, training/instructional sessions, pre/post-game meals or outings, team travel, review of video, team- or sport-related relationship building activities, celebrations, award ceremonies, banquets, team- or sport-related fundraising or community service, sport education, or competition site visits.

Jurisdiction means the ability to enforce applicable Association policies and includes Events and Facilities.

Minor Athlete Abuse Prevention Policy (MAAPP) is a collection of proactive prevention and training policies for the U.S. Olympic & Paralympic Movement developed by the U.S. Center for SafeSport. The MAAPP policies address training requirements and limiting one-on-one interactions between adults and minor athletes.

Minor Athlete is an athlete under 18 years of age who participates in, or participated within the previous 12 months in, the State Junior Team or a State Program event, program, activity, or competition that is part of, or partially or fully under the Jurisdiction of the Association.

Out of Program Contact is any one-on-one contact between an Adult Participant and Minor Athlete unrelated to In-Program activities or events (i.e., trips, meals, or gifts without any direct correlation to the Association). Out of Program Contact is prohibited unless a Dual Relationship or Close-in-Age Exception exists, or a custodial parent/legal guardian has provided written consent from Out of Program Contact.

Power Imbalance exists where, based on the totality of the circumstances, one person has supervisory, evaluative, or other authority over another. A Power Imbalance is presumed to exist through the duration of a Coach-Athlete relationship.

Regular Contact is defined as ongoing interactions during a 12-month period wherein an Adult Participant is in a role of direct and active engagement with any Minor Athlete.

SafeSport refers to any designation when the two words “Safe” and “Sport” are combined, the reference is to the U.S. Center for SafeSport.

State Committee shall mean the State Junior Team Program Committee that is overseen by the Association and comprised of various representatives from the state or region involved in junior golf. The State Committee helps manage the State Program.

State Team refers to Team Tennessee, also known as the USNDP Tennessee State Junior Team, and its member athletes. The State Team is operated by the Tennessee Golf Foundation and managed by the Association and State Committee.

State Program refers to the USNDP Tennessee State Junior Team Program which includes the State Junior Team, camps, clinics and other events, programs or activities sanctioned by the Tennessee Golf Foundation in connection with the USNDP State Junior Team Program. The State Program is operated by the Tennessee Golf Foundation and managed by the Association and State Committee.

USNDP refers to the U.S. National Development Program.

USGA refers to the United States Golf Association.

Prevention Policies

Effective April 1, 2025

A. One-on-One Interactions Policy

One-on-One is defined as interaction between one Adult Participant and one Minor Athlete. One-on-One interactions between Adult Participants and Minor Athletes **are not permitted** under any circumstance and applies to all situations, both In-Program Contact and Out-of-Program Contact, except as stated in this policy.

Interactions Must be Observable and Interruptible

Interactions are not One-on-One if they are observable and conducted at a distance allowing for interruption by another adult. One Adult Participant and one Minor Athlete alone violates this policy.

Exceptions

Association recognizes the following exceptions to the prohibitions against One-on-One interactions:

1. Emergency circumstances such as fires, medical emergencies, or minors left without parental supervision after an In-Program activity. In all emergency circumstances every effort must be made for the One-on-One Policy to be maintained.
2. When a Dual Relationship exists, and a custodial parent/guardian has provided written consent annually; or
3. When the Close-in-Age Exception applies; or
4. If a Minor Athlete needs a Personal Care Assistant, and:
    a. the Minor Athlete's custodial parent/guardian has provided written consent annually to the Association for the Adult Participant Personal Care Assistant to work with the Minor Athlete; and
    b. the Adult Participant Personal Care Assistant has complied with the Association Education & Training Policy; and
    c. the Adult Participant Personal Care Assistant has complied with the Association Background Check Policy.
5. In other circumstances specifically addressed in this policy that allow for certain one-on-one interactions if the Association receives custodial parent/ guardian consent.

Individual Training Sessions

One-on-One individual training sessions between an Adult Participant and Minor Athlete are not allowed. All individual training sessions with Minor Athletes must adhere to the following:

- Sessions must be observable and interruptible at all times.
- A Minor Athlete's parent/legal guardian must be allowed to attend the individual training session.
- All individual training sessions require advance, written consent from the Minor Athlete's custodial parent/ guardian at least annually, which can be withdrawn at any time. This includes all One-on-One sessions as stated above.

Virtual Training Sessions

All virtual training is considered In-Program Contact and must comply with the One-on-One Interactions policy and remain open and transparent at all times.

All efforts should be made for virtual training to occur in common areas, such as a backyard - never in a bedroom, bathroom, or other private space of either the Minor Athlete or Adult Participant. If this cannot occur, all parties must maintain a professional atmosphere during the virtual session.

Private messaging Minor Athletes during virtual sessions is strictly forbidden as it would violate the One-on-One Interactions Policy. All messaging during virtual training sessions needs to be made public and visible for all participants.

Association recognizes the following exceptions to the prohibitions against One-on-One Individual Training Sessions or Virtual Training Sessions:

- When a Familial Dual Relationship exists, and a custodial parent/ guardian has provided written consent annually; or
- When the Close-in-Age Exception applies.

Meetings with Mental Health Professionals and Health Care Providers:

If a licensed mental health care professional or licensed health care provider meets One-on-One with a Minor Athlete at an Event or Facility under the partial or full Jurisdiction of the Association in conjunction with participation, the meeting must be observable and interruptible without exception.

Additionally:

- Another adult must be present at the Facility and notified that a meeting is occurring, although the Minor Athlete's identity need not be disclosed.
- An Association representative, or other person of authority must be notified that the provider will be meeting with a Minor Athlete.
- Custodial parent /guardian of the Minor Athlete must provide written consent.
- The provider must obtain consent consistent with applicable laws and ethical standards, which can be withdrawn at any time.
- Closed door (door must remain unlocked and open/partially open) meetings with Minor Athletes are not allowed at any Event or Facility under the partial or full Jurisdiction of the Association.
- Private virtual meetings without another adult present are not allowed.

B. Transportation

Absent emergency circumstances, Adult Participants shall not transport a Minor Athlete One-on-One during In-Program or Out-of-Program travel, and a second Minor Athlete or second Adult Participant must always be present, except:

1. When a Dual Relationship exists; or
2. When the Close-in-Age Exception applies; or
3. If a Minor Athlete needs a Personal Care Assistant, and:
    a. the Minor Athlete's custodial parent/guardian has provided written consent annually to the Association for the Adult Participant Personal Care Assistant to work with the Minor Athlete; and
    b. the Adult Participant Personal Care Assistant has complied the Association Education & Training Policy; and
    c. the Adult Participant Personal Care Assistant has complied with the Association Background Check Policy.
4. In other circumstances specifically addressed in this policy that allow for certain one-on-one interactions if the Association receives custodial parent/ guardian consent.

Transportation Sanctioned by the Association

Custodial parents or guardians of Minor Athletes must give written consent on an annual basis for travel sponsored by the Association in connection with a State Program. Parents or guardians of Minor Athletes can withdraw this consent at any time. For all In-Program travel authorized or funded by the Association, all Adult Participants will agree to and sign the Association Travel Policy annually.

Parental/Guardian Consent for Travel Between One Adult Participant and One Minor Athlete

An Adult Participant may be offered an exception from the One-on-One Interactions Policy if they obtain written consent on an annual basis from a Minor Athlete's custodial parents/guardian for In-Program travel. The parent/guardian may withdraw consent at any time.

Shared or Carpool Travel Arrangements

Association encourages parents/guardians to pick up their Minor Athlete first and drop off their Minor Athlete last in any shared or carpool travel arrangement.

C. Lodging

All In-Program Contact at a hotel or other lodging site between an Adult Participant and a Minor Athlete must be observable and interruptible, and an Adult Participant cannot share a hotel room or otherwise sleep in the same room with a Minor Athlete(s), except:

1. When a Familial Dual Relationship exists, and custodial parent/ guardian has provided advance, written consent before each instance for the lodging arrangement; or
2. When the Close-in-Age Exception applies, and written consent has been given in advance before each instance for the lodging arrangement; or
3. If a Minor Athlete needs a Personal Care Assistant, and:
    a. the Minor Athlete's custodial parent/guardian has provided written consent before each instance to the Association for the Adult Participant Personal Care Assistant to work with the Minor Athlete; and
    b. the Adult Participant Personal Care Assistant has complied with the Association Education and Training Policy; and
    c. the Adult Participant Personal Care Assistant has complied with the Association Background Check Policy.

Lodging Sanctioned by the Association

For all In-Program lodging authorized or funded by the Association in connection with a State Program, all Adult Participants will agree to and sign the Association Travel/Lodging Policy annually. Custodial parents/guardians of a Minor Athlete must provide written consent for all In-Program lodging at least annually.

- Adult Participants that travel overnight with Minor Athlete(s) are assumed to have Authority Over a Minor Athlete(s) and thus must comply with the Association

Education & Training Policy and pass a background check. This does not include Adult Athletes who meet the Close-in-Age Exception. Adult Athletes are exempt from the background check requirement provided they are not in a position of authority, but must complete U-110: Safe Sport Core Course as a condition of participation.

- Adult athletes traveling with Minor Athletes must meet the Close-in-Age exemption to be eligible to stay in the same hotel room with a Minor Athlete. Written consent must be provided by a custodial parent/ guardian prior to the lodging arrangement. The Minor Athlete, their parent/guardian or the adult athlete may refuse this arrangement without explanation. A refusal by any party must be honored without exception.
- Athletes are permitted and encouraged to make and receive regular check-in telephone calls to and from parents/guardians. Team personnel will allow any calls that do not interfere with team events, such as training sessions or meetings. Emergency calls will be permitted regardless of team schedule or events.

Monitoring or Room Checks During In-Program Travel

If room checks are performed during In-Program lodging, the One-on-One Interactions Policy must be followed and at least two adults must be present for the room checks.

Meetings

Meetings must not be conducted in the hotel room or other lodging location of an Adult Participant, a Minor Athlete or other athlete during In-Program travel.

D. Electronic Communications & Social Media

Electronic communication between an Adult Participant and Minor Athlete includes, but is not limited to, phone calls, video calls, video/live-streamed training sessions, texts, social media platforms (e.g., Facebook, Twitter (X), Instagram, WhatsApp, Snapchat, etc.), fitness, statistical and/or performance improvement applications, emails, gaming platforms and direct messaging. All electronic communication between an Adult Participant and a Minor Athlete must comply with the One-on-One Interactions Policy and must be open and transparent.

1. Open and Transparent means that the Adult Participant copies or includes the Minor Athlete's parent/guardian, another adult family member of the Minor Athlete, or another Adult Participant.

2. If a Minor Athlete communicates with the Adult Participant first, the Adult Participant must follow this policy in the response.
3. All electronic communication must be professional in nature.
4. Only platforms that allow for open and transparent communication may be used to communicate with Minor Athletes.
5. Communication platforms must be able to record or maintain the message.
6. Electronic communications to an entire team or any number of Minor Athletes on the team must include at least one other Adult Participant or the Minor Athletes' parents/guardians if any team member is a Minor Athlete.
7. A custodial parent or guardian may request in writing that a Minor Athlete not be contacted through electronic communications. Requests that a Minor Athlete not be contacted electronically must be honored.
8. Any private or public direct communication between adults and Minor Athletes encouraging illegal drug and alcohol use and/or involving sexual content is prohibited.

This includes all communications unless the following exceptions exist:

a. When a Dual Relationship exists; or
b. When the Close-in-Age Exception applies.

Hours

Send electronic communications to athletes and parents/guardians only between the hours of 8:00 a.m. and 8:00 p.m., except for travel, competition or emergency circumstances.

Social Media

All social media communication is considered In-Program Contact and must comply with the One-on-One Interactions Policy, in addition to the following conditions:

1. Adult Participants, except those with a Dual Relationship or who meet the Close-in-Age Exception, are not permitted to maintain private social media connections with Minor Athletes. This includes requesting or accepting a request to "follow" or "friend" a Minor Athlete or "liking" a Minor Athlete's social media post. All such existing connections must be discontinued by the Adult Participant if they violate this policy.
2. Minor Athletes may "friend", like" or "follow" an official Association social media account or page.
3. Photos or videos of Minor Athletes may be posted on the private social media page of the Adult Participant provided that:

- photos are displayed professionally;
- in context of practice or competition;
- displayed positively representing the athlete(s);
- public facing and demonstrate the photo(s) are taken as a part of the professional role;
- parents or Minor Athletes reserve the right to request photos to be removed and all requests respected;
- parents are allowed to see the photo(s); and
- parents are aware of such postings.

4. Adults Participants must conduct themselves in a professional manner when posting on any social media platform, as this information is often public and can be perceived as a direct reflection of the Association.

5. Acts of cyberbullying by any Minor Athlete or Adult Participant towards another Minor Athlete or Adult Participant is prohibited and includes acts of harassment, intimidation, humiliation, or places an individual in reasonable fear of harm and has the effect of substantially disrupting the operation of any activity or Event within the Jurisdiction of the Association.

Note: Public fan pages are excluded from these restrictions. Private messaging to Minor Athletes is not excluded.

E. Photography/Videography

Photographs or videos of athletes must be taken in public view, observe generally accepted standards of decency, and must appropriately serve the best interest of the athlete.

F. Gifting

Personal or individual gifts are not permitted to be given to athletes by Adult Participants. Gifts must serve a legitimate motivational, inspirational or educational purpose and must be accessible to all individual members in a group or team.

G. Locker Rooms & Changing Areas

Adult Participants are not permitted at any time to be alone with a Minor Athlete in a locker room or changing area, except under emergency circumstances. The One-on-One Interactions Policy applies at all times, and in all locker rooms, changing areas, and restrooms within a Facility that is partially or fully under the Jurisdiction of the Association. All interactions must be observable and interruptible except:

1. When a Dual Relationship exists, and custodial parent/guardian has provided written consent annually; or
2. When the Close-in-Age Exception applies; or
3. If a Minor Athlete needs a Personal Care Assistant, and:
    a. the Minor Athlete's custodial parent/guardian has provided written consent annually to the Association for the Adult Participant Personal Care Assistant to work with the Minor Athlete; and
    b. the Adult Participant Personal Care Assistant has complied with the Association Education & Training Policy; and
    c. the Adult Participant Personal Care Assistant has complied with the Association Background Check Policy.

Conduct in Locker Rooms and Changing Areas

- Adult Participants must not change clothes or behave in a manner that intentionally or recklessly exposes their breasts, buttocks, groins, or genitals to a Minor Athlete.
- Adult Participants must not shower with Minor Athletes under any circumstance unless a Close-in-Age exemption exists.
- Custodial parents/guardians may request in writing that their Minor Athlete(s) not change or shower with Adult Participant(s) where a Close-in-Age exception applies. The Association and the Adult Participant(s) must abide by this request.
- Recording of any kind is prohibited in locker rooms, restrooms, changing areas or similar spaces by Adult Participants, any athletes, and parents. This includes voice recording, still cameras, and video recording.
- Credentialed media will not be allowed to interview or photograph any athletes in a bathroom or changing area.
- Adult Participant Personal Care Assistants are permitted to be with and assist Minor Athlete(s) in locker rooms, changing areas, and similar spaces where other Minor Athletes are present, if they meet the requirements above.

Availability and Monitoring of Locker Rooms, Changing Areas, and Similar Spaces

Private or semi-private places must be made available for Minor Athletes to change clothes or undress at competitions or Facilities that are partially or fully under the Jurisdiction of the Association.

- A semi-private area is an area that is not separate from where other individuals are changing but offers the Minor Athlete some privacy to change. For example, a bathroom stall with a door would meet this requirement. A semi-private area can also be created by a partition or drapery.
- A private area is an area separated completely from anyone else changing. This area would be fully enclosed with a door, and no other individual would be able to enter without the Minor Athlete's permission. This could be a single restroom or family restroom, where the Minor Athlete can change alone and lock the door.

Designated locker rooms or changing areas must be monitored with random sweeps at any Facility hosting an Event or Facility under the partial or full Jurisdiction of the Association to ensure compliance with policy, including competitions, camps, and other relevant Events.

H. Athletic Training/Medical Modalities, Massages, Rubdowns & Medical Orders

All In-Program athletic training or medical modalities, stretching, massages, or rubdowns of a Minor Athlete must adhere to the following general conditions. There are no exceptions to this policy.

- Observable and interruptible, with another Adult Participant physically present and in full sight of the treatment at all times;
- Performed with the Minor Athlete fully or partially clothed, ensuring that the breasts, buttocks, groin, or genitals are always covered; and
- Allow parents/guardians in the room as an observer, except for competition or training venues that limit credentialing.

Except for emergency medical treatment or immediate pain mitigation, only licensed professionals who are hired to specifically perform such duties are permitted to perform any athletic training/medical modality, stretching, rubdown or massage within the competition facilities or training area. However, Coaches, regardless of whether they are licensed massage therapist, may not massage Minor Athletes.

Consent

The following consent procedures must be adhered to before any non-emergency athletic training/medical modality, massage, stretching or rubdown is offered:

- Providers of athletic training or medical modalities, massages, and rubdowns or the Association, when applicable, must obtain written consent at least annually from Minor Athletes' custodial parents/guardians before providing any athletic training or medical modalities, massages, or rubdowns.
- A detailed treatment plan including specific areas and method of each treatment must be presented verbally to the athlete before each treatment is offered and throughout the process.
- Athletes and/or parent/guardian may withdraw consent at any time and without explanation.

Medical Orders and Follow-up

Adult Participants must adhere to any and all restrictions placed on the athlete for practice and/or competition. To include, but not limited to:

- A time frame for how long the medical provider wants the restrictions placed on the athlete;
- Any training modifications that the medical provider feels will benefit the athlete; and
- Any alternative forms of conditioning that may be acceptable during practice (i.e. lower body conditioning only, in place of full body conditioning).

I. Parent Training

Association recommends that parents/guardians of Minor Athletes complete the SafeSport education and training on child abuse prevention that are offered by the Association before providing consents for their Minor Athlete as set forth in these Prevention Policies, including, consents for (i) meetings or training sessions with an Adult Participant (ii) One-on-One travel by Minor Athletes with an Adult Participant, (ii) lodging arrangements for Minor Athletes, and (iii) athletic training or medical modalities, massages, stretching or rubdowns under these Policies.

Education & Training Policy

Effective April 1, 2025

A. Adult Participant Training on Child Abuse Prevention

1. Adult Participant Training

    a. Adult Participants identified below shall take the *SafeSport Trained Core* course offered by the U.S. Center for Safe Sport's online or through a Center-approved in-person training:
        i. Adult Participants who have Regular Contact with any athlete who is a minor;
        ii. Adult Participants who have Authority Over any athlete who is a minor;
        iii. Adult Participants who are Association employees, Association board members, or State Committee members.

    b. Adult Participants, who are medical providers, are required to complete either the *SafeSport Trained Core* course offered by the U.S. Center for SafeSport's online or through a Center-approved in-person training, or the Health Professionals Course in lieu of the *SafeSport Trained Core* course.

2. Timing of Training

    Adult Participants must complete this training:

    a. Before having Regular Contact with an athlete who is a minor; and
    b. Within thirty (30) days of beginning a new role subjecting the adult to this policy.

3. Refresher Training

    a. All Adult Participants must complete a *Core Refresher* course on an annual basis (every 12 months), beginning the calendar year after completing the *SafeSport Trained Core* course or the *Health Professionals Course,* as applicable.

    b. Every four (4) years, Adult Participants are required to retake the *SafeSport Trained Core* training. Adult Participants, who are medical providers, may retake the *Health Professionals Course* in lieu of the *SafeSport Trained Core*.

c. Individuals can renew the athlete protection education requirement as early as 90 days prior to their expiration date by taking the appropriate refresher course.

B. Minor Athlete and Parental Training

On an annual basis, the Association shall offer and, subject to parental/guardian consent, give training to Minor Athletes and parents/guardians on the prevention and reporting of child abuse. The youth and parental courses offered by the U.S. Center for SafeSport shall satisfy this training requirement and are located at www.safesporttrained.org.

C. Optional Training

Adult Participants serving in a volunteer capacity, who will not have Regular Contact with or authority over Minor Athletes, are encouraged to take the U.S. Center for Safe Sport's *Volunteer Course* or *SafeSport Trained Core* before engaging or interacting with any Minor Athlete(s).

The Association may provide training in addition to the *SafeSport Trained Core* but any such additional training does not replace requirement to complete the *SafeSport Trained Core* and subsequent *Core Refresher*.

Parents of Minor Athletes shall be provided free online access to the U.S. Center for SafeSport *Parent Course* and are encouraged to take the training.

D. Exemptions and Accommodations

Exemptions from this Education & Training Policy may be made on a case-by-case basis for victims/survivors. Requests may be made via email to nhantle@tngolf.org.

The Association shall provide reasonable accommodations for any person with disabilities or individual with limited English proficiency to satisfy these training requirements and track any exemptions for such individuals.

E. Monitoring

Association shall track whether Adult Participants under the organization's jurisdiction complete the required training listed in Section A above.

The Association may update this Policy at any time, subject to prior approval by the USGA. Unless otherwise stated, changes are effective immediately upon publication.

Background Check Policy

Effective April 1, 2025

A. Application

All adult employees of the Association and individuals that the Association formally authorizes, approves or appoints to (a) serve in a position of Authority Over, or (b) have Regular Contact with a Minor Athlete shall undergo a background check in accordance with this Background Check Policy (the "Policy"). Through this background screening, the Association will utilize reasonable efforts to ascertain criminal history and motor vehicle violations (if applicable). The Background Check Policy assists the Association in promoting the safety and welfare of athletes.

The following groups and individuals that are 18 years of age or older are subject to this Policy and required to go through the background checks set forth herein:

- Association staff who are designated as having Regular Contact or Authority Over Minor Athletes
- Association board members
- State Committee members
- State Program coaches
- State Program caddies
- State Program captains
- State Program team managers
- State Program chaperones
- State Program transportation drivers
- State Program consultants/independent contractors
- State Program medical personnel
- State Program trainers
- Officials of any State Program sanctioned competition
- Directors of any State Program sanctioned competition or training who are designated by the Association as having Regular Contact or Authority Over Minor Athletes
- Event coordinators of any State Program sanctioned competition or training who are designated by the Association as having Regular Contact or Authority Over Minor Athletes
- Volunteers of any State Program sanctioned competition or training who are designated by the Association as having Regular Contact or Authority Over Minor Athletes
- Adult athletes participating on any State Team or in any Association sanctioned competition or training in connection with the State Program.

- Assistant or personal care assistants of a Minor Athlete who are funded, have a contractual obligation with, or are credentialed by the Association
- Any other individuals who are authorized, approved, or appointed by the Association in connection with a State Program to (a) serve in a position of Authority Over, or (b) have Regular Contact with a Minor Athlete

The background check must be completed before Regular Contact with any Minor Athlete. Background checks must be refreshed every two years.

B. Screening Provider

Association uses the National Center for Safety Initiatives ("NCSI") as its provider to conduct background checks. NCSI is a full-service screening organization that works in accordance with the recommended guidelines established by the National Council of Youth Sports ("NCYS") and the provider recommended to National Governing Bodies by the USOPC.

C. Search Components

1. **Full Background Checks.** All full background checks will include at least the following search components:
    a. Social Security Number validation;
    b. Name and address history records;
    c. Two independent Multi-Jurisdictional Criminal Database searches covering 50 states plus DC, Guam, and Puerto Rico;
    d. 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;
    e. 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;
    f. National Sex Offender Registry database search of all available states, plus DC, Guam, and Puerto Rico;
    g. Multiple National Watch Lists;
    h. SafeSport Disciplinary Records;
    i. Comprehensive International Records search for U.S. citizens who have lived outside of the United States for six consecutive months in any one country, during the past seven years;

j. Motor Vehicle Records of at least a 3-year history in the state of licensure; (if driving is required for position);

2. **Supplemental Background Checks.** All supplemental off-year background checks will be conducted using at least the following search components:
   a. Multi-Jurisdictional criminal database covering 50 states plus DC, Guam, and Puerto Rico;
   b. Sex Offender Registry database searches of all available states, plus DC, Guam, and Puerto Rico; and,
   c. SafeSport Disciplinary Records.

D. Timing and Frequency of Background Checks

1. Full background checks will be completed prior to the commencement of a new role for all applicable individuals.

2. At a minimum, full background checks will be conducted on all applicable individuals every two (2) years using at least the background check search components referenced in Section C(1) and Section F(1) of this Policy.

3. A supplemental, partial, background check will be conducted in each off-year using at least the background check search components referenced in Section C(2) of this Policy**.** This supplemental re-screening will be conducted automatically by our vendor at or about one year from the individual's initial background check registration date.

4. Additional Background Checks. The Association retains the right to require additional background checks at any time.

E. Applicant Registration

Individuals required to go through background checks under this Policy will be provided a link to register an account with Association's third-party background check vendor, NCSI. NCSI has developed a background screening registration process, including a Consent and Authorization Form, for Association applicants via a secure website. Individuals undergoing background screening must complete the online background screening Consent and Authorization Form and registration information. As part of its background check, NCSI will run a full background screen that includes at least the search components detailed in Section F(1) of this Policy.

F. Screening Criteria

1. **Background Check Elements.** Any background check that results in a report of a disposition or resolution of a criminal proceeding, other than an adjudication of not guilty,[1] for any of the below criminal offenses will be subject to the Association's policies and procedures to determine the individual's level of access and involvement:

    a. **Disqualifiers. (Red Light/Flagged)**
        1. Any felony (any crime punishable by confinement of greater than one year)
        2. Any misdemeanor involving:
            a. All sexual crimes, criminal offenses of a sexual nature to include but not limited to: rape, child molestation, sexual battery, lewd conduct, possession and distribution of child pornography, possession and distribution of obscene material, prostitution, indecent exposure, public indecency, and any sex offender registrant;[2]
            b. Any drug related offenses;
            c. Harm to a minor and vulnerable person, including, but not limited to, offenses such as child abandonment, child endangerment/ neglect/abuse, contributing to the delinquency of a minor, and DUI with a minor;
            d. Violence against a person (including crimes involving firearms and domestic violence);
            e. Stalking, harassment, blackmail, violation of a protection order and/or threats;
            f. Destruction of property, including arson, vandalism, and criminal mischief; and,
            g. Animal abuse or neglect.

    b. **Automatic Disqualifiers (If Accurate, Not Subject to Appeal)**

[1] A "disposition or resolution of a criminal proceeding, other than an adjudication of not guilty" shall include, but is not limited to: an adjudication of guilt or admission to a criminal violation, a plea to the charge or a lesser included offense, a plea of no contest, any plea analogous to an Alford or Kennedy plea, the disposition of the proceeding through a diversionary program, deferred adjudication, deferred prosecution, disposition of supervision, conditional dismissal, juvenile delinquency adjudication, or similar arrangement, or the existence of an ongoing criminal investigation, a warrant for arrest, or any pending charges.

[2] Any participant that has been convicted of, received an imposition of a deferred sentence for, or any plea of guilty or no contest for any sexual crime, criminal offense of a sexual nature, and/or is a sex offender registrant must be reported.

1. Any sex offense (felonies and misdemeanors), criminal offense of a sexual nature to include but not limited to; rape, child molestation, sexual battery, lewd conduct, possession and distribution of child pornography, possession and distribution of obscene material, prostitution, indecent exposure, public indecency, and any sex offender registrant;
2. Murder and Homicide regardless of time limit;
3. Felony Violence and Felony Drug offenses in the past 10 years;
4. Any misdemeanor violence offenses in the past 7 years;
5. Any multiple misdemeanor drug and/or alcohol offenses within the past 7 years;
6. Any other crimes against children in the past 7 years

If the findings involve any of the above Automatic Disqualifiers, such findings are not appealable, and such individual will be deemed ineligible to participate.

Note: The time frames associated with the categories of crime listed above are calculated based on the date of the offense. Individuals that are disqualified must wait at least one (1) year before reapplying for affiliation with the Association.

2. **Motor Vehicle Reports**
In limited instances, the Association may require an Adult Participant to be subject to a motor vehicle report check. Prior to any review of motor vehicle reports, the Association will procure the Adult Participant's permission. For purposes of being authorized to transport people in any motor vehicle for business purposes, a record that contains the following information will be flagged and will prevent the individual from providing transportation services related to any Event:
    a. No valid driver's license (expired or lack of license);
    b. Suspended or revoked driver's license;
    c. More than two moving violations and/or accidents in the prior two years;
    d. A conviction for a major moving violation including, but not limited to: DUI/DWI, possession of an open container, any drug-related motor vehicle incident, leaving the scene of an accident, assault (in any form) by use of a motor vehicle, and reckless driving (willful or wanton disregard for safety of persons or property in any form);
    e. Pending traffic offenses; and
    f. An individual being under 25 years of age.

3. **Full Disclosure & Ongoing Obligation.** In addition to the background check, each applicable individual who is subject to a background check under this Policy has the affirmative and ongoing duty to disclose any disqualifiers listed above in Section C(1). Failing to disclose or intentionally misrepresenting any of the above disqualifiers is grounds for disqualification from participation, regardless of when the offense is discovered. Participants must make disclosures by emailing nhantle@tngolf.org.

4. **Findings.** The Association's criminal background check report will return a Red Light/Flagged or Green Light/Cleared finding.

    - A Green Light/Cleared or "meets the screening criteria" finding indicates an individual meets the background- screening requirement for Association participants. The background check vendor located no records that would disqualify the individual. 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 other means.
    - A Red Light/Flagged finding means criminal history has been sourced that "does not meet the screening criteria." A Red Light finding means the criminal background check revealed criminal records that suggest the individual does not meet the criteria and is not suitable for Association participation.

5. **Results.** When the criminal background check vendor (NCSI) sources criminal history information as outlined above and attributable to the applicant, NCSI will send that information directly to the applicant. NCSI will inform Association of all Red Light/Flagged findings, including Automatic Disqualifiers, and Green Light Findings.

G. Appeals Process

Once the Association is informed of an applicant's accurate Red Light finding, the Association's Review Panel (defined below) will appraise the Red Light status.

1. **Disputes of Findings.** Individuals subject to disqualification under a Red Light finding may challenge the accuracy of the information reported by the criminal background check vendor, NCSI. That individual will be provided with an opportunity to correct potential errors in their record or to provide additional information. NCSI will research issues that are raised and revise the report if any inaccuracies are found. The applicant will be notified accordingly.

2. **Appeals of Disqualifications.** Individuals subject to disqualification under an accurate Red Light/Flagged findings have the right to request an appeal of their disqualification, except for findings of Automatic Disqualifiers which are not subject to appeal. The individual must file a written request for appeal within thirty (30) days from the date of notification of the final disqualification determination. Individuals who do not request an appeal, or fail to request an appeal within the thirty (30) day time period, are deemed to have waived their right to an appeal and will not be permitted to re-apply for participation in the Association for a period of one (1) year.

   All appeals for Red Light determinations shall be made to the Association's Review Panel. Participants will receive an Adverse Action Letter with instructions on how to initiate an appeal.

   The Association's Athlete Safeguarding Review Panel ("Review Panel") will consist of no less than 3 persons which shall include Allison Brown, Whit Turnbow and Chuck Ruttan.

   To initiate an appeal, the individual must provide the following:

   a. Provide an email to nhantle@tngolf.org with the subject line "USNDP State Team - Background Screen Appeal".
   b. Within the email, include the individual's first and last name, email, phone number and a brief description of the position or role sought with the Association and/or the State Program.
   c. Provide a reasonable description of the grounds for disqualification and any information that might be useful for the Review Panel to know, including justification for the appeal and the individual's contributions to the game of golf.

3. **Review and Considerations.** In rendering its finding, the Review Panel will consider the following.
   a. The legitimate interests of the Association in providing a safe environment for athletes and other individuals who may

participate in Association and/or State Program events and programs;

b. Any information produced by the individual, or produced on behalf of the individual, concerning the disqualifying matter;
c. Any other information, which in the determination of Association, would bear on whether or not the individual should be denied or granted approval to participate.

In making a final determination, the Review Panel will evaluate the circumstances surrounding the disqualifying matter, the dates in which the matter occurred and the overall impact of the matter on the relevant Association and/or State Program event, program, or position sought.

4. **Final Determination**. The Review Panel may take up to thirty (30) business days to process the appeal once it is received. An individual will be issued a final determination in writing regarding the Review Panel's decisions.

Reporting & Responding Policy

Effective April 1, 2025

This Reporting & Responding Policy ("Policy") governs the process by which the USGA and the Association responds to and resolves reports of abuse or misconduct alleged of individuals involved with the State Team or State Program.

All reports will be received by the USGA. Anyone can make a report to the USGA of alleged abuse or misconduct; however, Adult Participants are required to make reports as set forth below. Capitalized terms shall have the same meaning as defined in the Prohibited Conduct list and within these Athlete Safeguarding Program Policies.

Reports may be made anonymously to the USGA by following the instructions below. There are no direct fees or other costs involved in making a report. No one should investigate suspicions or allegations of abuse or misconduct or attempt to evaluate the credibility or validity of allegations or information learned prior to reporting.

Reporting can be difficult, and if you need any advice or help in making your report, please contact USGA Safeguarding staff at Safeguarding@usga.org or Association's Safeguarding representative at nhantle@tngolf.org.

A. Mandatory Reporting of Child Abuse, including Sexual Child Abuse

Adult Participants must report Child Abuse, including sexual Child Abuse, within 24 hours; however anyone can report an incident of Child Abuse as set forth below. This requirement begins when an Adult Participant learns of information that give reason to suspect that a child has suffered an incident of Child Abuse or that adult is informed of an allegation of Child Abuse. Reports must be made within 24 hours to *both* (i) law enforcement and (ii) the USGA, as provided below.

Law enforcement and/or state designated agency
Learn more about how and where to report to local law enforcement or designated state agencies by visiting the following sites: ▪ How to Report Child Abuse and Neglect ▪ States and Territories Resources
USGA
▪ USGA Athlete Safeguarding Reporting Form ▪ Phone: **855-874-2744**

Reports made to the USGA may be made anonymously

Upon receipt, USGA will promptly report and refer suspicions or allegations of Child Abuse to law enforcement for investigation and further handling. Investigations will be conducted solely by appropriate law enforcement. As necessary, USGA may ask clarifying questions of the individual making the report to help provide sufficient information to law enforcement. USGA may also provide further information or resources necessary for law enforcement to investigate reported allegations.

Federal law and various state laws may require individuals to report allegations or suspicions of Child Abuse to law enforcement or to a designated child protection agency. USGA is also responsible for complying with mandatory reporting laws. It is each person's obligation to know and comply with federal and state laws. Reporting such conduct to the USGA does not satisfy an adult's obligation to report to law enforcement or other appropriate authorities/agencies.

If an individual is unsure about reporting, they should seek guidance from the local police department, department of child services or child advocacy center. These authorities will understand the law in their jurisdiction. As best practice, the person reporting should document the date, time, name of the local police department contacted, name of the officer and the officer's badge number as confirmation of their efforts. Child Abuse includes incidents that involved a victim who is a minor at the time of the alleged incident, even if the victim is now an adult.

B. Reporting Sexual Misconduct

Adult Participants must report incidents of Sexual Misconduct to the USGA as provided below. If an incident of Sexual Misconduct involves possible criminal conduct, the Adult Participant should report the matter to appropriate law enforcement. This requirement begins when an Adult Participant learns of information that gives reason to suspect an incident of Sexual Misconduct occurred or that adult is informed of an allegation of Sexual Misconduct. Sexual Misconduct may involve an adult or minor; however, if the Sexual Misconduct involves a minor, it should be reported as Child Abuse as set forth in Section A above.

Local law enforcement

- Report to local law enforcement if Sexual Misconduct involves possible criminal conduct
- Report to law enforcement and/or designated state agency if Sexual Misconduct involves a minor. See Section A above for more information about how and where to report.

USGA

- USGA Athlete Safeguarding Reporting Form
- Phone: **855-874-2744**

Reports made to the USGA may be made anonymously

Upon receipt, USGA will promptly report and refer suspicions or allegations of Sexual Misconduct that involve potentially criminal conduct to law enforcement for investigation and further handling. Investigations will be conducted solely by appropriate law enforcement. As necessary, USGA may ask clarifying questions of the individual making the report to help provide sufficient information to law enforcement. USGA may also provide further information or resources necessary for law enforcement to investigate reported allegations.

In the event law enforcement does not deem the reported Sexual Misconduct criminal, the reported case will be handled by the USGA in accordance with this Policy.

C. Reporting Other Types of Prohibited Conduct

Adult Participants must report other types of Prohibited Conduct to the USGA. They may also report other types of misconduct to the USGA. This requirement begins when an Adult Participant learns of information that gives reason to suspect an incident of Prohibited Conduct or other misconduct occurred or that adult is informed of an allegation of Prohibited Conduct or other misconduct occurred. This includes any of the following:

- Physical and Emotional Misconduct
- Criminal Charges and Dispositions
- Violations of the Prevention Policies or other Athlete Safeguarding Policies
- Misconduct relating to the Athlete Safeguarding Program processes
- Misconduct Relating to Reporting
- Aiding and Abetting
- Retaliation
- Other inappropriate conduct

USGA
■ USGA Athlete Safeguarding Reporting Form ■ Phone: **855-874-2744** *Reports made to the USGA may be made anonymously*

If the reported allegations involve the USNDP State Program, USGA will conduct an assessment to determine whether USGA or the Association who is operating the State Program has jurisdiction over the reported allegations. This may depend on the severity of the reported allegations. A description of the types of allegations that may fall within the jurisdiction of the Association are set forth below in Section F. If the USGA determines that allegations fall within the jurisdiction of the Association, USGA may refer the reported allegations to the Association operating the State Program for further handling.

If an incident of misconduct involves possible criminal conduct, the Adult Participant should report the matter to appropriate law enforcement.

D. Prohibition on Retaliation

Association expressly prohibits all forms of retaliation before, during, and after the reporting, investigative and conclusion of resolving an abuse or misconduct allegation. Retaliation is a category of Prohibited Conduct and thus deemed a violation of the Association Athlete Safeguarding Program.

E. Failure to Report

An Adult Participant who fails to make a report pursuant to this Policy may be subject to disciplinary action by the USGA and/or law enforcement (as applicable). Specifically, an Adult Participant who fails to report actual or suspected Sexual Misconduct or Child Abuse to the USGA and, when appropriate, to law enforcement may be subject to disciplinary action by USGA and may also be subject to federal or state penalties.

F. Response and Resolution of Reported Allegations

The Director, Course Rating & Member Services works with USGA Safeguarding staff to administer and enforce this Reporting & Responding Policy, and to resolve reported allegations fairly and efficiently.

Reports may be made to the USGA using the reporting methods set forth above. A report of alleged abuse or misconduct to the USGA begins a process that includes assessment, determination of jurisdiction, investigation (if the report meets relevant criteria), issuance of finding, and determination of sanction if appropriate.

"Claimant" is a person(s) alleges to have experienced conduct that constitutes an Athlete Safeguarding Program violation. **"**Respondent" is the person(s) alleged to have violated the Athlete Safeguarding Program. "Third-party reporters" are persons other than a Claimant who reported the alleged violation.

Making a report can be a difficult and emotional process. USGA and Association will ensure that all reported matters are handle with the appropriate attention and care, and USGA and Association shall handle all reported matters confidentially in accordance with the provisions set forth in Section I of this Policy.

1. **Determination of Jurisdiction**

   USGA will conduct an initial assessment of the reported allegations and determine whether law enforcement, the USGA, or the Association has jurisdiction over the matter pursuant to this Policy.

   Upon receipt of complete information related to a report, USGA will inform an identified reporting party of its jurisdictional determination regarding their report, communicating that the matter either is being referred to appropriate law enforcement, being addressed by USGA directly, or being referred to the Association for further handling.

   a. <u>Law Enforcement Jurisdiction</u>

      Pursuant to applicable state and federal laws, law enforcement must be notified of suspicions of child abuse. Accordingly, USGA will immediately notify law enforcement of any report it receives involving suspicion of child abuse. In addition, pursuant to this Policy, USGA will notify law enforcement of any report it receives that may involve criminal conduct, including, but not limited to, reported allegations of Sexual Misconduct that may involve criminal conduct. Law enforcement shall have exclusive jurisdiction over the following types of allegations that are reported to the USGA or the Association:

      - Child Abuse
      - Sexual Misconduct that involves possible criminal conduct

- Other misconduct that involves possible criminal conduct

USGA and the Association will cooperate, to the extent permitted by law, with any investigation by law enforcement involving the above allegations. USGA and the Association reserves the right to implement temporary measures against any individual who is subject to an ongoing investigation by law enforcement, including, but not limited to, suspension of an individual from any USNDP or State Program sanctioned event, program, or activity, whether or not such event, program, or activity is subject to or falls within the scope of the Athlete Safeguarding Program.

b. USGA Jurisdiction

USGA will respond to and resolve reported Athlete Safeguarding Program allegations that involve the following:

i. Any allegations of misconduct involving the USNDP National Teams, USNDP Grants or any other matters involving the USNDP, excluding those that involve the USNDP State Program which fall within the jurisdiction of the Association as set forth in Section 1(b)(ii) below.

ii. Allegations of misconduct involving the USNDP State Program where the reported misconduct is severe, as determined by USGA in its reasonable discretion. Severity will depend on the frequency, intensity, number of reported incidents, or reasonable possibility of escalation. Alleged misconduct may include:
    - Sexual Misconduct
    - Criminal Charges and Dispositions
    - Physical or Emotional Misconduct
    - Violations of the Athlete Safeguarding Program, including the Prevention Policies

iii. Allegations of misconduct involving the USNDP State Program where the USGA determines, in its discretion, that a conflict of interest exists for the Association (e.g., the matter involves an Association staff member, State Committee member, or State Program coach).

c. State Program Jurisdiction

USGA will receive and refer Athlete Safeguarding Program allegations involving the USNDP State Program to the Association for further handling

where the reported misconduct is not deemed severe, as determined by USGA in its reasonable discretion. Alleged misconduct may include:

- Physical or Emotional Misconduct that is not deemed severe (e.g., verbal attacks, peer-to-peer bullying)
- Violations of the Athlete Safeguarding Program, including Prevention Policies, that are not deemed severe

Each Association or its State Committee will respond to and resolve such reported allegations of abuse and misconduct and shall report to USGA on the status of such matters and notify USGA of their resolutions as set forth in Section D(v) below.

2. Resolution Process

a. Preliminary Investigation.

i. USGA. When the USGA receives notice of a matter within its jurisdiction, it will undertake a preliminary inquiry to determine whether or not there is reason to believe an Athlete Safeguarding Program Policy violation has occurred. If, after the preliminary inquiry, the USGA concludes there is reason to believe a violation may have occurred, it will initiate proceedings, which may include an investigation and informal or formal resolution. If the USGA deems that there is insufficient information to determine that there is reason to believe an Athlete Safeguarding Program Policy violation may have occurred, it may administratively close the matter, with the option to reopen it if more information is presented in the future. USGA maintains an internal, confidential system for tracking all reported allegations.

ii. Association. When USGA notifies the Association of a matter within its jurisdiction, it will undertake a preliminary inquiry to determine whether or not there is reason to believe an Athlete Safeguarding Program Policy violation has occurred. If, after the preliminary inquiry, the Association concludes there is reason to believe a violation may have occurred, it will initiate proceedings, which may include an investigation and informal or formal resolution. If the Association deems that there is insufficient information to determine there is reason to believe an Athlete Safeguarding Program Policy violation may have occurred, it may administratively close the matter, with the option to reopen it if more information is presented in the future. Association maintains an internal, confidential system for tracking all reported allegations. Association shall inform the USGA of its determination in accordance with Section H below.

b. Temporary Measures

i. At any point before a matter is final, temporary measures may be appropriate to ensure the safety or well-being of any of the parties. Temporary measures may include, but are not limited to, altering training schedules, providing chaperones, implementing contact limitations between the parties, and suspensions.

ii. If a matter is within the jurisdiction of the USGA and it imposes temporary measures that impact an individual involved with the State Program, USGA will notify the Association and provide instructions regarding implementation of any such temporary measures or safety plans, and the Association will help implement any temporary measure and safety plans within their geographical area. USGA will notify such individual of any temporary measures that restrict or limit the individual's involvement in the State Program.

iii. If a matter is within the jurisdiction of the Association and it imposes temporary measures that impact an individual involved with the State Program, the Association will implement any temporary measures or safety plans within their geographical area and will notify such individual of any temporary measures that restrict or limit the individual's involvement in the State Program. Association will notify USGA of any temporary measures it issues.

iii. While USGA does not investigate allegations of abuse or misconduct that fall within the jurisdiction of law enforcement or the Association, USGA reserves the right to implement temporary measures against any individual who is subject to an ongoing investigation by law enforcement or by the Association, including, but not limited to, suspension of an individual from any USGA, USNDP or State Program sanctioned event, program, or activity, whether or not such event, program, or activity is subject to or falls within the scope of the USGA Athlete Safeguarding Program. USGA will immediately notify such person that they are ineligible to participate in any USGA, USNDP or State Program event, activity or program until further notice.

c. Investigation and Determination.

i. USGA and Association may investigate allegations of abuse or misconduct within each of their jurisdictions. The timing, scope and processes of the investigation will be based on the particular circumstances of the matter.

ii. USGA or Association may use a third-party investigator to conduct or assist with any investigation within their jurisdiction. Such third-party

investigator will be required to maintain the confidentiality of such matters, subject to applicable law.

iii. If, at any point during the investigation of a matter within the jurisdiction of the Association, it is determined that a conflict of interest exists for the Association (e.g., the matter involves an Association staff member, State Committee member, or State Program coach), the Association must transfer the investigation to the USGA for further handling.

iii. USGA or Association (as relevant, depending on their jurisdiction) will notify the Claimant that it is conducting an investigation and update the Claimant on the status of the investigation and its resolution, as appropriate.

iv. During its investigation, USGA or the Association (as relevant, depending on their jurisdiction) may seek to interview the Respondent and advise them of the nature of the allegations, interview witnesses, collect evidence or other information relevant to the investigation.

v. For cases that are investigated by the USGA, the USGA will make a final determination based on all relevant information obtained as to whether abuse or misconduct occurred in violation of the Athlete Safeguarding Program and issue appropriate sanctions, as deemed appropriate in the USGA's sole discretion. USGA will provide written notice of its determination ("Notice of Decision") to the Claimant, the Respondent, and, if appliable, the Association if in connection with a USNDP State Program.

vi. For cases that are investigated by the Association, the Association will make a final determination based on all relevant information obtained as to whether abuse or misconduct occurred in violation of the Athlete Safeguarding Program and issue appropriate sanctions, as deemed appropriate in the Association's sole discretion. Association will provide a written Notice of Decision to the Claimant, the Respondent, and the USGA.

vi. USGA or Association may close an investigation of matter within their respective jurisdiction prior to final resolution if the USGA or the Association (as applicable) could not conduct or complete an investigation because there was insufficient information, the matter did not warrant final resolution, or the USGA or the Association determines there is no reason to believe that there has been an Athlete Safeguarding Program violation.

vii. Sanctions may include, but are not limited to, suspension, removal, or termination from the USNDP or State Program, additional training or education, or other consequences as appropriate.

3. Appeals

Claimants and Respondents have the right to request an appeal and challenge the USGA's or Association's Notice of Decision or the handling of any reported claim. Either the Claimants or Respondents ("Appellants") to the USGA Safeguarding Appeals Committee ("Appeals Committee"). Appellant may initiate a request for an appeal by filing a statement of appeal within thirty (30) days after the date the Notice of Decision is issued. Requests for an appeal, including the statement of appeal and a copy of the Notice of Decision, shall be sent via email to Safeguarding@usga.org.

Appeals will be conducted and governed in accordance with the terms of this Policy and the USGA Appeals Committee Procedures. The parties to the appeal shall be the Appellant and the USGA or the Association, as applicable, and no other person or entity shall have standing to challenge the Notice of Decision issued by the USGA or the Association or participate in any appeal. Minors who are parties to an appeal may have parent/guardian representation. In all cases the Appellant and USGA or Association, as applicable, may have attorney representation during the appeals process. The Appeals Committee shall be the exclusive forum for challenges to Notice of Decisions issued by the USGA or Association.

The Appellant has the burden of demonstrating that the Notice of Decision of the USGA or the Association, as applicable, was arbitrary and capricious with no rational basis. Pending a final decision of the appeal by the Appeals Committee, the Notice of Decision under appeal shall remain in full force and effect. The Appeal Committee shall issue a final written decision, which shall be final and binding on both the Appellant and the USGA or the Association, as applicable.

G. Bad Faith Allegations

Any individual who alleges misconduct under the Athlete Safeguarding Program that, upon review, is determined to be malicious, frivolous or made in bad faith, will be deemed in violation of the Athlete Safeguarding Program, and may be subject to criminal or civil action and sanctions.

H. State Program Tracking and Reporting to USGA

The Association shall provide reporting to USGA on the status and resolution of all Athlete Safeguarding Program cases that fall within the jurisdiction of the State Program involving the USNDP State Team, in accordance with the following:

a. The State Program's Safeguarding Director, or their designee, shall be responsible for reporting on the status of any open cases, including case status and disposition, to the USGA's Safeguarding Lead Investigator on a regular and recurring basis, and at minimum (i) on quarterly basis, and (ii) upon resolution of any matter.

b. Association shall maintain the tracking of all reported cases within its jurisdiction and shall reflect how allegations were responded to, investigated (if applicable) and their respective outcomes. Association shall keep all cases information confidential, subject to the confidentiality provisions set forth in Section I of this Policy.

c. USGA shall maintain the tracking of all reported cases, including those within law enforcement's jurisdiction, the USGA's jurisdiction and within each Association's jurisdiction. Such tracking will be maintained by the USGA's Safeguarding Team and shall reflect how allegations were responded to and their respective outcomes. USGA shall keep all case information confidential, subject to the confidentiality provisions set forth in Section I of this Policy.

I. Confidentiality

To the extent permitted by law, Association and USGA will keep confidential the names of the persons involved, including the victim or claimant, respondent, third-party reported, and witnesses, the nature of the underlying allegations or information reported or learned during an investigation. Notwithstanding the foregoing, when a matter is within their jurisdiction, Association or USGA may be required to disclose such information in the following circumstances:

- Association or USGA, as applicable, may disclose such information to parties involved in the investigation, including the victim or claimant, respondent, third-party reported, and witnesses, third party investigators, Association or USGA staff or personnel, persons involved with the State Program, and others with a need to know, only as necessary in order to properly and sufficiently assess and investigate the matter being reported;
- Association or USGA, as applicable, may disclose the outcome of the matter to persons or organizations with a need to know to ensure the resolution is properly communicated and understood or effectuated;
- Association or USGA, as applicable, may be required to disclose such information to law enforcement in accordance with relevant state or federal law, or other mandatory reporting requirements imposed by law enforcement; and

- Association or USGA, as applicable, reserves the right to disclose such information in order to publicly correct any misrepresentation related to these reporting and resolution procedures or outcomes.