



DIOCESE OF GALLUP

PO Box 1338
Gallup, New Mexico 87305

January 9, 2023

Dear Fathers, Deacons, Principals, and Supervisors of Safe Environment Activities,

Greetings from the Chancery. Please accept the thanks from His Excellency, Bishop Wall, the staff of the Safe Environment Office and me for all your efforts to comply with the policies to protect our children. We are especially appreciative for the recent timely submission of your data for the annual report for the USCCB Charter Audit. The Diocese received full approval!

The purpose of this message is to inform everyone that we need to implement change in the processing and storage of background check documents. This responds to new guidance to reduce risk of inadvertent disclosure of protected information. In addition, His Excellency, Bishop Wall, has amended the *Policy and Procedures for the Protection of Minors* to reduce the requirements for the Financial History (Credit Reports) which will decrease cost and reduce administrative burden.

All the current policies remain in effect about who requires a background check. The change affects only one component of the report. The process for requesting background checks remains unchanged except for a revised request form in *Appendix V*. The requirements for the criminal and driving components of the background check remain unchanged.

The changes involve the Credit Reports which have stringent legal requirements. The new process limits where the Credit Reports may be sent and stored. They now will reside in the custody of the Chancery which has been inspected to certify its security. Please see the attached memorandum for details. It outlines the specific actions required by all parties.

You should find in this packet a sheet entitled *Instructions for Handling and Storage of Background Check Documents*. Also included is the promulgation letter from Bishop Wall for the amendment of Appendix V in the Policy and a copy of that document. There are also cover pages for the Master Catalog that may be used to show that the policy contains the update in your copy.

Please contact the staff of the Safe Environment Office, Mrs. Cathy McCarthy, Ms. Anna Flores or me if you have any questions on this process at Safeenvironment@dioceseofgallup.org, or call 505-863-4406. Our goal is always to maintain a safe and nurturing environment for the children of our diocese. In that process we must also honor the employees and volunteers who labor with us by respecting the security of their personal information.

Once again, please accept my gratitude for all your ministry. Contact me directly if you have difficulty reaching our staff to assist you in this change of procedures.

Respectfully,

Dcn. Randolph Copeland

Chancellor

chancellor@dioceseofgallup.org

505-979-2406

Instructions

For Handling and Storage of Background Check Documents

For the Diocese of Gallup

(updated: January 9, 2023)

Actions by Chancery:

- Background checks will be processed as usual except for those with Credit Checks.
- All completed background reports will be sent to the requesting parish/school; however, Credit Reports will not be included.
- If a Credit Report was requested, a cover memorandum will be attached to the background report. It will indicate that the results of the Credit Report were either unremarkable or what problems were noted. The pastor or supervisor may call about the details as needed.
- Copies of background checks (electronic or paper) will be retained for a minimum of seven years in the chancery files. Flagged reports will be retained permanently.

Actions by parish, school and organization:

Existing background checks in your files --

- Review the files of all employees and affected volunteers to see that there is an annotation of the date that any report was done and any comments on the results. (For directions on continued storage for these documents, see below.)

New background checks --

- Pastor or supervisor must review the new background report and make a note for the person's file to annotate the date the report was done and any comments on the results. (Please see below for storage directions.)

Storage options:

Option 1 -- Shred all background check documents, after reviewing and documenting a summary note for a permanent personnel file. (This is the recommended option.)

Options 2 -- Retain background checks in a securely locked cabinet in a safe area with limited/monitored access with the following restrictions:

- A background check without a Credit Report may be kept unaltered
- A background check with a Credit Report must be managed by –
 - o Removal of all pages containing the Credit Report
 - o Securely shred that portion of the document

Please contact the staff of the Safe Environment Office you have any questions on this process. (Safeenvironment@dioceseofgallup.org, 505-863-4406)