

Safe Environment Program Compliance Plan

St. Mark the Evangelist
2727 W. Tangerine Road Oro Valley, Az 85742

July 1, 2025 – June 30, 2026

COMPLIANCE PLAN
JULY 1, 2025 – JUNE 30, 2026

The Office of Child, Adolescent and Adult Protection has an electronic version of this template, first published and distributed January 2006. Changes may be made periodically. This template is current as of February 2025.

The Diocese of Tucson **Guidelines for the Prevention of and Response to Sexual Misconduct** and the **Diocese of Tucson Code of Conduct**, both of which have been adopted by this organization, establish the guidelines for the prevention of sexual misconduct with children, adolescents, and vulnerable adults. The Guidelines, which are the basis for the Safe Environment Program (SEP) of the Diocese of Tucson, apply to all, including priests, deacons, religious, seminarians, and all diocesan employees and volunteers, whether full or part-time, who work or volunteer in any organizations within the Diocese of Tucson which have adopted these Guidelines.

Compliance with the prevention aspect of the Guidelines requires that intensive efforts be undertaken by both the Diocese of Tucson and all the Adopting Organizations in their screening and selection process prior to a person being employed or assigned as a volunteer. This includes the requirement that training and criminal history checks be performed on all priests, deacons, religious, seminarians, employees, and all volunteers. In addition, to comply with the US Conference of Catholic Bishops' **Charter for the Protection of Children and Young People**, it is necessary that all who are currently employed or in volunteer positions undergo a re-screening every three (3) years.

Any role in the Diocese of Tucson and all Adopting Organizations, no matter how small, is an important delegation of authority by the leader of the Adopting Organization and is the expression of trust in the individuals who have been asked to perform services for the Diocese and all Adopting Organizations.

Careful scrutiny of all persons asked to serve in the Diocese and any Adopting Organizations is particularly important in case a person is being considered for a role in which he or she will minister to another person, thus creating a "ministerial relationship". A ministerial relationship is marked by an "imbalance of power." The individual serving is given that power by the Adopting Organization to use for the good of those served. Nevertheless, it can be misused and lead to the harm of the persons being served. The individual considered for such a role should be marked by humility, awareness of his or her weaknesses, openness to supervision and a desire to grow in wholeness.

The Adopting Organization's compliance plan should be shared with all its leaders, such as a parish council, a parish board of directors, parishioners, clergy, employees, and volunteers.

This Compliance Plan is adopted by _____ St. Mark the Evangelist _____ to meet or exceed the minimum requirements recommended by the Diocese of Tucson to prevent the abuse or mistreatment of children, adolescents, and vulnerable adults.

Contact Information:

St. Mark the Evangelist

2727 W. Tangerine Road Oro Valley, Az 85742

Parish Phone 520-469-7835

Fax

Parish Email office@stmarkov.com

Pastor Name Fr. John P. Arnold

Compliance Officer:

Name Shantell Rains-Kubat

Work Phone 520-469-7835 ext 303

EMAIL srainskubat@diocesetucson.org

SECTION I: VOLUNTEERS AND EMPLOYEES

VOLUNTEER INFORMATION:

All volunteers are classified as high responsibility/risk because they have, or at some point may have, independent access to or influence over minors or vulnerable adults. This access may be due to the specific nature of the ministry or service or because of the general prominence of the role.

A person is considered a volunteer if he or she works one day or more per month in handling any aspect of an Adopting Organization's ministry or activities.

To comply with the adopted Guidelines, volunteers should not be put into ministry or service until the proposed volunteer has successfully completed the Safe Environment Program, and a Diocese of Tucson Safe Environment Clearance Memorandum has been issued by the Diocese of Tucson Human Resources Department for the volunteer for the location where the ministry or service will be provided. It is not acceptable for a volunteer in an adopting organization to be ministering or serving in any capacity prior to the issuance of a Clearance Memo by the Diocese of Tucson.

The Diocese of Tucson policy, which has been adopted by the Adopting Organizations, including St. Mark the Evangelist, states that all volunteers, regardless of the level of responsibility or risk, must go through the Safe Environment Program which includes a criminal history and background check prior to acceptance as a volunteer.

In the Diocese of Tucson, all volunteers are classified as high-risk, including the following:

- Members of the Parish Board of Directors and Finance and Pastoral Council Members – They hold positions of high responsibility in the parish/school/affiliated organization and are in a position to assist the pastor/principal/executive in making major decisions. They are recognized as leaders in the parish/school/affiliated organization and by the nature of their responsibility, may be subjected to personal contact with minors or vulnerable adults.
- Money Counters, Bookkeepers, Accountants – Persons working in these capacities represent risks to the parish/school/affiliated organization and to those served by the parish/school/affiliated organization including, but not limited to, minors. Money counters and those working with cash in any capacity must also undergo a credit history check, as required by the Diocese of Tucson Parish Accounting Manual, which this entity has adopted, in addition to the criminal history check. Volunteers can complete the credit check by logging into their Diocese of Tucson CMG Connect account and completing the Finance Management Training and Credit Check. Upon successful completion, the Diocese of Tucson Human Resources Department will issue a Credit Clearance Memo, which is valid for one year.
 - Volunteers who will be working in the capacity of a Bookkeeper or Accountant will also be required to successfully complete and pass a bookkeeper exam through the Diocese of Tucson Fiscal Department.
- Volunteers who transport others, especially those who transport minors, must have successfully completed a motor vehicle check in addition to the criminal history check. At minimum, drivers should produce evidence of a valid driver's license and insurance. Further guidance regarding the credentialing of drivers is available through the Property and Insurance Office of the Diocese of Tucson. Refer also to the Guidelines Concerning Supervision of Minors on Parish and School Trips & Other Outings found on the Diocese of Tucson website under Property and Insurance. Volunteers can complete the motor vehicle check by logging into their Diocese of Tucson CMG Connect account and completing the Defensive Driving Training and Motor Vehicle

COMPLIANCE PLAN
JULY 1, 2025 – JUNE 30, 2026

Check. Upon successful completion, the Diocese of Tucson Human Resources Department will issue a Motor Vehicle Clearance Memo, which is valid for one year.

- Catechists, Youth Ministers, and anyone assisting with these programs.
- Ministry leaders, such as prayer groups and other similar groups.
- Any volunteer who is serving in a diocesan level governing board, advisory board, or committee.
- Society of St. Vincent de Paul volunteers are normally incorporated into the parish plan as individual high-risk volunteers. Although the St. Vincent de Paul Society is an independent organization, the members usually serve in and on behalf of a parish. In most cases, the individual members are required to enter private homes as a service to the parish or otherwise come in contact with minors and vulnerable adults and must be classified as high-risk volunteers.
- Knights of Columbus volunteers are handled similarly to St. Vincent de Paul volunteers. Even though the Knights of Columbus as an organization is independent, if members (individually or collectively) are serving on behalf of a parish, they must be counted as volunteers and classified as high-risk.

A copy of the online Application for Volunteers, Reference Checks, CMG Training Certificate, the Clearance Memo, and any additional compliance documentation should be part of the volunteer's personnel record at the adopting organization's office.

Any information obtained from the above-named sites should be treated with the same level of confidentiality as the initial screening. It should be shared only on a need-to-know basis.

YOUTH VOLUNTEERS:

Volunteers who are minors (16 to 17 years of age, younger than 18) are not considered exempt from completing a youth volunteer approval process. They might be at greater risk because of their inexperience if they are serving other minors. The proximity in age is also a risk factor.

The education and supervision of minors with respect to carrying out their work safely are extremely important in mitigating risk. Minor volunteers require intensive education in maintaining boundaries with other minors they might be serving, through the Youth Code of Conduct. This training is best supported by a clear set of instructions (see references to Standard Operating Procedures (SOP) in Section V).

Minors cannot be given responsibility as a driver for the transport of other persons in a motor vehicle.

Any minor under 16 years of age must be under constant supervision by the minor's parent or guardian.

A copy of the online Application for Volunteers, Permission to Obtain Information Form, Reference Checks, Letter of Good Standing, Verification of completion of current Circle of Grace Training, Youth Code of Conduct, and any additional compliance documentation should be part of the volunteer's personnel record at the location.

Any information obtained from the above-named sites should be treated with the same level of confidentiality as the initial screening. It should be shared only on a need-to-know basis.

AD HOC VOLUNTEERS:

An Ad Hoc Volunteer is defined as a person who only volunteers on a very limited basis for certain specific events, such as for the annual Parish festival, or a one-time event. Persons who volunteer on an ad hoc basis for Adopting Organization events or seasonal celebrations can be managed with proper supervisory processes and a Standard Operating Procedure (SOP) which addresses how the supervisory process will be handled, (see references to SOP

in Section V). Such activities must include designated persons who have been screened and educated to be “on site supervisors”, circulation of written policies regarding prudent behavior which is covered in the Standard Operating Procedures (SOP) (see references to SOP in Section V), and education regarding the implementation of those policies for all who will be engaged. Persons who violate SOPs during the event should be disciplined according to the nature of the violation, up to and including not participating in the event or celebration.

EMPLOYEE INFORMATION:

Employees are expected to be leaders in the Adopting Organization and examples to others. Employees play a critical role in maintaining a professional atmosphere and efficient organization to serve the mission of the Adopting Organization while guarding against various risks that would threaten the sustainability of the mission.

The Diocese of Tucson policy, which has been adopted by the Adopting Organizations, including St. Mark the Evangelist, states that all employees, regardless of the level of

responsibility or risk, must go through the Safe Environment Program which includes the criminal history and background check prior to employment.

To comply with the adopted Guidelines, employees cannot be scheduled or work until the successful completion of the Safe Environment Program and a Diocese of Tucson Safe Environment Clearance Memorandum has been issued by the Diocese of Tucson Human Resources Department for the employee at the hiring location. It is not acceptable for an employee to work in any capacity for an Adopting Organization prior to the issuance of a clearance memo by the Diocese of Tucson.

All employees of an Adopting Organization, regardless of status (full time, part time, on-call, etc.) are required to go through the Safe Environment Program.

- Employees handling cash (i.e., Bookkeepers, Accountants, etc.) – Persons who work in these positions represent risks to the Adopting Organizations and to those served by the parish. Any employee handling cash and/or counting money in any capacity must also undergo a credit history check in addition to the criminal history check as required by the Diocese of Tucson Parish Accounting Manual. Employees can complete the credit check by logging into their Diocese of Tucson CMG Connect account and completing the Finance Management Training and Credit Check. Upon successful completion, the Diocese of Tucson Human Resources Department will issue a Credit Clearance Memo, which is valid for one year.
 - Employees who will be working in the capacity of a Bookkeeper or Accountant of an Adopting Organization will also be required to successfully complete and pass a Bookkeeper Exam through the Diocese of Tucson Fiscal Department.
- Employees who transport others, especially those who transport minors, must have successfully completed a motor vehicle check in addition to the criminal history check. At minimum, drivers should produce evidence of a valid driver's license and insurance. Further guidance regarding the credentialing of drivers is available through the Diocese's Property and Insurance Office. Refer also to the Guidelines Concerning Supervision of Minors on Parish and School Trips & Other Outings found on the Diocese of Tucson website under Property and Insurance. Employees can complete the motor vehicle check by logging into their Diocese of Tucson CMG Connect account and completing the Defensive Driving Training and Motor Vehicle Check. Upon successful completion, the Diocese of Tucson Human Resources Department will issue a Motor Vehicle Clearance Memo, which is valid for one year.

A copy of the online Application for Employment, Reference Checks, CMG Training Certificate, the Clearance Memo, and any additional compliance documentation should be part of the employee's permanent personnel record at the location of the employing Adopting Organization.

Any information obtained from the above-named sites should be treated with the same level of confidentiality as the initial screening. It should be shared only on a need-to-know basis.

SCREENING, TRAINING AND CLEARANCE FOR ALL EMPLOYEES AND VOLUNTEERS

In the Diocese of Tucson and at all Adopting Organizations, including _____,

St. Mark the Evangelist _____,

all employees and all volunteers are classified as High Risk and must complete all three (3) segments of the Safe Environment Program (SEP). The three segments are a) **Applicant Tracking and Screening**, b) **Safe Environment Training** and c) **Criminal History, Background Checks and Fingerprints**. Upon successful completion of all three (3) segments by the applicant, the Diocese of Tucson Human Resources Department will issue a Clearance Memo to _____ St. Mark the Evangelist _____ for the applicant.

Segment A: Applicant Tracking and Screening:

All potential employees or volunteers of Adopting Organizations must submit an online application via the Applicant Tracking System at the Diocese of Tucson Employment/Volunteer Opportunities web page:

<https://www.diocesetucson.org/human-resources/employment-opportunities/>.

Since parishes, independent schools, and other Catholic entities are separately incorporated, for liability purposes, a new application is required for each corporation.

A new application must be reviewed and processed within six (6) months of the submission date. Once the application expires, a new application is required to be submitted if the original application was not processed timely.

It is important that the leadership, management, compliance officer, hiring managers and ministry leaders understand the importance of the application and screening process, which refers to the careful consideration of any person who is authorized to serve as an employee or volunteer. This is a careful process of getting to know the person who is to be employed or allowed to volunteer no matter how limited the person's responsibilities are, to make sure the individual is capable and willing to carry out his or her responsibilities in accordance with diocesan and

_____ St. Mark the Evangelist _____

requirements.

This process includes a review of the person's application for employment or volunteer service, which must be completed in its entirety, review of all educational records or certifications, followed by the phone screen and interview(s), and a minimum of three (3) current professional reference checks for all employee and all volunteer applicants. Once each step of the process is completed by the Compliance Officer or Hiring Manager, it must be recorded in the Applicant Tracking System by documenting the completion date, time and the name of the person completing each step: a) Application Review, b) Phone Screen, c) Interview(s), and d) Reference Checks.

The purpose of the reference check process is to determine the suitability of the applicant for the position the applicant has applied for. A Professional Reference is defined as an individual that a person has worked or volunteered with. In addition, for references to be considered current, the references must have been completed within six (6) months of the application date. The completed documentation of the three (3) current professional references needs to be

uploaded to the applicant file in the Applicant Tracking System
COMPLIANCE PLAN
JULY 1, 2025 – JUNE 30, 2026

Segment A-1: Youth Applicant (Employment or Volunteer)

Youth (16 to 17 years of age, younger than 18 years of age) are not considered exempt from completing a Youth Volunteer Approval Process. Youth (16 to 17 years of age) must complete the following:

- A volunteer application.
- A phone screen/interview must be conducted.
- A Permission to Obtain Form (PTO Form).
- Requires three (3) current professional references.
- A Letter of Good Standing from their high school.
- Verification of completion of current Circle of Grace Training.
- A signed Youth Code of Conduct Acknowledgement Form after receiving the Youth Code of Conduct.

The Youth Volunteer Approval Process includes a review of the person's application for volunteer service, which must be completed in its entirety, followed by the phone screen and interview(s), completion of a Permission to Obtain Form (PTO Form), a minimum of three (3) current professional reference checks, and a letter of good standing from their high school. Clearance for minors expires upon their 18th birthday. At that time the minor will need to complete the regular clearance process as outlined in Segment A, B and C.

Note: A Permission to Obtain Form (PTO Form) will need to be completed by the minor applicant following the interview if the minor is selected to continue in the Youth Volunteer Approval Process. This should occur prior to completing the references and requesting a letter of good standing from their high school. This packet must be processed through Applicant Tracking and all documents must be uploaded to the applicant file in the Applicant Tracking System so that the youth volunteer application can be reviewed and approved by the Diocese of Tucson Human Resources Department.

Segment B: Safe Environment Training:

The application and screening process must be complemented by providing education on the requirements of the Safe Environment Program (SEP) and its objectives for both employees and volunteers. When a person is to be given authority as an employee or volunteer, it is necessary to teach the person not only how to do their work or ministry well, but how to do it safely for their good and the good of all, especially minors and vulnerable adults.

Orientation to the SEP is as important as the orientation to the actual work to be done. The SEP Orientation is accomplished by registering in the Catholic Mutual Group (CMG) Connect System, referred to as the Diocese of Tucson CMG Connect Safe Environment Program. This orientation consists of viewing relevant video(s), review and acknowledgement of the Code of Conduct and the Guidelines for the Prevention of and Response to Sexual Misconduct, and the State of Arizona Mandatory Reporting Law. It will culminate in the signing of an individual Affirmation where the new employee or volunteer will confirm that he or she understands and will abide by the policies of the Diocese of Tucson, as adopted by the Board of Directors of _____ St. Mark the Evangelist _____,

and the law of the State of Arizona, all of which are to prevent harm to minors and vulnerable adults and are requirements of the SEP. The program also includes the required notices and mandatory forms. The individuals will have permanent access to their accounts in CMG anytime during the duration of their active service.

The process to invite a person to register in CMG is through the Applicant Tracking System. Upon successfully completing Section I: Segment A, the Compliance Officer or Hiring Manager can invite the applicant to register and complete the Diocese of Tucson CMG 3-in-1 Process by submitting a background check request in the Applicant Tracking System. An email invitation will be sent to the applicant with instructions to register and complete the Diocese

of Tucson CMG 3-in-1 Process, which will include the requirements of the SEP Orientation. The applicant has seven (7) days to complete the process in CMG.

Note: Any person wanting to work or volunteer at another Adopting Organization, and that has successfully completed the Diocese of Tucson CMG 3-in-1 Process prior to applying at the new Adopting Organization, will not have to complete the Diocese of Tucson CMG 3-in-1 Process again. The person must submit a new application and register again in the Diocese of Tucson CMG Connect System under the new Adopting Organization, since it is a separate independent corporation. Upon applying and registering, the Compliance Officer/Hiring Manager will be required to complete all required steps in the Applicant Tracking System, as outlined in Section I: Segment A. Once the Compliance Officer or Hiring Manager submits a background check request via the Applicant Tracking System, the Diocese of Tucson Human Resources Department will verify the existing clearance and issue a Clearance Memo to the new Adopting Organization for the applicant, as long as the clearance at the prior Adopting Organization is active and current.

Segment B-1: Youth Applicant (Employment or Volunteer)

Youth (16 to 17 years of age, younger than 18) are not considered exempt from completing a youth volunteer approval process. They might be at greater risk because of their inexperience; and if they are serving other minors, the proximity in age is also a risk factor. Minors (16 to 17 years of age) must complete the Circle of Grace Training and the Youth Code of Conduct along with a signed Youth Code of Conduct Acknowledgement Form after receiving the training. It is the responsibility of _____ to facilitate the Circle of Grace Training for youth

St. Mark the Evangelist

applicants as required (refer to Section VI). All documents must be uploaded to the Applicant Tracking System so that the youth volunteer application can be reviewed and approved by the Diocese of Tucson Human Resources Department.

Segment C: Criminal History, Background Checks and Fingerprints:

Most important to our program is to make sure that every person successfully completes a criminal history check and if applicable, the background checks (Credit Check, Motor Vehicle Check, etc.), prior to the start of employment or volunteer service. All employees and all volunteers must complete the AZ DPS Digital Fingerprint Process through FieldPrint following the offer of employment or volunteer service but prior to hire or start date. To complete the AZ DPS Digital Fingerprint Process, the applicant must visit www.fieldprintarizona.com to register and schedule an appointment.

The Diocese of Tucson does not accept any other criminal history and/or background checks other than those completed in the Diocese of Tucson CMG Connect System.

Upon successful completion of the CMG process by the applicant, as outlined in Section I: Segment B, the CMG System will automatically process the electronic criminal history check and a report will be sent to the Diocese of Tucson Human Resources Department for review. Once the review is complete the Diocese of Tucson Human Resources Department will issue a Clearance Memo to _____ for the applicant.

St. Mark the Evangelist

Segment C-1: Youth Applicant (Employment or Volunteer)

Youth (16 to 17 years of age, younger than 18 years of age) are not considered exempt from completing a youth volunteer approval process. However, it is not possible to conduct a criminal history or background checks on a minor, unless at some point the individual has been tried as an adult. The record as a juvenile

offender is usually sealed by the courts. Refer to Section I: Segment A-1 and B-1 for the required process for Youth Volunteers.

RECORDKEEPING:

For privacy purposes, volunteer and employee compliance records must be kept in a secure location, accessible only by persons authorized by the President of the Adopting Organization, which will normally include the Chief Executive Officer, the Compliance Officer, and the person or persons who have responsibility for personnel records and have been specifically authorized by the President of the Adopting Organization.

Employee personnel and volunteer files contain personal and confidential information and must be kept in a secure location. The file will contain a copy of the on-line application for employment or volunteer service and materials associated with the review of that application. The application should be accurate and appropriate for the position. It will also contain the Diocese of Tucson Safe Environment Clearance Memorandum that will only be issued when a person is approved for service by the Diocese of Tucson Human Resources Department.

A separate file should be maintained to record any disciplinary actions or reports made to law enforcement. The files of each employee and volunteer are considered privileged information. They must be maintained in locked cabinets with access limited to the President of the Adopting Organization, its Chief Executive Officer, its Compliance Officer, and the person or persons who have responsibility for personnel records and have been specifically authorized by the President of the Adopting Organization. These files will also be made available to appropriate diocesan personnel who are delegated by the Bishop to audit the records of the Adopting Organizations.

Under no circumstances should anyone other than the President of the Adopting Organization, its Chief Executive Officer, its Compliance Officer, and the person or persons who have responsibility for personnel records and have been specifically authorized by the President of the Adopting Organization have access to employee, volunteer and clergy records. In addition, under no circumstances should employee or volunteer records be taken out of the Adopting Organization's offices, or be permanently in a Compliance Officer's or other employee's private computer.

SECTION II: INDEPENDENT CONTRACTORS AND OUTSIDE VENDORS

INDEPENDENT CONTRACTORS' INFORMATION:

An independent contractor is defined as a person who established himself or herself as an independent business person and who vends himself or herself to an organization to provide a specific service not available internally.

Adopting Organizations sometimes engage personnel as independent contractors rather than as employees. Independent contractors are considered high-risk because they work on the premises of the Adopting Organizations and will be expected to complete the Diocese of Tucson Safe Environment Program through the Applicant Tracking System and CMG Connect System.

COMPLIANCE PLAN
JULY 1, 2025 – JUNE 30, 2026

The following are the independent contractors currently contracted:

[Enter the names of individuals engaged as independent contractors and their responsibility]

Currently, St. Mark the Evangelist does not have Internal Independent Contractors

Independent Contractors cannot be scheduled or allowed to work until the successful completion of the Safe Environment Program and a Diocese of Tucson Safe Environment Clearance Memorandum has been issued for the hiring location. It is not acceptable for an independent contractor to work for an Adopting Organization prior to the issuance of a Clearance Memo by the Diocese of Tucson Human Resources Department.

Segment A: Applicant Tracking and Screening:

All potential independent contractors must submit an online application via the Applicant Tracking System by invitation from the Adopting Organization. The application for independent contractors is not available publicly on the Diocesan website, it is only available as an internal posting within the Applicant Tracking System and should include the submission of the Contract and Scope of Work.

Since Adopting Organizations are separately incorporated, all proposed independent contractors must submit a new application for each Adopting Organization for which they seek employment.

It is important that the leadership, management, compliance officer, hiring managers and ministry leaders understand the importance of the application and screening process, which refers to the careful consideration of any person who is authorized to serve as an independent contractor. This is a careful process of getting to know the person who will be working with staff and volunteers, no matter how limited the person's responsibilities are, to make sure the individual is capable and willing to carry out his or her responsibilities in accordance with diocesan and

St. Mark the Evangelist requirements.

This process includes a review of the person's application as an independent contractor, which must be completed in its entirety. The application collects contact information and requests any applicable disclosures as required by the Safe Environment Program.

The independent contractor must complete the application in its entirety, including the need for any disclosures as required. Once the Compliance Officer or Hiring Manager completes the application review, the review date and time and the name of the person reviewing the application must be recorded in the Applicant Tracking System. The application can be moved forward by submitting the background check request in the Applicant Tracking System. The process in Applicant Tracking for independent contractors does not include the submission of documented independent contractor interviews nor reference checks, which is the responsibility of the Adopting Organizations.

Segment B: Safe Environment Training:

The application and screening process must be complemented by education on the requirements of the Safe Environment Program (SEP) and its objectives for independent contractors.

The SEP Orientation is accomplished by registering in the Catholic Mutual Group (CMG) Connect System, referred to as the Diocese of Tucson CMG Connect Safe Environment Program. This orientation consists of viewing a relevant video, review and acknowledgement of the Code of Conduct and the Guidelines for the Prevention of and Response to Sexual Misconduct and the State of Arizona Mandatory Reporting Law. It will culminate in the signing of an individual Affirmation where the new independent contractor will confirm that he or she understands and will abide by the policies of the Diocese of Tucson as adopted by the parish/school/affiliated organization through its Board of Directors and the law of the State of Arizona, all of which are to prevent harm to minors and vulnerable adults and requirements of the SEP. The program also includes the required notices and mandatory forms. The individual will have permanent access to their account in CMG anytime during the duration of their active service.

The process to invite a person to register in CMG is through the Applicant Tracking System. Upon successful completion of Section II: Segment A, the Compliance Officer or Hiring Manager can invite the applicant to register and complete the Diocese of Tucson CMG 3-in-1 Process by submitting a background check request in the Applicant Tracking System. An email invitation will be sent to the applicant with instructions to register and complete the Diocese

of Tucson CMG 3-in-1 Process, which will include the requirements of the SEP Orientation. The applicant has seven (7) days to complete the process in CMG.

Note: If the person has successfully completed the Diocese of Tucson CMG 3-in-1 Process, prior to applying at a new Adopting Organization, will not have to complete the Diocese of Tucson CMG 3-in-1 Process again. The person must submit a new “Independent Contractor” application and register again in the Diocese of Tucson CMG Connect System under the Adopting Organization, since it is a separate independent corporation. Upon applying and registering, the Compliance Officer/Hiring Manager will be required to complete all required steps in the Applicant Tracking System, as outlined in Section II: Segment A. Once the Compliance Officer or Hiring Manager submits a background check request via the Applicant Tracking System, the Diocese of Tucson Human Resources Department will verify the existing clearance and issue a Clearance Memo to the Adopting Organization for the applicant, as long as the clearance at the prior Adopting Organization is active and current.

Segment C: Criminal History, Background Checks and Fingerprints:

Most important to our program is to make sure that every person successfully completes a criminal history and, if applicable, the background checks (Credit Check, Motor Vehicle Check, etc.), prior to the start of the contracted services. All independent contractors must complete the AZ DPS Digital Fingerprint Process through FieldPrint following the signing of the contract and scope of work, but prior to the start date. To complete the AZ DPS Digital Fingerprint Process, the applicant must visit www.fieldprintarizona.com to register and schedule an appointment.

The Diocese of Tucson does not accept any other criminal history and/or background checks other than those completed in the Diocese of Tucson CMG Connect System.

Upon successful completion of the Diocese of Tucson CMG process by the applicant, as outlined in Section II: Segment B, the CMG System will automatically process the electronic criminal history check and a report will be sent to the Diocese of Tucson Human Resources Department for review. Once the review is complete the Diocese of Tucson Human Resources Department will issue a Clearance Memo to St. Mark the Evangelist for the applicant.

OUTSIDE VENDORS INFORMATION:

Agencies or businesses with which St. Mark the Evangelist contracts for recurring

services will be required to demonstrate that they have risk mitigation strategies that meet the diocesan standard as adopted by the parish/school/affiliated organization. The contract with such agencies should include a statement that requires disclosure by the contractor or vendor of the agency’s policy to reduce risk of one of their personnel abusing a minor or vulnerable adult. The policy and associated procedures will ordinarily be some combination of screening, education, and supervision including at minimum, a check of sex offender lists.

COMPLIANCE PLAN
JULY 1, 2025 – JUNE 30, 2026

The following are contracted for recurring services:

Accura Systems of Tucson, Inc
Accurate Backflow Testing & Repair, Inc.
Ace Roof Coating, LLC
Adam Schwartz
Adriana Morales
Alison Wahl
AmeriGas
Amy Pickering
Anderson's Office Furniture & Designs Inc.
AV Innovations Inc.
Brandon Brown
Central Alarm, Inc.
CenturyLink/Lumen
Curtis Plumbing Company, INC
Dane Carten
Dave Walton
Digital Imaging Systems
Durazo's Roofing, LLC ROC
Environment Control Tucson - 293
Erika Burkhart
Everon, LLC
Fast Signs
F.C. Ziegler Company
Firetrol Protection Systems, Inc.
FirstDigital Communications Arizona, LLC
Gina McCann
Gregory Helseth
i3 Media
Iron Mountain
IT Specialists
Joey Munoz
Jordan Robison
Joseph Swinson
Joshua Schanie
Kathryn Lieppman
Keenan Dolan
Kirsten Kingsley
Kyocera Document Solutions West, LLC
Lucy Kellett
Magnolia Strings LLC
Martha Castleberry
Morgana Ortiz
Morgan Ballard-Wheeler
Neal Flint
Old Pueblo Septic and Drain Service, Inc
Old Pueblo Theatrical Solutions, Inc
Oro Valley Storm Water Utility
Oro Valley Water Utility
Oscar Homero Ceron
Our Sunday Visitor
Palo Verde Cleaning Co. LLC
ParishSOFT, LLC
Phil's Mobile Welding
Pitney Bowes, Inc
Rene Navarro
Ross Daniels
Rula Marji
Sean Finn
Site Organic
Sparkletts & Sierra Springs
Stefan Vikingur
Stephen Schmidt
Super Cleaning LLC
TMS Technologies, Inc.
Truly Nolen Branch 021
Truly Nolen Branch 022
Truly Nolen Branch 022, Bee Traps
Tucson Electric Power
United Fire, Inc
U.S Postal Service
Waste Management
Water Tec of Tucson, Inc.
Watson Refrigeration Company, Inc.
Western Water Wells LLC
Catholic Foundation
Barker Contracting
Quality Innovations, LLC
Seaver Franks
[Enter the name of the businesses or agencies that the location contracts with on an on-going basis (long-term or short-term)]
[Enter the risk mitigation strategies]

Individuals or firms engaged to perform intermittent or time limited services on an irregular basis will be actively supervised during the time they are on the grounds. At no time should they be allowed to be around minors or vulnerable adults without this supervision.

SECTION III: VISITING PRESENTERS

VISITING PRESENTER INFORMATION

In order to maintain our commitment to provide a safe environment for the people Adopting Organizations serve, and to ensure the authentic Catholic teachings and traditions are respected,

St. Mark the Evangelist

and leaders of the various organizations and ministries will adhere to the Diocesan policy on guest speakers.

All lay presenters (individuals, performers, musicians, groups retreat leaders etc.) that come to Adopting Organizations from outside of the Diocese of Tucson and are invited to speak or present on issues of Catholic doctrine, tradition, ritual, etc., must contact the **Diocese of Tucson Chancellor's Office (520-838-2500)** and request a Lay Presenter Application Form. All lay presenters must fill out and submit the Lay Presenter Application Form, along with the applicable documents and a current (within six weeks of the event) letter of good standing from their pastor or Bishop.

Prior to the event, the form should be sent with adequate time to respond to the Chancellor's Office, along with the topic the presenter will address and date of the event. If the proposed presenters are conducting a retreat or similar event for children or youth, they must also provide proof that they have undergone a successful criminal background check.

All clergy or religious that come from outside the Diocese of Tucson to speak or present at an Adopting Organization must present a current (within six weeks of the event) letter of good standing from their Bishop or religious superior. That document should be sent to the Chancellor's Office, along with the topic and date of the event, prior to coming. If they are conducting a mission, retreat, or similar event for children or youth, they must also provide proof that they have undergone a successful criminal background check.

SECTION IV: RENEWAL PROCESS

RENEWAL INFORMATION

In the Diocese of Tucson, every participant (Employees, Volunteers, Clergy, etc.) of an Adopting Organization is required to renew the Safe Environment Program **prior** to expiration. The renewal process has been automated using the Diocese of Tucson CMG Connect Safe Environment Program. Renewals are required every three (3) years for training and criminal history checks and annually for motor vehicle and credit checks. **Participants must be notified at the minimum of 60 days prior to expiration date.**

It is the responsibility of the Compliance Officers of the Adopting Organizations to monitor the expiration dates of clearances via the use of the Diocese of Tucson CMG Connect System. If the adopting organization does not have a Compliance Officer, the President of the adopting organization must designate a cleared person in the organization the responsibilities of the compliance requirements.

The Compliance Officers of Adopting Organizations will send the renewal invitation via email or US mail to the individuals due for renewal that includes the link to the Diocese of Tucson CMG System. The individuals must sign into their active Diocese of Tucson CMG account to complete the re-screening process **prior** to expiration of the current clearance period. It is the responsibility of the Compliance Officer to continue to send the renewal invitation at 30 days, 2 weeks, 1 week and 3 days prior to expiration if the person is not completing the renewal process timely.

Employees: If an employee of an Adopting Organization's clearance expires, the employee must be placed on unpaid administrative leave and cannot be scheduled to work/volunteer in any capacity until the renewal process is completed and a Renewal Clearance Memo is issued by the Diocese of Tucson Human Resources Department. The employee must receive written notification that he/she has been placed on unpaid administrative leave until the renewal process is complete and a Renewal Clearance Memo is issued. A copy of the written notification should be sent to the Diocese of Tucson to compliance@diocesetucson.org and to payroll@diocesetucson.org. The Employee Status Change Form placing the employee on unpaid administrative leave for payroll purposes should be sent to the Diocese of Tucson to payroll@diocesetucson.org and a copy of both the written notification and Employee Status Change Form must be included in the Personnel file.

Volunteers: If a volunteer of an Adopting Organization's clearance expires, the volunteer must re-apply as a new applicant rather than completing the renewal process. This will require the submission of a new application that is processed by the Adopting Organization's Compliance Officer or Hiring Manager in Applicant Tracking and completing segment A, B and C, as outlined in Section I. Such volunteers must receive written notification that the clearance has expired, and they cannot volunteer in any capacity until they complete the full process as outlined in Section I. The written notification should be sent to the Diocese of Tucson to compliance@diocesetucson.org and a copy must be included in the volunteer file.

After completion of the re-screening, a review of the results will be performed. If any unfavorable changes of significance are noted such as criminal charges since the last renewal a clearance will not be issued, and the individual will be asked to contact the Diocese of Tucson Human Resources Department for the results. Depending on the severity of the findings, an individual may or may not be cleared. There is zero tolerance in the Diocese of Tucson for child abuse or sexual misconduct.

Note: The Arizona State Department of Public Safety and FBI prohibits the divulge of any criminal history to anyone other than the individual applicant.

SECTION V: STANDARD OPERATION PROCEDURES

SUPERVISION

Supervision of ongoing activities is the responsibility of every level of leadership in the Adopting Organizations. It is accomplished in part by direct observation. Equally important, however, are written "standard operating procedures" (SOPs) for each ministry and service offered in the Adopting Organizations.

It is the policy of _____ St. Mark the Evangelist _____ to develop written "standing operating procedures" (SOPs) for all areas of ministry and service involving minors or vulnerable adults. The relevant SOPs are reviewed with each employee or volunteer at the site orientation.

SOPs are rules for handling one's self in the situations typical of a ministry. They reflect the most prudent manner of behaving in such situations. Prudence in ministry or service acknowledges the importance of the mission but asserts that the mission can be accomplished without exposing the one being served, the one serving or the Adopting Organization to undue risk of harm.

Each employee and volunteer is expected to know and adhere to the SOP applicable to his or her ministry or service. Failure to adhere to the SOP will be cause for review and possible disciplinary action, up to and including removal from the ministry or service in question or termination of an employee.

The key elements underlying all SOPs at _____ St. Mark the Evangelist _____ are as follows:

- Persons with a history of sexual misconduct with a minor or any other sexual misconduct cannot be employed or engaged in service or ministry as an employee or volunteer. **The Diocese of Tucson has a zero-tolerance policy in place for such misconduct.**
- An employee or volunteer should not be alone with a minor other than his or her own children. If the situation is unavoidable due to emergency or unavoidable conditions, the employee or volunteer should call another person on the team to seek assistance and/or to document the occurrence at the time it is happening.
- Any outing with youth should include an adequate number of adult chaperones who have undergone the screening process and an SOP for them to follow. This rule is especially important when an overnight stay is included.
- Minors in employment or volunteer service are not immune from the need to follow rules of prudent behavior. Minors can offend other minors and are also vulnerable to false allegations.
- Minors working or volunteering should be given clear rules for behavior during any class or group, especially if this includes an outing of any type.
- An employee or volunteer should avoid meeting with anyone he or she is serving in isolated locations or at odd hours. Visits to the home of a person being served or visits by the person being served to the home of the employee or volunteer are high risk events and should never be done without the company of another employee or volunteer.
- Behavior that singles out any one person among those served may signal increased risk and certainly invites misinterpretation.
- The more responsible the role of the employee or volunteer, the more risk is associated with the role. Such an employee or volunteer must learn to carry himself or herself as a public figure within the parish/school/affiliated organization community.
- Dress appropriate to the role is an important aspect of carrying one's self as a public figure.
- Appropriate speech is equally important in maintaining one's self as a person who is in service to others.
- Touching must be done with discretion and with respect for the comfort of the person being touched. Touch that might reasonably be construed as romantic or sexual is never appropriate.
- Prudent behavior includes maintaining interpersonal boundaries. Maintaining healthy interpersonal boundaries requires sensitivity to the reactions of others and awareness of one's self. Ongoing education to enhance interpersonal sensitivity is critical for any employee or volunteer in a role of high responsibility and risk.
- Accountability is not the enemy of privacy, but of secrecy. Secrecy is the breeding ground for abuse. Accountability includes being "visible" with respect to what, when, where and how a ministry or service is being provided. Any employee or volunteer is expected to be accountable regarding his or her activities.

COMPLIANCE PLAN
JULY 1, 2025 – JUNE 30, 2026

The following SOPs have been developed for young adult and adult ministries including vulnerable adults and are in effect in this Adopting Organization:

[Enter the list of the titles of the SOPs that have been developed for religious education, youth ministry, and adult ministries including vulnerable adults that are in place. You do not need to send the SOP as written, only include the list of titles of the SOPs]

Compensated Seasonal Musicians
Entire Parish
Eucharistic Ministers to the Homebound
Greeters and Ushers
Religious Education
Reporting Potential Abuse

RESPONSE TO SIGNS OF ABUSE

The mandated reporting law in the State of Arizona remains the bedrock of the prevention program.

The following Standard Operating Procedure (SOP) will be in effect at St. Mark the Evangelist and will be reviewed with all personnel on an annual basis.

1. In St. Mark the Evangelist, any cleric, consecrated religious, employee or volunteer is required to report reasonable suspicion of abuse of any minor, consistent with the mandatory reporting law of the State of Arizona.
2. The dual reporting protocol will be employed, in which reports are made both to **Local Law Enforcement (by calling 9-1-1)** first then to the **Department of Child Services (888-SOS-CHILD or 888-767-2445)**. The latter call is especially important if a parent, guardian or other family member is the suspected perpetrator of abuse.
3. It is also mandatory to make a report of reasonable suspicion of abuse, exploitation, or neglect of an elder or an adult considered under the law to be vulnerable. Call **Adult Protective Services (877-SOS-ADULT or 877-767-2385)**. In case of emergency, call **Law Enforcement (by calling 9-1-1)**.
4. The person making the report will be asked to write out a detailed summary of what gave rise to the concern and when and to whom the report was made using the Abuse/Incident Reporting Form found on the Diocese of Tucson website under the Office of Child, Adolescent and Adult Protection (OCAAP).
5. The person making the report will also inform the President of the Adopting Organization, and its Compliance Officer, who should also keep a log of the report and of follow up actions taken at the direction of these agencies.
6. After a report is made, the **Office of Child, Adolescent and Adult Protection (OCAAP) of the Diocese of Tucson (833-598-1286)** will be notified and supplied with a copy of the mandatory report and narrative.
7. Suspected abuse of a minor or vulnerable adult or any other criminal behavior is not the only situation in which action is expected. It is expected that any suspected or observed violation of the norms of appropriate or prudent conduct, with minors, vulnerable adults or any adult with whom a cleric, religious, employee or volunteer is in a ministerial relationship, will be reported to the President of the Adopting Organization, and its Compliance Officer.
8. If an adult reports sexual misconduct when he or she was a minor by a priest, deacon, or any worker in the church, no matter how long ago it is reported to have occurred, a report will be made to the Office of Child, Adolescent and Adult Protection (OCAAP), which will then make a report to the Pima County Attorney's Office.
9. The person making such a report will be encouraged to report it independently to local law enforcement. If the individual would like to have counseling assistance, he or she will be instructed to call the **Victim Assistance Program (800-234-0344)**.
10. An adult making any other kind of report of sexual abuse as a minor should be encouraged to make an independent report to law enforcement.
11. Upon finalization of a police investigation, and if no further enforcement action is called for, all such complaints will be investigated internally and reported to the Diocese of Tucson Human Resources Department and/or the Office of Child, Adolescent and Adult Protection (OCAAP) of the Diocese of Tucson. This aspect of the policy includes any inappropriate behavior, dress, attitude, language, or improper use of a computer.
12. The purpose of a report is not to summarily judge the person suspected of inappropriate conduct; it is to initiate an internal investigation that will make clear what happened. Therefore, as much as possible, confidentiality (beyond those with a genuine "need to know" with respect to the person accused) will be maintained.
13. In addition, as much as possible, the identity of the person making the allegation should be protected; however, in the course of many investigations it is necessary to directly or indirectly reveal the identity of the person making the report in order to allow the accused to make a response.
14. The results of the investigation will either clear the individual against whom the allegation has been made or point to what type of corrective action must be undertaken to prevent harm to those served, to the individual accused

and to the Adopting Organization.

COMPLIANCE PLAN
JULY 1, 2025 – JUNE 30, 2026

15. It is difficult to make a report. For that reason, it is important to be clear that any person at _____ St. Mark the Evangelist _____ making a good faith report will not be subject to any adverse consequences. No retaliatory action of any kind should be tolerated.

SECTION VI: EDUCATION FOR CHILDREN AND YOUTH

CHILDREN AND YOUTH INFORMATION

Children and youth will, during their religious education class or other group activity, be offered annual education in personal safety. This education will be carried out by _____ St. Mark the Evangelist _____ using

the Circle of Grace program, which is the approved program in the Diocese of Tucson. The goal is to reach at least 90% of the children and youth, excepting those whose parents refused such education on their behalf, with personal safety education.

Parents will be given the right of refusal of this education for their children. Refusal forms, completed by a child's parents or guardian, or by the person to whom the refusal was given orally, will be maintained at the Adopting Organizations.

When parents or guardians refuse, directly or indirectly, to allow the child to receive personal safety education, documentation will be maintained. Either a signed waiver form should be on file, or the class list should be annotated to document that the parents or guardians declined to send the child on the day of the education. In addition, the Adopting Organizations should demonstrate that educational materials bearing on the protection of children from abuse were offered to those parents and guardians, either specifically to the parents and guardians whose children did not receive personal safety education or to all parents and guardians (and other adults) of children in the Adopting Organizations. Parent educational materials are available from the OCAAP website.

Parents, Grandparents, and guardians as well as all other adults in the Adopting Organizations' community will be offered education on how to maintain a safe environment for their children, how to respond to reports of abuse and what the policies of the Diocese of Tucson are, as adopted by the _____ St. Mark the Evangelist _____

with respect to maintaining a safe environment for children and youth. This education may be offered in the form of programs, in the form of homilies or special announcements, as bulletin inserts, or during other events organized by Adopting Organizations. The goal ultimately is to enhance awareness of all in the Adopting Organizations' community regarding safety issues for children, youth and vulnerable adults in the Adopting Organizations and in the larger civic community and to encourage participation in the Adopting Organizations' and civic efforts to prevent harm.

- 1) Education of children and youth is an annual requirement at all Adopting Organizations.
 - a) This education need not be complicated. Its focus is to encourage children and youth to recognize abuse or other inappropriate actions of another person and to tell a trusted adult so that the situation can be reported and dealt with.
 - b) The Circle of Grace is a flexible instrument and the approved program in the Diocese of Tucson for implementing such education. The use of repetitions after the primary class is a helpful way to reach more of the students since, on any given day, there will be students missing from class.
 - c) Other types of risk to student well-being, such as social media, should not be neglected, especially for older students. Nor should the program neglect the responsibility of older children with good personal resources to notice distress in other minors and make a report to law enforcement or a trusted adult in the family or the

Adopting Organizations.

COMPLIANCE PLAN
JULY 1, 2025 – JUNE 30, 2026

- 2) Parent communication regarding the education of their children in personal safety is an important part of a successful education program.
 - a) In communicating with parents about this education, it should be clear that this is not sex education, nor is the focus solely on sexual abuse. The focus includes physical abuse, emotional abuse and neglect. The focus includes misconduct that may be initiated by a worker in a church, but it includes any misconduct by any person in any setting. It includes risk that accrues from the behavior of another minor, and risk that may be attendant on use of the internet.
 - b) A parent or guardian has the right to refuse to have a child participate in safety education, but this refusal should be clear and in writing.
 - c) Parents and guardians that have refused to allow their child(ren) to participate in personal safety education will have their refusal documented. This documentation may be a refusal form signed by the parent(s) or guardians, or by a notation if the parent(s) or guardians will not sign or simply did not send the child to the class. We will note all efforts to educate these parents and guardians as to how they might educate their children and maintain a safe environment in the home.
- 3) Some examples of optimal practice that may be used include the following.
 - a) Education that is integrated into regular class time is preferable to scheduling safety education at other times.
 - b) Education that is integrated into the regular curriculum is preferable to a class that appears to be unrelated to the overall teaching of the Faith, especially as it addresses respect for self and others.
 - c) Education that integrates agencies (e.g., police or sheriff's department) in the local community into the planning or delivery of the programs. This effort builds connections with those agencies for the common good. Such connections build trust, which will be invaluable if there is an emergency of any type.
 - d) The use of repetition at teachable moments supplements the learning provided in the primary personal safety class.
- 4) Education of parents and guardians is a valuable undertaking and should be undertaken in a manner that best fits the Adopting Organization.
 - a) Parents and guardians benefit from education in maintaining a safe environment in the home.
 - b) Elements of the safe environment program that will be shared with parents and guardians include the following:
 - i) Children are safer when they feel free to speak with their parents or guardians about what might be troubling them.
 - ii) Children are more likely to speak with their parents or guardians if they are confident that the parent or guardian will maintain a balanced response, comforting the child without jumping to conclusions.
 - iii) Parents and guardians need to know how to make a report and why the Adopting Organization might have to make a report, even one that affects a parent or guardian.
 - iv) Parents and guardians benefit from information that makes them more aware of behavior that suggests an adult may be pursuing their child and that increases their knowledge of internet dangers.
 - c) It is often valuable to offer parent education sessions in collaboration with local law enforcement or other agencies involved in child welfare. We will attempt to include law enforcement if possible.
- 5) Education of adults in the Adopting Organizations is beneficial. We should strive to educate adults as follows:

- a) Many adults who do not have children or youth in Adopting Organizations' programs will have children and youth in the extended family. We should strive to make them aware of the risks that children and youth face. By doing so, they are more likely to be alert to problems that these children and youth face.
 - b) Many adults will have elders or other vulnerable adults in the immediate or extended family. If they are aware of the risks that elders or other vulnerable adults face, they are more likely to be alert to problems that might arise in their own families.
 - c) Many adults will have had negative ideas from secular media regarding the church with respect to sexual abuse. They will benefit from learning about their Adopting Organizations' efforts to prevent harm and to respond effectively should there be reason to suspect abuse or maltreatment.
 - d) All adults, as citizens of their civic communities, have a responsibility for the welfare of children, youth and vulnerable adults. We should make them aware insofar as possible of the risks and the civic organizations created to prevent or respond to maltreatment, so they can be better prepared to respond to urgent situations and to support the civic effort to prevent harm.
- 6) All will be made aware of the useful educational materials that are available from the Compliance Officer Toolbox.

YOUTH TRAINING AND RECORDKEEPING:

A separate list should be maintained listing all children in religious education, youth ministry or similar youth programs. The list of children and youth in religious education or youth groups begins with a class list that is maintained by the teacher or ministry leader. The overall list should be overseen by the Director of Religious Education (DRE) and/or Director or Coordinator of Youth Ministry to make sure it is current.

Sign-in sheets for individuals and a log of the sessions should be utilized any time safe environment program educational sessions are held. Similarly, sign-in sheets should be maintained to document parent education sessions. The sign-in sheets and the logs are important for the purposes of the annual audit by the US Conference of Bishops (USCCB).

The Adopting Organizations will also construct and maintain for each academic year a list of students in religious education, youth group and other similar groups. The list will be organized by class or group. There will be a column after the name to indicate whether that student has received personal safety education or whether the student's parents or guardians expressly refused that education.

Personal safety education programs for children that are parent-based require additional reporting. Adopting Organizations with such a program should report not only the number of parents and guardians who were taught how to teach their child/children, but also the number of children that the parents or guardians indicate were educated by them in the home.

Class lists, and youth group membership lists should be maintained by academic year.

Documentation of all educational sessions will be maintained in the form of the educational log, log of planned sessions, sign-in sheets, and class lists. This information must be entered by the Compliance Officer into the Diocese of Tucson CMG Connect System under the Children Data tab.

SECTION VII: US CONFERENCE OF BISHOPS MANDATED AUDITS

Audits by an audit firm contracted by the United States Conference of Bishops (USCCB) are conducted on an annual basis shortly after the end of the Fiscal Year. _____ St. Mark the Evangelist _____ will make a

COMPLIANCE PLAN
JULY 1, 2025 – JUNE 30, 2026

report annually to the Diocese as soon as possible, but no later than July 31st of each year. The report will include information requested by the Diocese of Tucson Human Resources Department, Office of Child, Adolescent and Adult Protection (OCAAP) and other documentation necessary to demonstrate the implementation of the education and screening components of the prevention plan.

The focus of these reports is dependent in part on the information required of the diocese by the USSCB audit process. However, they will include a request for the following information.

- Total number of employees.
- Total number of volunteers.
- Total number of volunteers classified as having independent access to or influence over minors or vulnerable adults (required in the parish/school/affiliated organization Plan to have an up-to-date criminal history background check).
- The total number of children and youth in religious education, youth groups or other formation program at the end of the academic year.
- The number of employees whose criminal history background check is up to date.
- The number of employees who have received at least once in the last three years their basic safe environment program education or an update to the basic education.
- The number of volunteers (of those subject to criminal history background checks in the compliance plan) whose criminal history background check is up to date.
- The number of volunteers (of the total number of volunteers) who have received in the last three years their basic safe environment program education or an update to the basic education.
- The number of children and youth who in the last academic year have received personal safety education bearing on prevention of abuse or other maltreatment.
- The number of children and youth for whom parents or guardians have offered written or oral refusals of personal safety education.
- An estimate of the number of parents, guardians and other adults in the Adopting Organization community who in the last academic year have received education in how to maintain a safe environment for their children.

St. Mark the Evangelist
2727 W. Tangerine Road Oro Valley, Az 85742
Parish Phone 520-469-7835

Date: April 30, 2025

Memorandum to: Most Reverend Gerald F. Kicanas, Apostolic Administrator for the Diocese of Tucson
c/o Office of Child, Adolescent and Adult Protection

Reference: Guidelines for the Prevention of and Response to Sexual Misconduct

Subject: **COMPLIANCE PLAN FOR THE PROTECTION OF CHILDREN, ADOLESCENTS, AND VULNERABLE ADULTS**

St. Mark the Evangelist

witnesses herewith to its solidarity with all the Adopting

Organizations of the Diocese of Tucson in the common commitment to protect the children, adolescents, and vulnerable adults of the diocese and this Adopting Organization's community from harm.

I hereby affirm that I have reviewed the plan for compliance and believe that it is consistent with the Diocese of Tucson Code of Conduct, and Guidelines for the Prevention of and Response to Sexual Misconduct, as adopted by St. Mark the Evangelist.

I further affirm that I will personally review this Plan as circumstances change, no less often than once per year. A revised Plan will be submitted for review by the Office of Child, Adolescent, and Adult Protection (OCAAP) no later than June 30th, of each year. In adherence to canonical law and in communion with the Bishop of Tucson, I also affirm that all supporting information that bears on implementation of the Plan will be maintained and ready for review by the our Corporate Board of Directors, the Diocese of Tucson Human Resources Department, the Office of Child, Adolescent and Adult Protection, parishioners, or any other person delegated authority to review those records by the Bishop of this Diocese.

Affirmed by:

Pastor Name Fr. John P. Arnold