April 7, 2020

The Archdiocesan Office for the Protection of Children and Youth (OPCY) has received a high number of inquiries from parishes and schools regarding operations during the COVID-19 crisis. This FAQ document provides practical guidance during these unusual times as we work together to maintain environments in which children are safe to learn and worship.

**Furloughs**

1) **Who do we contact if our Safe Environment Coordinator is furloughed or unavailable to fulfill their duties?**
   - Contact your OPCY Program Liaison immediately, or email OPCY at opcy@archspm.org.
   - OPCY staff contact information is listed at the end of this document.

**Safe Environment Credentialing**

2) **Do we need to continue to maintain Essential 3 (E3) credentialing during this crisis?**
   - Yes.
   - Current employees and active volunteers must complete re-credentialing requirements.

3) **How do I process the E3 credentialing of a new employee or volunteer during this crisis?**
   - The Code of Conduct requirement is unaffected.
   - As discussed below, background checks and live VIRTUS sessions have been affected as a result of the pandemic. However, depending on the circumstances, alternative processes may be used. Please contact your OPCY Program Liaison to discuss options.

4) **When will live VIRTUS sessions resume?**
   - As of today (4/6/20), live VIRTUS sessions are on hold through May 11, 2020.
   - OPCY will notify parishes/schools of changes as information becomes available.

5) **Do we need to maintain E3 credentialing for furloughed employees?**
   - Generally, no. However, furloughed employees returning to work must have up-to-date E3 credentials prior to resuming duties.
   - Please contact your OPCY Program Liaison to discuss individual circumstances.

**Background Checks**

6) **Why are background check results showing alert icons?**
   - Contact your OPCY Program Liaison if you have questions or concerns about the temporary procedures described below.
   - All background check results since March 20, 2020 will show an alert icon due to court closures, indicating the background checks are not fully complete.
     - Your parish/school should still review the results that you do receive.
     - Your parish/school should then review the final results again once courts reopen.
       - McDowell will send an email notification when the final results are available.
Please refer to the McDowell Agency communication sent to clients, and check out their websites:
  o Main website
  o Client log-in site
Parishes/schools may want to conduct additional interviews as well as consider requesting additional “character references” for the employee or volunteer.

**Electronic Communications**

7) Who approves our procedures and plans for electronics communications?
- Parish and school leadership are responsible for reviewing and approving plans for electronic communications and the use of digital platforms.

8) What are considered “electronic communications”?  
- Electronic communications include but are not limited to:
  o Email
  o Phone calls
  o Texts
  o Video-chat applications/platforms (FaceTime, ZOOM, Google Hangout, etc.)
  o Social Media applications
  o Digital teaching applications/platforms

9) What policies apply to technology and electronic communications?
- Refer to these Archdiocesan policies:
  o 201: Acceptable Use and Responsibility Policy for Electronic Communications
  o 107: Code of Conduct for Church Personnel (in particular, see Section 2.9)
  o 106: Code of Conduct for Adult Volunteers Who Interact with Minors or Vulnerable Adults

10) Where is the archdiocesan Social Media Policy (as referenced in Policy 201)?
- The Archdiocese of Saint Paul and Minneapolis no longer has a separate Social Media policy.
- The policy committee is updating the Acceptable Use and Responsibility Policy for Electronic Communications policy to remove the reference to a social media policy. The policy committee has decided to address social media usage in Policy 201 and in the Code of Conduct rather than in a stand-alone social media policy.
- Many parishes and schools have individual social media policies; those policies need to be considered and applied.

11) What consent and permission forms do I need to use prior to communicating electronically with minors?
- Catholic Mutual has developed template forms. Those forms are available from The Catholic Mutual St. Paul Service Office.
- You may email requests for these forms to stpaulcontracts@catholicmutual.org. You may also call Paula Petke-McCarty at 651-295-4249, John Urlaub at 612-418-0324, or John Peterson at 952-836-7920.
- If your parish/school does not use Catholic Mutual, contact your insurance provider for forms and templates.

12) What digital applications/platforms are approved for use?
- Approvals are made by leadership at individual parishes/schools.
- Accounts must be “owned” by the parish/school.
  o No personal accounts should be used (i.e. Facebook, Instagram, Google, etc.)
  o More than one person at the parish/school must have administration rights to the digital accounts/platforms.
13) How do I apply safe environment requirements when using digital platforms?
   - It is critical that parishes and schools carefully review plans and platforms.
   - Things to consider:
     - Include safeguards to avoid 1:1 communications with minors and vulnerable adults.
     - Avoid inadvertently creating opportunities for minors and adults to progress into 1:1 communications.
     - Use the security controls within the digital applications, and incorporate safety protocols, such as:
       - Provide the invitation links (URL) directly to parents/guardians (Do not post the invitation URL on social media or public sites).
       - Avoid recording meetings or screenshots when students are on camera.
       - Avoid platforms that provide names, social media addresses, or other identifying information that can be seen by others. Alternatively, disable any ability to see such identifying information.
   - Keep parents/guardians informed of...
     - Communication platforms being used
     - Plans for security
     - Lessons being taught (including online videos, video chats, etc.)
     - Schedule changes

14) Do I really need two adults present when using electronic communications with minors?
   - Yes. As always, two E3 adults are still required during interactions with minors.
   - Because of the pandemic and rush to use electronic communications, experts are warning about increases in cyberbullying, sextortion, solicitation, increased vulnerability in children using apps and applications that they are not familiar with, social isolation, and increased anger and agitation. This also applies to vulnerable adults.
   - Guest presenters (in online interactive chats) must follow your site’s guest policy. For example, they are not considered an E3 adult and should not be left unattended.
   - Please consult with your OPCY Program Liaison to share, and learn of, ideas on how to include a second E3 adult into your electronic communications.

15) Do adult-to-youth ratios still apply when using electronic communications?
   - Yes. The same guidelines for in-person meetings apply to meetings with minors via electronic communications.
   - Schools and parishes may have different needs in this area.
   - Please work with your OPCY Program Liaison for detailed information on how this applies to your specific needs.

16) If a minor sends a direct message (DM) to our parish/school Instagram page, can we respond?
   - Yes, keeping these criteria in mind:
     - Parishes and schools must be the owners/managers of the page on the social media platform (i.e. Instagram, Facebook, etc.)
     - Multiple parish/school employees/E3 adults must have administrative rights to the page on the social media platform.

17) What do I do if a minor contacts me directly on my personal cell, email, and/or social media account?
   - Refrain from responding using your personal device/account.
   - Respond using your parish/school device/account, and copy the parent, guardian, and your supervisor. Additionally, remind the minor of the correct way to contact you.
   - Document the incident and inform your supervisor.
18) If a child is not registered in our Youth Group and attends a meeting with one of our regular students (via digital platform), what do we do?
   - Refer to your parish/school visitor policy.

19) How can we conduct tutoring with students on a one-on-one basis using electronic communications?
   - Individual tutoring may not be conducted without proper safeguards, and must be done in compliance with policies and the Code of Conduct.
   - Some acceptable approaches include:
     o Schedule tutoring when a parent or an E3 adult is present.
     o Re-organize teacher schedules to create a buddy-system.
     o Use existing E3 adults who can be present during communications (ie. Paras, regular school volunteers).
     o Re-structure teacher schedules to conduct tutoring outside of normal school hours when parents may be present.
     o Record lessons on video and send to parents to be viewed by students.
     o Both the teacher and the student should be in the social space of their homes (not from bedrooms or isolated rooms).

Pastoral Care

20) Can our staff or volunteers make phone calls to elderly parishioners to conduct wellness checks, even though some may be vulnerable adults?
   - Yes, but again proper safeguards must be in place.
   - Contact your OPCY Program Liaison to discuss options, requirements, and best practices.

OPCY Program Liaisons

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