

## **Compliance Plan Review Checklist**

In order to remain effective, plans must be reviewed at least annually. The purpose of the review is twofold.

- It is necessary to insure that the plan has kept up with changes in circumstances and has been enhanced based on experience.
- It is necessary to insure that actual practice is following the plan. A policy that is not followed is as bad as no plan at all. It becomes a liability.

### *Beginning the process*

Look at the date of your last plan and letter of transmittal. Note on your calendar the twelve-month anniversary of the plan.

At the time of the twelve-month anniversary, re-read the plan. As you do so, note the areas that you want to review more carefully either to consider adjustments or to insure that parish practice is following the plan.

Review the last audit feedback letter and audit report forms. Insure that any areas of concern have been addressed.

### *Steps in revision*

1. Study the sections identified in the review of the plan, audit feedback letter or audit report forms with the compliance officer and other key personnel responsible for implementation of these sections.
2. Discuss with the compliance officer and other key personnel modifications of sections in areas that could be improved. Reflect on your review of the plan, the last audit feedback letter, the last audit report forms, experience of the year, or new circumstances.
3. Load the document or, if the old document is not in the current recommended format, load the new template.
4. Re-write pertinent sections to reflect desired or required changes.
5. Personalize the plan by adapting the language provided to fit your parish situation.
6. Delete instructions and other extraneous material from the plan that you will submit.

## *Special Notes*

If you are using a program for personal safety education of children and youth other than the Diocese of Tucson *Personal Safety Curriculum* or the Southern Arizona Children's Advocacy Center's *Keeping Kids Safe*, you must provide a description of the program for review by OCAAP.

Insure that documentation is sound in all areas, including the education of children. In the latter area, the following documentation should be specified in the plan and maintained.

- Class lists for each class/grade
- On the class list, notation of children that did not attend the personal safety education or any repetition of the material
- Refusal forms from the parents of the children that did not attend, as many as were turned in (offer refusal forms to the parents at the beginning of the year)
- Mailing or other distribution of educational materials to parents, especially of those children that did not attend and/or educational programs offered to parents
- Educational Log of all educational programs, including those offered to children, youth and parents

Note that Standing Operating Procedures (SOPs) are recommended for any activity involving minors or vulnerable adults to insure consistency in how the activity is carried out and safety for all involved. Ask leaders in high responsibility areas like religious education if SOPs are being written and if ministers, employees and volunteers in those areas are being taught about the SOPs. Failure to have an element (like SOPs) that is specified as your policy leads to greater liability.

## *Conclusion*

When you have completed the review of your plan, whether or not you have revised it, write a new letter of transmittal and send it to OCAAP. If the plan has not been revised, simply note that in the letter. If it has been revised, send the revised version as well, with the table below to point out the changes you have made.

It is also helpful to share with all personnel and members of the parish the existence and essential elements of the compliance plan. If you do so, there is greater likelihood that the parish will be more committed to the safe environment program of the parish.

**Table of Revisions**  
**(to be included with the revised compliance plan)**

<b>Revision</b>	<b>Section</b>	<b>Description of change made</b>
1.		
2.		
3.		
4.		
5.		
6.		