



The Episcopal Diocese of Western Louisiana

Safeguarding God's Children

Policies for the Protection of Children and Youth from Abuse

Revised November 1, 2018

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SAFEGUARDING GOD'S CHILDREN

Policies for the Protection of Children and Youth from Abuse

Introduction

The Episcopal Diocese of Western Louisiana is committed to welcoming and protecting all children and youth who participate in ministries, activities and events in our congregations and Diocese. We are committed to providing safe places for our children and youth to grow in their life in Christ. We believe all who participate in our ministries, activities, and events should be protected from behavior that is physically, emotionally, spiritually, or sexually abusive or harassing.

The Diocese has established the following *Policies for the Protection of Children and Youth from Abuse*. These policies are based on the *Model Policies for the Protection of Children and Youth from Abuse* developed by The Church Pension Group in partnership with The Nathan Network, with some adaptations for the Diocese.

Training for Youth. The training program described in this document is designed primarily for adults. The Diocese has modified the program for youth under age 18.

Online Training. The *Safeguarding* program is designed to help people recognize, report, and, perhaps most importantly, prevent abuse and neglect of our children and youth. A guide to recognizing abuse and neglect and reporting requirements in the State of Louisiana is on the Diocesan website. The *Safeguarding* program consists of instructional materials found on the Diocesan website (<http://www.epiwla.org/safe-church/>) including informational videos. If you or a loved one has experienced abuse or neglect you might consider first talking with your clergy or a counselor before taking this training.

Other Rules May Apply. These Diocesan policies are provided as a guide for Episcopal institutions in the Diocese. They do not cover every issue. If there is any discrepancy between the policies and any state or federal law, the state or federal law will prevail. In addition, there may be certain instances, particularly with **Episcopal schools**, where the schools' rules and regulations will take precedence.

Diocesan Contacts. All questions about these *Policies* and *Safeguarding* training should be directed to the Safe Church Coordinator, Joy Owensby (joy@epiwla.org, 318-442-1304). All reports of suspected policy violations or inappropriate behavior, or concerns regarding clergy behavior or questions about making reports should also be directed to her.

I. Code of Conduct for Protection of Children and Youth

The following *Code of Conduct* has been adopted by the Diocese to help create a safe environment for children and youth and for those who minister to them. In order to participate in ministry with children or youth you must sign a copy of the following *Code of Conduct*, as set out on *Appendix C*, and deliver it to your congregation's Safe Church Minister. A copy, which can be printed and signed, is also on the Diocesan website at <http://www.epiwnla.org/safe-church/>. When you take *Safeguarding* training online you may submit the document electronically with your electronic signature.

CODE OF CONDUCT

- I will do my best to prevent abuse and neglect among children and youth involved in church, school or Diocesan ministries, activities and events.
- I will not physically, sexually or emotionally abuse or neglect a child or youth.
- I will comply with all applicable policies, standards and guidelines set forth in these *Policies for the Protection of Children and Youth from Abuse*.
- If I observe any inappropriate behaviors or possible violations of policies, standards or guidelines, or concerns about clergy behavior, I will immediately report my observations pursuant to the procedures in Section V of the *Policies for the Protection of Children and Youth from Abuse*.
- I acknowledge my obligation and responsibility to protect children and youth and will report suspected or known abuse or neglect to appropriate law enforcement authorities, state agencies and/or church leaders in accordance with Diocesan policies and the reporting procedures set forth in *Recognizing and Reporting Abuse of Children and Youth*.
- I understand that the Episcopal Church does not tolerate abuse or neglect of children or youth and agree to comply with these *Policies* in both spirit and action.

II. Definitions

A. Church Personnel

For the purposes of these *Policies*, the following are included in the definition of Church Personnel. **These individuals must be certified in *Safeguarding God's Children*:**

1. **All clergy** who are engaged in ministry or service to the church in this Diocese.
2. **All paid personnel**, full- or part-time, employed by the Diocese or any of its churches, schools or institutions, whether or not they work with or around children.
3. **Those who contract their services** to the Diocese, its churches, schools or institutions and who work with or around children or youth.
4. **Adult volunteers serving in staff positions** whether full-time or part-time, regardless of whether they work with or around children or youth.
5. **Adult volunteers in activities in which they work with or around children or youth.**
6. **Adult volunteers whose work routinely takes them throughout the facility or grounds** of a church, school or Diocesan institution when children or youth are present.
7. **Any person whose living quarters are on the grounds** of the church, school or other related institution.

Examples include, but are not limited to:

- Children’s or youth choir director
- Sunday School teachers and staff
- Vacation Bible School teachers and staff
- Lay youth ministers
- Directors of religious (Christian) education
- Staff or volunteers who work or assist with the nursery
- Teachers, substitute teachers, and staff in parochial schools, full- or part-time, contract or volunteer
- Adults who participate in overnight activities with children or youth

B. Age Categories

1. A **child** is defined as anyone under the age of 12 years.
2. A **youth** is defined as anyone who is at least 12 years old but not yet 18 years old. In addition, for the purposes of these *Policies*, a youth includes any individual enrolled in high school even if 18 years old or older.

C. Other

1. **Safe Church Coordinator.** The **Safe Church Coordinator** is the person serving as the Diocesan contact for questions about *Safeguarding* policies and training. Joy Owensby (joy@epiwla.org, 318-442-1304) serves as the Safe Church Coordinator for the Diocese.
2. **Safe Church Minister.** The **Safe Church Minister** is the person appointed by a

congregation, school or institution to help coordinate *Safeguarding* training and record keeping and to serve as the primary contact with the Diocese for the congregation, school or institution with respect to *Safeguarding* matters. See page 8 for more information.

III. Certification Requirements for Working with Children or Youth

Church Personnel become certified in *Safeguarding* when they have completed each of the screening and training steps below. Each congregation is responsible for maintaining CONFIDENTIAL certification files for each employee and volunteer. These files may be kept electronically or in paper format. Background checks and other documents relating to screening or *Safeguarding* certification must be maintained by the congregation in secure confidential files. The background checks and related application and screening documents should be maintained indefinitely.

A. Screening and Selection Process

All Clergy; all Employees; Volunteers Supervising Ministries for or Regularly Working with Children or Youth

1. All clergy, employees, and volunteers supervising ministries for or regularly working with children or youth must complete the procedures below.
 - a. **Clergy** are hired via Diocesan procedures for items 2, 3, 4 and 5 below.
 - b. **Employees** must go through a formal hiring process established by the employing church or institution.
 - c. **Volunteers** supervising ministries or regularly working with children or youth must be known to the clergy and congregation for at least 6 months.
2. Each applicant for a paid or volunteer position will complete an Application Form (*Appendix D*) and a Disclosure and Authorization Form for background checks (*Appendix I or J*), and receive a copy of the Summary of Rights Under the Fair Credit Reporting Act (*Appendix K*) prior to having a background check performed.
3. Each applicant will be interviewed by a person of appropriate supervisory authority.
4. The Rector or Priest-in-Charge will request and confidentially receive for each applicant the results of a nationwide sex offender and criminal history background check for all paid and volunteer staff and a check from the Department of Motor Vehicles for all paid and volunteer staff except for paid and volunteer staff not working with children or youth. The searches will include each state in which the applicant has resided during the past seven (7) years. **Clergy** and all who are **supervising ministries or programs for youth or children** must undergo a background check to be initiated by the Diocese with Oxford Documents or a service providing a comparable level of services.

5. The person with hiring or appointing authority will complete at least 3 reference checks with persons who know the applicant.
6. Each applicant will complete the required components of *Safeguarding God's Children* training set forth on the Diocesan Safeguarding Requirements Chart, which is on the Diocesan website (<http://www.epiwna.org/safe-church/>).

All information gathered about an applicant must be carefully reviewed and evaluated by the appropriate decision makers to determine whether the person is appropriate to work with children or youth. The Safe Church Coordinator shall be consulted if there is any uncertainty. Guidelines for evaluating background check results may be found in *Appendix H*.

Volunteers Assisting More than Four Times Per Year with Children or Youth or Accompanying Children or Youth on Overnights; VBS and Sunday School Volunteers; Children's Chapel Volunteers; Nursery Workers

1. Volunteers must be known to the clergy and congregation for at least 6 months.
2. Each volunteer must complete an information form (see *Appendix E*).
3. Each volunteer applicant must have an interview appropriate for the position with a person with supervisory authority over the ministry.
4. The Rector or Priest-in-Charge will request and confidentially receive for each applicant the results of a sex offender and criminal history background check, and in certain cases a Department of Motor Vehicles check, in each state in which the volunteer has resided during the past seven (7) years. The Diocese will make available a list of approved background check providers. The volunteer applicant will complete a Disclosure and Authorization Form for background checks (*Appendix J*), and receive a copy of the Summary of Rights Under the Fair Credit Reporting Act (*Appendix K*) prior to having a background check performed.
6. Each volunteer will complete the required components of *Safeguarding God's Children* training set forth on the Safeguarding Requirements Chart which is on the Diocesan website (<http://www.epiwna.org/safe-church/>).

All information gathered about a volunteer must be carefully reviewed and evaluated by the appropriate decision makers to determine whether the person is appropriate to work with children or youth. The Safe Church Coordinator shall be consulted if there is any uncertainty. Guidelines for evaluating background check results may be found in *Appendix H*.

B. Training Required but Not Certification

Vestry Members; Members of Diocese of Western Louisiana Diocesan Council, Standing Committee and Disciplinary Board

Each person serving on a Vestry or Bishop's Committee and each member of the Diocesan Council, Standing Committee and Disciplinary Board of the Diocese will complete the required components of *Safeguarding God's Children* training set forth on the Safeguarding Requirements Chart, which appears on the Diocesan website at (<http://www.epiwla.org/safe-church/>).

C. Certification Exceptions

Parents who assist no more than six (6) times a year with a program *in which their child is enrolled and attending* are exempt from certification requirements. This includes providing transportation, but does not include overnight activities/events or Vacation Bible School. Exempt adults shall not serve as the lead adult, but may serve as a helper to a certified leader. All adults accompanying children or youth on overnight excursions must be certified in *Safeguarding God's Children*.

D. Certification Deadlines, Recertification, and Transfer of Location

1. *Safeguarding* certification must be completed within 30 days of hire or start date. In the interim, anyone not certified must be supervised at all times in the presence of children or youth by a fully certified adult.
2. *Safeguarding* training must be renewed every three (3) years. A new sex offender registry and criminal background check, and for those for whom it is required, a new Department of Motor Vehicles check, must be performed every six (6) years. The Diocese will make available a list of approved background check providers.
3. Lay employees and volunteers who transfer within the Diocese of Western Louisiana should contact the Safe Church Coordinator, Joy Owensby (joy@epiwla.org, 318-442-1304) to update their certification to their new location. Clergy who transfer from another Episcopal Diocese must contact the Safe Church Coordinator to arrange for *Safeguarding God's Children* training and certification.
4. No training program other than *Safeguarding God's Children* will be accepted.

E. Safe Church Ministers at Each Congregation and School

Each congregation, school and institution will appoint a person who is certified in *Safeguarding God's Children* to serve as the Safe Church Minister of that congregation, school or institution. The Safe Church Minister will be responsible for informing the congregation, school or institution about *Safeguarding* training, changes to policies or procedures, assisting with enrollment in *Safeguarding* training, and maintaining proper records with respect to those who have been trained. Each congregation, school and institution will ensure that all applications for paid and volunteer positions, background checks and other confidential information is kept in secure individual files. The background checks and related application and screening documents should be maintained indefinitely. The Safe Church Minister will be the primary contact with the Diocese with respect to *Safeguarding* training, questions about *Safeguarding* policies and similar matters. The contact at the Diocese for these issues is the Safe Church Coordinator, Joy Owensby (joy@epiwla.org, 318-442-1304).

IV. Standards for Ministries with Children or Youth

A. Standards for Ministries

The following standards should be followed for all events activities for children or youth sponsored by a parish, group of parishes, deanery, diocesan institution or the Diocese.

Structural Standards

1. Every program for children or youth must have established ratios for adults and children. Compliance with the established ratio is required at all times, including activities. There needs to be 1 adult for every 6 children or youth.
2. No person should be alone with a child or youth or multiple children or youth where other adults cannot easily observe them.
3. Volunteers under the age of 18 must be directly supervised by adults over the age of 21 who are physically present during all activities.
4. An up-to-date list of approved congregation-sponsored programs for children and youth must be maintained in the church office or some other location that is easily accessible to parishioners.
5. Any new activities developed for children or youth that take place at a location other than the church or at a time when parents are not present must be approved

by the Rector or Priest-in-Charge. Requests to develop new activities must be submitted in writing to the Rector or Priest-in-Charge, leaders of children or youth ministries and appropriate ministry teams. The Rector or Priest-in-Charge determines whether the plan for a new activity is appropriate and includes adequate adult supervision.

6. Each ministry will develop age-appropriate procedures to ensure the safety of children and youth using restrooms and showers or baths.

7. When supervising or assisting private activities such as dressing, showering or diapering infants or children, all persons shall remain in an area observable by other adults or work in pairs.

8. When possible, at least two unrelated adults shall supervise activities. On overnight trips supervision by male and female adults is mandatory when both boys and girls are in attendance.

9. Church computers must have adequate password protection.

10. Congregations must have clear guidelines and adequate supervision (by church staff or authorized persons) of anyone using a church computer to access the Internet. Be advised that any activity on a church computer is not considered private and may be accessed by authorized persons.

11. Each parish is encouraged to conduct a “safe church audit” annually to review practices and policies within the congregation.

12. Congregations are expected to comply with these *Safeguarding* policies, standards and guidelines. Copies of these *Policies for the Protection of Children and Youth from Abuse* and *Recognizing and Reporting Abuse of Children and Youth* should be made readily accessible to members of the congregations, such as keeping a copy at the receptionist’s desk or other easily accessible location and posting a copy on the congregation’s website and providing a link to <http://www.epiwla.org/safe-church/>.

General Conduct for the Protection of Children and Youth

The following guidelines are intended to assist all persons in monitoring and supervising behaviors and interactions with children and youth in order to identify and prevent persons who may intend to harm children or youth, those who may try to groom or improperly influence children, youth and their parents, or who may create the conditions under which abuse can occur more easily. These guidelines should also be used in making decisions about interactions with children and youth in church sponsored and affiliated programs. These guidelines are not designed or intended to address interactions within families. When exceptions to these

guidelines must be made, the exception must be reported to the appropriate supervisor as soon as possible.

1. All persons who work with children or youth must agree to comply with the Diocese of Western Louisiana's *Guidelines for Appropriate Demonstrations of Affection (Appendix A)* and have completed and signed the *Code of Conduct (Appendix C)*.
2. No person is allowed to volunteer to work regularly with children or youth until the person has been known to the clergy and congregation for at least six months. The Rector has the authority to refuse to allow any person to work with children and youth.
3. Programs for children under twelve (12) years of age must have procedures to ensure that children are released only to their parents or legal guardians or those designated by them.
4. All persons are prohibited from using, possessing, distributing, or being under the influence of alcohol, illegal drugs, or misusing legal drugs while participating in or assisting with programs or activities for children or youth.
5. A parent or guardian must provide written permission forms before anyone may transport children and youth for a church sponsored activity or for any purpose on more than an occasional basis.
6. All persons will respond to children and youth with respect, consideration and equal treatment, regardless of sex, race, religion, sexual orientation, culture, socioeconomic status or similar characteristics. All persons will portray a positive role model for children and youth by maintaining an attitude of respect, patience, and maturity, avoiding even the appearance of favoritism.
7. One-to-one counseling with children or youth will be done in an open or public or other place where private conversations are possible but which occur in full view of others.
8. Adults are prohibited from dating or becoming romantically involved with a child or youth.
9. All persons are prohibited from having sexual contact with a child or youth.
10. All persons are prohibited from possessing any sexually oriented materials (magazines, cards, videos, films, clothing etc.) on church property or in the presence of children or youth except as expressly permitted in writing as part of a preauthorized educational program.

11. All persons are prohibited from using the Internet to view or download any sexually oriented materials on church property or in the presence of children or youth.
12. All persons are prohibited from discussing their own sexual activities, including dreams and fantasies, or discussing their use of sexually oriented or explicit materials such as pornography, videos or materials on or from the Internet, with children or youth.
13. Adults are prohibited from sleeping in the same beds, sleeping bags, tents, hotel rooms or other rooms with children or youth. It is acceptable to have multiple adults sleep with all the children or youth participating in one open space such as a church basement or camp lodge.
14. Adults are prohibited from dressing, undressing, bathing, or showering in the presence of children or youth.
15. All persons are prohibited from using physical punishment in any way for behavior management of children and youth. No form of physical discipline is acceptable. This prohibition includes spanking, slapping, pinching, hitting, or any other physical force. Physical force may only be used to stop a behavior that may cause immediate harm to the individual or to a child, youth or others.
16. All persons are prohibited from using harsh language, degrading punishment, or mechanical restraint such as rope or tape for behavior management.
17. All persons are prohibited from participating in or allowing others to conduct any hazing activities at or in preparation for any children's or youth ministry or camp activities.
18. All persons should be vigilant in preventing questionable situations from arising.

V. Reporting Abuse, Neglect, Inappropriate Behavior and Policy Violations

The *Code of Conduct* (see *Appendix C*) requires that all adults who work with children or youth make reports required under Louisiana law, as discussed below, and also report to the church, school, institution or Diocese any inappropriate behavior or policy violations involving children or youth.

Reporting Abuse, Including Sexual Abuse, or Neglect

All adults who work or volunteer with children and youth at church, school or Diocesan activities or events are considered to be mandatory reporters for child abuse and neglect under Louisiana law. Please see *Recognizing and Reporting Abuse*

of *Children and Youth* on the Diocesan website at <http://www.epiwla.org/safe-church/> for more information on how to recognize abuse and neglect and how to make a report if you suspect a child or youth is being abused or neglected.

Reporting Suspected Abuse Committed by Children or Youth

If you witness or have knowledge of sexual abuse or rape of a child or youth by anyone, including another child or youth, it must be reported immediately under Louisiana law. Call **911** immediately.

If you suspect other types of abuse, including bullying, stalking, or similar behaviors committed by a child or youth upon another child or youth, promptly make a report under the policies of your church, school or institution. If the church, school or institution does not have a reporting policy or if you do not know the policy, report to the Rector, Head of School, or other appropriate person in authority at the church, school or other institution. If you have made a report and are concerned that adequate steps are not being taken, contact the Safe Church Coordinator, Joy Owensby, at joy@epiwla.org or 318-442-1304. You may submit a Confidential Notice of Concern (see *Appendix F*).

Reporting Inappropriate Behaviors or Policy Violations Involving Children or Youth

If you observe any inappropriate behaviors, including violations of school, church or institutional policies, report your observations and/or concerns as set forth below.

Examples of inappropriate behaviors or policy violations would include:

- seeking private time with children or youth,
- taking children or youth on overnight trips without other adults,
- swearing or making suggestive comments to children or youth,
- selecting staff or volunteers who have not completed *Safeguarding God's Children* certification required by these *Policies*

Any person observing or receiving a report of inappropriate behaviors or possible policy violations that relate to interactions with children or youth should report immediately by:

- (i) A telephone call or meeting with the rector or priest-in-charge, head of school or executive director of the Diocesan institution. Notification may also be made to the Safe Church Coordinator.
- (ii) A telephone call or meeting with one of the Intake Officers if the complaint is against a clergy person; with the Safe Church Coordinator if the complaint is against a head of school, Diocesan employee or executive director of a Diocesan institution.
- (iii) A Confidential Notice of Concern may be sent to the Safe Church Coordinator at the address below. The form of Confidential Notice of Concern is attached as *Appendix F*.

All reports of inappropriate behavior/ policy violations with children or youth are taken seriously.

To make a report to the Safe Church Coordinator or one of the Intake Officers:

Mrs. Joy Owensby, Safe Church Coordinator

Email: joy@epiwla.org

The Rev. Rich Snow, Intake Officer

Email: frrich@epiwla.org

The Rev. Annie Etheredge, Intake Officer

Email: madreannie@epiwla.org

The Episcopal Diocese of Western Louisiana

PO Box 4330, Pineville, LA 71361

Phone: 318-442-1304

Fax: 318-442-8712

The Diocese will work with the parish, school, or other Diocesan institution as well as local law enforcement authorities to determine the appropriate course of action.

The Diocese of Western Louisiana is grateful to the Diocese of Louisiana for their work in developing this policy,

APPENDICES

- Appendix A: Guidelines for Appropriate Affection
- Appendix B: Guidelines for Social Media and Electronic Communication
- Appendix C: Code of Conduct
- Appendix D: Sample Application Form
- Appendix E: Sample Information Form
- Appendix F: Confidential Notice of Concern
- Appendix G: Reporting Abuse or Neglect
- Appendix H: Guidelines for Reviewing Background Checks
- Appendix I: Disclosure and Authorization Form – Clergy and Staff
- Appendix J: Disclosure and Authorization Form - Volunteers
- Appendix K: Summary of Rights Under Fair Credit Reporting Act

APPENDIX A: GUIDELINES FOR APPROPRIATE AFFECTION

The Diocese is committed to creating and promoting a positive, nurturing environment for our children's and youth ministries that protects our children and youth from abuse and protects persons who work with children or youth from misunderstandings.

When creating safe boundaries for children or youth, it is important to establish which types of affection are appropriate and which are inappropriate. If appropriate boundaries are not established the lack of guidance may lead to inappropriate decisions about boundaries. Stating which behaviors are appropriate and inappropriate allows persons who work with children or youth to comfortably show positive affection in ministry, and yet identify individuals who are not maintaining safe boundaries with children or youth.

The following guidelines must be followed by all persons working around or with children or youth. The following guidelines are by no means an exhaustive list of either appropriate or inappropriate forms of affection. It is important that all adults who work with children or youth inquire as to the appropriateness of specific behaviors if they have questions.

Love and affection are part of church life and ministry. There are many ways to demonstrate affection while maintaining positive and safe boundaries with children and youth.

Some POSITIVE and APPROPRIATE forms of affection include the following:

- Brief hugs.
- Pats on the shoulder or back.
- Handshakes.
- "High-fives" and hand slapping.
- Verbal praise.
- Touching hands, faces, shoulders and arms of children or youth.
- Arms around shoulders.
- Holding hands while walking with small children.
- Sitting beside small children.
- Kneeling or bending down for hugs with small children.
- Holding hands during prayer.

The following forms of affection are considered INAPPROPRIATE with children and youth in ministry setting because many of them are the behaviors that child molesters use to groom children or youth and their parents for later molestation or can be, in and of themselves, sexual abuse.

- Inappropriate or lengthy embraces.
- Kisses on the mouth.
- Holding children over three years old on the lap.
- Touching bottoms, chests or genital areas other than for appropriate diapering or toileting of infants and toddlers.
- Showing affection in isolated areas such as bedrooms, closets, staff only areas or other private rooms.
- Occupying a bed with a child or youth.
- Touching knees or legs of children or youth.
- Wrestling with children or youth.
- Tickling children or youth.
- Piggyback rides.
- Any type of massage given by a child or youth to an adult.
- Any type of massage given by an adult to a child or youth.
- Any form of unwanted affection.
- Comments or compliments (spoken, written, or electronic) that relate to physique or body development. Examples would be, "You sure are developing," or "You look really hot in those jeans."
- Snapping bras or giving wedgies or similar touch of underwear whether or not it is covered by other clothing.
- Giving gifts or money to individual children or youth.
- Private meals with individual children or youth.

APPENDIX B: Guidelines for Social Media and Electronic Communications

A. Practices and Guidelines

The following recommended practices and guidelines apply commonly accepted principles of healthy boundaries to digital networking and communication.

- Use prudent judgment in the time you contact individuals via social media. The “home phone rule” is a basic rule of thumb to use: do not text, chat, or email back-and-forth at a time you would not normally call the home phone line, *i.e.* before 8:00 AM or after 9:00 PM or during school hours.
- Consider whether creating separate private and professional profiles on networking sites/social media makes sense for your ministry. It may make sense to maintain separate personal and professional accounts.
- Implement appropriate privacy settings and personal boundaries when using social networking sites and all digital communication and apply privacy settings that are consistent with all youth and adults across all social media platforms. *Have the same rules for everyone that you are communicating with online.*
- Review accessible content and photos frequently.
- If you choose to utilize any social networking site to communicate with your community of faith, your rector or priest-in-charge should have full access to all of your profiles and correspondence.
- Parents should be aware of how your ministry uses social media platforms, including such information as the fact that their children or youth are in the “Youth Group Facebook Group” or “friends” with the youth leaders.
- The group names and individual names of social media sites used by a ministry should be public and all members of a youth group or congregation should be able to be part of the online group if they participate in the specific ministry.
- Communication should be sent to entire groups, posted on their Facebook wall or in public areas - not in private messages – this includes images.
- Adults should not participate in ongoing individual communication with a child or youth through text messages, email, or Facebook conversations. If there is a need for ongoing pastoral communication between a youth and an adult, the adult should notify their rector or youth minister and then arrange to meet the youth in a public place. *Face-to-face meetings, or a phone call if meeting in person is not possible, are ALWAYS the preferred mode of communication, particularly when responding to emotionally driven communication or pastoral emergencies. Email, text messages, and Facebook communications should be used to get information*

out to a large community, not to individually counsel children or youth.

- Video Chatting with a youth is strongly discouraged – if you must, be aware of what you're wearing and of your surroundings, the only situations where a video chat is appropriate are in a group setting (*e.g.*, Skype with a group of youth while on a mission trip), and transcripts of on-line chats (video or text) should be saved.

B. Covenants for Online Communities or Digital Groups

Covenants should be created to address the following:

- Appropriate and inappropriate language and behavior
- Who may join and/or view group activity and when they should leave the group
- Content that can be posted/published on the group site or page
- Who, how and when photos can be tagged (*e.g.*, did guardians give written permission to post pictures of their youth)
- Mandatory reporting laws and how they will be followed
- Consequences for breaking the covenant

If you are the adult responsible for the online community or digital group you should consider the following:

Any inappropriate material posted in your online groups should be deleted and addressed with the person who posted; a report should be made to the rector or priest-in-charge. In general, parents should be informed that content, including images, that appears on student pages or groups that are not sponsored by the church are NOT within the purview of the church ministry. (*i.e.*, youth leaders are not responsible for pictures on the Facebook pages of youth group members)

C. Photography and Video Policy

When using photos and videos of children or youth for ministry purposes:

- Respect the dignity of every person depicted in the image or video
- Avoid identifying names with images (*e.g.*, captions, tagging on Facebook) let children, youth, or adults tag themselves rather than doing it for them.
- Never attach specific names to pictures on church, youth group, or other any other website open to the public.

APPENDIX C: CODE OF CONDUCT FOR THE PROTECTION OF CHILDREN AND YOUTH

This *Code of Conduct* is to be signed upon the completion of *Safeguarding* training. When you take *Safeguarding Online*, you will be asked to agree to the *Code of Conduct* and submit an electronic signature.

**EPISCOPAL DIOCESE OF WESTERN LOUISIANA
CODE OF CONDUCT FOR THE PROTECTION OF CHILDREN AND YOUTH**

- I will do my best to prevent abuse and neglect among children and youth involved in church, school or Diocesan ministries, activities and events.
- I will not physically, sexually or emotionally abuse or neglect a child or youth.
- I will comply with all applicable policies, standards and guidelines set forth in these *Policies for the Protection of Children and Youth from Abuse*.
- If I observe any inappropriate behaviors or possible violations of policies, standards or guidelines, or concerns about clergy behavior, I will immediately report my observations pursuant to the procedures in Section V of the *Policies for the Protection of Children and Youth from Abuse*.
- I acknowledge my obligation and responsibility to protect children and youth and will report suspected or known abuse or neglect to appropriate law enforcement authorities and to church leaders in accordance with Diocesan policies and the reporting procedures set forth in *Recognizing and Reporting Abuse of Children and Youth*.
- I understand that the Episcopal Church does not tolerate abuse or neglect of children or youth and agree to comply with these *Policies* in both spirit and action.

Signed the ____ day of _____, 20__

Name Printed: _____

APPENDIX D: SAMPLE APPLICATION FORM

Please complete all of the questions accurately and fully and attach additional sheets if needed.

Date:

PERSONAL DATA

Name:

Street address:

City:

State:

Zip:

How long at current address:

Home phone:

Cell phone:

Work phone:

Best time to contact you:

Email address:

Driver license number:

State:

Social Security number:

Are you legally eligible to work in this country?

Yes No

Note: If you are chosen for a paid position, you will be required to show documents verifying your employment eligibility and identity to complete the INS Form I-9 as required by the Immigration Reform and Control Act.

Please list your addresses in the past five years:

- 1)
- 2)
- 3)
- 4)
- 5)

For what position are you applying?

What interests you about the position for which you are currently applying?

What has prepared you for the position for which you are currently applying?

Please attach additional sheets if necessary.

EMPLOYMENT HISTORY - Please complete for your prior employers, covering the past TEN years.

CURRENT EMPLOYER

Company name:
Address:
City: State: Zip:
Immediate supervisor name:
Immediate supervisor phone number:
Position held:
Dates of employment: from to
Reason for leaving position:

PREVIOUS EMPLOYER

Company name:
Address:
City: State: Zip:
Immediate supervisor name:
Immediate supervisor phone number:
Position held:
Dates of employment: from to
Reason for leaving position:

PREVIOUS EMPLOYER

Company name:
Address:
City: State: Zip:
Immediate supervisor name:
Immediate supervisor phone number:
Position held:
Dates of employment: from to
Reason for leaving position:

VOLUNTEER EXPERIENCE - Include all experience working with children or youth.

Organization:
Contact:
Phone:
Duties:
Dates:

Organization:
Duties:
Dates:
Contact:
Phone:

EDUCATIONAL HISTORY

Name of school
Address:
City: State: Zip:
Type of school:
Name of program or degree:
Program completed?

Name of School
Address:
City: State: Zip:
Type of school:
Name of program or degree:
Program completed?

PERSONAL REFERENCES

Name:
Address:
City: State: Zip:
Daytime phone: Evening:
How long have you known this person?
Relationship to you:

FAMILY REFERENCES

Name:
Address:
City: State: Zip:
Daytime phone: Evening:
How long have you known this person?
Relationship to you:

Have you ever been accused of physically, sexually or emotionally abusing or neglecting a child or an adult?
 Yes No If yes, please explain.

To the best of my knowledge, the information contained in this application is complete and accurate. I understand that providing false information is grounds for not hiring me or choosing me for a volunteer position or for my discharge if I have already been hired or chosen. I authorize any person or organization, whether or not identified in this application, to provide any information concerning my previous employment, education, credit history, driving record, criminal conviction record, sexual offender registry or other qualifications for my employment or volunteering. I also authorize the Episcopal Diocese of Western Louisiana or the church, school or Diocesan institution to which I am applying to receive such information.

If hired or chosen, I agree to be bound by all policies and procedures, including but not limited to the Episcopal Diocese of Western Louisiana *Policies for Protection of Children and Youth From Abuse* and the *Code of Conduct for the Protection of Children and Youth*. I understand that these may be changed, withdrawn, added to or interpreted at any time at the sole discretion of the Episcopal Diocese of Western Louisiana and without prior notice to me. I also understand that my employment or volunteering may be terminated, or any offer or acceptance of employment or volunteering withdrawn, at any time, with or without cause, and with or without prior notice at the option of my church, Diocese or myself.

Nothing contained in this application or in any pre-employment or pre-volunteering communication is intended to or creates a contract between myself and the Episcopal Diocese of Western Louisiana or any church, school or Diocesan institution for employment, volunteering, or the providing of any benefit.

I HAVE READ AND UNDERSTAND THE ABOVE PROVISIONS.

Signature _____

Date _____

APPENDIX E: INFORMATION FORM (FOR THOSE WHO ARE NOT FILLING OUT AN APPLICATION FORM)

PERSONAL DATA

Name:

Street address:

City:

State:

Zip:

How long at current address:

Home phone:

Cell phone:

Work phone:

Best time to contact you:

Email address:

Driver license number:

State:

Social Security number:

Ministry, program, activity or event for which you would like to volunteer:

Have you volunteered for something similar in the past? Please describe briefly.

Why are you interested in volunteering? _____

Do you have children or other relatives participating in this ministry, program, activity or event? Please give their name(s) and relationship(s).

Have you ever been accused of physically, sexually or emotionally abusing or neglecting a child or an adult?

Yes No

If yes, please explain.

If chosen to serve as a volunteer, I agree to be bound by all policies and procedures, including but not limited to the Episcopal Diocese of Western Louisiana *Policies for*

Protection of Children and Youth From Abuse and the *Code of Conduct for the Protection of Children and Youth*. I understand that these may be changed, withdrawn, added to or interpreted at any time at the sole discretion of the Episcopal Diocese of Western Louisiana and without prior notice to me. I also understand that my volunteering may be terminated, or any offer or acceptance of volunteering withdrawn, at any time, with or without cause, and with or without prior notice at the option of my church, Diocese or myself.

Nothing contained in this application or in pre-volunteering communication is intended to create or creates a contract between myself and the Episcopal Diocese of Western Louisiana or any church, school or Diocesan institution for either employment, volunteering, or the providing of any benefit.

I HAVE READ AND UNDERSTAND THE ABOVE PROVISIONS.

Signature _____

Date _____

APPENDIX F: CONFIDENTIAL NOTICE OF CONCERN

The following notice of concern allows individuals to report inappropriate behavior or policy violations to the Episcopal Diocese of Western Louisiana. Reports of abuse or neglect should be made to law enforcement (911), local law enforcement nonemergency phone number or the Department of Children and Family Services (855-452-5437) as described in the reporting procedures of the Diocese. Making a report of abuse or neglect to anyone other than these authorities will not fulfill the legal obligations of mandatory reporters. If you have questions about incidents or reporting procedures please contact Joy Owensby, joy@epiwl.org, 318-442-1304. The Diocese will cooperate fully with an investigation by law enforcement authorities and with other legal processes.

Who is the complaint about?

Date of occurrence

Congregation/school/ institution: _____

City _____

Nature of
Concern: _____

Inappropriate behavior with a child or youth (please describe the behavior)

Policy violation with a child or youth: ___ Yes ___ No

Reason to believe abuse occurred/is occurring: ___ Yes ___ No

Other _____

Describe the situation:

What happened?

Where did it happen?

Who else was present?

Has it ever happened before?

Was it reported to the authorities? ___ Yes ___ No

If reported, to whom:

Please attach a copy of the written report if a written report to DCFS was made.

What action, if any, was or is being taken? _____

Follow-up:

Does anyone else need to be notified? Who? _____

How may we reach you if we need additional information about this situation?

Name: _____ Telephone: _____

Address:

Email:

Signature: _____ Date _____

Would you like someone to call you to discuss the situation? ___ Yes ___ No

APPENDIX G: REPORTING ABUSE OR NEGLECT

Detailed information on mandatory reporting and recognizing and reporting abuse or neglect can be found on the Diocesan website (<http://www.epiwla.org/safe-church/>). Please refer to the following documents:

Recognizing and Reporting Abuse of Children and Youth

Reporting Suspected Abuse of a Child or Youth (2 page summary of reporting information)

For all emergency situations call 911.

The 24-hour telephone number for making reports to the Department of Children and Family Services is 855-452-5437.

Additional information on mandatory reporting laws in the state of Louisiana, as well as access to the state of Louisiana mandatory reporter online training can be obtained at the following website:

<http://www.dcf.louisiana.gov/index.cfm?md=pagebuilder&tmp=home&pid=109>

APPENDIX H: GUIDELINES FOR REVIEWING BACKGROUND CHECKS

The policies of the Episcopal Church provide that “no person who is known to have a civil or criminal conviction or record of child abuse, or who has admitted to child abuse, may be ordained, employed or permitted to volunteer to work with or around children.”

If a background check reveals a conviction for a sexual or violent offense, the applicant is not allowed to be with or around children or youth. You must promptly notify the rector or priest-in-charge of the church, head of school or head of the Diocesan institution who, in turn, must promptly notify the Safe Church Minister and Safe Church Coordinator of any convictions for sexual or violent offenses.

Conviction for minor offenses unrelated to and not involving sexual or violent conduct is usually not sufficient to deny an individual employment or a volunteer position. If you receive notice of a conviction or are uncertain how to interpret the search results, please consult with the Safe Church Coordinator for assistance.

Background checks and any related application or screening documents must be maintained by the congregation in secure confidential files. The background checks and related application and screening documents should be maintained indefinitely.

APPENDIX I: DISCLOSURE AND AUTHORIZATION FORM – CLERGY AND EMPLOYEES

DISCLOSURE AND AUTHORIZATION FORM FOR CLERGY, EMPLOYEES AND VOLUNTEER STAFF

Disclosure Regarding Background Investigation

The Episcopal Diocese of Western Louisiana or any church, school or Diocesan institution in which you seek to serve as a member of the clergy, an employee (including independent contractor assignments) or volunteer staff may request, for lawful employment purposes (including positions as volunteers), background information about you from a consumer reporting agency in connection with your employment, application for employment or application to serve as a volunteer in a staff position. This background information may be obtained in the form of consumer reports and/or investigative consumer reports (commonly known as "background reports"). These background reports may be obtained at any time after receipt of your authorization and, if you are hired or engaged by the Diocese, church, school or Diocesan institution, throughout your employment period, your contract period or the time in which you serve as a volunteer staff member.

Pursuant to Diocesan policy, Oxford Documents, Praesidium or another reporting agency or entity will prepare or assemble the background reports for the Diocese, church, school or Diocesan institution. Oxford Documents can be contacted by mail at P.O. Box 307, 655 West Highway 10, Anoka, MN 55303-1623 and can be contacted by phone at (800) 801-9114. Praesidium can be contacted by mail at PO Box 202002, Arlington, TX 76006 or phone at (817) 801-7773.

The types of information that may be obtained depend on the level of search required by Diocesan policy for the position for which you are applying and may include, but are not limited to: social security number verifications; address history; credit reports and history; criminal records and history; public court records; sex offender registries; driving records; accident history; worker's compensation claims; bankruptcy filings; educational history verifications (*e.g.*, dates of attendance, degrees obtained); employment history verifications (*e.g.*, dates of employment, salary information, reasons for termination, etc.); personal and professional references checks; professional licensing and certification checks; drug/alcohol testing results, and drug/alcohol history in violation of law and/or company, church or Diocesan policy; and other information bearing on your character, general reputation, personal characteristics, mode of living and credit standing.

This information may be obtained from private and public record sources, including, as appropriate: government agencies and courthouses; educational institutions; former employers; personal interviews with sources such as neighbors, friends and

associates; and other information sources. If the Diocese, church, school or Diocesan institution should obtain information bearing on your credit worthiness, credit standing or credit capacity for reasons other than as required by law, then the Diocese, church, school or Diocesan institution will use such credit information to evaluate whether you would present an unacceptable risk of theft or other dishonest behavior in the job or position for which you are being evaluated.

You may request more information about the nature and scope of any background reports by contacting the Safe Church Coordinator of the Diocese. A summary of your rights under the Fair Credit Reporting Act is also being provided to you.

Authorization of Background Investigation

I have carefully read and understand this Disclosure and Authorization form and the attached summary of rights under the Fair Credit Reporting Act. By my signature below, I consent to preparation of background reports by a consumer reporting agency and to the release of such background reports to the Diocese, church, school or Diocesan institution and its designated representatives and agents, for the purpose of assisting the requesting party in making a determination as to my eligibility for employment (including independent contractor assignments or as volunteer staff, as applicable), promotion, retention or for other lawful employment purposes or to serve as a volunteer to work with children or youth. I understand that if the Diocese, church, school or Diocesan institution hires me, contracts for my services, or authorizes me to work with children or youth, my consent will apply, and the Diocese, church, school or Diocesan institution may obtain updated background reports, throughout my employment, contract or volunteer period.

I understand that information contained in my employment, contractor or volunteer application, or otherwise disclosed by me before or during my employment or contract assignment, if any, may be used for the purpose of obtaining and evaluating background reports on me. I also understand that nothing herein shall be construed as an offer of employment or contract for services.

I hereby authorize law enforcement agencies, learning institutions (including public and private schools and universities), information service bureaus, credit bureaus, record/data repositories, courts (federal, state and local), sex offender registries, motor vehicle records agencies, my past or present employers, the military, churches, Dioceses and other individuals and sources to furnish any and all information on me that is requested by the consumer reporting agency.

By my signature below, I also certify the information I provided on and in connection with this form is true, accurate and complete. I agree that this form in original, faxed, photocopied or electronic form (including electronically signed), will be valid for any background reports that may be requested by or on behalf of the Diocese, church, school or Diocesan institution.

Please complete the following information:

Home address Apt. number

City State Zip Code

Social Security Number: _____

Date of Birth (month/day/year): ____ / ____ / ____

Full name (printed)

Signature

Date: ____ / ____ / ____

APPENDIX J: DISCLOSURE AND AUTHORIZATION FORM – VOLUNTEERS

DISCLOSURE AND AUTHORIZATION FORM FOR VOLUNTEERS

Disclosure Regarding Background Investigation

The Episcopal Diocese of Western Louisiana or any church, school or Diocesan institution in which you seek to serve as a volunteer may request background information about you from a consumer reporting agency in connection with your request to serve or continue serving as a volunteer to work with children or youth as part of its Safeguarding God's Children policy. Your cooperation and understating of the importance of taking steps like this to help protect our children and youth is appreciated. This background information may be obtained in the form of consumer reports and/or investigative consumer reports (commonly known as "background reports"). These background reports may be obtained at any time after receipt of your authorization.

Praesidium or another reporting agency or entity will prepare or assemble the background reports for the Diocese, church, school or Diocesan institution. Praesidium can be contacted by mail at PO Box 202002, Arlington, TX 76006 or phone at (817) 801-7773.

The types of information that may be obtained include, but are not limited to: social security number verifications; address history; criminal records and history; public court records; sex offender registries; driving records; accident history; and other information bearing on your character, general reputation, and personal characteristics. For the majority of volunteer positions background searches do not including obtaining credit information such as credit reports and similar information; you will be notified if this type information will be obtained.

This information may be obtained from private and public record sources, including, as appropriate: government agencies and courthouses; personal interviews with sources such as neighbors, friends and associates; and other information sources.

You may request more information about the nature and scope of any background reports by contacting the Safe Church Coordinator of the Diocese. A summary of your rights under the Fair Credit Reporting Act is also being provided to you

Authorization of Background Investigation

I have carefully read and understand this Disclosure and Authorization and the attached summary of rights under the Fair Credit Reporting Act. By my signature below, I consent to preparation of background reports by a consumer reporting

agency and to the release of such background reports to the Diocese, church, school or Diocesan institution and its designated representatives and agents, for the purpose of assisting the requesting party in making a determination as to my eligibility to serve as a volunteer to work with children or youth. I understand that if the Diocese, church, school or Diocesan institution authorizes me to work with children or youth, my consent will apply, and the Diocese, church, school or Diocesan institution may obtain updated background reports throughout my volunteer period.

I understand that information contained in my volunteer application or information form, or otherwise disclosed by me before or during my time as a volunteer, if any, may be used for the purpose of obtaining and evaluating background reports on me. I also understand that nothing herein shall be construed as an offer of employment or contract for services.

I hereby authorize law enforcement agencies, sex offender registries, information service bureaus, record/data repositories, courts (federal, state and local), motor vehicle records agencies, churches, Dioceses and other individuals and sources to furnish any and all information on me that is requested by the consumer reporting agency.

By my signature below, I also certify the information I provided on and in connection with this form is true, accurate and complete. I agree that this form in original, faxed, photocopied or electronic form (including electronically signed), will be valid for any background reports that may be requested by or on behalf of the Diocese, church, school or Diocesan institution.

Please complete the following information:

Current home address Apt. number

City State Zip Code

Social Security Number: _____

Date of Birth (month/day/year): ____/____/____

Full name (printed)

Signature

Date: ____/____/____

APPENDIX K: SUMMARY OF RIGHTS UNDER FAIR CREDIT REPORTING ACT

Para información en español, visite www.consumerfinance.gov/learnmore o escriba a la Consumer Financial Protection Bureau, 1700 G Street N.W., Washington DC 20552.

A Summary of Your Rights Under the Fair Credit Reporting Act

The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Here is a summary of your major rights under the FCRA. For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

- You must be told if information in your file has been used against you. Anyone who uses a credit report or another type of consumer report to deny your application for credit, insurance, or employment - or to take another adverse action against you - must tell you, and must give you the name, address, and phone number of the agency that provided the information.
- You have the right to know what is in your file. You may request and obtain all the information about you in the files of a consumer reporting agency (your “file disclosure”). You will be required to provide proper identification, which may include your Social Security number. In many cases, the disclosure will be free. You are entitled to a free file disclosure if:
 - a person has taken adverse action against you because of information in your credit report;
 - you are the victim of identity theft and place a fraud alert in your file;
 - your file contains inaccurate information as a result of fraud;
 - you are on public assistance;
 - you are unemployed but expect to apply for employment within 60 days.
- In addition, all consumers are entitled to one free disclosure every 12 months upon request from each nationwide credit bureau and from nationwide specialty consumer reporting agencies. See www.consumerfinance.gov/learnmore for additional information.

- You have the right to ask for a credit score. Credit scores are numerical summaries of your credit-worthiness based on information from credit bureaus. You may request a credit score from consumer reporting agencies that create scores or distribute scores used in residential real property loans, but you will have to pay for it. In some mortgage transactions, you will receive credit score information for free from the mortgage lender.
- You have the right to dispute incomplete or inaccurate information. If you identify information in your file that is incomplete or inaccurate, and report it to the consumer reporting agency, the agency must investigate unless your dispute is frivolous. See www.consumerfinance.gov/learnmore for an explanation of dispute procedures.
- Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information. Inaccurate, incomplete or unverifiable information must be removed or corrected, usually within 30 days. However, a consumer reporting agency may continue to report information it has verified as accurate.
- Consumer reporting agencies may not report outdated negative information. In most cases, a consumer reporting agency may not report negative information that is more than seven years old, or bankruptcies that are more than 10 years old.
- Access to your file is limited. A consumer reporting agency may provide information about you only to people with a valid need -- usually to consider an application with a creditor, insurer, employer, landlord, or other business. The FCRA specifies those with a valid need for access.
- You must give your consent for reports to be provided to employers. A consumer reporting agency may not give out information about you to your employer, or a potential employer, without your written consent given to the employer. Written consent generally is not required in the trucking industry. For more information, go to www.consumerfinance.gov/learnmore.
- You may limit "prescreened" offers of credit and insurance you get based on information in your credit report. Unsolicited "prescreened" offers for credit and insurance must include a toll-free phone number you can call if you choose to remove your name and address from the lists these offers are based on. You may opt-out with the nationwide credit bureaus at 1-888-567-8688.
- You may seek damages from violators. If a consumer reporting agency, or, in some cases, a user of consumer reports or a furnisher of information to a consumer reporting agency violates the FCRA, you may be able to sue in state or federal court.
- Identity theft victims and active duty military personnel have additional rights. For more information, visit www.consumerfinance.gov/learnmore.

- States may enforce the FCRA, and many states have their own consumer reporting laws. In some cases, you may have more rights under state law. For more information, contact your state or local consumer protection agency or your state Attorney General. For Information about your Federal rights contact:

TYPE OF BUSINESS:

CONTACT:

1. a. Banks, savings associations, and credit unions with total assets of over \$10 billion and their affiliates.

Consumer Financial Protection Bureau 1700 G Street NW
Washington, DC 20552

- b. Such affiliates that are not banks, savings associations, or credit unions also should list, in addition to the CFPB:

Federal Trade Commission: Consumer Response Center – FCRA Washington, DC 20580
(877) 382-4357

2. To the extent not included in item 1 above:

- a. National banks, federal savings associations and federal branches and federal agencies of foreign banks

Office of the Comptroller of the Currency Customer Assistance Group
1301 McKinney Street, Suite 3450
Houston, TX 77010-9050

- b. State member banks, branches and agencies of foreign banks (other than federal branches, federal agencies and Insured State Branches of Foreign Banks), commercial lending companies owned or controlled by foreign banks, and organizations operating under section 25 or 25A of the Federal Reserve Act

Federal Reserve Consumer Help Center PO Box 1200
Minneapolis, MN 55480

- c. Nonmember Insured Banks, Insured State Branches of Foreign Banks, and insured state savings associations

FDIC Consumer Response Center 1100 Walnut St., Box #11
Kansas City, MO 64106

- d. Federal Credit Unions
National Credit Union Administration
Office of Consumer Protection (OCP)

Division of Consumer Compliance and Outreach (DCCO) 1775 Duke Street
Alexandria, VA 22314

3. Air carriers

Asst. General Counsel for Aviation Enforcement & Proceedings
Aviation Consumer Protection Division Department of Transportation
1200 New Jersey Avenue, S.E. Washington, DC 20590

4. Creditors Subject to Surface Transportation Board

Office of Proceedings, Surface Transportation Board Department of Transportation
395 E Street, S.W.
Washington, DC 20423

5. Creditors Subject to Packers and Stockyards Act, 1921

Nearest Packers and Stockyards Administration area Supervisor

6. Small Business Investment Companies

Associate Deputy Administrator for Capital Access United States Small Business
Administration
409 Third Street, SW, 8th Floor
Washington, DC 20416

7. Brokers and Dealers

Securities and Exchange Commission 100 F Street, N.E.
Washington, DC 20549

8. Federal Land Banks, Federal Land Bank Associations, Federal Intermediate Credit
Banks and Production Credit Associations

Farm Credit Administration 1501 Farm Credit Drive McLean, VA 22102-5090

9. Retailers, Finance Companies, and All Other Creditors Not Listed Above

FTC Regional Office for region in which the creditor operates or Federal Trade
Commission:

Consumer Response Center - FCRA
Washington, DC 20580
(877) 382-4357