

Diocese of Manchester Diocesan Review Board

Audit Report 2006

The Diocese of Manchester's *Promise to Protect, Pledge to Heal, the Protection of Children and Young People: Policy and Procedures* ("Policy") provides that on a regular basis, the Diocese of Manchester's Diocesan Review Board ("Board") will conduct an audit of the Office for Ministerial Conduct. The Board conducted its first audit of the Office for Ministerial Conduct in 2005 in accordance with the Policy.¹ In the Board's report dated January 12, 2006, the Board included among its recommendations that in December 2006, it "review the progress that will have been made in screening, educating, and training diocesan personnel." This report sets forth the Board's findings with respect to progress made by the Office for Ministerial Conduct on screening, educating, and training diocesan personnel and on the Board's other recommendations.

In conducting its review and developing its findings, the Board reviewed the compliance reports issued by the Diocesan Compliance Coordinator, interviewed Office for Ministerial Conduct personnel, reviewed the Policy, and reviewed supporting documentation. In as much as the Diocese of Manchester was audited both by the New Hampshire Attorney General's Office designee (KPMG, LLP) and the United States Conference of Catholic Bishops (USCCB) in 2006, the Diocesan Review Board opted to forego an additional agreed-upon procedures audit by Howe, Riley and Howe (HRH). Notably, the USCCB recently notified the Diocese that it was found to be in compliance with the *Charter for the Protection of Children and Young People* for 2006. Although the audit conducted by KPMG took place in the summer of 2006, the Diocese has not yet received any results from KPMG's audit.

The Board found that significant progress has been made in the screening and training of church personnel who regularly work with minors. The Diocese has established procedures and hired additional personnel to monitor and ensure compliance with diocesan policy with respect to screening and training. The Diocese continues to report allegations of sexual abuse of a minor to the civil authorities in accordance with diocesan policy and NH law, and has not assigned to ministry any priest or deacon who either admitted or was found to have sexually abused a minor.

The Board has made four recommendations, three of which involve continuing the work of the Office for Ministerial Conduct and the Compliance Coordinator, in particular. The Board also recommends that it conduct an annual review of diocesan records to monitor continued compliance with diocesan policy with respect to the assignment of priests and deacons and the reporting of sexual abuse of a minor.

¹ A copy of the Board's January 12, 2005, report can be found on the Diocese of Manchester's website at www.catholicchurchnh.org under Child Safety (Public Reports).

I. Screening of Church Personnel

Substantial progress has been made by the Office for Ministerial Conduct and the Diocese of Manchester with respect to background screening of Church personnel. The Policy and the *Screening and Training Protocol for Church Personnel* (as revised in May 2006) require that all employees and volunteers who regularly work with minors and clergy assigned to ministry by the diocesan bishop or who serve in supply ministry undergo background screening. These church personnel are required to complete a screening form; complete an acknowledgement of receipt of the Policy and *Serving Christ, Serving Others Code of Ministerial Conduct* form; undergo a national sex offender registry check; and undergo a state criminal records check. In addition to those requirements, diocesan school employees are also required to undergo FBI fingerprint checks.

At the conclusion of its agreed-upon procedures audit in 2005, the Board found that most parishes and Catholic schools were in substantial compliance with the screening requirements but that some organizations within the diocese were not in complete compliance. However, at the conclusion of its review in 2006, the Board found that all clerics and all employees and volunteers who regularly worked with minors as of May 1, 2006, were in full compliance with screening requirements.

II. Assignments of Priests and Deacons.

The Policy provides that no priest or deacon who admitted or was found guilty of sexual abuse of a minor should be considered for reassignment. The Diocesan Review Board has reviewed the list of diocesan personnel accused of sexual abuse of a minor in 2006 and has found that the bishop has not assigned to ministerial duties any person who admitted or was found guilty of sexual abuse of a minor. Moreover, the Board found that priests under investigation for sexual abuse of a minor were placed on precautionary leave pending the results of the investigation.

III. Training of Personnel.

The Policy requires that employees and volunteers who regularly work with minors and clerics assigned to ministry by the diocesan bishop or who serve in supply ministry attend a workshop on sexual abuse awareness and prevention called *Protecting God's Children* training. An examination of the documents on file with the Office for Ministerial Conduct indicate that all clergy in ministry and all diocesan administration employees have undergone this training and that all other employees and volunteers who regularly worked with minors as of May 1, 2006, had either undergone the necessary training or were in the three month period allowable by the Policy to have completed the training after beginning service.

IV. Intervention and Reporting of Incidents, Allegations and Concerns

The Diocese has established procedures for the reporting of incidents of sexual abuse of minors and has established certain investigative procedures. Every report of

sexual abuse of a minor, regardless of the date of the alleged occurrences, is reported by the Office of Ministerial Conduct to the civil authorities. A review of documents generated during the calendar year 2006 and interviews with diocesan personnel demonstrate that the Office of Ministerial Conduct continues to strictly adhere to the Policy regarding immediate intervention and reporting to the Attorney General's Office (DCYF, if appropriate) and to local enforcement if the circumstances suggest it.

In 2006, the Diocese suggested to the Attorney General's office a system for ensuring that all reports of sexual abuse of a minor made to the Office for Ministerial Conduct have been conveyed to the Attorney General's office. The Attorney General's office agreed to this system, which requires that records of the offices are reconciled on a quarterly basis. The records between the Office for Ministerial Conduct and the Attorney General's office have been reconciled for all four quarters of the 2006 calendar year.

V. Documentation

The Diocese has established a policy on the retention of records related to allegations of sexual abuse of minors. Based on questioning personnel and an examination of the records, the Board is convinced that documents related to allegations of sexual abuse of minors have been maintained and preserved. The Diocese is in the process of reviewing and revising its policy on the retention of screening and training records and will be establishing similar guidelines for parishes, schools, and camps in the first half of calendar year 2007.

VII. Communications and Oversight

With respect to communications, the Office for Ministerial Conduct has used a variety of means to communicate with those responsible for safe environment and the public. The diocesan website, www.catholicchurchnh.org, contains a Child Safety section with information about the reporting process, safe environment programs, child safety policies, public reports, and other helpful links. The Office for Ministerial Conduct holds an annual state-wide Safe Environment Conference for all Safe Environment Coordinators, Safe Environment Council members, pastors, principals, and others involved in safe environment efforts. In addition, three times per year, the Office publishes and distributes broadly a Safe Environment Newsletter that contains information concerning safe environment news, tips, and other helpful information.

In March 2006, the Diocese hired a full-time Compliance Coordinator who is responsible for ensuring that the parishes, schools, and camps are in compliance with the Policy, particularly the screening and training obligations. In addition, the Diocese hired a full-time Safe Environment Assistant to assist the Compliance Coordinator in her duties.

The Diocese also developed an Action Plan to address concerns raised by KPMG in its report to the Attorney General. In order to ensure that the Action Plan was followed, the Diocese hired a certified public accountant to work with the Office for

Ministerial Conduct to monitor and assist in compliance. To date, the Action Plan has been followed.

To that end, the Diocese has taken steps to ensure that site visits to all 108 parishes and 25 schools have taken place during the calendar year 2006. To ensure that all of this was accomplished in a relatively short period of time, the Compliance Coordinator, the certified public accountant, and 14 temporary staff trained by the Compliance Coordinator (including a certified public accountant and teachers) conducted the site visits. In addition, the Diocese has taken steps to improve and enhance its existing safe environment database to make it available to authorized representatives of the diocesan schools, parishes, and camps. The improvements and enhancements (which are expected to be available in the early part of 2007), will enable the parishes and schools to enter information immediately with respect to the screening and training obligations under the Policy and will enable the Diocese to check immediately whether or not each and every organization has complied with the terms of the screening and training obligations under the Policy.

The Compliance Coordinator has planned follow-up site reviews of parishes, schools, and camps during the years 2007 through 2009. Those site reviews, which have already begun, involve a thorough examination of records and files and meetings with key staff. The first site visits will be paid to those parishes or schools that faced some challenges in complying with the screening and training requirements of the Policy.

Based on its work and successes in 2006, it is obvious that the Office for Ministerial Conduct has taken responsibility for ensuring compliance with the terms of the Policy. The Office has hired personnel and has established mechanisms for ensuring compliance on a daily basis if necessary.

VIII. Recommendations

The Board made five recommendations in its report of January 12, 2006, and the Board has found that all have been adopted by the Office for Ministerial Conduct.

The following are the Board's recommendations based on its 2006 review:

1. The Diocesan Review Board recommends the continuation of the office of and the activities of the Compliance Coordinator. If necessary, the Diocesan Review Board recommends that, as needed, part-time or temporary employees be engaged to conduct site visits and offers of assistance to any organizations within the Diocese that are having administrative difficulties in complying with the screening and training obligations under the Policy.

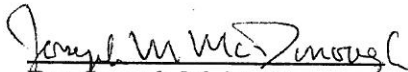
2. The Diocesan Review Board recommends that as enhancements and improvements are made to the safe environment database, the Compliance Coordinator and/or the Safe Environment Assistant maintain and monitor the database to ensure that

screening and training of church personnel who work with minors occur within the applicable time limits.

3. The Diocesan Review Board notes that through newsletters, bulletin announcements, safe environment meetings, and the diocesan website, attention has been paid to continuing education of all diocesan employees and volunteers with respect to proper conduct in dealing with minors. The Board recommends that this be continued.

4. The Board recommends that on an annual basis, the Board review diocesan records to ensure that the Office for Ministerial Conduct continues to comply with its obligations under the Policy with respect to the assignment of priests and deacons and the reporting of sexual abuse of a minor.

**Diocese of Manchester
Diocesan Review Board**


By: Joseph M. McDonough
Its: Chair

28 Feb 07
Date