

January 12, 2006

Most Rev. John B. McCormack  
Diocese of Manchester  
153 Ash Street  
Manchester, NH 03105

Re: 2005 Diocesan Review Board Audit

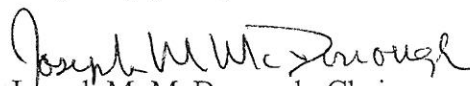
Dear Bishop McCormack:

In accordance with the Diocese of Manchester's *Promise to Protect, Pledge to Heal The Protection of Children and Young People: Policy and Procedures* ("Policy"), the Diocesan Review Board conducted an audit to measure compliance with the diocesan policy from its implementation on March 19, 2004 to December 31, 2004. In conducting the audit, the Diocesan Review Board retained Howe, Riley and Howe, PA to conduct the audit on its behalf. The auditors began their work in November 2004 and completed its work in June 2005.

On behalf of the Diocesan Review Board, I am pleased to present you with the report of our first compliance audit. You will note that the report contains our findings as well as five (5) recommendations. We believe that these recommendations will serve to improve the stalwart commitment that you and your staff have made to promote a safe environment in the Church.

Please let me know if you have any questions or concerns about the report.

Very truly yours,

  
Joseph M. McDonough, Chair  
Diocesan Review Board

# **Diocese of Manchester Diocesan Review Board Audit Report 2005**

This report, issued this 12<sup>th</sup> day of January 2006 by the Diocesan Review Board of the Diocese of Manchester, is in accordance with the requirements of the *Promise to Protect, Pledge to Heal Policy and Procedures for the Protection of Children and Young People* (“Policy”) published December 29, 2003, and effective March 19, 2004. The Policy applies to all clergy, employees, and volunteers in ministry for the Diocese of Manchester and addresses matters involving the sexual abuse of minors. The objectives of the Policy are to prevent child sexual abuse in the Church before it occurs, respond with compassion and respect to those who report that they have been abused by church personnel, ensure due process and respect for the rights of those who have been accused of sexual abuse, provide for cooperation with the civil authorities, and address allegations of child sexual abuse openly.

The Policy is a refinement and development of pre-existing policies governing the expectations for clergy as well as lay employees and volunteers with respect to sexual misconduct matters. The Policy covers prevention, intervention, remediation, reporting, documentation, communication, and accountability.

The personnel rosters for Church personnel, particularly employees and volunteers in all parishes and Catholic schools, are fluid and are subject to change, even daily. In general terms, however, the Diocese includes 117 parishes and 25 Catholic schools. As of December 31, 2004, there were 211 priests and 48 permanent deacons incardinated in the Diocese. 116 priests and 44 permanent deacons were assigned to ministry in the Diocese, largely to parishes and diocesan institutions. There are approximately 2,300 lay employees and more than 11,000 volunteers in the parishes and Catholic schools.

The Diocesan Review Board, in accordance with its task of measuring the Office for Ministerial Conduct’s compliance with the Policy, hired the firm of Howe, Riley & Howe (HRH) to conduct an audit of the Diocese which audit was carried out between November 2004 and June 2005.

The audit consisted of a comprehensive review of all the documentation required by the Policy at the diocesan administration level and a “field” audit of nine parishes, three elementary schools, one secondary school, and one camp chosen by Howe, Riley & Howe. The selection of these entities was based on a desire to examine parishes in each deanery (region) of the Diocese and a representative sample of Catholic schools and diocesan institutions. Approximately 400 hundred hours were spent in the field in determining the compliance level of the parishes, schools, and camp.

## **I. SCREENING OF CHURCH PERSONNEL**

The Policy requires that clergy and all employees and volunteers undergo some form of background screening, depending upon their level of interaction with children. All church personnel are required to complete a screening form and an acknowledgment of the Policy and *Serving Christ, Serving Others Code of Ministerial Conduct* form, and undergo a sex offender registry check. Those who regularly work with children in parishes must also undergo a criminal records check, while educators and other Catholic school personnel must complete a criminal records check and an FBI fingerprint check in addition to the other requirements.

While most parishes and Catholic schools were in substantial compliance with the requirements to perform the above-noted tasks and to record the results, some organizations within the Diocese were not in complete compliance.

It is worth noting that full compliance is complicated by two factors. First, the roster of employees and volunteers throughout the Diocese changes regularly. Therefore, on any given day there may be employees or volunteers active in the Diocese who are in the process of completing the screening and checking requirements but who have not completed that process. Second, as with any substantial policy initiative, a certain period of time must pass before the personnel responsible for compliance can be expected to conform to all the aspects of the Policy.

## **II. ASSIGNMENT OF PRIESTS AND DEACONS**

The Policy provides that no diocesan personnel credibly accused or found guilty of sexual abuse of a minor should be considered for reassignment. This requirement has been audited by HRH, and its finding is that the diocesan administration has strictly complied with this provision.

## **III. TRAINING OF PERSONNEL**

This portion of the Policy requires that all clerics and all employees and volunteers who regularly work with children attend a workshop on sexual abuse awareness and prevention and undergo periodic ongoing training.

Records maintained by the Office for Ministerial Conduct demonstrate that all clergy in ministry and all diocesan administration employees required by the Policy to undergo training have undergone the training and are in full compliance with the Policy. With respect to training of parish, school, and other diocesan institution employees and volunteers, records of training are kept at the local level. A review of these records by HRH shows that substantial compliance was found throughout the Diocese, although compliance with the administrator's record keeping compliance varied among the parishes and Catholic schools visited by the auditors.

#### **IV. INTERVENTION**

The Diocese established procedures for the reporting of incidents and allegations of sexual abuse of minors and for the investigation thereof. All parishes, Catholic schools and institutions of the Diocese have been made aware, through a variety of sources, of the need for immediate reporting to civil authorities and the Office for Ministerial Conduct.

Every report of the sexual abuse of a minor, regardless of the date of the alleged occurrence, is reported by the Office for Ministerial Conduct to civil authorities. Pastoral outreach is provided to all persons who make such reports.

In the case of a credible allegation made against a cleric (bishop, priest or deacon), that individual is placed on precautionary administrative leave from all public ecclesiastical ministry and offered pastoral care and support until an investigation in accordance with Church law is concluded. In the case of a credible allegation made about a lay employee or volunteer, the Delegate for Ministerial Conduct works with the immediate supervisor of the employee or volunteer to ensure that the person is placed on precautionary administrative leave from all ministry until an investigation is concluded. The person on leave is also provided with pastoral care.

The audit of these practices by HRH indicates that the Office for Ministerial Conduct has strictly adhered to the Policy regarding immediate intervention in the case of reports of abuse. The Office for Ministerial Conduct has retained professional investigators to assist in all investigations, and it is apparent that the Office for Ministerial Conduct responds immediately to any allegation of misconduct that involves a minor.

#### **V. REPORTING OF INCIDENTS, ALLEGATIONS, AND CONCERNS**

The auditors found as a result of interviews with various diocesan personnel, that immediately upon receiving a report of an allegation of sexual abuse of a minor, the Office for Ministerial Conduct makes a report to DCYF (if the alleged victim is a minor), to the Attorney General's Office, and to local law enforcement if the circumstances suggest it. A report was made to the civil authorities in every instance where the Office for Ministerial Conduct became aware of an allegation or report.

#### **VI. DOCUMENTATION**

While the diocesan central administration does adhere to certain practices regarding the retention of records, there is no uniform diocesan records retention policy. Assurances were given the auditors that no documents related to allegations of sexual abuse of minors have been discarded since the Policy went into effect.

## VII. COMMUNICATIONS

It would appear that the Policy and accompanying procedures that are the subject of this audit have been communicated to all of the parishes, Catholic schools, and other affiliated institutions, such as the diocesan camps. A review of the Acknowledgment Forms indicates that the communication has been universal.

With respect to the requirements that public announcements be issued on a regular basis to remind the laity about the duties of diocesan personnel under the Policy, it is noted that announcements are made at Sunday Masses and/or in parish and school bulletins issued by parishes and Catholic schools.

## VIII. RECOMMENDATIONS

1. The Diocesan Review Board recommends that the Office of the Chancellor establish and maintain a uniform record retention policy for use in all diocesan offices, parishes, and Catholic schools and institutions.
2. The Diocesan Review Board recommends that the Diocese consider establishing a position to ensure regular internal audits for compliance with this and other diocesan policies. This will help to further ensure ongoing compliance with the Policy and procedures by all parishes, Catholic schools, and diocesan institutions.
3. The Diocesan Review Board recommends that a regular schedule for visits to parishes, Catholic schools, and diocesan institutions be established for annual review and/or audit of compliance with this Policy, including, but not limited to, ensuring that Safe Environment Coordinators have been appointed and are active in the performance of their duties.
4. The Diocesan Review Board recommends that in December 2006, it review the progress that will have been made in screening, educating, and training diocesan personnel.
5. The Diocesan Review Board recommends that the compliance personnel noted in Recommendation 2 conduct "spot checks" of parishes, Catholic schools, and institutions to ensure compliance with this Policy.

**Diocese of Manchester  
Diocesan Review Board**

  
By: **Joseph M. McDonough**  
Its: **Chair**

January 12, 2006  
Date