

A. Introduction. The USCCB insists upon the integrity of its fiscal management process. A special Audit Subcommittee comprised of Bishops and lay advisors has been established under the authority of the USCCB Committee on Budget and Finance. The Audit Subcommittee will conduct its work relative to the integrity of the USCCB fiscal management process through a staff committee consisting of the Director of Human Resources, Chief Financial Officer and the General Counsel. Each member of the staff committee may designate a member of his or her staff to act for any or all purposes with respect to any particular matter that comes to the staff committee's attention. Complaints may also be made to the Bishop Chair of the Audit Subcommittee.

B. Purpose. The staff committee is established on a temporary basis as described in G below. During its tenure, the committee shall be the exclusive way in which the USCCB will evaluate, and recommend to the Audit Subcommittee resolution of, complaints of mismanagement of Conference funds and similar unethical conduct. Complaints of misconduct involving personnel actions with respect to employees or alleged violations of other policies of the USCCB are not within the staff committee's purview, but are to be addressed through regular Conference processes for resolving workplace grievances, discrimination, and harassment. *See* Part II of the Manual (regarding maintenance of a fair workplace). The staff committee's work is generally confined to complaints involving (a) serious ethical impropriety related to fiscal matters, including conflicts of interest, or (b) mismanagement of Conference assets with financial consequences for the Conference that are more than de minimis. The staff committee will decide whether a complaint is within its scope, in consultation with the Subcommittee.

C. Proceedings. Any Bishop, consultant, employee, contractor, vendor, or volunteer may file a complaint with any member of the staff committee or directly to the Chair of the Audit Subcommittee, who shall convene the staff committee and inform the Audit Subcommittee. Complaints within the scope of Part B of this Policy received by all other USCCB managers or employees shall be brought to the attention of the staff committee. The staff committee may consider the matter orally or in writing, as it deems appropriate to the particular case. The staff committee shall carry out its investigations in such manner as it considers appropriate.

D. Reporting. The staff committee shall provide regular reports of its work to the Audit Subcommittee. The Audit Subcommittee Chair shall promptly notify the General Secretary when a complaint has been received, and the Subcommittee will also discuss

with him any proposed resolution. The Subcommittee will seek the General Secretary's agreement to follow through on the recommended disposition.

E. Recusal. A staff committee member shall disclose to the rest of the staff committee and to the Chair of the Audit Subcommittee any complaint alleging misconduct by that member or a member of his or her department, and shall offer to recuse himself or herself in that matter.

F. Non-retaliation. There shall be no retaliation against any person for any complaint filed in good faith with the staff committee or for any other good faith action taken with respect to the work of the Audit Subcommittee.

G. Duration. The staff committee shall operate on a two-year trial basis commencing January 1, 2007, and ending December 31, 2008, unless extended, made permanent, or terminated by the Administrative Committee of the Conference. The non-retaliation principle shall be retained.