

CHAPTER TWO

2008 Methodology and Limitations

METHODOLOGY

Types of Audit

As summarized in the memorandum dated November 30, 2007, from Bishop Gregory M. Aymond, Chair of the Committee on the Protection of Children and Young People of the United States Conference of Catholic Bishops, the USCCB's Administrative Committee approved that the 2008 audits would begin a one-third/two-thirds auditing cycle: each year, one-third of the dioceses/eparchies receive a full on-site audit, and the remaining two-thirds of the dioceses/eparchies participate in a collection, compilation, and review of data. The goal is to have every diocese/eparchy receive at least one full on-site audit every three years.

As in past years, approximately two weeks before the scheduled on-site audit visits, the full set of audit documents were to be submitted by the diocese/eparchy electronically to the auditor(s), who reviewed them for completeness and consistency with prior audit materials. The audit documents for 2008 were as follows:

- Audit Instrument
- Chart A/B (Victim/Accused)
- Chart C/D (Safe Environment Training/Background Evaluations)
- Additional Actions for the Protection of Children Form

Any omissions or inconsistencies identified during that review were brought to the attention of the diocese/eparchy and were resolved by either telephone or e-mail prior to or during the on-site visit. During the on-site audit, the auditors verified with the responsible diocesan/eparchial employee(s) the responses given in telephone or personal interviews and as designated on the Audit Instrument prior to or during the on-site. The auditors reviewed supporting documentation furnished by the diocese/eparchy and conducted in-person and/or telephone interviews with parish priests/personnel to determine the availability and

understanding of relevant process and materials at the parish level.

Those two-thirds that participated in the data collection audits were instructed to submit completed Chart A/B, Chart C/D, and the Additional Actions forms electronically to the auditors. Any omissions or inconsistencies were brought to the attention of the diocese/eparchy by telephone or e-mail. With little opportunity to review supporting documentation, unless it was available on the various Web sites or provided to the auditor via e-mail, facsimile, or regular mail, responses were taken at face value unless clarification was necessary.

For both types of audits, the auditors completed their review and provided their analysis on the documents, which were then electronically submitted to The Gavin Group, Inc., where a second level of review was conducted by the Special Audit Coordinator. The Special Audit Coordinator provided quality control to ensure completeness and uniformity of information requested and consistency in the audit process.

Once the Special Audit Coordinator completed her review, inserted her comments and analysis (which included an initial determination of compliance), and entered data into the administrative spreadsheets, the documents were electronically forwarded to Mr. William A. Gavin, President of the Gavin Group, for his review.

Mr. Gavin reviewed all of the information obtained along the way, inserted his comments into the documents, independently entered data into the additional administrative spreadsheets, confirmed or reversed the initial call of compliance, and forwarded the entire package to the USCCB Secretariat of Child and Youth Protection (SCYP) for its review.

Mr. Gavin and the Special Audit Coordinator periodically compared data collected on the spreadsheets and resolved any differences. At the end of the audit

period, the spreadsheets were forwarded to the SCYP. This lengthy and detailed process gave the SCYP an opportunity to review the entire auditing procedure, including information initially provided by the diocese/eparchy, as well as the clarifications and analyses at all levels of review.

Parish Participation

The bishops of 17 archdioceses and dioceses agreed to have the Gavin Group auditors conduct detailed interviews in parishes to determine the extent of *Charter* understanding and compliance at the parish level. The parishes were selected by agreement between diocesan officials and auditors with consideration being given to selecting parishes from various types of locations (such as urban, suburban, and rural) as well as those with schools and those without. Interviews included the pastor, school principal if applicable, and staff member(s) designated to coordinate the safe environment program training. Most interviews were conducted in person, although some were conducted by telephone.

Those having parish interviews included the following:

- Diocese of Austin
- Diocese of Baton Rouge
- Archdiocese of Boston
- Archdiocese of Cincinnati
- Archdiocese of Detroit
- Diocese of Fort Worth
- Diocese of Green Bay
- Archdiocese of Hartford
- Diocese of Jefferson City
- Archdiocese of Milwaukee
- Diocese of Pittsburgh
- Diocese of Portland, Maine
- Diocese of Richmond
- Diocese of Rockville Centre
- Diocese of Shreveport
- Diocese of Spokane
- Diocese of Springfield in Illinois

Workshops

In preparation for the 2008 audits, eight workshops were held across the country from March 2007

through May 2008. All 195 dioceses and eparchies were invited to send representatives to these workshops. These were free to all the participants with the exception of any travel cost. Representatives of 141 dioceses/eparchies attended these workshops, a 72% response rate.

In addition, the *Audit Training Manual* developed in 2006 by the SCYP in conjunction with The Gavin Group, Inc., was updated, distributed to all workshop attendees, and discussed in great detail. The manual included copies of the 2008 audit documents and set out the minimum requirements for each Article. Also included in the 2008 *Manual* were sample forms to be used as guides for completing the audit documents. Copies of the *Manual* were mailed to those who were unable to attend any of the workshops and who requested a copy. The final workshop in Washington, D.C., was videotaped in anticipation of preparing a training DVD to be available for the 2009 and 2010 audits, which will use essentially the same format and documents.

Format

The 2008 audit documents followed the format of 2007 audit documents, with one significant modification: Charts A (Victims) and B (Accused) were combined into a single document (Chart A/B), as were Charts C (Safe Environment Training) and D (Background Evaluations), in order to more efficiently gather the necessary information.

Training

As in prior years, The Gavin Group, Inc., utilized men and women experienced in management, investigations, and compliance to conduct these audits. Auditor training was held in Phoenix, Arizona, for one full day in June 2008. Auditors assigned to the 2008 audits had participated in the 2007 audits wherein all dioceses/eparchies had full on-site audits, and all the auditors were in attendance for the full training session. The *Audit Training Manual*, the audit process, and audit documents were discussed in detail, including parameters for what was to be considered compliant and noncompliant for each question. Suggestions for identifying and informally resolving issues were discussed,

as were instructions for handling matters that could not be informally resolved. The Executive Director and Associate Director of the SCYP also participated and provided an overall national perspective of the audit process as well as discussing the concerns of the USCCB Committee on the Protection of Children and Young People regarding consistency in the application of the compliance criteria.

LIMITATIONS/PROBLEMS ENCOUNTERED

Completeness/Accuracy

As in past years, in order for the auditors to reach a compliance or non-compliance conclusion, both types of audits relied on the completeness and accuracy of the information provided to the auditors by the diocesan/eparchial personnel. For those audits performed on-site, the auditors did not examine personnel files or other confidential materials.

Dates of Audit Periods

The 2007 audit cycle brought the statistical data collected during these audits up to date as of June 30, 2007. Thus, in 2008, for the first time since the beginning of the audit process, the audit period was the same for all dioceses/eparchies: July 1, 2007, through June 30, 2008. This 12-month uniform audit period will be used for all audits at least through the end of the current cycle in 2010.

Definitions

The definitions utilized in 2007 for Articles 12 and 13 were slightly modified in 2008 as follows:

1. The definition for “candidates for ordination” eliminated candidates for the diaconate.
2. The definition of “educators” was modified to allow inclusion of school administrators and principals.
3. The category of “parochial/parish employees” was changed to “parish/school employees” to more accurately define that category.

Because the *Charter* is silent on clear definitions, some dioceses/eparchies grouped persons outside of the specified definitions, which had an impact on the statistical accountings.

Standard for Compliance on Article 12 (Safe Environment Training)

As in the 2007 audits, dioceses/eparchies were asked if the safe environment program(s) being utilized had been approved by the bishop. This was critical in those instances where no diocesan/eparchial safe environment training was offered for children/youth attending religious education classes but where, rather, the diocese/eparchy relied on the training provided by the public school systems. In a number of instances, dioceses/eparchies were still unable to identify the program(s) used by the public school system(s) and to indicate whether those were approved by the bishop/eparch to satisfy the *Charter* criteria.

Additionally, some dioceses advised that they did not provide safe environment training to the students in the religious education classes because their particular state had mandated safe environment training in all the public schools—only for the auditors to find out that the public schools did not provide any training, because the safe environment training in that state was an unfunded mandate.

Statistics

The dates of the uniform audit period were designed to give an optimum opportunity to ensure that all persons covered under Articles 12 and 13 (i.e., those whose duties include ongoing, unsupervised contact with minors) have been trained and background evaluations completed. While the dioceses/eparchies were instructed to identify a “snapshot in time” (June 30, 2008) and to use the statistics available on that date for Chart C/D, there was still significant confusion. Because of the different ways dioceses/eparchies track their numbers, particularly those of children/youth, these numbers remain, at best, estimates.

Timeliness

The two-thirds of the dioceses/eparchies that received data collection audits were instructed to submit the completed audit documents to the auditor by August 31, 2008. However, the majority were late with their submissions. To complicate matters, requests for clarification by the auditors to the dioceses/eparchies often did not receive timely responses and required multiple requests by the auditor. In a few instances, these delays required calls to dioceses/eparchies by The Gavin Group, Inc., personnel before the requested responses were received.

Workshops

Those dioceses/eparchies that did not send any representative to the workshops had more difficulty completing the audit documents than those that did have

personnel attend a workshop. Many of those who attended workshops were not the individuals specifically responsible for collecting the information and completing the audit documents. Furthermore, there was a significant turnover in diocesan/eparchial personnel assigned either to implement portions of the *Charter* or to complete the audit documents for submission to The Gavin Group, Inc., which resulted in incomplete and/or incorrectly filled-out forms. To resolve these challenges required additional time and effort on the part of many additional personnel—within the diocese/eparchy and on behalf of the Gavin Group and the SCYP.