

pastor's, principal's, or camp director's failure to ensure compliance with the requirements of the Program, up to and including separation from employment, for example. To further enhance the effectiveness and comprehensiveness of the Disciplinary Policy, the Diocese should consider the inclusion of specific, illustrative examples that might result in disciplinary measures."

Diocese of Manchester Response: See Action Plan IV, item 3.

Recommendation IV(A)(5)(a)(4) (page 15)

"To avoid confusion, forms created and distributed going forward should have unique names, instead of being called "verification forms," so that they are easily identifiable."

Diocese of Manchester Response: See Action Plan IV, item 4.

Recommendation IV(A)(5)(b)(5) (page 15)

"Ongoing self-evaluation of the Program and all of its elements is critical to its future effectiveness and sustainability. The Diocese should develop a formalized policy and procedure around the annual evaluation of its Program and subsequent development of action plans to implement enhancements."

Diocese of Manchester Response: See Action Plan IV, item 5.

Recommendation IV(A)(5)(b)(6) (page 15)

"KPMG commends the Diocese for developing a Site Revisit Summary Report and accompanying Site Revisit Summary Report guidance. The Diocese should continue its efforts and continuously work to evaluate and refine its risk assessment protocol and accompanying forms and instructions. In July 2009, when the matrix is next scheduled to be reviewed and updated, instructions should be further refined so that reviewers are provided with even more explicit rating guidelines. This will help standardize revisit results and provide a baseline that will enable the OMC to more reliably compare site revisit results from year to year and across entities. The Diocese should also reevaluate its rating system to determine whether it is effective as adopted. KPMG suggests defining uniform rating categories based, in part, on numerical findings (e.g. X% of Acknowledgements Outstanding =a2). The revised matrix and instructions for use should be structured such that the arbitrary use of undefined ratings is eliminated. The proper structuring of a successful tool will ensure that its implementation is approached and executed consistently over a sustainable period."

Diocese of Manchester Response: See Action Plan IV, item 6.

Recommendation IV(A)(5)(b)(7) (page 16)

"The Diocese should ensure the Compliance Coordinator is fully briefed on a regular basis with regard to violations and reporting matters by conducting regularly scheduled, confidential meetings during which the identities of both individuals and entities involved in these matters are

Coordinator. The Diocese will continue its strong and constant efforts to inform Church personnel of the mandatory reporting requirements. See also Action Plan IV, item 8.

Recommendation IV(B)(2)(e)(1) (page 20)

“KPMG recommends that the Bishop approve the Delegate’s suggested policy of maintaining documentation that supports the basis for reassigned ministry to prevent the appearance of any improper retaliatory actions or relocations that may be perceived responsive to the identification, reporting, or enforcement of the Program’s requirements. The implementation of the procedures noted above regarding the memorandum from the Delegate and associate Delegate to the Bishop would fulfill this recommendation.”

Diocese of Manchester Response: Bishop McCormack has approved the Delegate’s suggested policy of maintaining documentation that supports the basis for ministerial reassignments. The policy change will become effective on March 1, 2009.

Recommendation IV(B)(2)(e)(2) (page 21)

“KPMG continues to recommend that the investigative protocols be updated to require a determination as to whether other individuals had knowledge of, or should have been aware of, the alleged abuse or policy violation, but failed to report such abuse or violations in accordance with the Code and Policy.”

Diocese of Manchester Response: See Action Plan IV, item 9.

Recommendation IV(B)(2)(e)(3) (page 21)

“KPMG recommends that the Diocese establish controls to prevent multiple entries for a single individual in the SE Database.”

Diocese of Manchester Response: In November of 2008, KPMG brought to the attention of the Office for Ministerial Conduct a concern that duplicate names could be entered into the Database. In December 2008, the Diocesan Database Manager created two reports which can be run internally. The reports are able to capture duplicate and similar names in the database. These names can be compared and data can be reviewed, investigated, and corrected, as necessary. The Safe Environment Report and Reconciliation Log was revised to reflect that these reports will be run and reviewed on a quarterly basis beginning in January 2009. See also Action Plan IV, item 10.

Recommendation IV(B)(2)(e)(4) (page 21)

“The purpose of the restriction note should be to alert all other entities to an individual in the event that they attempt to work or volunteer with minors pending the outcome of an investigation or after an individual is deemed ineligible to work with minors. As such, a protocol should be in place for the appropriate and systematic application of this tool.

The Diocese should develop a written protocol to ensure that: 1) all accused individuals and individuals removed from ministry are included in the SE Database; and that 2) all accused individuals and individuals removed from ministry have a restriction note applied to their SE Database entry *immediately* upon initiation of an investigation into alleged misconduct or upon the determination that an individual should be removed from ministry due to misconduct or receipt of a problematic criminal records check.”

Diocese of Manchester Response: See Action Plan IV, item 11.

Recommendation IV(B)(2)(e)(5) (page 21)

The Diocese should finalize a written protocol to ensure the SE Database is regularly searched for duplicate entries of individuals as new people are entered. Such a protocol should further include an exercise whereby it searches the SE Database for all individuals who have been removed or restricted from ministry to ensure that 1) their entries are appropriately noted; and 2) that any duplicate entries are identified, flagged, and eventually deleted from the database.

Diocese of Manchester Response: See responses to Recommendations IV(B)(2)(e)(3) (page 21) and IV(B)(2)(e)(4) (page 21) (above). See also Action Plan IV, item 12.

Programs to Prevent the Sexual Abuse of a Minor

Recommendation IV(C)(1)(e)(1) (page 34)

“The SE Database has evolved to become a powerful tool but still requires enhancement of some important controls. For instance, the Diocese should institute controls surrounding the restriction of individuals to ensure that multiple database entries are flagged and that any reasonable name variation entered by an SE Coordinator will trigger the appropriate restriction message, requiring proactive clearance from the OMC.

Also, the ability to change an individual’s status to pending or active should be restricted to OMC personnel. This will prevent an individual SE Coordinator from inappropriately altering the status of an employee or volunteer to manipulate the individual’s “pending date” and, ultimately, the state of that individual’s compliance. Before instituting such a control, the Diocese should consider running a report to assess whether or not it appears any entities had previously been taking advantage of this lax control.”

Diocese of Manchester Response: See response to Recommendation IV (B)(2)(e)(3) (page 21) (above). See also Action Plan IV, items 12 and 13 (a).

Recommendation IV(C)(1)(e)(2) (page 35)

“The Diocese should define parameters in the SE Database to track both the date an individual is added to the SE Database (i.e., add date) *and* the date an individual actually begins working with

minors (i.e., start date) in order to accurately measure compliance. Further, it should track the initial dates of compliance with all SE requirements, as well as any subsequent updates, as appropriate (e.g., updated NSOPR checks) in order to measure the ongoing effectiveness of the Program.”

Diocese of Manchester Response: The Safe Environment Database includes a tracking mechanism that automatically identifies the names of any person who is overdue in meeting the requirements. See also Action Plan IV, items 13 (b) and 13 (c).

Recommendation IV(C)(1)(e)(3) (page 35)

“The Diocese should continue its effort to regularly and thoroughly reconcile the SE Database against the personnel files of each Diocesan entity, taking special care to ensure that all those currently working with minors are included in the database, are listed with the appropriate designation, and have completed all Program requirements. Further, the Diocese should continue to regularly test the validity of data in the database and should develop procedures and a schedule for doing so in a timely manner. This includes reconciling multiple fields intended to capture similar information to ensure that the information in the secondary fields are accurately reflected in the master field.

The Diocese should also ensure that, in scrubbing its database, it is doing so in a way that all control modifications are applied on both an ongoing and a retroactive basis. Individuals with missing requirements should not continue to be classified as active because they were input into the database before controls took effect.

Finally, the Diocese should continuously evaluate whether third-party services upon which it relies, such as SE Database software developer, are providing those services effectively and accurately. The database is designed to be a primary tool in monitoring compliance, so it is imperative that its underlying data be accurate and thus reliable. As such, each of these measures is critical in ensuring the effectiveness of this valuable tool.”

Diocese of Manchester Response: The files and personnel lists of Diocesan entities continue to be reconciled against the Safe Environment Database during site reviews, which have been ongoing since 2006. The Office for Ministerial Conduct follows an internal report and reconciliation schedule designed to identify any data inaccuracies and correct them in a timely manner. In addition, in November of 2008, the Diocese entered into a contract with a local accounting firm. The firm began conducting database validity testing for the Office for Ministerial Conduct in November 2008 and will continue to do so on a regular basis. The Office for Ministerial Conduct will continuously evaluate whether the third-party Safe Environment Database developer is providing services effectively and accurately.

Recommendation IV(C)(1)(e)(4) (page 35)

“The Diocese should continue giving consideration for the enhancement of the camp screening and training procedures. Similarly, the system for conducting site visits to the camps should be enhanced to include, for instance, a review on the first day of the preseason special needs camp

to verify that those employees and volunteers are in compliance with the screening and training *before* the special needs session takes place.

Further, the Diocese should consider enhancing the Screening and Training Protocol for all camp season employees and volunteers to require completion of at least a criminal records check and an NSOPR check *before* the first day they begin to work with minors. This measure would seek to mitigate the risk that an individual unfit to work with minors is actually doing so and would take into account the two to three week period required to complete a criminal record check. The Diocese and Camp Directors can achieve this goal by encouraging applicants to download CRR forms from the camp Web site and submitting them in the weeks prior to the start of the camp season.”

Diocese of Manchester Response: A paid staff member who is an experienced safe environment coordinator has been hired to serve as Safe Environment Coordinator for the diocesan camps, including special needs week, which will enhance the camp screening and training procedures. See also Action Plan IV, item 13 (d).

Recommendation IV(C)(1)(e)(5) (page 35)

“The Delegate and Compliance Coordinator should continue their work with leaders of organizations, such as the Daniel Webster Council, the CYO Office and Religious Education, to solicit their committed cooperation in the process of ensuring that all active volunteers and employees are in the SE Database and have completed all Program requirements. The cooperation of these entities is crucial in ensuring the continued success of the Program and compliance with its requirements.

KPMG recommends that the Compliance Coordinator continue to work with the Diocese to formally implement her suggestions that each ministry head (i.e., leaders of the CYO, scout, and religious education programs) be required to submit a full listing of current volunteers and employees who regularly work with minors to the SE Coordinator annually and be required to regularly report any status changes and the names of new personnel to the SE Coordinators on an ongoing basis.”

Diocese of Manchester Response: See Action Plan IV, item 14.

Recommendation IV(C)(1)(e)(6) (page 36)

“If an inactive individual returns to volunteering or is rehired, the Diocese should require that the SE Coordinator review that person’s file and communicate the results to the Diocese *before* the individual’s status is changed back to active in the SE Database by the OMC.”

Diocese of Manchester Response: See Action Plan IV, item 15.

Recommendation IV(C)(1)(e)(7) (page 36)

“The Compliance Coordinator should consider taking certain measures to enhance the site visit review process. For instance, to ensure an adequate and appropriate level of testing at each site, the sample size should be proportionate to the entity’s employee and volunteer population, and be adopted in accordance with the particular risks of that entity. In other words, higher-risk entities should require a larger test population. Also, the Diocese should eliminate any maximum number of files reviewed from its protocol that would limit the scope of review and the potential for identifying compliance issues, such as the current maximum of 25 files.

In addition to these enhancements, the Compliance Coordinator should expand upon the existing site visit protocol of performing additional testing when an exception rate of greater than 10 percent is found. Rather than being limited to additional testing for only the one element with high exception rates, the reviewer should conduct additional tests for *all* requirements. High exception rates in one area can be indicative of problems in other areas. Here, too, the number of files tested should be based on the population and the risks of that entity rather than being a set number of five files.”

Diocese of Manchester Response: See Action Plan IV, item 16.

Recommendation IV(C)(1)(e)(8) (page 36)

“Through discussions with KPMG, it is apparent that SE Representatives continued to experience some misunderstanding of key SE timetables, policies and protocols. Also, several SE Coordinators admit to not having read either the Screening and Training Protocol or the Code and Policy. While the Diocese is limited in its authority over part-time volunteer SE Coordinators, these individuals remain central to the effective screening and training of Diocesan personnel. Their commitment to and knowledge of the Screening and Training Protocol and Code and Policy requirements is vital to the overall success of the Program and compliance with its requirements.

As such, the Diocese should consider developing a reliable system of accountability of the Program’s SE Coordinators. An example of such system would be development of a Coordinator-specific acknowledgement form, which would include a statement confirming the Coordinator *has read and understood* the Screening and Training Protocol and the Code and Policy. To further confirm this, the form would have Protocol and/or Code and Policy related questions, the answers to which would confirm that the Coordinator has actually read the documents.”

Diocese of Manchester Response: See Action Plan IV, item 17.

Recommendation IV(C)(1)(e)(9) (page 36)

“The Diocese should consider developing a written protocol detailing the Diocese’s responsibilities in response to SE Coordinator turnover and the circumstances in which SE Coordinators may not be available to perform their duties for extended periods due to personal or

professional responsibilities outside the Diocese. As part of this protocol, the Diocese should consider including a provision holding SE Coordinators responsible for notifying the Diocese of any planned absence exceeding, for example, 30 days, which would allow the Compliance Coordinator to coordinate supplemental coverage in a timely manner. This protocol would support the Diocese in its responsibility to ensure that each Diocesan entity has an SE Coordinator assigned to it and that if a gap in coverage occurs it can be promptly addressed."

Diocese of Manchester Response: See Action Plan IV, item 13 (e).

Recommendation IV(C)(1)(e)(10) (page 36)

"While KPMG commends the Diocese for requiring National Criminal Records checks (or CORI checks for MA residents) for individuals with out-of-state residences, the current procedure should be improved so that it does not rely on individuals to self-report their past states of residence. One of the traits of child predators is their proclivity to deceive. By intentionally omitting any past states in which offenses could have occurred, the sex offender could avoid further screening. The Diocese should eliminate the risk of self-reporting by running national criminal record checks on all potential employees and volunteers."

Diocese of Manchester Response: See Action Plan IV, item 13 (f).

Recommendation IV(C)(1)(e)(11) (page 37)

"The Diocese should continue running exception reports and following up with SE Coordinators to ensure that all individuals working with minors have been properly screened and are in compliance with the Diocese Program mandates. The protocol for CRR exception reports should specify that personnel who are identified as having exceeded their requirement deadlines should be removed from their positions working with minors *immediately*."

Diocese of Manchester Response: The Safe Environment Assistant runs exception reports on a monthly basis according to an established Report and Reconciliation Log. She and the Compliance Officer routinely follow up with parishes and schools to address any identified issues. In addition, as of January 10, 2009, automatic notifications are sent to Safe Environment Coordinators listing the names of any individuals noted as overdue and informing the coordinators that the individuals are not eligible to work with minors until the requirements are completed. The Office for Ministerial Conduct will continue these efforts. See Also Action Plan IV, item 18.

Recommendation IV(C)(1)(e)(12) (page 37)

“Unless the Diocese begins conducting national criminal record checks for all personnel (per the recommendation above), the Diocesan Employment Applications should be amended to specifically request the states the individual resided in for the past five years. Work history is not an adequate determination of residence. Many people work in one state and live in a bordering state. Also, employees may not list all past employment if such listings are too numerous or potentially irrelevant to the job being applied for.

Further, the Diocese should consider maintaining applications at the OMC or formalizing a procedure for identifying employees and volunteers with out-of-state residence histories. If the OMC is unaware of an individual’s residential history, appropriate record checks, per the Screening and Training Protocol, will not be run and the Diocese will be at risk of allowing a potentially ineligible individual to work with minors.

Finally, the Diocese should consider augmenting both its employee and its volunteer applications so that they plainly require the individual’s date of birth, which is often required as an identifier to determine when potential CRR and NSOPR hits actually relate to the individual at hand.”

Diocese of Manchester Response: The Diocese of Manchester Screening & Training Protocol clearly states the procedure that each entity is to follow regarding obtaining an out-of-state criminal records check for any employee or volunteer who has resided out-of-state during 5 years preceding his/her application. The Volunteer Application requires that applicants include a date of birth, but the Employment Application does not because state law prohibits employers from including dates of birth on employment applications. All employees and volunteers provide a date of birth when they complete the NH Criminal Records Release Authorization Form. See Action Plan IV, item 19.

Recommendation IV(C)(1)(e)(13) (page 37)

“The Diocese should document the process of conducting reference checks to verify their completion. In addition, if portions of the application form refer to other documents, those documents, or copies of those documents should be maintained with the application in order to ensure completeness.”

Diocese of Manchester Response: Employees are required to provide 3 references and parishes/schools have been instructed to document the reference checks. See Action Plan IV, item 20.

Recommendation IV(C)(1)(e)(14) (page 37)

“NSOPR checks should include all states in order to properly mitigate the risk of failing to detect and identify child-sex offenders. The Diocese should amend its instructions to reflect the need to check *all* states for National Sex Offenders. Currently, the Diocese seems to be operating under the assumption that it is unlikely for a sex offender to move to NH from a state outside of New England. However, we currently live in a highly mobile society and this type of assumption is

unfounded and can leave children at risk. The Diocese should also augment its policy to reflect appropriate follow up procedures when temps identify an issue requiring additional due diligence (e.g., what procedures should the OMC follow if a state inside New England is currently unavailable at the time of the NSOPR check?).”

Diocese of Manchester Response: The Office for Ministerial Conduct has established clear, written procedures for conducting National Sex Offender Registry Checks. Sex offender registry checks are completed at the parish/school level and repeated at the diocesan level regularly. In addition, every active employee and volunteer is rechecked on the sex offender registry every 3 years. More than 7,000 national sex offender registry checks are completed by the Office for Ministerial Conduct annually. See Action Plan IV, item 13 (g).

Recommendation IV(C)(1)(e)(15) (page 37)

“The Diocese should continue to run exception reports and follow up with SE Coordinators to ensure that all individuals working with minors have been properly screened. The protocol for NSOPR exception reports should specify that personnel who are identified as have exceeded their requirement deadlines should be removed from their positions working with minors *immediately*.”

Diocese of Manchester Response: See response to Recommendation IV(c)(1)(e)(11) (page 37) above.

Recommendation IV(C)(1)(e)(16) (page 37)

“The Diocese should inquire if any independent contractors at parishes regularly work with minors and verify that the contracts contain the appropriate language if applicable. According to the Site Visit Protocol, testing for his only occurs at schools and camps. Independent contractors that regularly work with minors at parishes should be tracked by the Diocese, along with those that work at schools and camps.”

Diocese of Manchester Response: See Action Plan IV, item 21.

Recommendation IV(C)(1)(e)(17) (page 38)

“As part of the site visits conducted each year, the Compliance Coordinator should consider requesting the documentation demonstrating the independent contractor has complied with the screening and training requirements. This could be done for a sample of Diocesan sites that have independent contractors that regularly work with minors to verify that the appropriate background checks are being conducted by the contractors.”

Diocese of Manchester Response: See Action Plan IV, item 22.

Training Personnel, Communications, and Acknowledgements

Recommendation IV(C)(2)(e)(1) (page 42)

“The Diocese should continue evaluating alternative substitutes for its current *PGC* training program and should ultimately implement a program to address several limitations that both the Diocese and KPMG have recognized. Key to implementing a new program should be the requirement that all Diocesan personnel complete the training and that a sustainable method be in place to track completion, specifically within the SE Database. In selecting its new training program, the Diocese should consider its plan for training recertification once every three years.

In considering a new PGC training program, the Diocese should weigh various accessibility options, such as offering the training both in-person and online. Online or video-based training could serve as an alternative for individuals who are unable to attend a PGC training session within a reasonable distance from their home and within the time frames set out by the Screening and Training Protocol.

Finally, the Diocese should strongly consider choosing a program that includes a method for measuring training effectiveness, such as a Web-based quiz, to verify each individual’s comprehension of the program’s concepts, especially if training is presented online or in a video. Such an expectation will facilitate the effectiveness of the training and will introduce an important element of accountability.”

Diocese of Manchester Response: The Diocese of Manchester has contracted with an expert in the field of child abuse prevention training to develop a new training program that will replace the current *Protecting God’s Children* training in 2010. The new training will be offered both in-person and online and will include a web-based quiz. Completion of training is currently tracked in the Safe Environment Database and will continue to be tracked in this manner. Recertification is ongoing using the *Renewing Our Promise* refresher Training bulletin.

Recommendation IV(C)(2)(e)(2) (page 42)

“Throughout the life of the SE Program, the Diocese should continually assess its communication protocols and consider areas for improvement. For instance, formulating the protocol to have appropriate flows of information and timetables will foster greater accountability and allow the Diocese to keep its communication current and levels of awareness high. An annual communications plan would document specifically how, when, and what communication will occur throughout the year. A written protocol will allow for future sustainability when the time comes for leadership roles to change.

As an enhancement to existing Diocesan communications, the Compliance Coordinator should consider supplementing the eNews bulletin with regular mass distribution of an SE-specific e-mail communication directed to Pastors, Principals, Directors, and SE Coordinators. This would help address the issue concerning those that may not be thoroughly reviewing the eNews bulletin.

Further, as a leading practice, the Diocese should recommend that parishes and schools feature information and materials regarding child safety and the SE Program on their individual Web sites. Access to SE forms online will improve the efficiency of the Program and raise awareness.

Diocese of Manchester Response: As noted in the KPMG Assessment (page 40), communication between the Office for Ministerial Conduct and safe environment representatives at the parishes and schools is “ongoing.” The Office for Ministerial Conduct will continue communicating important safe environment information to parishes, schools, and camps via e-News, email, written communications, site review interviews, and any other method deemed appropriate. See also Action Plan IV, item 13 (h).

Recommendation IV(D)(5)(a) (page 43)

“KPMG continues to recommend that the Bishop accept the Delegate’s recommendation to put in place protocols that would uphold a sustainable framework for the tracking and documentation of clergy activity, including the movement of priests to parishes within the Diocese and the formalization of an investigation timetable.”

Diocese of Manchester Response: See response to Recommendation IV(B)(2)(e)(1) (page 20).

Recommendation IV(D)(5)(b) (page 43)

“The Diocese should consider centralizing its filing system by retaining copies of all Program requirement documentation (i.e., applications, Acknowledgement Forms, PGC, CRR, and NSOPR results) at the OMC to mitigate the risks of missing Program requirements and inaccuracy of data. This practice would also ensure that, for example, the Diocese reviews the applications for individuals who have lived out-of-state and that the appropriate criminal background checks are done. Moreover, this will strengthen the Diocese’s practice of reconciling files to the SE Database, reducing the potential for inaccuracies, and will facilitate the process of regular testing.”

Diocese of Manchester Response: See Action Plan IV, item 23.

Recommendation IV(D)(5)(c) (page 44)

“As noted above, the Diocese should continue to thoroughly monitor development and integrity of its SE Database and the information contained therein for limitations and areas for improvement. Success and sustainability of the Program and its tools relies considerably the Diocese’s commitment to consistently evaluate its Programs, policies, and performance in order to keep up with evolving Program needs and technical advances.

Diocese of Manchester Response: As noted above, in November of 2008, the Diocese entered into a contract with a local accounting firm. The firm began conducting database validity testing for the Office for Ministerial Conduct in November 2008 and will continue to do so on a regular basis. Safe environment protocols and procedures are reviewed and updated on an annual basis.

Recommendation IV(E)(5)(a) (page 45)

“KPMG continues to recommend that the Diocese develop its own comprehensive plan to have a continuing independent annual audit of the Program, to be led by a subcommittee of the DRB that is wholly independent from the Program’s operation or execution.”

1. **Diocese of Manchester Response:** As mentioned in Bishop John B. McCormack’s January 26, 2009, letter to Attorney General Kelly Ayotte, the Bishop has accepted the auditors’ recommendation that the Diocesan Review Board review its current plan for ongoing oversight and audit of the diocesan safe environment program. Bishop McCormack has instructed the Compliance Officer to work with the Diocesan Review Board to develop a plan for his review and approval on or before June 30, 2009. See Action Plan IV, item 24.

Recommendation IV(E)(5)(b) (page 45)

“KPMG continues to recommend that the DRB conduct (or require its independent auditors to conduct) more extensive assessments of its systems, not predicated by advanced notice, to help ensure that it is in full compliance with its Code and Policy, its own Action Plans, and the previously mentioned leading industry standards. The current test procedures in the “Compliance Audit Instrument 2007 v 1.0,” requiring quarterly review of Attorney General reconciliations and reviews of any priest transfers, do not seem to adequately assess the OMC’s overall compliance with its policy.”

Diocese of Manchester Response: See response to Recommendation IV(E)(5)(a)(page 45) above.

Recommendation IV(E)(5)(c) (page 45)

“The DRB should be provided with ample time to conduct an audit, and timetables should be developed to ensure that audits are completed and results are provided in a timely fashion. Additionally, if the DRB elects to use its own members, rather than external consultants, to perform its audits, it should ensure that those members have the competence, skills, and experience that would be helpful in conducting such a review.”

Diocese of Manchester Response: See response to Recommendation IV(E)(5)(a)(page 45) above.