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Society of Mary  
U.S Province

Praesidium Accreditation  
Final Report  
June 30<sup>th</sup>, 2015

Audit Period: August 29<sup>th</sup>, 2011 – February 3<sup>rd</sup>, 2015

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## Glossary of Terms

**Allegation.** A first-person accusation of sexual abuse of a minor brought against a current Member, former Member, or deceased Member which is reported to the Institute through any form of communication, including any that are anonymous.

**Candidate.** An individual who is applying for membership in an Institute.

**Child Pornography.** Any activity which involves a graphic depiction of a minor that is sexually explicit.<sup>1</sup>

**Confidential.** Private information which shall be kept restricted from others and only be disclosed to an authorized person for legitimate reasons of the Institute or because the disclosure is legally required.

**Confidential Documents.** Documents which are given confidential status as defined by the Institute in its policies and procedures and as required by canon and civil law and whose confidential status has been communicated to the Members of the Institute.

**Established Allegation.** Based upon the facts and the circumstances, there is objective certainty that the accusation is true and that an incident of sexual abuse of a minor has occurred.

[This is a definition which keeps it in line with the concept of moral certainty required by canon law. The judgment of the major superior must be objective, i.e. based upon facts and circumstances discovered in the course of the investigation. It is not based upon a percentage of the evidence, i.e. *most likely true* or *most likely occurred*, which implies 50 + 1% of the evidence. It allows for the canonical principle in moral certitude which states that the judgment of the major superior admits that the contrary (the falsity of the accusation) is indeed possible but highly unlikely or improbable, to the extent that the major superior has no fear that the contrary (the falsity of the accusation) may be true.]

**High-Risk Member.** A Member who has sexually abused a minor in the past and is likely to sexually abuse a minor again if left untreated and/or unsupervised.

**Institute.** The individual religious province, association, monastery, abbey, congregation, society or order that is seeking Accreditation.

**Major Superior.** The responsible leader according to the proper law of the Institute that is seeking accreditation.

**Member.** A person for whom an Institute is responsible according to canon law and the proper law of the Institute.

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<sup>1</sup>From a presentation given at the USCCB Promise to Protect seminar on September 13, 2007 by Kenneth V. Lansing, which was adapted from his work, *Cyber "Pedophiles": A Behavioral Perspective*, Chapter 4 of *Prosecuting Internet Child Exploitation Cases* (James S. Peters ed., US Department of Justice, USA Book): "The legal definition of the term "child pornography" varies from state to state and under Federal law. Under most legal definitions, child pornography involves a visual depiction of a child that is sexually explicit. The Federal child pornography law defines a child (minor) as someone who has not yet reached his or her 18<sup>th</sup> birthday."

## Glossary of Terms (cont.)

### Ministry:

**Ecclesiastical Ministry.** Any ministry that is under the authority of a diocesan bishop.

**Public Ministry.** Any ministry that is under the authority of a diocesan bishop and/or under the sponsorship of a religious institute, and/or with the permission of the major superior.

**Minor.** Anyone under the age of 18.<sup>2</sup>

**Report.** A third-party accusation of sexual abuse of a minor brought against a current Member, former Member, or deceased Member which is conveyed to the Institute through any form of communication, including any that are anonymous.

**Review Board.** An advisory group of individuals not employed by the Institute with unique knowledge, expertise and experience, who provide counsel and recommendations to the Major Superior in situations involving the sexual abuse of a minor.

**Risk Assessment.** The prediction of the degree of possibility of re-offense for someone with a known history of sex offenses.<sup>3</sup>

**Safety Plan.** A formal, written supervision program for an individual who, it has been established, has sexually abused a minor.

**Sexual Abuse of a Minor.** Contact or interaction between a minor and an adult when the minor is being used for sexual stimulation of the adult. This occurs when an adult engages a minor in any sexual activity, including direct sexual contact as well as sexual non-contact, such as frottage, exhibitionism, and the distribution, downloading, and/or intentional viewing of child pornography.

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<sup>2</sup> This definition of a minor reflects the stipulation of the USCCB *Charter for the Protection of Children and Young People* (revised June 2011), which states that “for purposes of this *Charter*, the offense of sexual abuse of a minor will be understood in accord with the provisions of *Sacramentorum sanctitatis tutela* (SST), article 6, which reads:


§1. The more grave delicts against morals which are reserved to the Congregation for the Doctrine of the Faith are:  
1<sup>o</sup> the delict against the sixth commandment of the Decalogue committed by a cleric with a minor below the age of eighteen years; in this case, a person who habitually lacks the use of reason is to be considered equivalent to a minor.”



<sup>3</sup> According to Association for the Treatment of Sexual Abusers (ATSA), risk assessment is “concerned with predicting the degree of possibility of a sexual re-offense for someone with a known history of sex offending . . . the task of risk assessment is to strike a scientific and ethical balance among the identification of offenders, while optimizing public safety.”


## Symbols Used in the Report


- A green symbol indicates full compliance with the Accreditation Standard.
- A yellow symbol indicates partial compliance with the Accreditation Standard.
- A red symbol indicates serious deficiencies in compliance with the Accreditation Standard.
- 🚩 A red flag indicates an area in which the Institute is not in full compliance with the Accreditation Standard.
- ⚙️ A blue sun indicates recommendations for bringing the Institute into full compliance with the Accreditation Standard.

## STANDARDS FOR PREVENTION



STANDARD		STATUS
1.	<b>The Institute will screen new candidates for membership in the Institute.</b>	
<b>Requirement 1</b>	Candidates will be specifically screened for a history of sexually abusing minors or violating the boundaries of minors.	
<b>Requirement 2</b>	<p>Each candidate has the following documentation:</p> <ul style="list-style-type: none"> <li>a. <b>A completed criminal background check including every state/county that the Candidate has resided in for the last ten years and a completed national sex offender registry check.</b></li> <li>b. <b>A minimum of three documented personal references (including at least one from a family member) and two professional references, for a total of five references.</b></li> <li>c. <b>Face-to-face interviews with more than one representative of the Institute.</b></li> <li>d. <b>A psychological evaluation conducted by a licensed psychologist and a psycho-sexual history conducted by either a licensed psychologist or a licensed mental health professional with skills in conducting psycho-sexual histories and in assessing psycho-sexual health in preparation for a life of celibate chastity.</b></li> </ul>	
<b>Requirement 3</b>	Candidates with an established allegation of sexually abusing a minor in his past or who have acquired/intentionally viewed child pornography have not been permitted to continue to Membership in the Institute.	
<b>Requirement 4</b>	The Vocation Director and the Formation Director are able, by education, training or experience, to identify behaviors in candidates who may be at higher risk to sexually abuse a minor.	

STANDARD		STATUS
2.	<b>At each stage in the initial formation of Members, the Institute will assist in their ongoing growth toward a healthy sexuality as a foundation for celibate chastity.</b>	
<b>Requirement 1</b>	Members in formation are educated about how to develop a mature, integrated sexuality as a foundation for celibate chastity.	
<b>Requirement 2</b>	Members in formation are encouraged to identify and address challenges to maintaining celibacy and healthy intimate relationships.	
<b>Requirement 3</b>	Praesidium Specialists did not identify any situation in which a Member in formation who sexually abused a minor was permitted to continue.	
<b>Requirement 4</b>	Praesidium Specialists did not identify any situation in which a Member in formation was unable to maintain appropriate boundaries with minors, despite clear guidelines and instruction, and was permitted to continue.	
3.	<b>The Institute will identify and utilize systems of support and accountability for its Members.</b>	
<b>Requirement 1</b>	The Major Superior is able to describe the Institute's systems of support and accountability for Members.	
<b>Requirement 2</b>	The Major Superior is able to demonstrate on-going adherence to the Institute's systems of support and accountability for Members.	
<b>Requirement 3</b>	The Major Superior or his delegate meets at least annually with each Member.	
<b>Requirement 4</b>	The Major Superior maintains a record of the occurrence of the annual meeting with each Member who is in public ministry.	
<b>Requirement 5</b>	For Members who are employed in any organization or in public ministry, the Institute has communicated at least annually with the organization in which the Member is employed or in public ministry. This communication is documented in some form, identifies the Major Superior, and includes information on how to contact the Major Superior.	
<b>Requirement 6</b>	Members who are living outside of the typical systems of support and accountability for the Institute have either been given an individualized system of support and accountability or re-engaged in the typical systems of support and accountability for the Institute.	
<b>Requirement 7</b>	The Major Superior has initiated canonical procedures for Members who are unwilling to re-engage in the typical systems of support and accountability of the Institute.	



STANDARD		STATUS
4.	<b>The Institute will establish and publish clear policies for boundaries with minors.</b>	
<b>Requirement 1</b>	The Institute's policies for boundaries with minors identify those interactions which the Institute prohibits for Members under all circumstances, including interactions via electronic communications and social media.	
<b>Requirement 2</b>	The Institute's policies for boundaries with minors identify positive forms of affection and demonstration of pastoral care that would be appropriate for Members under most circumstances.	
<b>Requirement 3</b>	The Institute's policies for boundaries with minors clarify what constitutes appropriate social interaction with minors, including those who are part of the Member's family.	
<b>Requirement 4</b>	Each Member and Candidate has signed the policies for boundaries with minors, which indicates that he has read and understood the policies of the Institute.	



STANDARD		STATUS
5.	<b>The Institute will educate its Members regarding the prevalence, identification, and prevention of sexual abuse of minors, giving special attention to topics that are of unique relevance to religious.</b>	
<b>Requirement 1</b>	All Members who serve in public ministry, even those who only occasionally serve in public ministry, have participated in a minimum of total number of hours of education that is equal to the number of years in the Institute's accreditation period.	
<b>Requirement 2</b>	<ul style="list-style-type: none"> <li>a. All Members who serve in public ministry, even those who only occasionally serve in public ministry have been provided with information about both preferential and situational type sexual offenders.</li> <li>b. All Members who serve in public ministry, even those who only occasionally serve in public ministry have been provided with information regarding self-protection from false allegations of sexual abuse of a minor, including what to do if one is concerned about being falsely accused.</li> <li>c. All Members who serve in public ministry, even those who only occasionally serve in public ministry have been provided with information about child pornography, including its nature as a criminal offense and as an offense considered under the United States Conference of Catholic Bishops document, the Charter for the Protection of Children and Young People.</li> <li>d. All Members who serve in public ministry, even those who only occasionally serve in public ministry have been provided with information regarding abuse with vulnerable adults, including its nature as an offense considered under the United States Conference of Catholic Bishops document, Charter for the Protection of Children and Young People.</li> <li>e. All Members who serve in public ministry, even those who only occasionally serve in public ministry have been provided with information on how to make a report to the civil authorities of known or suspected sexual abuse of a victim who is currently a minor in the jurisdictions where the Member is assigned.</li> </ul>	
<b>Requirement 3</b>	The Institute has provided on-going training programs which include a variety of topics that support the prevention of the sexual abuse of minors more broadly.	
<b>Requirement 4</b>	The Institute has an educational plan for Members who are returning from ministry outside of the U.S. as well as for international Members who are coming for ministry within the U.S. and who are under the authority of the local Institute.	




STANDARD		STATUS
6.	<b>The Institute will interrupt and intervene when a Member violates the Institute’s policies regarding boundaries with minors.</b>	
<b>Requirement 1</b>	The Institute has stated in writing the process by which a Member should respond when another Member allegedly violates policies regarding boundaries with minors.	
<b>Requirement 2</b>	The Institute has stated in writing who is responsible for responding to concerns about policy violations regarding boundaries with minors.	
<b>Requirement 3</b>	All Members have been provided with the process by which a Member should respond when another Member exhibits warning signs, and information about who is responsible for addressing concerns.	
<b>Requirement 4</b>	Praesidium was able to verify that the person responsible for addressing concerns has documented the inappropriate behavior and steps taken for intervention. This documentation is maintained in a manner that is helpful for future Major Superiors and those who will have official responsibility for the Member.	
<b>Requirement 5</b>	Praesidium was able to verify that when a Member had repeated boundary violations with a minor or a minor was known to be in danger, that situation was presented to a review board, an intervention plan was developed which outlines how the boundary violations with minors were interrupted, and the Institute verified that the intervention plan had been implemented.	
<b>Requirement 6</b>	The Institute shall immediately intervene in situations where there is potential risk of harm to an identifiable minor.	
7.	<b>The Institute will offer to provide support and assistance to any Member who discloses to leadership concerns about his own attraction to minors or about potential boundary violations with minors.</b>	
<b>Requirement 1</b>	Praesidium Specialists did not identify any situation in which a Member who discloses concerns was not offered responsible assistance by the Institute.	



## STANDARDS FOR RESPONDING



STANDARD		STATUS
<b>8.</b>	<b>Representatives of the Institute will respond pastorally and compassionately to any person who alleges sexual abuse of a minor by a Member of the Institute.</b>	
<b>Requirement 1</b>	The Institute has identified Brother Joe Kamis as the representative who will respond to those who allege sexual abuse of a minor by a Member of the Institute.	
<b>Requirement 2</b>	The Institute documents its responses to those who have reported since June 2002 the sexual abuse of a minor, or since the date of the Institute’s last Accreditation visit.	
<b>Requirement 3</b>	The Institute has responded pastorally and compassionately to individuals who have alleged sexual abuse of a minor by a Member of the Institute.	
<b>Requirement 4</b>	Representatives of the Institute have provided a guide and explained the procedure that the Institute typically follows in responding to an allegation to individuals who have alleged sexual abuse of a minor.	
<b>9.</b>	<b>Representatives of the Institute who are responsible for assisting individuals who have alleged sexual abuse of a minor will be educated regarding the nature of their role.</b>	
<b>Requirement 1</b>	<ul style="list-style-type: none"> <li>a. <b>The Representative of the Institute has had training and/or experience in the dynamics of sexual abuse.</b></li> <li>b. <b>The Representative of the Institute has had training and/or experience in the effects of sexual abuse.</b></li> <li>c. <b>The Representative of the Institute has had training and/or experience in how to provide comfort to victims of sexual abuse.</b></li> <li>d. <b>The Representative of the Institute has had training and/or experience in how to encourage trust in victims who reported being sexually abused as a minor.</b></li> <li>e. <b>The Representative of the Institute has had training and/or experience in how to promote a victim’s healing.</b></li> </ul>	
<b>Requirement 2</b>	The Institute has provided written guidelines for individuals responsible for assisting those who have alleged sexual abuse as a minor.	


STANDARD		STATUS
<b>10.</b>	<b>Representatives of the Institute will make a significant effort to promote the healing process for individuals who allege being sexually abused as a minor.</b>	
<b>Requirement 1</b>	Representatives of the Institute have offered to meet personally with any individual who alleges being sexual abuse as a minor by a Member of the Institute.	
<b>Requirement 2</b>	Representatives of the Institute have made every attempt to assist in the healing process with any individual who alleges having been sexually abused as a minor by a Member.	
<b>11.</b>	<b>The Institute will adhere to written protocols for responding to reports and allegations of sexual abuse of a minor.</b>	
<b>Requirement 1</b>	<ul style="list-style-type: none"> <li>a. The Institute has written protocols that provide guidance for responding to individuals who report sexual abuse of a minor.</li> <li>b. The Institute has written protocols that provide guidance for responding to individuals who allege they have been sexually abused as a minor.</li> <li>c. The Institute has written protocols that provide guidance for responding to Members who have been accused.</li> <li>d. The Institute has written protocols that provide guidance for complying with reporting requirements.</li> <li>e. The Institute has written protocols that provide guidance for communicating with the accused.</li> </ul>	

STANDARD	STATUS
	<ul style="list-style-type: none"> <li data-bbox="513 317 1377 380">f. The Institute has written protocols that provide guidance for protecting the rights of all those involved.</li> <li data-bbox="513 394 1382 457">g. The Institute has written protocols that provide guidance for conducting internal investigations.</li> <li data-bbox="513 472 1352 535">h. The Institute has written protocols that provide guidance for working with review boards.</li> <li data-bbox="513 550 1357 640">i. The Institute has written protocols that provide guidance for communicating with the diocesan bishop where the alleged abuse took place and where the Member is residing, as appropriate.</li> <li data-bbox="513 655 1365 779">j. The Institute has written protocols that provide guidance for communicating with the employer of the place where the alleged abuse took place and where the Member is currently employed, as appropriate.</li> <li data-bbox="513 793 1349 884">k. The Institute has written protocols that provide guidance for communicating with the Religious Institute, the faith community, and the public, as appropriate.</li> </ul>


STANDARD		STATUS
<b>Requirement 2</b>	The written protocols include who, by role, is responsible for each part of the response to allegations of sexual abuse of a minor.	
<b>Requirement 3</b>	The Institute has documented adherence to the written protocols for responding to reports and allegations of sexual abuse of a minor.	
<b>12.</b>	<b>The Institute’s policy will state the obligation of each of its Members to report to civil authorities all allegations of known or suspected sexual abuse of a victim who is currently a minor.</b>	
<b>Requirement 1</b>	Members must report to appropriate civil authorities all known or suspected sexual abuse of a victim who is currently a minor, whether alleged to have been perpetrated by a Member or by a non-Member.	
<b>Requirement 2</b>	Members must report to appropriate civil authorities known or suspected possession, distribution, downloading and/or intentional viewing of real or virtual child pornography.	
<b>Requirement 3</b>	Members must be educated in their obligations under the Institute’s policy that they must report to civil authorities all allegations of known or suspected sexual abuse of a minor, regardless of the civil mandatory reporting laws of the jurisdiction.	

STANDARD		STATUS
13.	<b>The Institute will report known or suspected sexual abuse of a minor by a Member when the victim is no longer a minor, as obligated by the civil laws of the state where the sexual abuse of a the minor allegedly occurred.</b>	
<b>Requirement 1</b>	All individuals who have approached the Institute since June of 2002 to report the sexual abuse of a minor have been advised of their right to report to civil authorities and encouraged to make a report.	
14.	<b>The Institute will investigate all reports and allegations of sexual abuse of minors by a Member, to the extent possible based on the information provided.</b>	
<b>Requirement 1</b>	All information that has been provided to the Institute has been investigated to the extent possible, including information that is provided anonymously.	
<b>Requirement 2</b>	The Institute has written procedures in place for investigating reports of sexual abuse of a minor by its Members.	
<b>Requirement 3</b>	For each report or allegation, an investigation has been done by a trained individual who produced a written report.	
<b>Requirement 4</b>	All allegations of sexual abuse of a minor reported since June of 2002, or since the last Accreditation site visit, have a documented investigation or documentation of the reason(s) an investigation was not possible or was not necessary.	


STANDARD		STATUS
15.	<b>The Institute will cooperate with civil authorities that are conducting an investigation of an allegation of sexual abuse of a minor.</b>	
<b>Requirement 1</b>	Praesidium did not identify any situations in which the Institute has not cooperated with investigations of its Members by civil authorities.	
<b>Requirement 2</b>	Praesidium did not identify any situations in which the Institute has not consulted with civil authorities when its own internal investigations occur concurrently with a criminal investigation.	
16.	<b>The Institute will document all reports and allegations of sexual abuse of minors by a Member, and its responses to the reports and allegations, including anonymous allegations and reports.</b>	
<b>Requirement 1</b>	Representatives of the Institute document all reports and allegations of sexual abuse of minors by Members, including anonymous reports and allegations which have been made since June of 2002, or since the last Accreditation site visit.	
<b>Requirement 2</b>	Representatives of the Institute document the Institute's response to the reports and allegations of sexual abuse of a minor by Members.	
<b>Requirement 3</b>	Documentation of allegations, reports, and responses concerning the sexual abuse of minors remains accessible to the Major Superior and his successors.	
<b>Requirement 4</b>	The Institute must document that a one-time review of the personnel files of all living current Members for any possible allegations of sexual abuse of a minor has been accomplished.	

STANDARD		STATUS
17.	<b>The Institute will utilize a Review Board for the purpose of providing consultation to the Major Superior on the response to all reports and allegations of sexual abuse of minors.</b>	
<b>Requirement 1</b>	The Review Board meets at least annually and is made up of at least five members, with no more than two Members of the Institute.	
<b>Requirement 2</b>	The Review Board has provided recommendations regarding the response to reports and allegations of sexual abuse of a minor by a Member that have come forward since June of 2002, or since the date of the last Accreditation site visit.	
<b>Requirement 3</b>	<p>When considering an allegation of sexual abuse against a Member, the Review Board has been provided with the original report or allegation of sexual abuse of a minor by a Member that was submitted to the Institute.</p> <p>When considering an allegation of sexual abuse against a Member, the Review Board has been provided with the final report of an investigation.</p> <p>When considering an allegation of sexual abuse against a Member, the Review Board has been provided with all other allegations of sexual misconduct by that Member.</p> <p>When considering an allegation of sexual abuse against a Member, the Review Board has been provided with any relevant disciplinary actions that have been taken in the past in regard to that Member and the reasons for the actions.</p>	
<b>Requirement 4</b>	In cases where the alleged sexual abuse of a minor by a Member could not be investigated or established, the Review Board has provided consultation regarding the disposition of the case.	
<b>Requirement 5</b>	Review Board members are familiar with the following documents: <i>Charter for the Protection of Children and Young People</i> , the Essential Norms for Diocesan/Eparchial Policies Dealing with Allegations of Sexual Abuse of Minors by Priests or Deacons, 2002 CMSM Statement of the Assembly, the Institute's Policies and the CMSM Accreditation Standards.	






STANDARD		STATUS
<b>Requirement 6</b>	The Review Board has policies and standardized operating procedures which address the following: confidentiality, constitution of the board, terms of membership, records retention, how information will be disseminated to Review Board members, agree-upon standards of operation that are considered under its procedures, and possible alternatives for the disposition of cases.	
<b>Requirement 7</b>	The Institute has documented that all allegations and reports of the sexual abuse of minors have been presented to the Review Board.	
<b>18.</b>	<b>In cases where an allegation of sexual abuse of a minor committed by a Member has been established, the Institute will inform the leadership of any organization or ministry in which the Member has admitted to, or is suspected of, having sexually abused a minor, to the extent possible.</b>	
<b>Requirement 1</b>	The Institute has informed the leadership of any organization or ministry in which the Member has admitted to the sexual abuse of a minor or in which the Member has an established allegation of the sexual abuse of a minor.	
<b>Requirement 2</b>	The Institute maintains documentation concerning its communication with the leadership of the organizations and ministries in which the Member has admitted to, or has an established allegation of, the sexual abuse of a minor, including any reasons why this communication was not possible or that the communication was deemed not feasible, if such was the case.	



## STANDARDS FOR SUPERVISION


STANDARD		STATUS
<b>19.</b>	<b>The Institute will maintain a written, individualized Safety Plan to guide the supervision of any Member against whom an allegation of sexual abuse of a minor has been established.</b>	
<b>Requirement 1</b>	<ul style="list-style-type: none"> <li>a. Each Safety Plan includes a summary of the problem behaviors.</li> <li>b. Each Safety Plan includes information about how the Member spends the majority of his time.</li> <li>c. Each Safety Plan includes any applicable sex offender registry requirements, including parole and probation.</li> <li>d. Each Safety Plan includes a summary of the Member’s risk assessment and the risk-reduction strategies, including as appropriate 1) limitations on the Member’s access to minors and how any such access is supervised, 2) issues of personal relationships with friends and family, to ensure that the Member does not have unsupervised access to minors, 3) monitoring of the Member’s use of electronic communications, social media and internet access, and 4) issues of financial accountability.</li> </ul>	

STANDARD		STATUS
	<ul style="list-style-type: none"> <li>e. Each Safety Plan includes the person responsible for the implementation of each risk reduction strategy.</li> <li>f. Each Safety Plan includes consequences for non-compliance with the Safety Plan.</li> <li>g. Each Safety Plan includes dates on which the Safety Plan has been reviewed by the Review Board.</li> </ul>	
<b>Requirement 2</b>	Each safety plan is signed by the Member, the Major Superior, and at least one individual who is directly involved in the supervision of the individual.	
<b>Requirement 3</b>	Each Safety Plan has been implemented by the Institute and the Member understands the consequences for non-compliance with the Safety Plan.	
<b>Requirement 4</b>	Within thirty (30) days of implementation, the accrediting agency must be informed of a new Safety Plan for a Member who is determined to be a “High Risk” offender.	

STANDARD		STATUS
20.	<b>When the sexual abuse of a minor by a Member has been established, the Member will not be permitted to work in any position which allows access to minors, or in any ecclesiastical ministry, in accordance with the Essential Norms for Diocesan/Eparchial Policies Dealing with Allegations of Sexual Abuse of Minors by Priests or Deacons.</b>	
<b>Requirement 1</b>	Appropriate work for any Member who has sexually abused a minor has been determined in consultation with the Review Board, and when appropriate, the local bishop.	
<b>Requirement 2</b>	Appropriate work, and the specific assignment, for a Member who has sexually abused a minor has been documented in the Safety Plan of the Member.	
21.	<b>The Review Board will review each Safety Plan at least annually and offer recommendations to the Major Superior.</b>	
<b>Requirement 1</b>	The Review Board for the Institute reviews each new Safety Plan in a timely manner after the Safety Plan's development.	
<b>Requirement 2</b>	The Review Board reviews each existing Safety Plan at least once each year.	
<b>Requirement 3</b>	The Review Board receives a report of compliance annually which includes the Member's overall response to the Safety Plan and information about any violations of the Safety Plan.	
<b>Requirement 4</b>	The Member, his Local Superior, and the Safety Plan Supervisor are given timely notice of the Review Board meeting and invited to submit information for consideration and requests for modifications of the Safety Plan.	

STANDARD		STATUS
<b>Requirement 5</b>	The Review Board documents its recommendations offered to the Major Superior, either in their annual report or in some other memo/minutes.	
<b>22.</b>	<b>Individuals who supervise Members who have Safety Plans will be physically and emotionally capable and adequately trained to perform the duties involved in supervision.</b>	
<b>Requirement 1</b>	Individuals who supervise Members with Safety Plans have received written guidelines regarding their role and procedures for supervision, including how to respond if the supervised Member violates his Safety Plan.	
<b>Requirement 2</b>	Individuals who supervise have been provided with training regarding their responsibilities.	
<b>Requirement 3</b>	Individuals who supervise do not have physical or emotional disabilities that prohibit their fulfillment of the function of supervision.	

STANDARD		STATUS
23.	<b>Those who supervise Members who have Safety Plans will have access to all pertinent information about the Member that is not otherwise privileged.</b>	
<b>Requirement 1</b>	<p>Individuals who supervise Members who have Safety Plans have access to the relevant history of sexual abuse of a minor.</p> <p>Individuals who supervise Members who have Safety Plans have access to all allegations of sexual misconduct, including those with adults.</p> <p>Individuals who supervise Members who have Safety Plans have access to the history of compliance with Safety Plans.</p> <p>Individuals who supervise Members who have Safety Plans have access to the current progress in treatment, if applicable or information about treatment completion.</p> <p>Individuals who supervise Members who have Safety Plans have access to the history of substance use and/or abuse, if applicable.</p>	
<b>Requirement 2</b>	Individuals who supervise must be provided with written instructions regarding documentation that must be maintained to verify compliance.	
24.	<b>The Major Superior or his delegate will annually evaluate compliance with all Safety Plans.</b>	
<b>Requirement 1</b>	The Major Superior or his delegate evaluates and documents compliance with Safety Plans at least once each year.	
<b>Requirement 2</b>	The Institute has developed protocols for routine documentation of compliance with Safety Plans.	
<b>Requirement 3</b>	When a Member who is currently on a Safety Plan experiences any significant change in behavior, or a new allegation surfaces, his Safety Plan is reviewed as soon as possible by the Major Superior. Any adjustments made to the Safety Plan for managing risk have been communicated to the supervisor and Review Board immediately.	

STANDARD		STATUS
25.	<b>Communities that house “high-risk” Members will be visited by outside auditors on an unannounced basis to ensure consistent implementation of Safety Plan protocols.</b>	
<b>Requirement 1</b>	The Institute has determined the level of risk for each of its Members who have an established allegation of the sexual abuse of a minor and are on a safety plan.	
<b>Requirement 2</b>	The Major Superior reported that in the case of a “high-risk” Member, the Institute would allow outside auditors to have annual unannounced visits to the community where the Member is housed.	