



Analysis of the Written Policies of the 32 U.S. Archdioceses on the Prevention of Child Sexual Abuse

Stephanie J. Dallam^a, Marci A. Hamilton^b, Sabine Glocker^b, and Andrew J. Ortiz^a

^aCHILD USA, Philadelphia, Pennsylvania; ^bCHILD USA

ABSTRACT

The Catholic Church in the U.S. has been under concerted public pressure to improve its child protection policies. However, development of these policies has largely been left to the discretion of local dioceses with little central oversight. To determine the scope of current abuse prevention policies, we analyzed all 32 U.S. archdioceses' policies and practices for developing a safe environment and preventing child sexual abuse. Using a tool developed from a list of unique components selected from the policies of all 32 archdioceses, we compared policies and procedures across archdioceses. On a group level, we found policies to be inadequate. The average score for archdioceses in the general area of prevention was 40.7 (SD = 9.3) out of 102 possible points (40% of possible points) with few prevention policies conforming to basic best practices that would be expected of a youth-serving organization. The variation and inconsistencies across archdioceses reveal the need for the Catholic Church to establish more uniform standards for preventing sexual abuse. These standards should be grounded in evidence-based practices and expert guidance. We also discuss some key areas which warrant immediate attention in future policy-making.

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Revelations of cases in which Catholic priests have sexually abused minors and church authorities have concealed the crimes have drawn intense media attention and public outrage. Clergy-perpetrated child sexual abuse is a betrayal of trust that has caused much damage to victims (McGraw et al., 2019), their families (Wind et al., 2008), and parishioners (Kline et al., 2008). Amid considerable scrutiny, Catholic institutions have been called upon to address underlying organizational conditions that may facilitate abuse and develop effective strategies for prevention. This article is the second of a three-part series examining the written safe environment and child protection policies in each of the 32 U.S. Catholic archdioceses.¹ The current article provides results of a larger study that analyzed all U.S. archdioceses' policies

CONTACT Stephanie J. Dallam  sjscout@gmail.com  Social Science Department, CHILD USA, Philadelphia, Pennsylvania 32345 W. 255th St., Paola, KS 66071

¹We did not include the Archdiocese for the Military in our review as it does not actually have a child protection policy. Instead, the Archdiocese of the Military borrows priests from other archdioceses and requires that they follow the protection policies of the archdiocese in which they normally reside.

for preventing and responding to CSA (Dallam et al., 2020). The purpose of this study was to analyze sexual abuse prevention policies to make recommendations as to how archdioceses can strengthen their policies to better protect children in the future.

Scope of abuse in the Catholic Church

By 1985, according to a study commissioned by the Catholic bishops in the U.S., almost all dioceses in the U.S. had experienced cases of sexual abuse of minors by priests' (John Jay College Research Team, 2011). Allegations of child sexual abuse (CSA) were usually handled internally within a system where the bishops directed the response. In the vast majority of cases the abuse was never reported to the police; instead, reports regarding abuse were often ignored or priests were sent to treatment and then transferred to another parish where they found new victims (John Jay College of Criminal Justice, 2004). In early 2002, the *Boston Globe's* now famous Spotlight investigation revealed that clergy sexual abuse was endemic in the Boston Archdiocese. The investigation found that officials in the Boston Archdiocese had endangered children by disregarding warnings and repeatedly allowing abusive priests access to children (Globe Spotlight Team, 2002). After the *Globe's* reporting, victims of sex abuse began to come forward across the U.S. and CSA by clergy was soon recognized as a national crisis (Burton, 2018).

Scholars at John Jay College of Criminal Justice (2004) analyzed data provided by bishops on clergy abuse. They found that 4,392 priests sexually abused nearly 11,000 minors between 1950 and 2002, which was equivalent to 4% of priests in ministry during that time. Subsequent data, also based on data supplied by the bishops, indicated that 5% of priests in ministry since 1950 have been accused of abusing approximately 15,000 minors (John Jay College Research Team, 2011). In 2012, it was estimated that there are as many as 100,000 total victims of clerical sexual abuse (Allen Jr., 2012).

Research suggests that the Catholic Church's organizational structure and culture allowed for onset and persistence of abuse within the institution (e.g., Keenan, 2011; Terry, 2015). Keenan noted that the Catholic Church as a closed organization that places members at high risk for exploitation, as it encourages practices that exacerbate loneliness and emotional immaturity in clergy and demands absolute obedience to a centralized leadership without accountability or checks and balances. The Church has also prioritized the reputation of the organization over the welfare of the victims and the prosecution of perpetrators. Written documents from the 1980s (when the bishops discussed CSA at their national conference for the first time) reveal that diocesan leaders focused primarily on the well-being of the priests who had abused children, with little discussion about the harm caused to child victims, or the need for significant changes in practices (Terry, 2015).

Policies to prevent sexual abuse of minors

In June 2002, after the Boston Globe's investigation revealing widespread abuse by clerics, the U.S. Conference of Catholic Bishop's (USCCB) met in Dallas and overwhelmingly approved the *Charter for the Protection of Children and Young People: Essential Norms for Diocesan/Eparchial Policies Dealing with Allegations of Sexual Abuse of Minors by Priests or Deacons*. In 2003, Pope John Paul II approved the *Charter and Essential Norms* ("Charter") as law for the U.S. Church. The *Charter* required every diocese to promulgate a written policy on the sexual abuse of minors by clergy. In addition, all dioceses were required to enact the following prevention measures: offer abuse prevention training to anyone who interacts with children; implement a code of conduct prohibiting misconduct and boundary violations; and develop a process for performing background checks on employees, volunteers, seminarians, priests, and deacons. The *Charter* was revised in 2011 and 2018. However, no guidance was provided regarding the specific practices and procedures necessary to support these new measures.

The Catholic Church has 32 territorial archdioceses and 144 territorial dioceses in the U.S. Each diocese is subject to the *Charter* in principle but sets its own child abuse prevention policies. Thus, the development of CSA prevention policies has largely been left to the discretion of local bishops and archbishops with little in the way of central oversight. Since the adoption of the *Charter*, U.S. dioceses have been under concerted public pressure to improve their child protection policies. Catholic dioceses and archdioceses are among the most sued entities in the U.S. for CSA with case numbers continuing to rise due to the success of the CSA statute of limitations reform movement. This movement is responsible for extending and/or reviving child sex abuse statutes of limitation in 96% of the states (Hamilton, 2008, 2021). Civil litigation has become a vehicle for policy change in individual dioceses as lawsuits give victims leverage to insist on changes to church policies (Lytton, 2008). There have also been a number of grand jury investigations and some archdioceses have convened lay commissions to review their handling of clergy abuse cases. These reports have produced findings and recommendations for preventing abuse in the future including better policies and practices (Terry, 2015). In addition, a few archdioceses have submitted to government oversight in lieu of criminal charges also resulting in changes to CSA policies (e.g., Collins & Feshir, 2015).

There is now a hodgepodge of relatively new child protection practices across the U.S. dioceses and archdioceses with some in the Church hierarchy asserting that they have put into place the "gold standard" of policies to protect children (e.g., Bury, 2015; Gunty, 2019). Little is known, however, regarding the actual policies and practices that each diocese and archdiocese have enacted. Consequently, it is important to examine current policies that have been put

in place to prevent CSA and determine how likely they are to be effective. The aim of this article was to provide a content analysis of the policies presently used to address CSA prevention in Catholic archdioceses in the United States.

Methodology

Because there is no current standard by which to judge the content of a Catholic archdiocese's policies and procedures, we began by analyzing all the child protection and safe environment policies of every archdiocese in the U.S. To evaluate content systematically and objectively, each policy from each archdiocese was broken down into single components (i.e., practices, procedures, or directives). We created a list of unique components selected from the policies of all 32 archdioceses. These formed the basis of our Policy Analysis Tool. The development of the tool was an iterative process. It was revised several times during the process as we tested it against the policies of the various archdioceses. We ended up with 171 distinct components. Of these, 102 were focused on preventing CSA.

Coding

Each individual item in the Policy Analysis Tool was given a point value based on how well it reflected the stated goal of the policy and the overall goal of protecting children from abuse. Most items were given a point value of 1; an archdiocese received a point if the item was present in its child protection policies and a zero if it was not. A few items were given higher point values if they represented particularly important practices. For example, the Tool provides one point if only a state background check is done and two points if a national background check is done.

Using the Policy Analysis Tool, the first and third authors went through the policies of each archdiocese at least twice. This analysis was performed between August and December 2020. To assess inter-rater reliability, both the first author and third author coded five of the same archdioceses separately and then compared results. Coding was straightforward based on whether or not each item was present, and our results were usually in substantial agreement ($\kappa = .92$). Differences usually involved one author finding a piece of information that the other had missed and thus were easily resolved. Items found to be unreliable were dropped or revised.

Results

General Results

All 32 archdioceses have written policies on maintaining a safe environment that are publicly retrievable on their websites. While each archdiocese's policies were different, we found four distinct types of policies focused on preventing CSA.

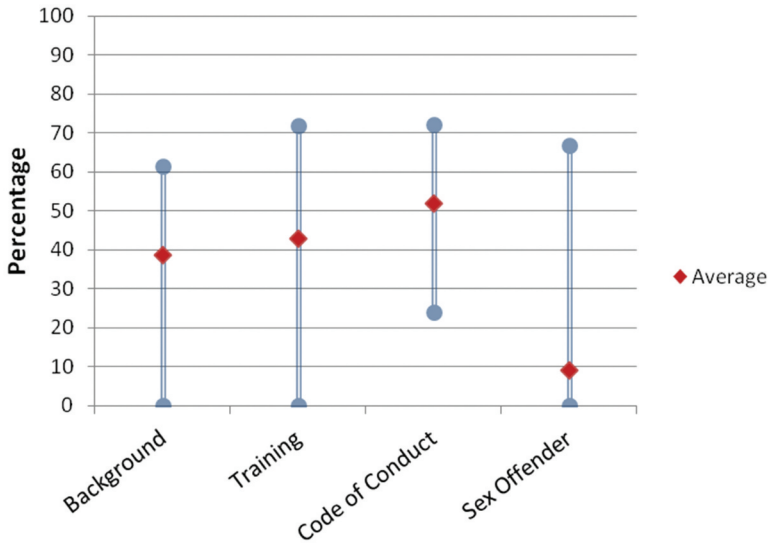


Figure 1. Policies on prevention: average scores of all archdioceses with ranges.

These include: (1) background screening, (2) education and training, (3) code of conduct, and (4) monitoring sex offenders. Many of the practices assessed by the Policy Analysis Tool conform to recommended practices for youth serving organizations (see e.g., The Massachusetts Legislative Task Force on the Prevention of Child Sexual Abuse, 2017; Saul & Audage, 2007). Thus, a higher scoring policy can be viewed as more comprehensive and more likely to achieve the goal of protecting children than policies that scored lower.

The average score for all 32 archdioceses in the area of prevention was 40.7 out of 102 possible points or 40%. The range was 20 to 57 ($SD = 9.3$). The lowest scoring policy was that of the Archdiocese of Dubuque, while the highest scoring policies were those of New York and New Orleans. Figure 1 displays how archdioceses scored in each of the policies making up the Child Abuse Prevention domain. The group average is displayed in relation to the range of scores after being converted to the percentage of the total points possible.

Average scores were low for several reasons. First, not all archdioceses had policies in the four policy areas identified and thus in certain areas may not have received any points. In other instances, archdioceses had policies that were very limited, which also pulled down the average score. In the following sections, we examine the four child prevention policies in more detail.

Background screening policies

Article 13 of the *Charter* requires dioceses to evaluate the background of clergy, candidates for ordination, educators, employees, and volunteers. Article 13 also requires obtaining suitability information about priests or deacons who are

visiting from other dioceses or religious orders (U.S. Conference of Catholic Bishops, 2018). The main goal of background screening is to screen out individuals who have sexually abused youth or are at risk for offending.

The average background screening policy score was 10.1 out of 26 possible points (38.5%; Range = 0–16). The highest scoring policies were those of the archdioceses of Baltimore, Cincinnati, and New York, which each achieved 61.5% of the points possible. The lowest scoring policy was that of Dubuque as it did not include background screening in its publicly available child protection policies. Higher scores represent employing more stringent screening procedures on a wider variety of personnel. Table 1 displays the practices drawn from screening policies across the 32 archdioceses along with the number and percentage of archdioceses that employ each practice.

Most archdioceses do national criminal background screening, though 22% only screen for crimes in the state where the archdiocese is located. Sixty-nine percent of archdioceses have policies that require periodic rescreening of personnel. The average period of time between rescreening in policies that required this was every 3.8 years (mode = 5 years), with a range of 30 days to 10 years. Only 34% of archdiocesan policies require background screening of third-parties with whom they contract for services and only two archdioceses (6%) mention performing international background screening in their policies – Miami and Portland – and their policies are extremely limited. The Archdiocese of Miami (2019) only screens those who have not been in the U.S. for at least a year, while the Archdiocese of Portland (2014) only mentions screening volunteers. There is no mention of screening international clergy or other personnel from other countries.

Table 1. Background screening: practices present in the policies of U.S. Archdioceses.

Background Screening Practices	Number of Archdioceses	Percent
When receiving cleric from another jurisdiction, ask about any past acts of abuse ¹	23	72%
Reference checks	18	56%
Standardized employment or volunteer application	16	50%
Interviews	4	12.5%
Background Checks		
<i>National</i>	25	78%
<i>State only</i>	7	22%
<i>Fingerprints taken</i>	10	31%
<i>Check registered sex offender registry</i>	7	22%
<i>Check Child Protective Service registry</i>	3	9%
Criminal background check repeated at least every 5 years	19	59%
Must pass background check before beginning employment	13	41%
Background checks done on third party contractors who come into contact with minors	11	34%
Background checks done on any adult attending overnight events with minors	5	16%
International background checks on personnel from other countries	2	6%
Those that fail screening placed on “do not hire” list	4	12.5%
Must report any arrests subsequent to background check	3	9%

¹Required by *Charter for the Protection of Children and Young People*

Child abuse prevention training policies

Article 12 of the *Charter* requires safe environment training, but is silent on what the training should include. As a result, the structure and content of training varies across dioceses. The goal of this training is to give people information and skills to help them prevent and respond to CSA. Only one archdiocese (Dubuque) did not have a written policy that mentioned child abuse prevention training. Fourteen (44%) archdioceses specify that they use Virtus training. (According to the Virtus website [Virtus Description, n.d.], Virtus training was developed by the National Catholic Risk Retention Group, Inc. in conjunction with a group of experts working in the field of child abuse.) Most of the remaining archdioceses did not provide details on the type of training they offered. Because of the lack of information available on all the different training programs, scores only represent training practices—not content. Higher scores represent more frequent and comprehensive training of more types of church personnel.

The average score of training policies across the 32 archdiocese was 11 out of 25 possible points (44%, Range = 6–18). The policies of the Anchorage Archdiocese achieved the highest score, attaining 72% of the points possible. The lowest scoring policies, after the Archdiocese of Dubque which received no points, were those of the Archdioceses of Detroit, Hartford, Louisville, Newark, and St. Louis, with each scoring 6 (24%). Table 2 displays the practices drawn from the education and training policies across the 32 archdioceses along with the number and percentage of archdioceses that employ each practice.

Only 19% of archdioceses require that training be completed before working with minors. Twenty-eight percent of archdioceses require it to be completed within 30 days of being hired and 13% allow training to be completed up to 90 days after being hired. Forty-one percent of archdiocesan policies did not specify any time period by which training had to be completed. Only 13% of the policies mentioned offering training to third-party contractors who have contact with children. Most archdioceses (78%) have policies that state that

Table 2. Child abuse prevention training: practices present in policies of U.S. Archdioceses.

Practices	Number of Archdioceses	Percent
Requires clergy, employees, and volunteers to complete training on prevention of child sexual abuse ¹	31	97%
Training must be completed within 30 days of being hired	9	28%
Training must be completed before working with minors	6	19%
Training must be repeated at least every 3 years	8	25%
Continuing education offered	10	31%
Training provided to children	25	78%
Training offered to parents	18	56%
Training provided to third-party contractors who have contact with minors	4	13%
Maintain database of training of employees and volunteers	6	19%

¹Required by *Charter for the Protection of Children and Young People*

children will be offered training on child abuse; however, only a little more than half (56%) mentioned training children's parents. Content of what was taught to children was not available and thus not evaluated in our study.

Code of conduct policies

According to Article 6 of the *Charter*: "There are to be clear and well publicized diocesan/eparchial standards of ministerial behavior and appropriate boundaries for clergy and for any other paid personnel and volunteers of the Church with regard to their contact with minors" (U.S. Conference of Catholic Bishops, 2018, p. 11). However, no further guidance is provided and thus each archdiocese has devised their own standards of conduct. The main purpose of conduct codes is to identify acceptable and unacceptable behaviors and outline reporting procedures so risky behaviors can be stopped before they progress to child abuse.

We found that all U.S. archdioceses have some type of code of conduct, though these vary greatly in content and quality. The average score across the 32 archdioceses was 18.6 out of 36 possible points (51.7%; Range = 8.5–26). The Archdiocese of New York has the highest scoring code, attaining 72.2% of points possible. The lowest scoring policy was that of the Archdiocese of Galveston-Houston, which scored 8.5 (24%). Higher scores represent more comprehensive policies with more detailed procedures for reporting violations. [Table 3](#) displays the practices drawn from conduct codes across the 32 archdioceses along with the number and percentage of archdioceses that employ each practice.

Most archdiocesan codes of conduct ban inappropriate physical and verbal interactions with children. Some codes simply ban "inappropriate" or sexualized physical contact, without providing any guidance on what contact is considered inappropriate. Better policies provide examples of appropriate ways to touch or show affection to children along with examples of inappropriate forms of touch. For example, the Archdiocese of New Orleans's (2011) code of conduct lists 12 forms of physical contact that are considered appropriate (e.g., handshakes, high-fives, brief hugs) and 14 forms that are inappropriate (e.g., tickling, any type of massage, touching buttocks, chest or genital area). Most archdioceses (91%) require staff and volunteers to sign a statement of receipt and agreement with the code of conduct upon being hired. Some of the better policies require the code to be reviewed and signed on a regular basis, such as when renewing child abuse prevention training.

Protecting children from known sex offenders

There are two types of sex offenders that pose a risk to children in Catholic archdioceses: (a) clergy who have committed sexual misconduct with minors, and (b) lay sex offenders attending events at parish churches or schools. Points in these two areas were combined into a single score events. Few archdioceses

Table 3. Code of conduct: practices present in policies of U.S. Archdioceses.

Elements of the Code of Conduct	Number of Archdioceses	Percent
<i>Behavioral Guidelines</i>		
1. Guidelines on appropriate physical contact with examples	27	84%
2. Guidelines on verbal interactions with examples	21	66%
3. Guidelines on displaying affection with examples	14	44%
4. Avoid being alone with minors (one-on-one interactions)	29	91%
5. Guidelines for being off site with minor	22	69%
6. No overnight stays with unrelated youth	23	72%
7. No sleeping in same bed or sharing room	24	75%
8. Ban on giving/receiving expensive gifts	22	69%
9. Don't use in front of, or give, drugs/alcohol to minors	30	94%
10. No sexually oriented materials/ pornography	25	78%
11. No nudity in presence of minors	5	16%
12. No demands for secrecy	5	16%
13. No photographs without signed permission of parents	2	6%
14. No dating or becoming romantically involved with youth	10	31%
15. No form of abuse, sexual harassment	26	81%
16. No physical discipline	27	84%
<i>Guidelines on Electronic Communication</i>		
17(a). Guidelines on electronic communication	19	59%
(b). Guidelines for interacting on social media	8	25%
18. Parents must be copied on any messages or e-mails sent to child	12	38%
19. Notes right to inspect, intercept or access all matters on systems of the archdiocese including e-mail without notice	8	25%
<i>Follow Reporting Procedures</i>		
20. Must follow civil reporting requirements	30	94%
21. Must cooperate fully with any investigation	10	31%
<i>Accountability</i>		
22. Must sign that read code	29	91%
23. Must read and sign on regular basis	5	16%
<i>Code Violations</i>		
24. Must report if arrested or received citation for behavior violating policies	8	25%
25. Must report if others violate code	28	88%
26. Provides info on who to contact if uncertain whether conduct violates code	15	47%
27. Can confidentially report violations to third-party	3	9%
28. Penalty for violating code	22	69%

have policies that address protecting minors from known sex offenders while attending parish schools, services, or events. Consequently, the average score of sex offender policies across the 32 archdioceses was very low, only 1.3 out of 15 points possible (9%, Range 0 = 10).

Monitoring clergy who have committed misconduct related to minors. The *Charter* includes a “zero-tolerance” clause stating that a priest shall be removed from ministry if CSA is found to be substantiated. In these cases, the archbishop is to refer the offender to the Vatican for laicization. Defrocking a priest is a process that usually takes years² and under canon law dioceses have an obligation to these individuals as long as they remain priests. Laicization is not required for aged or infirm priests who can opt to remain priests but live a life “prayer and penance” and receive church-funded retirements. These priests can no longer practice ministry but remain priests and usually are allowed to remain in archdiocesan

²In the Boston Archdioceses some referrals of priests to Rome for laicization have been pending for over 17 years (Green, 2019).

residential facilities. As a result, many archdioceses provide residences to clerics who have substantiated abuse claims against them.³ The *Charter* fails to address how children should be protected from these offenders; however, recently the USCCB's National Review Board for the Protection of Children and Young People (2018) called on all dioceses to implement standardized safety plans for all clergy who are confined to prayer and penance for abusing a child.

Only three archdioceses (9%; Chicago, St. Louis, and Philadelphia) had policies that we could find for monitoring clergy who have committed misconduct with minors. Of these, the Archdiocese of Chicago (n.d.) had the most complete policy. Its policy includes having a safety plan, daily monitoring, requirements that the cleric stay away from minors, and outlines repercussions if the cleric fails to comply. The Archdiocese of Philadelphia (n.d.) has also developed a safety plan and employs a full-time monitor who is a former probation officer. In addition, the facility at which the participants live is equipped with a swipe card and video monitoring system to assist staff in monitoring offenders, not only when they are on site, but also when they enter or leave the facility. It is unclear what the other 29 archdioceses are doing to protect children from clergy who have abused children.

Safety plan for sex offenders attending church or school activities. In addition to offending clerics, children also need to be protected from lay persons who are registered sex offenders, or persons otherwise known to be sex offenders, who attend church or school activities. Currently, only seven (22%) archdioceses have policies addressing sex offenders attending parish and/or school activities. Table 4 displays practices drawn from sex offender policies of the 7 archdioceses that have policies in this area along with the number and percentage of the 32 U.S. archdioceses that employ each practice.

Two archdioceses (Atlanta and Baltimore) ban registered sex offenders from being on school premises when children are present even if the offender has a child attending classes. Five archdioceses (Anchorage, New York, Omaha, Philadelphia, and St. Louis) require sex offenders to agree to abide by a safety plan. For example, the Archdiocese of St. Louis (2018) has a safety plan for registered sex offenders attending mass and church events. It also has a safety plan for sex offenders who have a close relative who is a student attending school activities. The decision of whether to allow a sex offender to enter parish or school property is made by the Pastor or chief school administrator. The sex offender must always be accompanied by one or more adults who must be identified to and approved by the chief school administrator. Violation of the safety plan may result in the individual being restricted from attending future activities.

³Between July 1, 2017 and June 30, 2018, Catholic dioceses reported paying over 20 million dollars for the support (including living expenses, legal expenses, therapy, etc.) of clergy who committed misconduct with minors (Secretariat of Child and Youth Protection and the National Review Board, 2019, p. 60; Woodall, 2018).

Table 4. Policy on known sex offenders: practices present in the policies of 32 U.S. Archdioceses.

Practices Included in Policies on Known Sex Offenders	Number of Archdioceses	Percent
1. Registered sex offender banned from schools	2	6%
Safety plan for being on parish and/or school premises		
2. Must identify self to pastor or school administrator who will communicate to others in position to monitor	4	13%
3. Offender must be accompanied by an escort	4	13%
4. Offender must stay away from minors	3	9%
5. Failure to follow policy may result in being banned	3	9%
6. Signed safety plan is developed	2	6%

Discussion

Currently, no archdiocese has the “gold standard” policy for preventing CSA. While some archdiocese performed better than others in policy development, all had areas needing improvement. The average score for all 32 archdioceses in the general area of prevention was 40.7 out of 102 possible points or 40%. There is much variation between archdioceses with few policies conforming to basic best practices that would be expected of a youth-serving organization. There are a number of areas which warrant increased attention in future policymaking.

Background screening policies

Few archdioceses have policies that include all the procedures necessary to thoroughly vet a new employee or volunteers’ background. The Massachusetts Legislative Task Force on the Prevention of Child Sexual Abuse (2017) provided guidelines for youth-serving organizations based on existing best practices and research. The Task Force emphasized that state and national criminal history and sex offender registries should be checked whenever there is potential for personnel to have unsupervised contact with youth. However, many archdioceses neglect these fundamental forms of vetting. Twenty-two percent of archdioceses only screen personnel for crimes in the state the archdiocese is located. Thus crimes committed in other states would not be revealed. In addition, only 22% of archdioceses have policies requiring that sex offender registries be checked prior to hiring personnel.

A review of literature by South et al. (2015) found that because most potential offenders have no criminal record, criminal background screening alone is limited in its effectiveness as a preventative measure. To be effective, criminal background checks should be combined with personal reference checks, interviews, examining employment history, credential verification, identity verification (such as fingerprinting or photos), and checking abuse registries and other disciplinary bodies. This combined approach is missing from most archdiocesan policies. For example, only 12.5% of the policies reviewed mention conducting interviews and just a little over half mention checking references.

While the CDC recommends youth serving organizations complete background screening prior to personnel beginning service (Saul & Audage, 2007), only 41% of archdioceses follow this practice. Massachusetts Legislative Task Force on the Prevention of Child Sexual Abuse (2017) recommends that background screening be repeated periodically, such as every three years. Although the *Charter* does not require background checks to *ever* be repeated, repeating background checks every three to five years is considered a best practice by the USCCB (Secretariat of Child and Youth Protection and the National Review Board, 2019). The policies of 69% of archdioceses require background checks to be repeated. However, a document on the USCCB's website shows that 94% of archdioceses self-report that they repeat criminal background checks (Secretariat for Child and Youth Protection, 2020b). Thus, a number of archdioceses report to the USCCB that they rescreen personnel, yet fail to mention this in their screening policies. The average period of time between rescreening in the 22 archdioceses that required rescreening in their policies was 3.8 years (mode = 5 years), with a range of 30 days to 10 years. Analysis of self-reports submitted by archdioceses to the USCCB resulted in the same statistical findings.

An area that was overlooked by most archdiocesan policies is the need for international background checks on personnel who have spent time in other countries. Currently, approximately one-fourth of all diocesan priests in the U.S. come from foreign countries, and 30% of U.S. priests ordained in 2016 were born outside the country (Allen, 2017). According to a 2007 *Charter* compliance audit, 50% of credible allegations concerning current minors involved foreign priests (Secretariat of Child and Youth Protection, 2010).⁴ The USCCB responded by issuing a checklist for vetting international priests including performing international background checks (Secretariat of Child and Youth Protection, 2010). Despite these recommendations, only two archdioceses mention performing international background screening in their policies – Miami and Portland – and their policies are extremely limited. In light of the evidence that a significant number of new abuse allegations involve international clergy, the failure of the majority of archdiocesan policies to address performing background checks on international clergy is difficult to reconcile with their professed commitment to prevent CSA.

Child abuse prevention training policies

Training is a core element of any organization's CSA prevention efforts. While most archdioceses have a training policy, there is no standardized curriculum across archdioceses. Fifteen archdioceses (47%) specify that they use Virtus

⁴We could not find a more recent report as apparently the USCCB is no longer providing information about the background of recently accused priests; however, in 2016 the USCCB noted a significant number of new abuse allegations involve international priests working at U.S. dioceses (Secretariat of Child and Youth Protection and National Review Board, 2016, p. 4).

training in their policies. However, a document on the USCCB's website shows that 22 (69%) of the archdioceses self-report using Virtus, either by itself, or in conjunction with other types of training programs; six report using self-generated trainings, and four use trainings offered by other commercial vendors (Secretariat for Child and Youth Protection, 2020a). Because of the wide range of curricula in use, much of which is not publically available, we were not able to analyze the quality of the content of each archdioceses' training curriculum. Desai and Lew (2012), who were commissioned by the USCCB to examine the effectiveness of safe environment programs in U.S. dioceses, noted the lack of educational standards and concluded that, "the Church's safe environment programs could be improved by universal implementation of the best practices in the field" (p. 5). They found some evidence to support the use of Virtus programs. According to Desai and Lew, a survey conducted by the National Catholic Risk Retention Group, Inc. found a relatively high level of retention of key elements of the Virtus training (Desai & Lew, 2012).

Based on best practices, the Massachusetts Legislative Task Force on the Prevention of Child Sexual Abuse (2017) recommended training should take place before interactions with children begin; yet, only 19% of archdioceses specify that training must be completed before working with children. We also assessed whether trainings are periodically repeated. Only 13 archdioceses specify retraining in their policies. Among these archdioceses, the average retraining requirement was every 2.5 years with a median of 3 years. Recurring trainings are important as they underscore an organization's commitment to preventing child abuse and improving practices based on new strategies and expert recommendations. Although most guidelines for youth-serving organizations suggest periodic retraining (e.g., Saul & Audage, 2007), we could find no research that indicates the optimal time interval for this to occur. The Massachusetts Legislative Task Force recommended that child abuse training be offered at least annually. In their accreditation standards, Praesidium (2020), which developed the Virtus training used by almost half of archdioceses, also recommends that retraining be done annually. Currently, only 25% of archdioceses require training to occur at least every three years.

Most (78%) archdiocesan policies mentioned providing annual child abuse prevention training to children attending parish schools; however, few provided details on what such training entails. When training children, Massachusetts Legislative Task Force on the Prevention of Child Sexual Abuse (2017) suggests curricula should be evidence-based and evaluated for effectiveness. Research shows that child abuse prevention training for children is most efficacious when parents also receive training (Finkelhor & Dziuba-Leatherman, 1995). However, only a little more than half (56%) of archdiocesan policies mentioned offering training to children's parents.

Although research suggests training children is more effective in eliciting disclosures of sexual victimization than actually preventing abuse (Finkelhor, 2009), training parents can reinforce the education that children are getting at school. Parental training can also help caregivers provide safer environments for their children by teaching them to recognize potential grooming patterns of offenders (Wurtele & Kenny, 2010). This is particularly important given the research showing that abusive priests would often build relationships with the families of the victims in order to gain their trust prior to abusing a child (John Jay College of Criminal Justice, 2004). Caregivers also need education about the organization's sexual abuse prevention policies and procedures so they know what they should expect of the organization and its employees and volunteers (Irenyi et al., 2006), and how to report abuse if they suspect it has occurred (Praesidium, 2020).

A centralized database is an important tool to ensure that all personnel are appropriately trained. However, only 19% of archdiocesan policies mention using a centralized database for tracking compliance with safe environment requirements for archdiocesan personnel. A recent audit by the USCCB, observed that dioceses not using a centralized database continue to struggle with effective monitoring of training and background checks at the parish level (Secretariat of Child and Youth Protection and the National Review Board, 2018).

Code of conduct policies

A strong code of conduct is a front-line defense against the types of conduct violations that may culminate in a child being abused. While not rising to the level of sexual abuse, inappropriate behaviors can be a warning sign that if left unchecked could result in a child being abused. Unlike intra-familial perpetrators of child maltreatment who have access to children in private settings, perpetrators of organizational abuse must create "opportunities" to offend by arranging both time alone with the child and a location for carrying out the abuse (Irenyi et al., 2006). While most archdioceses (91%) have guidelines to avoid being alone with a child on site, 31% of codes failed to address interacting with children off site. This is a critical omission as research suggests an important way to prevent abuse is to increase the chance that the abuse will be detected by having another adult nearby (Wortley et al., 2019).

An area neglected by most archdiocesan codes of conduct is description of common grooming techniques among child sex offenders. Research has established that sexually abusive priests follow similar grooming strategies as other sexual offenders (Spraitz & Bowen, 2019). While most archdiocesan codes forbid giving gifts to children or offering them drugs or alcohol, other common grooming techniques were rarely addressed. The code of the Miami Archdiocese was one of the few exceptions. Its *Standards of Conduct* contains a section listing eight behaviors that raise serious concerns with respect to maintaining a safe environment for children. These behaviors include: over-

identification with children, keeping secrets with children, allowing children under supervision to break rules, and developing a special relationship with an individual child, among others (Archdiocese of Miami, 2019, p. 8).

An area that requires updating in many archdioceses' codes of conduct is electronic communication with minors. While 59% addressed electronic communication, few had comprehensive policies in this regard, and only 25% addressed interacting with children on social media. Better policies ban communicating with an unrelated child via private messaging except under certain circumstances and never from a private device. Better policies also ban interacting with minors on social media unless it is a group set up specifically for use by the parish or school and monitored by more than one adult. For example, the Archdiocese of San Antonio (2019, p. 11) code of conduct forbids Church personnel from using a personal social networking account to contact minors and directs personnel to ignore "friend requests" from minors that are addressed to the adult's personal social media account.

A number of archdioceses state that parents must be aware of, or copied on, messages from an adult to a child, but do not ban personal online relationships outright. From a prevention perspective, personal online relationships with an unrelated child should be prohibited even if the adult has the permission of the child's parent. As noted previously, researchers at John Jay College of Criminal Justice (2004) found that priests would often build relationships with the families of the victims in order to gain their trust prior to abusing a child. A personal online relationship between a priest and a child could easily evolve into a situation in which, at some point, the parent is no longer consulted. Thus, parental permission may be insufficient to prevent sexual misconduct.

The success of a code of conduct is largely dependent on the willingness of personnel to report violations. The Massachusetts Legislative Task Force on the Prevention of Child Sexual Abuse (2017) recommends that institutions outline penalties for failing to report misconduct. The Royal Commission into Institutional Responses to Child Sexual Abuse (2017) recommends that the code of conduct also outline the protections available to individuals who make complaints or reports in good faith. Most archdiocesan codes (88%) direct personnel to report misconduct of which they are aware and 69% mention penalties for failing to report misconduct; however, only 28% of archdioceses had policies assuring reporters that they will not be retaliated against. Archdiocese of St. Paul Archdiocese & Minneapolis (2016) had the strongest whistleblower protection policy among U.S. archdioceses. Its policy not only prohibits retaliation, it holds that employees who retaliate against someone who has reported a concern in good faith may be disciplined, up to and including termination.

Even when clear reporting mechanisms are available, staff can be hesitant to bring problems to the attention of leaders, especially if the problem involves someone senior to them in the organizational hierarchy. Having a hotline administered by a third-party who provides the option for the reporter to

remain anonymous and has become a standard best practice in many organizations (Association of Certified Fraud Examiners, 2016). A confidential third-party hotline seems to be a particularly important practice in institutions like the Catholic Church where leaders have participated in cover-ups and people have lost trust in the institution. Currently, only three archdioceses have instituted this practice (Baltimore, Indianapolis, and Washington).

Limitations

There are some important limitations to keep in mind regarding our research. We surveyed the written child protection policies of the 32 U.S. archdioceses. We did not evaluate informal policies and practices that have not been reduced to writing or policies that have not been made public. Because the review is of written material only, it may not provide a complete picture of how each individual archdiocese handles issues related to CSA prevention. In addition, with training policies, we looked at whether training was provided but not the content of the training. So having a high scoring policy may not translate to having an effective one in this area. Another limitation is that we did not evaluate the implementation of policies within each archdiocese. Nor did we compare archdiocesan policies against the best child protection policies possible. Finally, some archdioceses may have revised their policies after our analysis, which is important to keep this in mind when a specific archdiocese is named in this paper. Despite these limitations, we believe that a review of written policies is valuable as written policies are binding on a youth-serving organization and are valuable to parents and the public when making decisions about child safety within an organization.

Conclusion

We analyzed the current child prevention policies of the 32 Catholic archdioceses in the U.S. to determine how they have responded to the clergy sexual abuse crisis. Using a tool developed from a list of unique components selected from policies across all 32 archdioceses, we found current policies to be inadequate. While some archdioceses perform better than others, no archdiocese currently has the “gold standard” policy for preventing CSA. The variation and inconsistencies across multiple archdioceses within the U.S. reveal the need for the Catholic Church to establish more uniform standards on appropriately and effectively dealing with CSA within its dioceses. These standards should be based on empirically supported best practices and recommendations from organizations with experience and expertise in relation to CSA. This article points to parameters for consideration in developing better policies for the protection of children within the organization.

There are several key areas which warrant increased attention in future policy-making. Archdioceses need to strengthen their background screening policies to more thoroughly vet personnel. Background screening should be done on all third-party contractors who have contact with children and international background screenings should be done on all clergy and personnel who have lived in other countries prior to being hired. Archdioceses need to institute more rigorous guidelines to ensure that all personnel and volunteers are periodically trained using a curriculum that is evidence-based. Children and parents should also be offered annual training using an evidence-based curriculum that has been evaluated for effectiveness in the age groups being taught. Codes of conduct need to provide more concrete examples of acceptable and unacceptable behavior, ban common grooming behaviors, and should be updated to include interacting with children via electronic communication and social media. Archdioceses should also provide a confidential hotline administered by a third-party for reporting misconduct. In addition, archdioceses should develop policies that provide protection from retaliation to whistleblowers within the Church. The failure of the majority of archdioceses to create written policies regarding how offending priests will be monitored is incongruous with the Catholic Church's child protection efforts. All archdioceses providing residence to priests who have committed misconduct with a minor should have written policies detailing how they plan to protect minors from these offenders.

Preventing abuse requires not only good policies and practices but also consistent implementation, strong oversight, and the active participation of everyone in the organization. The Catholic Church's sexual abuse crisis proliferated in an atmosphere of secrecy. Preventing future abuse requires educating children, parents, and personnel at all levels of an organization about abuse and encouraging them to speak up whenever a concern arises.

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Notes on contributors

Stephanie Dallam, PhD, Visiting Scholar, Social Science Department at CHILD USA, Philadelphia, Pa; and a co-founder of the Leadership Council on Child Abuse and Interpersonal Violence.

Sabine Glocker, formerly part of the Legal Department at CHILD USA, is now a Judicial Law Clerk at the Family Court, First Judicial District of Pennsylvania, Philadelphia, PA.

Correspondence concerning this article should be addressed to Stephanie Dallam, PhD, CHILD USA, 32345 W. 255th St., Paola, KS 66071. E-mail: sjscout@gmail.com

Marci A. Hamilton, JD, is the founder and CEO of CHILD USA. She is also a Professor of Practice at the Fels Institute of Government and a Resident Senior Fellow in the Program for Research on Religion at the University of Pennsylvania, Philadelphia, PA.

Andrew J. Ortiz, MS, is a researcher in the Social Science Department at CHILD USA, Philadelphia, PA.

References

- Allen, J. L., Jr. (2017, March. 5). Foreign nuns, priests embody historic opportunity for U.S. church. *Crux*, <https://cruxnow.com/analysis/2017/03/foreign-nuns-priests-embody-historic-opportunity-u-s-church/>
- Allen, Jr. J., L. (2012, Feb. 8). Vatican abuse summit: \$2.2 billion and 100,000 victims in U.S. alone. *National Catholic Reporter*, <https://www.ncronline.org/blogs/ncr-today/vatican-abuse-summit-22-billion-and-100000-victims-us-alone>
- Archdiocese of Chicago. (n.d.). *Book II: The people of God*. §1105.3. Author.
- Archdiocese of Miami. (2019). *Creating and maintaining a safe environment for children and vulnerable adults*. Author.
- Archdiocese of New Orleans. (2011, October 1). *Principles of ethics and integrity in ministry: Code of ethics*. Author.
- Archdiocese of New York. (2018). *Safe Environment Policies*. Author.
- Archdiocese of Philadelphia. (n.d.). *Prayer and penance program*. http://archphila.org/HHHC/doc/Prayer%20and%20Penance%20Program_May%202012.pdf
- Archdiocese of Portland. (2014). *Background check policies and procedures*. Author.
- Archdiocese of San Antonio. (2019). *Code of conduct For church personnel*. Author.
- Archdiocese of St. Louis. (2018). *Policy: Registered sex offender: Participation and accountability*. Author.
- Archdiocese of St. Paul Archdiocese & Minneapolis. (2016). *Reporting wrongdoing – “Whistleblower” protection policy*. Author.
- Association of Certified Fraud Examiners. (2016). *Report to the Nation on occupational fraud and abuse*. Author.
- Burton, T. I. (2018, September 4). The decades-long Catholic priest child sex abuse crisis, explained. *Vox*. <https://www.vox.com/2018/9/4/17767744/catholic-child-clerical-sex-abuse-priest-pope-francis-crisis-explained>
- Bury, C. (2015, September. 22). Sex abuse scandals haunt American Catholics. *PBS News Hour*. <https://www.pbs.org/newshour/show/sex-abuse-scandals-haunt-american-catholics>
- Collins, J., & Feshir, R. (2015, December. 18). Archdiocese, Ramsey Co. agree to settle civil charges in priest child abuse case. *MPR News*. <https://www.mprnews.org/story/2015/12/18/archdiocese-stpaul-minneapolis-civil-abuse-case-settlement-clergy>

- Dallam, S. J., Hamilton, M. A., & Glocker, S. (2020, October 1). *White paper: Survey and analysis of the written child protection policies of the 32 U.S. Roman Catholic Archdioceses*. CHILD USA.
- Desai, K., & Lew, D. (2012). *Safe environment training: The effectiveness of the Catholic Church's child sexual abuse prevention programs*. Children at Risk Institute.
- Finkelhor, D. (2009). The prevention of childhood sexual abuse. *The Future of Children*, 19(2), 169–194. <https://doi.org/10.1353/foc.0.0035>
- Finkelhor, D., & Dziuaba-Leatherman, J. (1995). Victimization prevention programs: A national survey of children's exposure and reactions. *Child Abuse & Neglect*, 19(2), 129–139. [https://doi.org/10.1016/0145-2134\(94\)00111-7](https://doi.org/10.1016/0145-2134(94)00111-7)
- Globe Spotlight Team. (2002, January. 6). A history of secrecy, coverups in Boston Archdiocese, *The Boston Globe*. http://www.boston.com/globe/spotlight/abuse/extras/coverups_archive.htm
- Green, E. (2019, Feb. 14). Why does the Catholic Church keep failing on sexual abuse? *The Atlantic*. <https://www.theatlantic.com/politics/archive/2019/02/sean-omalley-pope-franciscatholic-church-sex-abuse/582658/>
- Gunty, C. (2019, Sep. 16). Marie Collins: The Vatican's response to church abuse crisis is not enough. *America: The Jesuit Review*. <https://www.americamagazine.org/politics-society/2019/09/16/marie-collins-vaticans-response-church-abuse-crisis-not-enough>
- Hamilton, M. A. (2008). *Justice denied: What America must do to protect its children*. Cambridge University Press.
- Hamilton, M. A. (2021). *The history of SOL reform: 2002-2020*. CHILD USA.
- Irenyi, M., Bromfield, L., Beyer, L., & Higgins, D. (2006, Spring). Child maltreatment in organisations: Risk factors and strategies for prevention. *Child Abuse Prevention Issues*, 25, 1–23. <https://aifs.gov.au/cfca/publications/child-maltreatment-organisations-risk-factors-and-strate>
- John Jay College of Criminal Justice. (2004) . *The causes and context of sexual abuse of minors by Catholic priests in the United States, 1950-2002*. USCCB.
- John Jay College Research Team. (2011). *The causes and context of sexual abuse of minors by Catholic priests in the United States, 1950-2010*. USCCB.
- Keenan, M. (2011). *Child sexual abuse and the Catholic Church: Gender, power and organizational Culture*. Oxford University Press.
- Kline, P. M., McMackin, R., & Lezotte, E. (2008). The impact of the clergy abuse scandal on parish communities. *Journal of Child Sexual Abuse*, 17(3–4), 290–300.
- Lytton, T. D. (2008). *Holding bishops accountable: How lawsuits helped the Catholic Church confront clergy sex abuse*. Harvard University Press.
- Massachusetts Legislative Task Force on the Prevention of Child Sexual Abuse. (2017, June). *Guidelines and tools for the development of child sexual abuse prevention and intervention plans by youth-serving organizations in Massachusetts*. Commonwealth of Massachusetts.
- McGraw, D. M., Ebadi, M., Dalenberg, C., Wu, V., Naish, B., & Nunez, L. (2019). Consequences of abuse by religious authorities: A review. *Traumatology*, 25(4), 242–255.
- National Review Board for the Protection of Children and Young People. (2018, November 13). *Recommendations from the National Review Board addressing the current crisis specific to restoring the trust of the faithful*. USCCB.
- Praesidium. (2020). *Accreditation standards: Overview for consumer-serving organizations*. Author.
- Royal Commission into Institutional Responses to Child Sexual Abuse. (2017). *Final Report: Preface and executive summary*. Commonwealth of Australia.
- Saul, J., & Audage, N. C. (2007). *Preventing child sexual abuse within youth-serving organizations: Getting started on policies and procedures*. Centers for Disease Control and Prevention.

- Secretariat for Child and Youth Protection. (2020a). *2019 Safe environment training program compilation*. USCCB.
- Secretariat of Child and Youth Protection and the National Review Board. (2019, June). *2018 Annual report: Findings and recommendations*. Author.
- Secretariat for Child and Youth Protection. (2020b). *2019 background check methodology compilation*. USCCB.
- Secretariat of Child and Youth Protection. (2010, November). *International priests and the Charter for the Protection of Children and Young People: A resource for dioceses/eparchies*. USCCB.
- Secretariat of Child and Youth Protection and the National Review Board. (2016, May). *The 2015 Annual Report on the Implementation of the "Charter for the Protection of Children and Young People."* USCCB.
- Secretariat of Child and Youth Protection and the National Review Board. (2018, May). *The 2017 Annual Report on the Implementation of the "Charter for the Protection of Children and Young People."* USCCB.
- Secretariat of Child and Youth Protection and the National Review Board. (2019, June). *The 2018 Annual Report on the Implementation of the "Charter for the Protection of Children and Young People."* USCCB.
- South, S., Shlonsky, A., & Mildon, R. (2015). *Scoping review: Evaluations of pre-employment screening practices for child-related work that aim to prevent child sexual abuse*. Parenting Research Centre and the University of Melbourne.
- Spraitz, J. D., & Bowen, K. N. (2019). Examination of a nascent taxonomy of priest sexual grooming. *Sexual Abuse*, 31(6), 707–728. <https://doi.org/10.1177/1079063218809095>
- Terry, K. (2015). Child sexual abuse within the Catholic Church: A review of global perspectives. *International Journal of Comparative and Applied Criminal Justice*, 39(2), 139–154. <https://doi.org/10.1080/01924036.2015.1012703>
- U.S. Conference of Catholic Bishops. (2018). *Promise to protect, pledge to heal: Charter for the protection of children and young people: Essential norms for diocesan/eparchial policies dealing with allegations of sexual abuse of minors by priests or deacons*. Author.
- Virtus Description*. (n.d.). http://www.virtusonline.org/virtus/virtus_description.cfm
- Wind, L. H., Sullivan, J. M., & Levins, D. J. (2008). Survivors' perspectives on the impact of clergy sexual abuse on families of origin. *Journal of Child Sexual Abuse*, 17, 238–254.
- Woodall, C. (2018, December 6). More than 78 predator priests still paid by Catholic church in Pennsylvania. *Chicago Sun Times*. <https://chicago.suntimes.com/2018/12/6/18443642/more-than-78-predator-priests-still-paid-by-catholic-church-in-pennsylvania>
- Wortley, R., Leclerc, B., & Reynald, D. M. (2019). What deters child sex offenders? A comparison between completed and noncompleted offenses. *Journal of Interpersonal Violence*, 34, 4303–4327.
- Wurtele, S. K., & Kenny, M. C. (2010). Partnering with parents to prevent childhood sexual abuse. *Child Abuse Review*, 19, 130–152. <https://doi.org/doi:10.1002/car.v19:2>