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March 1, 2021

Most Reverend Austin A. Vetter  
Bishop of Helena  
P.O. Box 1729  
Helena, MT 59624

Dear Bishop Vetter:

Based on the results of our recently performed on-site audit of the Diocese of Helena, the Diocese has been found noncompliant with Article 2 within the *Charter for the Protection of Children and Young People* for the 2019/2020 audit period. The Diocese is compliant with all other articles within the *Charter*.

Per Article 2 of the *Charter* and Norm 5, *dioceses/eparchies are also to have a review board that functions as a confidential consultative body to the bishop/eparch. It is to regularly review policies and procedures for addressing sexual abuse of minors.* It is our understanding that the Review Board did not meet during the 2019/2020 audit period. While the Diocese may not have found it necessary to convene the Review Board for matters related to allegations of abuse, the Review Board should still meet. It is our understanding that subsequent to the audit period and prior to the audit report, the Diocese convened a meeting of the Review Board which brings the Diocese into compliance with Article 2 of the *Charter* and Norm 5.

The conclusions reached as to the compliance of your Diocese are based upon inquiry, observation and the review of specifically requested documentation furnished to StoneBridge Business Partners during the course of this audit.

Thank you for your cooperation during this process.

Sincerely,

*StoneBridge Business Partners*

StoneBridge Business Partners  
Rochester, New York

cc: Secretariat of Child and Youth Protection  
Deacon Michael Seipp, Director of Human Resources, Diocese of Helena

March 1, 2021

Most Reverend Austin A. Vetter  
Bishop of Helena  
P.O. Box 1729  
Helena, MT 59624

Dear Bishop Vetter:

In accordance with our recent audit of the Diocese of Helena the following topic is being brought to your attention. As outlined in our Compliance Letter, the issue regarding Article 2 requires **remediation**, while others are suggestions for your consideration.

**Article 2:**

**Issue:** The Diocese of Helena's independent review board did not meet during the 2019/2020 audit period.

**Recommendation:** Per Article 2 of the Charter and Norm 5, "dioceses/eparchies are also to have a review board that functions as a confidential consultative body to the bishop/eparch...it is to regularly review policies and procedures for addressing sexual abuse of minors." We recommend that the Diocese hold regularly scheduled meetings of the full Review Board. Our understanding is that this Issue has been remediated as of the date of this letter, as the Diocese convened a meeting of the full Review Board.

The following topics do not affect your compliance with the Charter for the Protection of Children and Young People; they are simply suggestions for your consideration.

**Article 2:**

**Topic:** The Diocese does not currently have any written by-laws for the Review Board that would define the scope of its responsibilities.

**Suggestion:** We suggest that the Diocese consider creating formal by-laws for the Review Board that outline the duties and responsibilities of its members. This document would include specifics related to the number of members required and term limits.

**Topic:** Article 2 addresses the establishment and guidelines involving a diocesan review board. During our discussions with Diocesan personnel and review board members, it was noted that the board may benefit from greater diversity amongst its members.

**Suggestion:** We suggest the Diocese consider adding some new members from different professions and skill sets represented such as law enforcement/former judges/prosecutors and school administration.

**Topic:** The Charter calls for the policies and procedures for those making a complaint to be readily available in printed form in all the principal languages in which the liturgy is celebrated within the Diocese. Procedures are currently available in English. The liturgy is being regularly celebrated in additional languages such as Spanish.

**Suggestion:** We suggest that the Diocese consider reviewing the principal languages in which the liturgy is celebrated to determine if procedures for those making a complaint should be printed in additional languages. We also suggest that all printed languages be made available on the Diocesan website.

**Article 12:**

**Topic:** The Diocese utilizes the Virtus monthly bulletins as a means for personnel to stay current with safe environment training. The local site administrators at parishes and schools are responsible for monitoring whether these are being completed for their personnel. In our sample selection, we noticed some personnel are significantly behind on completing these monthly bulletins. The Diocese does not currently require any other form of renewal training for personnel.

**Suggestion:** We suggest the Diocese reinforce this requirement with its site administrators at the parishes in an effort to improve compliance with this requirement for ongoing safe environment training. As an alternative, the Diocese could consider implementing a periodic renewal training requirement every three to five years. Virtus now offers an online program which could be utilized.

**Topic:** For children's training, it was found that some parishes/schools were sending home information for the parents to train their child(ren) and were counting them as trained without requiring a verification form/signature from the parent.

**Suggestion:** In order for children to be counted as trained when materials are being sent home, the Diocese should consider requiring a verification form from the parent attesting that they did in fact actually train their child(ren).

**Topic:** Not all parishes and schools are required to submit an annual certification to the Diocese, signed by the pastor/principal, indicating that the safe environment program materials have been received and that their location is complying with the various elements of the safe environment program.

**Suggestion:** As suggested by Bishop Aymond in his memo to all Bishops dated March 31, 2006, the Diocese should consider requiring Pastors and Principals of parishes and schools to certify that safe environment programs have been fully implemented in the parishes and schools. We suggest that the Diocese implement the use of an annual certification form for all Diocesan locations. The certification should be signed by the Pastor/Principal confirming that required personnel at their location have complied with all required elements of the Diocese's safe environment program.

**Article 12 & 13:**

**Topic:** The Diocese has a recent appointment of a new Bishop who has not yet had the opportunity to formally promulgate the current safe environment program utilized by the Diocese as being in accord with Catholic moral principles.

**Suggestion:** We suggest that Bishop review the safe environment programs utilized by the Diocese and issue a promulgation letter, including all training programs currently being utilized, affirming his endorsement of the programs as in accord with Catholic moral principle of the Diocese.

**Topic:** Although the Diocese is in communication with parishes and schools throughout the year regarding the status of safe environment programs, parish audits are not currently performed. Therefore, the Diocese relies largely on parish staff and volunteers to ensure program compliance and accurate reporting.

**Suggestion:** We suggest that the Diocese consider the feasibility of implementing a process to periodically visit parish and school locations in order to review documentation and assess compliance with the safe environment program requirements. This would allow the Diocese to gain a better understanding of how policies and procedures are being implemented at the parish and school level and assist in ensuring compliance with safe environment requirements.

**Article 13:**

**Topic:** The Diocese does not require clergy, employees, and volunteers to renew their background checks.

**Suggestion:** We suggest that the Diocese consider implementing a policy for renewing background checks for all clergy, employees, and volunteers on a periodic basis (suggested every 5 to 7 years). This would ensure that the Diocese has the most up to date information on individuals working with children. It is our understanding that this is in the works of being implemented.

**General Comments:**

**Topic:** The Diocese has not recently performed a complete review of clergy personnel files.

**Suggestion:** We suggest that the Diocese complete a review of all its clergy personnel files to ensure that any past Charter-related issues have been identified and handled appropriately.

By signing below, you attest that you have read and received our suggestions for the 2019/2020 *Charter* Audit process.



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Most Reverend Austin A. Vetter  
Bishop of Helena

Thank you for the efforts that you are taking to protect the children and young people in the Diocese of Helena. Please return a signed copy via email to [USCCBCharterAudits@stonebridgebp.com](mailto:USCCBCharterAudits@stonebridgebp.com) at your earliest convenience.

Sincerely,

*StoneBridge Business Partners*

StoneBridge Business Partners  
Rochester, New York

cc: Secretariat of Child and Youth Protection  
Deacon Michael Seipp, Director of Human Resources, Diocese of Helena



THE ROMAN CATHOLIC  
Diocese of Helena

## OFFICE OF

Human Resource Services  
Safe Environment Compliance

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### MEMO: Report of Progress on Audit 2020 Issue

#### Article 2:

**Issue:** The Diocese of Helena's independent review board did not meet during the 2019/2020 audit period.

**Recommendation:** Per Article 2 of the Charter and Norm 5, "dioceses/eparchies are also to have a review board that functions as a confidential consultative body to the bishop/eparch. It is to regularly review policies and procedures for addressing sexual abuse of minors." We recommend that the Diocese hold regularly scheduled meetings of the full Review Board. Our understanding is that this Issue has been remediated as of the date of this letter, as the Diocese convened a meeting of the full Review Board.

**Resolution:** It is true that no full Review Board meetings were conducted between July 2019 and June 2020, due to the transition to a new Bishop (Bishop Vetter was installed as Bishop of the Diocese of Helena in November 2019), as well as the disruption created by the COVID-19 pandemic. However, during the 2020/2021 audit period, full Review Board meetings were held in September 2020 and January 2021.

Thus, as confirmed by the on-site audit results letter, "subsequent to the audit period and prior to the audit report, the Diocese convened a meeting of the Review Board **which brings the Diocese into compliance** with Article 2 of the *Charter* and Norm 5."