



HISTORICAL REVIEW AND ACTIONS TAKEN REGARDING CAMPUS SAFETY

April 12, 2019

Dear Franciscan University Family:

The founding charism of the Friars of the Third Order Regular who are blessed to lead, guide and serve the Franciscan University of Steubenville is Ongoing Conversion. Seeking to care for our students and to be caretakers of the gift of this Catholic University rooted in the Franciscan tradition, we take seriously the call and responsibility of demonstrating this charism in our lives. This is who we are as Friars and this is who we are as a University.

Living our charism is practically spelled out in the Rule of Life which the Friars profess to live: *“Whenever they commit sin the brothers and sisters, without delay, are to do penance interiorly by sincere sorrow and exteriorly by confessing their sins to a priest. They should also do worthy deeds that manifest their repentance... (T.O.R. Rule, Article 13).”* This process, lived out individually as friars and cultivated wherever we minister, is the work of God and leads to integrity and truth.

Consistent with the Franciscan charism of Ongoing Conversion, we write to you now, on behalf of the Board of Trustees and the University, to advise you of steps the University has taken to understand past reports of sexual misconduct here at the University, to apologize for those instances where the University fell short in its responses, and to seek your support and prayers as the University implements several additional action steps to maintain campus safety.

In light of continued revelations about sexual misconduct within the Church, this past August, the entire University family was invited to stand for [Integrity and Truth](#). During the opening Mass, Father Sean O. Sheridan, TOR, and President of Franciscan University of Steubenville, apologized to any person who may have been harmed at Franciscan University, or whose complaints may not have been taken seriously, and invited them to report their experiences to the University and law enforcement. We want to thank the victims who made reports. By doing so, you exhibited great courage.

The University is committed to demonstrating care, compassion, and respect for persons who report being victims of sexual misconduct, taking reports seriously, and conducting prompt investigations. To that end, we have established a comprehensive sexual misconduct prevention program that began in June of 2014. Since 2014 we have established a number of reforms, protocols and investments to provide a structure and operation that continues to maintain campus safety as well as compassion for victims of sexual misconduct.

After the opening Mass in August 2018, Father Sheridan announced the engagement of Husch Blackwell LLP, a firm that specializes in Title IX compliance, to conduct a review of University records pertaining to past allegations of sexual misconduct by clergy and non-clergy employees at the University.

Husch Blackwell delivered its confidential report to the Board of Trustees in January 2019. In the time since, the University’s administrators and lay women, men, and clergy of the Board of Trustees, have carefully reviewed the report and prayerfully considered its findings and implications. After considering the privacy interests of victims, principles of fairness and due process to persons accused of misconduct, and state and federal laws governing confidentiality, the Board of Trustees has unanimously approved the public disclosure the University is making today.

It is clear that, in many instances, the University responded to reports of sexual misconduct promptly, equitably, and consistent with our Catholic and Franciscan values and the law. This is particularly true since 2014 when, in response to new Title IX guidance governing institutional response to sexual misconduct, the University implemented its comprehensive [Policy on Discrimination, Harassment and Sexual Misconduct](#), which the review found to be effective in meeting the University's legal and ethical obligations. Nonetheless, in certain instances prior to the Policy, and dating back to the late 1960s, the University, including its leadership, did not always respond to reports of sexual misconduct appropriately.

In most instances, those responsible for responding inappropriately are deceased or have long since separated from the University. The University has identified and taken appropriate personnel action with regard to any current employee who may have been involved in a past instance where the University responded inappropriately.

We apologize to our whole community for the harm caused to your faith and trust in our institution and the dedicated religious and employees who work every day to provide our students with an uplifting and fully orthodox Catholic education. We not only ask for prayers, but we ask for forgiveness from the victims, their families and the entire Franciscan University family. For the next year, the noon campus Mass on the first Friday of the month and afternoon Holy Hour that follows will be dedicated to the healing of victims through the Sacred Heart of Jesus.

In light of the Husch Blackwell review, and consistent with steps taken by dioceses and other Catholic institutions, Franciscan University is releasing a list of clergy who served at the University who had a substantiated report of unwelcome sexual contact against a student made against them. Additionally, the list includes clergy who worked at Franciscan University, and who have been publicly named by other dioceses or Catholic institutions as having substantiated reports of unwelcome sexual contact occurring elsewhere. In light of the Husch Blackwell review, the University is also implementing several new actions steps, in addition to those already taken since 2014, to further ensure campus safety.

Any person wishing to report sexual misconduct can do so through the [Integrity and Truth website](#) or by contacting one of the persons listed in the [Policy on Discrimination, Harassment and Sexual Misconduct](#). If new information comes to light as a result of additional reports, the list disclosed today will be updated, and any priest or employee with a substantiated allegation of unwelcome sexual contact, and who is still in service, will be removed from ministry at our University.

As Catholics and Franciscans, we see in "men and women, in every person, the living image of God himself . . . a brother or sister for whom Christ died." We ask all members of the University community to join us in praying for the healing of victims; strength and persistence in our efforts to confront sexual misconduct; and wisdom and guidance from the Holy Spirit for University administrators and the Board of Trustees as we lead our University forward.

In Christ and St. Francis

Father Sean O. Sheridan, TOR
President,

Father Malachi Van Tassell, TOR
Chair, Board of Trustees

HISTORICAL REVIEW AND ACTIONS TAKEN REGARDING CAMPUS SAFETY

Background

In August of 2018, in light of the ongoing sexual abuse scandal that has affected many dioceses, religious orders and Catholic institutions, Franciscan University of Steubenville's President Father Sean O. Sheridan, TOR, asked Husch Blackwell LLP to conduct a review of existing University records of past reports of sexual misconduct by clergy and non-clergy employees. The University's leadership, and its Board of Trustees, believed it was essential for the University to understand the extent of past reports of sexual misconduct and to determine if the University's response was consistent with its Catholic identity, including its commitment to promote and defend human dignity by providing a learning and working and living environment free from all forms of sexual misconduct. Also, Husch Blackwell was asked to consider whether the University complied with applicable legal and reporting requirements, and recommend action steps to address any deficiencies and to further improve the safety of our campus and University community going forward.

Summary of the Findings

The Husch Blackwell review found documentation of various reported instances of sexual misconduct from the late 1960s to the present. The universe of reported instances involved sexual misconduct ranging from sexually-explicit profanity and jokes to inappropriate sexual behavior and unwelcome sexual contact. The review found documentation of 65 potential incidents of sexual misconduct over this approximate 60 year period.

1. A majority of the 65 potential instances did not involve unwelcome sexual contact against students. This majority of instances was comprised of: reports of various forms of sexual harassment not involving physical contact, misconduct by clergy and non-clergy employees before or after their service at the University, complaints about policies and procedures (but not sexual misconduct), and/or reports of miscellaneous conduct not involving a sexual element and misclassified as such.
2. The review identified 14 potential instances of unwelcome sexual contact¹ against students by clergy, with all instances reported to have occurred no later than 2013.

¹ The University defines unwelcome sexual contact as any intentional physical contact of a sexual nature perpetrated against a person's will, or where a person is incapable of giving consent, including rape, sexual assault, sexual battery, and sexual coercion.

3. The review found no reported instances of unwelcome sexual contact by clergy alleged to have occurred after 2013, when the University began to deploy a series of reforms and additional reporting mechanisms to ensure safety on campus.
4. The review found that nine of these pre-2014 instances of reported unwelcome sexual contact by clergy were sufficiently substantiated² by an investigation, an admission by the respondent, documentation, or other corroboration that the University is publicly releasing the names of the involved clerics (find it on page eight of this document). Other instances have not been substantiated given factors such as the passage of time, lack of documentation, lack of corroboration, the death of one or more of the parties involved, and/or a decision by a reported victim to provide only minimal information. Clerics implicated in unsubstantiated reports will not be named.
5. Additionally, the University is disclosing the names of clergy members who served at and were employed by the University and who have been publicly named as having substantiated allegations of unwelcome sexual contact with respect to their conduct in dioceses or other Catholic institutions, even though they were not accused of having committed unwelcome sexual contact during their service at the University.

A cleric's inclusion by the University in this disclosure does not necessarily mean he was found guilty or would be found guilty of a crime or would be liable in a civil lawsuit. Some of the allegations reviewed were received by the University decades after the reported incident and, in some cases, after the death of the accused individual. Accused clerics may have been a member of the TORs, a priest from another religious order assigned to ministry at the University, a priest from the Diocese of Steubenville, or a priest from another diocese assigned to ministry at the University. No cleric with a substantiated report of unwelcome sexual contact is currently ministering or employed at Franciscan University. Additionally, going forward, any cleric for whom there is reasonable cause to suspect unwelcome sexual contact with a student will be immediately suspended from private interactions with students until such time as the matter is resolved.

With respect to several of the instances identified, victims have already been provided assistance including personal apologies, counseling, academic assistance, and spiritual support. In some instances, the University and/or the TORs entered into legal settlements that included compensation to the victim to be used for counseling, support services, and other forms of healing. Outreach and support to other victims will continue on an individual and private basis. Out of respect for the privacy interests of current victims, to encourage future reporting, and in light of confidentiality obligations imposed by law, including

² The University considered a report to be substantiated if either: (1) the accused cleric or employee admitted to it; (2) the University previously investigated the report and found it to be substantiated; or (3) upon review of the documentation presently available, the report was corroborated by witness statements, documents, photos, electronic communications, or by another source, including another victim reporting similar misconduct. A report can be considered substantiated even if the accused individual denies the allegation.

the Family Educational Rights and Privacy Act (“FERPA”), the University will not publicly discuss the particular details of any incident, substantiated or otherwise.

Adoption of the University’s Policy on Discrimination, Harassment, and Sexual Misconduct in 2014

As of June 2014, all reports of sexual misconduct involving clergy, administrators, faculty, staff, students, guests, and visitors are governed by the University’s [Policy on Discrimination, Harassment, and Sexual Misconduct](#), which is administered by the Director of Campus Safety and Compliance & Title IX/EEO Coordinator and several Deputy Title IX Coordinators, all of whom are lay persons. The Policy prohibits all forms of sexual misconduct, including sexual harassment, sexual violence, domestic violence, dating violence, and stalking. Since implementation of the University’s [Policy on Discrimination, Harassment, and Sexual Misconduct](#) in 2014, the University’s responses to reports of sexual misconduct have been formalized and are now consistent with the University’s Catholic identity, including its commitment to promote and defend human dignity by providing a learning, working, and living environment free from all forms of sexual misconduct. The review found that the University’s policy complies with operative federal and state laws, and matches industry standards.

Additional Action Steps Since 2014

In addition to adopting the [Policy on Discrimination, Harassment, and Sexual Misconduct](#), and under the leadership of Father Sheridan, the University has continually improved and augmented its processes and resources for responding to sexual misconduct. A timeline of 13 notable action steps taken since adoption of the Policy is as follows:

June 2014:	University adopts comprehensive Policy on Discrimination, Harassment, and Sexual Misconduct ³
August 2014:	University initiates mandatory in-person sexual misconduct prevention training for clergy, administrators, faculty, staff, and students
July 2015:	University hires full-time Director of Campus Safety and Compliance
September 2015:	University enters into memorandum of understanding with Steubenville Police Department regarding handling of complaints/reports of sexual misconduct that is potentially criminal in nature
September 2015:	University implements mandatory online sexual misconduct prevention training for students
March 2016:	The University implements mandatory online sexual misconduct prevention training for administrators, faculty, and staff (including clergy in those roles)

³ The Policy was initially titled “Policy Against Discriminatory and Sexual Harassment, Sexual Assault, and Other Forms of Sexual Violence Dating Violence, Domestic Violence and Stalking.” This disclosure uses the current title for clarity.

- May 2017: University significantly updates the [Policy on Discrimination, Harassment, and Sexual Misconduct](#) to comply with continued federal Title IX guidance and court decisions applying Title IX
- February 2017: University enters into memorandum of understanding with ALIVE, Inc. memorializing commitment to provide trauma-informed services to victims of sexual misconduct
- August 2018: Father Sean Sheridan, TOR, apologizes publicly to anyone who may have experienced sexual misconduct, or whose report of sexual misconduct was not taken seriously, and involved those individuals to report their experiences to the University and law enforcement as part of the initiative
- October 2018: In response to concerns raised in the media, the University commissions Jackson Lewis P.C. to review the University's handling of certain recent reports of student sexual misconduct; Jackson Lewis concludes that University staff has complied with [Policy on Discrimination, Harassment, and Sexual Misconduct](#)
- January 2019: Husch Blackwell delivers its report to the Board of Trustees regarding documentation of reports of past sexual misconduct involving clergy and non-clergy employees
- January 2019: Father Sheridan announces investments in additional investigative capacity and creation of the Student Advocate Office
- April 2019: The Board of Trustees makes a public disclosure concerning the results of the Husch Blackwell review

Individuals Associated With Substantiated Reports of Unwelcome Sexual Contact

This disclosed list includes clerics against whom one or more substantiated claims of unwelcome sexual contact against students were identified based on review of the University's existing records. The University is aware of a pending law enforcement investigation regarding one additional cleric who is no longer employed or in ministry at the University. The investigation concerns alleged conduct prior to 2014. The individual is not identified to avoid interfering with the investigation. The University will supplement the disclosure, as appropriate, if additional substantiated allegations are confirmed.

While the University made its best efforts to collect documentation of all reports, it is possible other substantiated claims were made and not documented at the time or that other substantiated claims were documented at the time, but documentation has since been lost. It is also possible that persons who experienced sexual misconduct disclosed the matter to a friend or family member, but not to the University.

Persons who experienced or who know of unwelcome sexual contact committed by a clergy member not listed in the disclosure are encouraged to report the matter to the University or to law enforcement. Reports to the University can be made to one of the individuals listed in the Policy on Discrimination,

Harassment, and Sexual Misconduct or through the Integrity and Truth website.

The clerics who had one or more substantiated reports of unwelcome sexual contact with a student are:

Name	Father Sam Tiesi, TOR
Last Known Status	Deceased, 2001
Year of Birth	1930
Affiliation	Franciscan Friars of the Third Order Regular, Province of the Most Sacred Heart of Jesus
Year of Ordination	1963
Position at FUS	Campus ministry; faculty
Time period at FUS	1978-1992; 1997-2001
Nature of Reported Conduct	Unwelcome sexualized kissing, groping, and hugging
Timeframe of Reported Conduct	1978-1992
More than One Allegation	Yes

Name	John McGuire (formerly, Father Conrad McGuire, TOR)
Last Known Status	Laicized, 1988
Year of Birth	1947
Affiliation	Franciscan Friars of the Third Order Regular, Province of the Most Sacred Heart of Jesus (former)
Year of Ordination	1976
Position at FUS	Assigned friar
Time period at FUS	1978-1980
Nature of Reported Conduct	Romantic and sexual relationship with student counselee
Timeframe of Reported Conduct	Between 1978 and 1980

More than One Allegation	No
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Name	Father Simeon (Daniel) Mulkern, TOR
Last Known Status	Deceased, 2016
Year of Birth	1938
Affiliation	Franciscan Friars of the Third Order Regular, Province of the Most Sacred Heart of Jesus
Year of Ordination	1966
Position at FUS	Faculty
Time period at FUS	1967-1972
Nature of Reported Conduct	Sexual contact with a student counselee
Timeframe of Reported Conduct	1969
More than One Allegation	No

Additionally, the University is disclosing the following individuals who served and were employed at the University and who have been publicly named as having substantiated allegations of unwelcome sexual contact with respect to their conduct in dioceses or other Catholic institutions, albeit not while at the University. Those individuals are:

Name	Father John Bertolucci
Last Known Status	Deceased, 2015
Year of Birth	1937
Affiliation	Diocese of Albany, NY
Year of Ordination	1965
Position at FUS	Faculty and speaker
Time period at FUS	1977-1987; 1991-1993; potential intermittent visits or lectures from 1993 to 1999

Name	Father Vincent Inghilterra
Last Known Status	Removed from ministry, 2013
Year of Birth	1930
Affiliation	Diocese of Trenton, NJ
Year of Ordination	1963
Position at FUS	Associate Director of Pre-Theologate Program; Associate Director of Priestly Discernment Program; Pastoral Counselor
Time period at FUS	2010-2012

Name	Joseph Moore (formerly, Father Joseph Moore)⁴
Last Known Status	Laicized, 2004
Year of Birth	1944
Affiliation	Diocese of Bridgeport, CT
Year of Ordination	1971
Position at FUS	Dormitory director; University Conference Office / Pastoral Director of Evangelism Training Program; Planning and Director of Priests and Seminarians Conference
Time period at FUS	1986-1989

Additional Action Steps in Light of the Husch Blackwell Review

In light of the Husch Blackwell review, President Sheridan has recommended, and the Board of Trustees has approved, seven additional action steps, for a total of 20. The seven additional actions steps are:

1. The University has adopted a protocol by which any cleric, for whom there is reasonable cause to suspect unwelcome sexual contact against student, will be immediately suspended from private interactions with students until such time as the matter is resolved.

⁴ This name was added on April 15, 2019, based on additional information reported to the University after the initial list of names was published.

2. So too, the University has adopted a protocol by which any non-clergy employee for whom there is reasonable cause to suspect unwelcome sexual contact against a student, will be immediately suspended from private interaction with students, until the matter is resolved or the Title IX Coordinator determines such restrictions are no longer needed.
3. The University has revised its [Policy on Discrimination, Harassment, and Sexual Misconduct](#) to explicitly codify the University's practice that the Title IX Coordinator, Deputy Title IX Coordinators, advocates, investigators, hearing board members, and appeals officers will all be lay persons.
4. The Board of Trustees has amended its bylaws to create a standing committee of the Board, consisting solely of lay persons, to oversee the University's policies and processes for responding to sexual misconduct. The committee will receive periodic reports from the Title IX Coordinator and report to the full Board of Trustees on at least a bi-annual basis.
5. The University will enter into memoranda of understanding with the TORs, dioceses, and other religious orders that make clerics available for employment at the University with the consent of their diocesan bishop. The memoranda will address application of the University's [Policy on Discrimination, Harassment, and Sexual Misconduct](#) to any report of sexual misconduct; establish processes for information sharing; and establish pre-screening requirements for all clerics placed on campus.
6. The University will implement additional mandatory training for all clergy and non-clergy employees engaged in spiritual advising and adopt formal standards governing the location, time, and manner in which spiritual advising occur, together with standards for appropriate methods of communication and physical contact between advisors and advisees.
7. The University will invest additional resources to document and retain records pertaining to reports of sexual misconduct.

How To Report Sexual Misconduct and the University's Process and Supports

A person who has experienced sexual misconduct, or who wishes to report sexual misconduct directed at someone else, is invited to make a report to Title IX Coordinator or any Deputy Title IX Coordinator. The Title IX Coordinator or a Deputy Title IX Coordinator meets with the complainant to discuss options, including seeking medical and counseling support and making a complaint to law enforcement with the University's assistance. Lay investigators then conduct a prompt and equitable investigation that involves interviews with the complainant, respondent, and other witnesses who may have relevant information. An investigation report is then prepared that recommends whether or not a preponderance of the evidence supports that the reported sexual misconduct occurred. If either party disputes the report's recommendation, the matter proceeds to a hearing where the matter is adjudicated. Either party

aggrieved by the decision has the right to appeal. Persons who are found responsible for sexual misconduct face the full range of discipline up to and including termination/dismissal.

The University has a range of supports in place to assist persons during and after an investigation is complete. On-campus services include free access to counseling and medical services through the Wellness Center; assistance with housing changes and housing accommodations; assistance with academic changes and accommodations, including class changes and withdrawals; assistance in contacting and working with law enforcement; imposition of no-contact orders; security escorts; and spiritual advising and prayer. Additionally, the University is in the process of opening a Student Advocate Office, staffed with persons who will be available on campus to serve as confidential resources and assist students in sexual misconduct cases with accessing the various on-campus services and navigating the investigation and determination process. The University also maintains and provides to students a list of off-campus resources, including victim assistance groups that are available to provide additional support.

The University strongly encourages anyone who has experienced sexual misconduct, or who is aware that someone has experienced sexual misconduct, to report the matter to the University's Title IX Coordinator or a Deputy Title IX Coordinator, and to law enforcement.

Current students who have experienced sexual misconduct but who are not certain of how they wish to proceed may contact the Wellness Center, the Chaplain's Office, or the Student Advocate Office (when opened) to schedule a confidential session where options will be discussed without a formal report being initiated.

The University's Title IX [website](#) includes additional important information about how to make a report of sexual misconduct, the University's process for responding to reports, and on- and off-campus resources.

While our campus will never be entirely free from the effects of sin, we are confident that the [Policy on Discrimination, Harassment, and Sexual Misconduct](#), our sexual misconduct prevention training programs, our campus security team, and the additional supports and policy changes adopted in light of the review demonstrate the University's firm commitment to campus safety.

QUESTIONS AND ANSWERS

1. Why is the University releasing this list now?

The University's President Father Sean O. Sheridan, TOR initiated this review in light of the ongoing sexual abuse scandal that has affected many dioceses, religious orders, and Catholic institutions. The University's leadership, and its Board of Trustees, believed it was essential for the University to determine the extent of past reports of sexual misconduct, to determine whether the University complied with applicable legal and reporting requirements, and, if deficiencies were found, to enact changes and provide additional support to maintain campus safety.

2. Does the University automatically remove priests from ministry when they are accused of misconduct?

Yes. Under protocols recently approved by administration and the Board of Trustees, any cleric, for whom there is reasonable cause to suspect unwelcome sexual contact against a student, will be immediately suspended from private interactions with students until such time as the matter is resolved. All of the individuals identified as having substantiated allegations of unwelcome sexual contact with students would have been immediately removed from contact with students under this new protocol.

As it pertains to reports of past unwelcome sexual contact, all known clerics with substantiated allegations are either deceased or have been removed from ministry/employment at the University. And there are no unresolved reports of unwelcome sexual contact involving any cleric or other person who is currently in ministry or employed at the University.

3. Does the University care about campus safety?

Yes. Campus safety is a priority for the University. The last reported instance of unwelcome sexual contact by a cleric against a student was alleged to have occurred no later than 2013. Since 2014, and today, the University has strong policies and processes in place to prevent and address any concerns of sexual misconduct. All students, clerics, and non-clergy employees receive mandatory training on sexual misconduct. Clerics not acting in a pastoral or sacramental capacity, and non-clergy employees, are required to report any information about sexual misconduct to the Title IX Coordinator. With the addition of additional investigative capacity, the creation of a Student Advocate Office, and the additional measures announced in this disclosure, the University has further strengthened its systems for preventing and responding to sexual misconduct.

4. What supports does the University offer to victims of sexual misconduct?

The University has a range of supports in place to assist victims of sexual misconduct. On-campus services include free access to counseling and medical services through the Wellness Center; assistance with housing changes and housing accommodations; assistance with academic changes and accommodations, including class changes and withdrawals; assistance in contacting and working with law enforcement; security escorts; and spiritual support. Additionally, the University's President recently directed the creation of a Student Advocate Office, staffed with persons who will be available on campus to assist students in sexual misconduct cases with accessing the various on-campus resources and navigating the investigation and determination process. The University also maintains and provides to students a list of off-campus resources, including victim assistance groups that are available to provide additional support.

5. Did the review identify any instances of child sexual abuse?

The review did not identify any substantiated child sexual abuse that happened on campus or in relation to the University's programs and activities. The University is aware that some clerics, who served in ministry and were employed at the University, have been publicly named as having substantiated allegations of sexual abuse against children at some other location, such as a diocese or another Catholic institution. Those individuals are identified in this disclosure.

6. Why didn't the University disclose the names of non-clergy employees for whom there are substantiated claims of unwelcome sexual contact against a student?

Consistent with disclosures made by other institutions, dioceses, and Church institutions, the University has disclosed the names of clerics against whom one or more substantiated claims of unwelcome sexual contact against a student were identified based on review of the University's records. Although there were a limited number of reported instances of unwelcome sexual contact by non-clergy employees, due to legal requirements governing the confidentiality of personnel records, and a judgment that such instances likely could not be disclosed without compromising the privacy of victims, the University determined not to identify the names of such individuals.

7. Why did the Franciscan University use Husch Blackwell to conduct this review?

Husch Blackwell is a national law firm with deep expertise in Title IX compliance, including sexual misconduct response at private colleges and universities like the University. We are confident that Husch Blackwell's subject matter expertise, which includes retired senior law enforcement officials, and experience working with similar institutions, made them a good choice for this project. As a law firm tasked by the University with conducting a review of past reports of sexual misconduct, Husch Blackwell attorneys are duty-bound to provide objective and candid information to the Board of Trustees. We are confident they did so here.

8. Why didn't you disclose Husch Blackwell's report?

The report Husch Blackwell delivered to the Board of Trustees was a confidential report. It also included discussion of factual details that would be inappropriate for public disclosure because of confidentiality limitations imposed by the Family Educational Rights and Privacy Act ("FERPA"), 20 U.S.C. § 1232g and because disclosure of the information could compromise the identities of victims, causing further trauma and discouraging future reports. The University takes seriously its legal and ethical obligations to protect the identities of victims, persons against whom allegations have not been substantiated, and other third-parties who may have been involved in particular reports.

9. Does the University immediately notify police whenever it receives a report of sexual misconduct?

Consistent with Ohio law, the University's policy is to immediately report to law enforcement any time (i) it has reasonable cause to suspect sexual abuse of a child; (ii) when the University has actual knowledge of a felony being committed; or (iii) when there is an emergency situation posing an imminent threat to safety. In other cases, and consistent with industry standard practice, the University encourages victims to report to law enforcement and will assist them in doing so. However, in deference to a victim's wishes, the University's policy is not report to law enforcement without a victim's consent absent one of the three situations identified above.

10. What training do clerics and others receive before being allowed into ministry on campus?

Before starting work at the University, all clerics and non-clergy employees are required to complete a criminal background check and an online Sexual Misconduct Prevention Training. Additionally, all non-clergy employees who work with children must comply with the University's [Policy for the Protection of Minors](#). All clergy who work with children must complete an acceptable form of safe environment training (such as Virtus or Praesidium). All priests under the jurisdiction of the Diocese of Steubenville are required to complete training on the [Decree on Child Protection](#) and Safe Environment Training, or a comparable course, as specified by the diocese. Further, all TORs are required by the Order to undergo sexual misconduct prevention training.