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| **TO** | Executive Committee, ACNA |
| **FROM** | Kathryn Nash and Tana VanGoethem, Lathrop GPM |
| **DATE** | November 16, 2026 |
| **SUBJECT** | Executive Summary of Findings and Recommendations of Independent Review |

## Background and Scope of Review

In June 2022, the Anglican Church in North America ("ACNA") College of Bishops called for an independent review of Provincial practices related to the Diocese of the Upper Midwest. After the disciplinary process concluded in December 2025, the Executive Committee formed a Review Subcommittee (the "Subcommittee"), and Lathrop GPM was engaged to conduct the review.

The Lathrop GPM review covered the period from July 2021, when the Province assumed oversight of the investigation at the request of the Diocese's Bishop's Council, through June 2025, when the trial began. The review examined:

- the Provincial Office's administration (the "Province") of the disciplinary process;
- its role in overseeing the investigations and in preparing presentments;
- its communications, recordkeeping, contracting, cost management, and related operational decisions;
- the circumstances surrounding the resignations of members of the Provincial Response Team; and
- the allegation that case files were inappropriately shared with the Court.

Consistent with the Subcommittee's direction, the review did not examine the work of the Board of Inquiry, which is confidential, or the conduct of the trial itself.

## Methodology

As part of the review, Lathrop GPM interviewed individuals who were involved in the disciplinary process. To maintain a narrow review scope and manage costs, the Subcommittee identified the individuals to be interviewed and the topics to address. Lathrop GPM contacted 20 individuals, 12 of whom participated in an interview. They included representatives of the Diocese, current and former Provincial staff and leadership, and members of the process bodies the Province created. Some of the individuals interviewed served in multiple capacities throughout the disciplinary process. Lathrop GPM also reviewed documents provided directly by the Subcommittee, as well as documents provided by interviewees. The Subcommittee reviewed documents provided by interviewees and weighed in on whether the documents were relevant to the review. The Subcommittee ultimately decided to forward all

documents received. The Subcommittee's suggestions on interviewees, topics, questions, and documents were for the purpose of maintaining scope and efficiency. The Subcommittee did not limit Lathrop GPM's ability to ask relevant questions, speak with additional interviewees, or review additional documents that it deemed necessary.

There were challenges during the review that created some limitations on Lathrop GPM's ability to gather information. Several individuals who were most closely involved in the Province's handling of the matter, and in some cases the only people with first-hand knowledge of particular decisions, declined to participate in an interview or set conditions on their participation that were inconsistent with Lathrop GPM's standard protocols. In addition, because many of the events occurred years earlier, interviewees' recollections were sometimes limited. As a result, there was certain information that could not be confirmed. However, the focus of the review was to understand the circumstances surrounding the Province's handling of the disciplinary process in order to make forward-looking recommendations; Lathrop GPM was not charged with making specific factual findings. Accordingly, these limitations did not affect Lathrop GPM's ability to make its recommendations.

## Summary of Findings and Recommendations

Following its review of the disciplinary process related to the Diocese of the Upper Midwest, Lathrop GPM identified a number of concerns regarding the Provincial Office's handling of the process. Many of these concerns stemmed from the absence of a defined process: the canons in effect at the time did not address how the Province should respond to initial reports involving a bishop, gather information before a presentment, or share information with the bishops considering a presentment. As a result, the process was developed ad hoc. Those involved were required to make significant decisions without established guidance. Lathrop GPM believes the concerns described below contributed to distrust of the process, as well as inefficiencies, increased costs, and delays that further undermined confidence in the disciplinary system.

- **Unclear and overlapping roles.** The Province relied on several formal and informal groups to administer the process. At times, their roles and responsibilities were unclear or overlapped, and in certain respects did not align with what had been publicly communicated. In addition, individuals and groups without a defined role in the process were sometimes involved in making recommendations and influencing decisions. When roles did not operate as described, trust was diminished among those serving in the process, as well as among survivors and others affected by it.

- **Structure and oversight of the investigations.** The decision to engage two investigative firms at the same time resulted in overlapping work and duplicative interviews, which increased costs and required some witnesses to recount their experiences multiple times, an approach that was not fully trauma-informed. The firms were also asked to perform different functions, with one making factual findings and the other reporting witness accounts, and they used different interview practices, which created some confusion. In addition, oversight of the investigations was not assigned to a single designated person or body, but was instead handled informally by overlapping groups of Provincial staff.

- **Presentment decision-making process.** The process lacked clear decision-making boundaries. Individuals without formal decision-making authority controlled what information was provided to those reviewing the investigation reports and, at times, attempted to influence their deliberations.

Multiple groups were asked to make recommendations regarding whether to proceed with a presentment, which blurred responsibility for the decision and made the process less efficient. There was also no process to ensure that those involved at different stages had access to the same information. Together, these circumstances raised questions about the independence and neutrality of both the process and its leadership and eroded trust.

- **Communications and stakeholder engagement.** Many stakeholders, including the Diocese of the Upper Midwest, expressed dissatisfaction with Provincial communications, citing concerns about transparency, consistency, and follow-through. The Province's communications created expectations, including among survivors, that did not always align with how the process ultimately unfolded, which contributed to frustration and distrust.

- **Cost management and recordkeeping.** The investigations involved significant expense, and the investigative structure likely added to both cost and duration. Although costs would have been difficult to estimate at the outset, budget expectations and tracking were not always clear to those with governance responsibility. Lathrop GPM had limited information about recordkeeping practices at the time, but was told that document access and retention were not governed by established protocols. Questions raised about the Court's access to case files underscore the importance of a defined process for maintaining the Province's records and ensuring that those making final decisions have access to the information relied upon earlier in the process.

As stated by the College of Bishops in June 2022, there is a commitment to learn from this experience and implement protocols or processes based on those learnings. Based on its review, Lathrop GPM's recommendations generally fall within the following areas:

- **Clear roles and accountability.** Define the responsibilities and authority of each participant in the process, including those in leadership roles, and limit involvement to those with a defined role. Designate a single point of contact to oversee the process and coordinate among the parties, investigators, and decision-makers. Provide role-specific training for all participants, including trauma-informed training for those handling matters involving sexual misconduct or abuse of a minor.

- **A distinct approach to reports of sexual misconduct or abuse of a minor.** Given the nature of these allegations and the needs of those affected, establish a separate process for receiving and responding to these reports that is trauma-informed and encourages reporting and participation.

- **Consistent investigation practices.** Centralize oversight of investigations; consolidate related investigations where possible to reduce cost and delay and minimize the burden on the parties and witnesses; and adopt written protocols governing how investigations are conducted, how records are maintained and secured, and how their results are documented and shared. Investigators should receive clear guidance on the scope of their work and should serve as information gatherers rather than decision-makers.

- **Independent, well-informed decision-making.** Vest decision-making authority in a clearly identified person or body, avoid layers of intermediate recommendations, and ensure that decision-makers deliberate independently. Decision-makers should be able to request and receive any

additional information they believe is necessary to fulfill their responsibilities, and should have access to all information considered by those involved at earlier stages of the process. Keep the parties informed and provide them with access to the information on which decisions are based.

- **Disciplined communications and preparation for high-profile matters.** Adopt protocols that govern when and how the Province communicates with internal and external stakeholders, and make commitments only when the Province is in a position to fulfill them. In high-profile matters, engage appropriate outside expertise early in the process.

Lathrop GPM also considered the Revised Title IV canons, which the ACNA recently adopted to amend its disciplinary process involving a bishop. Importantly, the revised canons represent a meaningful improvement, particularly by establishing a defined process for all stages of the disciplinary process, and in that respect are consistent with several of the recommendations above. However, Lathrop GPM has concerns about certain aspects of the revised process, including its complexity, the number of individuals and decision points involved, and the potential for inconsistent outcomes at different stages. Lathrop GPM has recommended targeted revisions to address these concerns, including ways to streamline the process and reduce the potential for conflicting determinations, which it believes would further strengthen the process and promote confidence in it.