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THE FOURSQUARE CHURCH

Audit & Gap Analysis

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The Foursquare Church
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BACKGROUND

2023 Assessment

In 2023, Guidepost Solutions (“Guidepost”) was engaged to assess The Foursquare Church’s (“Foursquare”) processes for responding to allegations of clergy misconduct. As part of this assessment, Guidepost reviewed relevant policy and procedure documents, including the *Handbook for Responding to Clergy Misconduct (“HFRCM”)*, *Handbook of Operations, Child and Youth Protection Manual (“CYPM”)*, and *Inappropriate Sexual Behavior Manual*. The 2023 assessment focused on identifying gaps in these policies and procedures and resulted in Guidepost presenting 35 priority recommendations aimed at increasing reporting awareness, strengthening the adjudication process, and enhancing institutional accountability. Guidepost also provided frameworks for defining the roles of the Ethic Process Team, Response Team, Review Panel, and Prevention Team, and presented training recommendations to inform ministry leaders of relevant topics to prevent abuse, harassment, and misconduct, as well as to improve the reporting process.

Evolution of Foursquare’s Prevention, Reporting, and Response Process

Historically, Foursquare relied on a decentralized system, where ethics complaints and misconduct reports were handled individually by the District offices, each led by District Supervisors. This approach often resulted in a lack of clarity and inconsistencies in how cases were adjudicated. To address this, Foursquare transitioned to a national, centralized reporting and response process overseen by a dedicated Ethics Process Team, following the procedures outlined in the HFRCM. Under the new framework, all misconduct reports are now received through a centralized intake point via a 24-hour hotline and the NAVEX/Ethics Point secure web portal. By removing the reporting and investigation phases of misconduct cases from the local District, the Ethics Process Team ensures that every incident report is processed using a standardized, consistent methodology across the denomination.

SCOPE

As established in the November 2025 Foursquare Proposal, the engagement objectives were to audit Foursquare’s reporting systems and response processes and identify gaps in policy based on recent data. The primary goal was to evaluate the performance and effectiveness of the newly centralized reporting system and response processes. By reviewing post-implementation case data and interviewing key leadership of the Ethics Process Team and the Prevention Team, Guidepost aimed to assess the functionality of the new accountability structures, identify emerging gaps in the current HFRCM V.10, and provide strategic recommendations to further improve Foursquare’s response processes.

METHODOLOGY

Guidepost began this engagement by meeting with the Foursquare leadership team. The purpose of this strategic planning session was to identify key stakeholders, clearly define the scope of the engagement, and establish specific goals and timelines for the assessment. In December 2025, Guidepost issued a formal document request to Foursquare to obtain the documents needed for a comprehensive paper audit. Guidepost's assessment included the following steps:

Document Review – Guidepost conducted a comprehensive review of the requested internal documents, policies, and training materials provided by Foursquare, as well as relevant Foursquare website links. The scope of this review was limited to verifying Foursquare's implementation of Guidepost's 2023 recommendations and Foursquare's abuse prevention and response initiatives. Therefore, Guidepost did not review all policies from the 2023 assessment and focused on reviewing the updated HFRCM V.10 and the updated CYPM V.7. Guidepost reviewed the following documents:

- *Handbook for Responding to Clergy Misconduct (V.10) (April 2025)*
- *Guidepost Recommendations 3.2.2023 with Foursquare Responses*
- *Child and Youth Protection Manual (V.7) (2025 Update)*
- *Prevention Team Fall Update - September 2025*
- *Prevention Team Case Summary and Recommendations - September 2025*
- *February 2024 Prevention Team Presentation*
- Websites: [Healthy Culture - The Foursquare Church](#); [Child + Youth Protection Manual + Resources - News + Resources](#)
- *Credential Renewal Hub Platform*

Review of Case Summaries– To assess the effectiveness and operation of the reporting system and response processes, Guidepost reviewed recent data collected since the implementation of the NAVEX/Ethics Point system. This involved reviewing high-level case metrics and resolution statuses to identify trends, challenges in processes, and potential gaps in policy application. Guidepost did not, however, conduct a review of specific case files, as the emphasis was on conducting a comprehensive, high-level evaluation of the overall process. Guidepost reviewed the following case logs and summaries:

- *2025 Annual Case Summary and Recommendations*
- *2024 Annual Case Summary and Recommendations*
- *Closed Ethics Cases Report*

Interviews– Because written policies often differ from operational reality, Guidepost conducted interviews with key members of the Ethics Process Team and the Prevention Team. These interviews were critical for assessing how HFRCM V.10 is applied in actual cases, identifying gaps, and developing recommendations.

OBSERVATIONS

Overall, Foursquare has demonstrated a strong commitment to organizational accountability by successfully implementing the vast majority of Guidepost’s original 2023 recommendations. To verify the adoption of these measures, Guidepost conducted a comprehensive evaluation that included a review of the updated HFRCM V.10 and the updated CYPM V.7, alongside a high-level case data analysis and interviews. The chart in [Appendix C](#) provides a line-by-line assessment of this progress, comparing the 35 original Guidepost recommendations and Foursquare’s responses against their verified operational status.

Interviews with the Ethics Process Team and Prevention Team leadership revealed there is universal agreement that the new, centralized reporting and response system is an improvement over the previous decentralized approach. By transitioning to a centralized model managed by the national Ethics Process Team, rather than relying on inconsistent and decentralized District offices, Foursquare has successfully established a standardized approach for reporting and processing misconduct claims. This ensures that credentialed ministers are consistently held to the same expectations.

- **Intake and Case Management:** Intake is primarily managed through the NAVEX/Ethics Point system, though claimants have directly sent reports to the District offices in some cases. All initial intake, claimant communication, and early documentation are kept strictly within the Ethics Point portal to maintain confidentiality. If the Ethics Process Team determines a claim involves actionable misconduct, the case is transitioned into a highly secure file within *The Hub* – Foursquare’s centralized database and case management system, built on the Salesforce CRM platform. At this stage, a credentialed minister’s profile is flagged with a “License Under Review” status, preventing role transfers while investigations are ongoing. Starting January 2026, The Hub was configured to track post-adjudication Growth Plans, sending automated notifications to the Ethics Process Team and District Supervisors to ensure ministers complete Growth Plan requirements, if assigned.
- **Adjudication:** After intake assessments, cases to be investigated are assigned to a demographically appropriate Response Team, and if the case is complex, an advisory Review Panel will be formed. Adjudicators on the Response Team use the “preponderance of the evidence” standard in making decisions.
- **Prevention and Compliance:** Foursquare has made great efforts to demonstrate proactive abuse prevention. The 2025 launch of the comprehensively rewritten *Child and Youth Protection Manual* was highly effective, earning a 5.0/5.0 efficacy score in recent Prevention Team audits due to excellent field engagement and training. Foursquare has embedded compliance into its organizational structure by linking mandatory policy review and training into the annual credential renewal process. Ministers must complete specific training modules and affirm their adherence to the CYPM and the HFRCM before they are allowed to renew their active Foursquare credentials.

FINDINGS & RECOMMENDATIONS

Despite the operational success of the centralized system, Guidepost found gaps that should be addressed with the policies and processes.

Finding 1 – Dual Pathway Confusion Draws Non-Actionable Complaints into the Formal Misconduct Reporting System

Foursquare implemented a Dual Pathway system to manage case volume by separating relational or leadership style concerns from actionable misconduct reports. Relational disputes should be reported through Pathway 1 and handled by Districts. Reports of misconduct should be reported through Pathway 2 and handled by the Ethics Process Team. The [Healthy Culture - The Foursquare Church](#) website provides separate buttons and forms for Pathway 1 and Pathway 2. However, less than 1% of claimants utilize Pathway 1, despite many reports involving relational disputes. Instead, claimants overwhelmingly report to Pathway 2 for minor HR and staff disputes, personality conflicts, or disagreements with leadership style.

Guidepost’s review of the [Healthy Culture - The Foursquare Church](#) website identified a critical gap: the absence of a clear definition for Pathway 1 and Pathway 2. Without these definitions prominently displayed on the main page, reporters may be unsure about which Pathway to select, increasing confusion and misdirected complaints. Although the terms “Pathway 1 (Relational)” and “Pathway 2 (Misconduct)” are frequently referenced on Foursquare’s reporting website and in internal Prevention Team presentations and reports, HFRCM V.10 does not explicitly reference the “Pathway” terminology in its text.

This confusion regarding the Pathways creates a significant bottleneck for the Ethics Process Team, requiring them to spend considerable time triaging and investigating claims that do not meet the threshold for actionable misconduct. Because claimants have expectations for an investigation, they are often disappointed when the Ethics Process Team determines their report is not appropriate for Pathway 2, and the case is either closed or referred back to the District for relational mediation. As a result, the Ethics Process Team must spend additional time explaining why a case is being closed or referred back.

Guidepost Recommendations – Finding 1

- a. **Clarify Website Language:** Add definitions of Pathway 1 and Pathway 2 to the main website where the portal/forms buttons are located. Post “Frequently Asked Questions” on the website that includes guidance for both Pathway 1 and 2.
- b. **Update HFRCM V.10:** Update HFRCM V.10 to explicitly incorporate and define the “Pathway 1 (Relational)” and “Pathway 2 (Misconduct)” terminology to match the website and internal training materials.
- c. **Create a Matrix:** Create and integrate an objective *Complaint Classification Matrix* directly into the HFRCM and FAQ’s to clearly define the threshold between non-disciplinary relational matters (Pathway 1) and actionable misconduct (Pathway 2). Providing a clear visual guide will help claimants understand which

concerns belong in each Pathway, set appropriate expectations before they submit a report, and significantly reduce the time the Ethics Process Team spends triaging non-actionable complaints. See the sample Matrix in [Appendix A](#). This approach will also support the Ethics Process Team in efficiently categorizing reports and establishing a consistent standard for what qualifies as misconduct.

- d. **Training:** Provide training for District leaders to ensure their understanding of Pathway 1 relational claims, and the process for handling them consistently when cases are referred back to the Districts.

Finding 2 – Subjective Definitions of Spiritual Abuse Complicate Triage and Adjudication

During intake, the Ethics Process Team frequently encounters subjective interpretations of terms like "spiritual abuse" and "toxic leadership". Claimants often submit reports characterizing legitimate church discipline, lawful HR terminations, or harsh communication as actionable misconduct. Ethics Process Team staff noted that one of their most difficult daily tasks is distinguishing between a toxic pattern of behavior and an isolated, poor leadership decision.

A persistent challenge during the intake phase is the high degree of subjectivity surrounding terms like "spiritual abuse," "leadership abuse," and "toxic leadership." While HFRCM V.10 provides a foundational definition of spiritual misconduct, applying the definition to real-world scenarios is unclear.

Guidepost Recommendations – Finding 2

- a. **Incorporate Spiritual Abuse Examples in the *Complaint Classification Matrix*:** Include specific, example-based criteria in the recommended *Complaint Classification Matrix* to clearly distinguish between isolated instances of poor leadership and actionable misconduct. This approach will provide greater consistency and clarity for both claimants and the Ethics Process Team when evaluating reports. See [Appendix A](#).

Finding 3 – Ambiguity in Ethics Process Roles Create Confusion in Process

HFRCM V.10 distinguishes between the "Ethics Process Team" (which handles intake, triage, and the administrative oversight of the investigation)¹ and the "Response Team" (which is the adjudicatory body responsible for determining whether misconduct occurred and deciding on disciplinary consequences).² However, the policy permits the Ethics Process Team Leader and other denominational leaders to simultaneously serve on the Response Team, causing these distinct procedural roles to sometimes overlap in practice. This overlap can lead to confusion among claimants, respondents, and participants regarding who holds the final decision-making authority.

¹ HFRCM V.10, page 15-16.

² HFRCM V.10, page 17-18.

This role confusion also extends to the Review Panel³, whose strictly advisory responsibilities are often misunderstood. For example, a Prevention Team member recounted that, during his experience on a Review Panel, Panel members were unsure if they were final adjudicators or simply advisors. In that instance, the Review Panel mistakenly thought they were making recommendations to the Board, when policy actually dictates they only advise the Response Team.

Based on our interviews and review of HFRCM V.10, significant textual contradictions have led to persistent role confusion among the Ethics Process Team, Response Team, and Review Panel. Several sections of HFRCM V.10, as detailed in [Appendix B](#), contain inconsistencies regarding the responsibilities and composition of the Response Team and Review Panel. These contradictions include unclear guidance on when to assemble a Response Team and whether a Review Panel is required in every case. Such ambiguities appear in both written procedures and process diagrams, leaving staff and volunteers uncertain about when the Response Team is formed and which group is responsible at each stage. This lack of clarity results in procedural confusion and challenges in defining roles throughout the ethics case workflow.

Guidepost Recommendations – Finding 3

- a. **Update HFRCM V.10:** Update HFRCM V.10 Sections related to roles to bring clarity. See [Appendix B](#).
- b. **Training:** Consider creating role-specific training modules for Response Team and Review Panel members, so they clearly understand their authority and reporting lines before cases begin.

Finding 4 – Post-Adjudication Growth Plans Lack Completion Verification

When misconduct does not warrant suspension, the Response Team frequently assigns a "Growth Plan" (e.g., mandatory coaching or counseling, training). At this post-adjudication stage, the Ethics Process Team concludes its active investigation and hands the case back to District leadership to oversee the completion of the Growth Plan. Historically, this handoff resulted in cases going unmonitored, with no consistent verification that ministers completed their mandates.

To close this gap, in January 2026, Foursquare launched an automated tracking system in The Hub, to send automatic reminders to the Ethics Process Team, the District leader, and the minister at specific intervals (e.g., 30 days and two weeks before the deadline to complete). If the District leader reports that the minister has abandoned the Growth Plan, the Ethics Process Team is notified and can re-open the ethics case for further disciplinary action.

³ As page 17 of the HFRCM V.10 indicates, a Review Panel is "assembled in cases where investigations reveal facts, conduct, motives, or other aspects that make assessment atypically difficult and warrant further discussion and further discernment."

This new system has not yet been audited for overall effectiveness. Guidepost did not find any reporting provided to the Prevention Team regarding the actual completion of these assigned Growth Plans by ministers.

Guidepost Recommendations – Finding 4

- a. **Audit Growth Plan Compliance:** Establish a formal, routine audit of The Hub tracking system to ensure that disciplined ministers complete their post-adjudication Growth Plan before resuming ministry or renewing credentials.

Finding 5 – Ethics Process Team Resource Limitations Present Operational Challenges

The most critical challenge within the current system is staff capacity. The Prevention Team feels the Ethics Process Team is performing very well, but may be stretched thin as the two-person team manages all national misconduct cases alongside mandatory ethics reviews for ministers going through divorces. At one point, the Ethics Process Team was managing 34 open cases simultaneously.

HFRCM V.10 targets completing investigations in 60 days, which sets a false expectation for participants. Due to logistical challenges of gathering written statements, conducting witness interviews, and aligning schedules to assemble the Response Team and the Review Panel, if applicable, cases typically take 90 to 120 days to resolve. In some complex cases, the investigation and adjudication process can extend to six months.

The Ethics Process Team's capacity constraints are heavily exacerbated by significant claimant expectations. Both Ethics Process Team leaders noted that claimants often demand frequent, consistent updates, which the team simply cannot accommodate due to their heavy caseload.

The Ethics Process Team leaders also expressed the need for formal investigation training, and recommended bringing a skilled, professional investigator to conduct a one-day training with the Ethics Process Team, District leaders, and Response Teams on proper evidence gathering, interviewing techniques, and evaluating standards of evidence.

Guidepost Recommendations – Finding 5

- a. **Expand Staffing:** Evaluate staffing levels and consider adding dedicated administrative or investigative support staff.
- b. **Training:** Provide investigator training that covers trauma-informed interviewing, grooming, authority figure abuse, and related topics.
- c. **Care for Secondary Trauma:** Consider providing formal emotional and psychological support for Ethics Process Team staff, as they manage significant and intense communications from claimants and respondents.

Finding 6 – Current Audit Practices Do Not Verify Case-Level Adherence to Policy

While the Prevention Team performs yearly audits of the incident reporting and adjudication processes, their current review remains strictly high-level, focusing only on summary data, case statistics, and general trends provided by the Ethics Process Team. There is no process in place for anyone outside of the Ethics Process Team to drill down into specific case files. A Prevention Team member expressed concern regarding this limitation, noting that because the team only sees high-level summaries, no one outside of paid Foursquare staff is actually reviewing case files to ensure the policies are being followed line-by-line.

Guidepost Recommendations – Finding 6

- a. **Validation Process:** To ensure the procedures in HFRCM V.10 are being properly executed, establish a small subcommittee within the Prevention Team to annually review a sampling of case studies using fully redacted/anonymized files. Conduct a line-by-line audit of these case files to ensure the policies are being followed.
- b. **Field Surveys:** Conduct surveys with field ministers and youth pastors within the next 1-2 years to evaluate how the new policies and procedures are functioning in practice.

CONCLUSION

Guidepost’s audit revealed that Foursquare has demonstrated a commendable commitment to organizational accountability by successfully implementing the majority of Guidepost’s 2023 recommendations. Notable achievements include the launch of the NAVEX/Ethics Point system, the creation of the Prevention Team, and the integration of the mandatory *Child and Youth Protection* training into the annual credential renewal process through The Hub – each a significant milestone in fostering a culture of healthy leadership, safety, and transparency.

However, as with any major system transformation, the newly established process is experiencing operational challenges that must be addressed to ensure its long-term sustainability. The most critical concern is the capacity constraint and bottleneck within the two-person Ethics Process Team, which is exacerbated by reporters’ confusion over the dual reporting pathways and the resulting high volume of misdirected, non-misconduct reports to the Ethics Process Team. By expanding Ethics Process Team staff resources, updating the HFRCM V.10 as recommended, and implementing more detailed case study audits, Foursquare can effectively close the remaining operational gaps. Doing so will further strengthen Foursquare’s response protocols and maintain the denominational trust in the reporting and response system they have worked so hard to build.

APPENDIX

APPENDIX A – MATRIX FOR PATHWAY DETERMINATION

Complaint Classification Matrix

This chart is a sample of the Matrix recommended to be used as a tool to determine which Pathway is appropriate for the report. The sample Matrix is intended to provide clear objective guidance to help reporters, the Ethics Process Team, and District leaders distinguish non-disciplinary issues from misconduct reports warranting investigation.

Category	Pathway 1: Relational / Pastoral Care (District Supervisor)	Pathway 2: Misconduct / Ethics Process (Ethics Process Team)
Leadership Style & Decisions	Disagreements over church direction, staffing strategy, lawful termination of at-will employees, poor judgement, or poor communication style in meetings or correspondence.	Retaliation, coercion, misuse of authority to conceal misconduct or compel unethical behavior.
Spiritual & Emotional Dynamics	Theological or doctrinal disagreements or offense related to tone, sermons, or appropriate discipline.	Spiritual abuse including manipulation of scripture to enforce personal loyalty, coercive control, exploitation of congregants for personal benefit, pattern of behavior, or malicious shunning or isolation.
Interpersonal Conflict	Personality conflicts, relational breakdowns between staff or congregants, miscommunication, or perceived lack of pastoral care or emotional support.	Bullying, intimidation, repeated shaming, blackmail, or misuse of confidential pastoral information.
Boundaries & Sexual Conduct	Not applicable – All boundary concerns require Ethics Process Team review.	Unwelcome touching, sexual harassment, grooming behaviors, extramarital affairs involving abuse of authority, or any inappropriate physical or digital contact with a minor.
Financial & Fiduciary Matters	Budget disagreements or disagreements regarding lawful financial decisions made in accordance with bylaws and policies.	Embezzlement, falsification, or exploiting congregants for personal financial gain.
Legal & HR Matters	General HR grievances not involving illegality or abuse (e.g., compensation, workplace concerns), lawful termination of at-will employees.	Violations of state or federal law, physical violence, threats of harm, or failure to report abuse or meet mandatory reporting obligations.

Triage Fail-Safe: If a Pathway 1 conciliation meeting uncovers evidence of Pathway 2 behaviors (e.g., a pastoral conflict reveals financial fraud), the District Supervisor must immediately halt the conciliation and escalate the case back to the Ethics Process Team.

APPENDIX B – RECOMMENDED UPDATES TO HFRCM V.10

HFRCM V.10 Section Needing Revision	Issue Identified	Recommended Revision
Page 12 - Definitions	Grooming is not defined.	Grooming definition should be added as a precursor to "Abuse." Clarify that the manipulative process used to prepare a victim for abuse is, in itself, actionable misconduct.
Pages 16-17 – Ethics Process Team & Investigator Responsibilities	<p>Item 2f states the Ethics Process Team must assemble a Response Team "for each case" (Page 16). However, later sections state it is only assembled "if an investigation is needed" (Page 28).</p> <p>Assumed Roles: Item 2k assumes Response Team input for every notice of decision (Page 16), and the Investigator definition assumes a Review Panel is used in every case (Page 17).</p>	<p>Revise 2f: Change to state a Response Team is assembled "<i>if an investigation is needed</i>" rather than "for each case".</p> <p>Revise 2i: Add, "<i>if applicable</i>"</p> <p>Add Qualifiers: Update 2k and the Investigator section (Page 17) to include qualifiers like "<i>if an investigation occurred</i>" or "<i>if one is utilized.</i>"</p> <p>Reorder Definitions: Move the "Response Team" definition to appear before the "Review Panel" definition to visually reinforce that the Review Panel is subject to the Response Team (Page 17).</p>
Page 22 – Submitting Claims of Misconduct	There is no formal explanation of Pathway 1 and Pathway 2 in HFRCM V.10.	Replace the current "Note" regarding conciliation meetings with a clear explanation of the two Pathways available when reporters are using the online webforms. Specifically, outline: Pathway 1: Relational – Not Subject to Discipline Pathway 2: Misconduct – Potentially Subject to Discipline
Page 24 – Diagram 1, <i>Incident Reporting Process</i>	There is no mention of Pathway 1 and Pathway 2 on the <i>Incident Reporting Process Diagram</i> .	Add "Pathway 1" and "Pathway 2" to the bold headers inside the boxes as such: "Pathway 2: Potentially Subject to Discipline" "Pathway 1: Not Subject to Discipline"
Page 26 - Diagram 2, <i>Intake and Investigation Process</i>	Missing Step: The flowchart includes a box for "Response Team review" following an investigation, but nowhere does the diagram actually show the step where the Response Team is established or assembled.	Add Process Box: Insert a specific step/box in the flowchart labeled "Response Team Assembled" alongside the investigation trigger so that users have a visual reminder of exactly when authority is handed over.

<p>Page 28 - Investigation Procedures</p>	<p>Circular Contradiction: The text states, "If an investigation is needed, a response team will be assembled as described earlier in this handbook." Because "earlier" points to the flawed text on Page 17, it creates a contradiction.</p>	<p>Ensure the text on Page 28 aligns with the corrected Page 17, explicitly clarifying that the Ethics Process Team handles initial triage alone, and the Response Team is only triggered if a formal investigation begins.</p>
<p>Page 30 – Investigation Sequence</p>	<p>The 60-day processing timeline has not been consistently achieved in practice.</p>	<p>Revise Page 30 Item 4 to read "The Ethics Process Team member will administratively oversee the data collection process to ensure that the investigation is prompt, fair, and thorough. Due to logistical challenges of gathering written statements, conducting witness interviews, and aligning schedules to assemble the Response Team and the Review Panel, if applicable, cases typically take 90 to 120 days to resolve, though circumstances may sometimes prevent a timely completion (e.g., law enforcement has requested a stay, complexity of the case, or other extenuating circumstances). In some complex cases, the investigation and adjudication process can extend to six months."</p>

APPENDIX C – AUDIT OF IMPLEMENTATION OF GUIDEPOST 2023 RECOMMENDATIONS

Rec. #	Guidepost Recommendations	Foursquare Response	Verification Status (February 2026)	Evidence/Notes
1	Create a 24-hour hotline (e.g., NAVEX, Lighthouse) with appropriate levels of confidentiality for reporting misconduct complaints, including anonymous complaints against credentialed ministers and church staff and any illicit activity occurring at a church.	In final negotiations with both Navex and Lighthouse on a 24-hour hotline service and case management system (Ethics Point) that will handle all intake and allow for anonymous reporting.	☑	<ul style="list-style-type: none"> Hotline number (844-704-9401) is active. Ethics Point portal (NAVEX) is active and centralizes intake.
2	Update the website to include prominent links to the Foursquare Reporting email [may want to retire] and the 24-hour hotline. Link to the hotline should also be included in the Handbook for Responding to Clergy Misconduct (HFRCM), Employee Handbook, and other relevant materials.	Foursquare Communications is prototyping a major update to the Healthy Culture page on Foursquare.org, along with links on Foursquare's main page. This will be available by the third week of April and will include a placeholder for the 800 number for the hotline and a link to the Ethics Point web-based system that will be used for intake.	☑	<ul style="list-style-type: none"> Healthy Culture - The Foursquare Church website page has prominent links for Reporting. Healthy Culture - The Foursquare Church link appears in HFRCM V.10 (Page 22).
3	In the Preface of HFRCM, clearly define to whom the HFRCM applies.	This was updated in Draft 6 (and beyond) of the HFRCM	☑	<ul style="list-style-type: none"> HFRCM V.10 Preface (Page 2) clearly states it applies to all credentialed ministers.
4	Revise language in HFRCM to be more neutral (e.g., Reporter, Respondent, complaint, allegations compared to vindicate, accusation, accuser, accused, etc.).	This was updated in Draft 7. The following terms are used: Claimant, Reporter, Respondent, incident report, and the person harmed (rather than the victim). There is also a disclaimer included that explains why the term victim is not used for the purposes of the handbook (pg. 16).	☑	<ul style="list-style-type: none"> HFRCM V.10 consistently uses neutral terms. "Victim" terminology is not used in HFRCM V.10. Foursquare explicitly included a disclaimer on why the term "victim" is not used (Page 15).

5	<p>Include all reporting channels in HFRCM. Consider including the following: 24-hour hotline; MyStory@foursquare.org; District Supervisor; Regional Pastor/Area Pastor; Local Church Pastor; Missions Director; Chaplain Director; and Foursquare Church HR.</p>	<p>Listed on page pgs. 23-25 and illustrated in the flowchart - Diagram 1 (pg. 26)</p>	<p style="text-align: center;">☑</p>	<ul style="list-style-type: none"> ▪ All reporting channels are listed in HFRCM V.10 (Pages 22-24).
6	<p>Create an annual communications plan to:</p> <ul style="list-style-type: none"> • Heighten awareness of the clergy misconduct response process; the 24-hour hotline, including how to report clergy misconduct and misconduct by church staff and the ability to report anonymously; and the reporting channels for submitting a complaint. • Communicate that Foursquare encourages Reporters to come forward. • Communicate to those receiving complaints through the reporting channels that, no matter the severity, all complaints must be reported to Foursquare (i.e., the Ethics Process Team). • Communicate whistleblower protections. • Identify ways to effectively communicate, including using newsletters, websites, and communications from leadership. • Encourage churches to voluntarily post basic information about the response process, including contacts, website information, and HFRCM. 	<p>Will incorporate all this information in an awareness training that will be a required part of annual minister credential renewals. The primary delivery system for this will be Maple LMS online courses (English and Spanish) connected to Salesforce. There will also be alternative training options (in-person, webinar, etc.) for non-English and Spanish language groups.</p>	<p style="text-align: center;">☑</p>	<ul style="list-style-type: none"> ▪ Prevention Team has worked on creating annual communication plans to help with prevention. ▪ New training videos on topics relevant to clergy misconduct response process, reporting channels, and child and youth protection have been launched in 2024/2025.

7	<p>Revise handbooks and manuals that overlap in scope with HFRCM (e.g., Inappropriate Sexual Behavior Manual, Handbook of Operations, Child and Youth Protection Manual, Employee Handbook, and Minister's Code of Ethics) to ensure that concepts and phrases included in them are consistent. For example, ensure the complaint, investigation, and adjudication procedures are described consistently in these materials.</p>	<p>This is planned for phase 2, which will begin after the implementation of the entire process; teams and trainings described in the HFRCM are complete Phase 2 is estimated to begin in early 2024.</p>	<p>Partially Implemented</p>	<ul style="list-style-type: none"> ▪ The <i>Child and Youth Protection Manual</i> was updated and launched in 2025. The new <i>Manual</i> link is embedded in the HFRCM V.10 and also found on Child + Youth Protection Manual + Resources - News + Resources. ▪ <i>Handbook of Operations</i> has not been updated.
8	<p>Assess whether phrases regarding misconduct are effectively defined in the handbooks and manuals. Update the list of definitions of misconduct to provide a thorough list of examples of situations, behaviors, and ministerial conduct that are not (and those that are) permissible.</p>	<p>Definitions and examples are included on pages 12-15 of the HFRCM.</p>	<p>See Recommendations</p>	<ul style="list-style-type: none"> ▪ HFRCM V.10 (Pages 11-15) has clear definitions for abuse, harassment, and spiritual misconduct. Guidepost recommends adding definition for "grooming." ▪ Ethics Process Team and Prevention Team leaders noted that the term "spiritual misconduct" remains highly subjective.
9	<p>Update the Board periodically about the clergy misconduct compliance program and serious allegations of misconduct of credentialed ministers and others that create potential risks for the Foursquare community.</p> <p>Updates should include the following:</p> <ul style="list-style-type: none"> • Statistics about cases such as matters handled informally vs. formally, the number of complaints, investigations, and cases adjudicated, appealed, and decided. • Status of matters involving serious allegations that pose a risk to the church. <p>Updates on prevention, training, and communication efforts.</p>	<p>Incorporated into the scope of responsibilities for the Prevention Team defined on pages 19-21 of the HFRCM. This team will perform an annual review of the cases, with statistics, and prepare a report to the ICFG board prior to the annual cabinet meeting in March.</p>	<p><input checked="" type="checkbox"/></p>	<ul style="list-style-type: none"> ▪ Prevention Team reviews summary data twice a year. Guidepost reviewed board memos from 2024 and 2025 meetings, which included case statistics and process status. ▪ Prevention Team members noted that they presented a report to the ICFG board ahead of the Cabinet meeting.

10	Expand the existing written conflict of interest/recusal process to address the Board, senior leadership, and others who are participating in the complaint, investigation, and adjudication processes and have a close personal relationship with the Respondent/Reporter.	Defined in Appendix E (pending completion)	☑	<ul style="list-style-type: none"> ▪ HFRCM V.10 Appendix E defines conflict of interest and recusal protocols for Response Teams.
11	Revise Diagram 2 Flowchart to mirror revised complaint, investigation, and adjudicatory processes.	Updated the workflow as illustrated in diagrams 1 and 2 on pages 26 and 28, respectively. (Note: these are different diagrams from those originally reviewed by Guidepost in draft 1 of the HFRCM)	See <i>Recommendations</i>	<ul style="list-style-type: none"> ▪ HFRCM V.10 has updated <i>Process Flow</i> diagrams (Page 24 & 26). ▪ Guidepost provides recommendations for updating the Flow diagrams in the <i>Recommendations</i> section of this report.

HFRCM Recommendations

Rec. #	Guidepost Recommendations	Foursquare Response	Verification Status (February 2026)	Evidence/Notes
12	Implement a procedure that describes a centralized intake point for all complaints made against credentialed ministers and church staff and any illicit activity occurring at a church. The procedure should also identify all channels through which complaints may be submitted.	Illustrated in diagram 1 and outlined on pages 29-30 of the HFRCM	☑	<ul style="list-style-type: none"> HFRCM V.10 outlines a centralized intake point for all reports – <i>Ethics Point</i> – and all channels of reporting (Diagram 1 – Page 24).
13	Create a procedure that allows for complaints of minor infractions to be handled through an informal process, so long as they do not involve allegations of ethical concerns, violations of law, physical abuse, bullying, harassment, or sexual misconduct, including sexual abuse and sexual harassment.	Illustrated on diagram one and explained on pg. 27 of the HFRCM as actionable and unactionable claims	<i>See Recommendations</i>	<ul style="list-style-type: none"> HFRCM V.10 outlines a procedure to report and address complaints of minor infractions (Pathway 1) that is separate from reports of clergy misconduct and ethical concerns (Pathway 2) (Page 22 & 24). Reporting page has links to report in either Pathway Healthy Culture - The Foursquare Church. Guidepost recommends adding definitions of Pathway 1 and Pathway 2 to the website and HFRCM.
14	Include a procedure in HFRCM for escalating allegations of physical abuse, sexual abuse, or conduct that poses a safety risk to the Reporter or the Foursquare community to senior leadership and Legal.	Illustrated by the red pathway on Diagram 2 and explained on pg.29 (items #3, 4, and 5) pg. 35.	☑	<ul style="list-style-type: none"> HFRCM V. 10 Diagram 2 (Page 28) outlines the procedure for immediate notification to ICGF Legal Counsel for allegations of abuse or conduct that poses a safety threat..

15	<p>Create an Ethics Process Team, led by the Ethics Process Leader, that will oversee and participate in the complaint, investigation, and adjudication processes to ensure that matters are handled promptly, thoroughly, and fairly.</p>	<p>Described on pgs. 16-17. This team already exists but needs to be expanded to include more personnel.</p>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> ▪ Ethics Process Team has been operating since 2023, follows the correct process described in HFCRM V.10, and has presented case summaries to the Prevention Team.
16	<p>Require robust recordkeeping requirements for the complaint, investigations, and adjudication processes, including maintenance of the following:</p> <ul style="list-style-type: none"> • Written communications with the Reporter and Respondent notifying them about the process and available resources. • Recording of complaint information requiring the intake recipient to record details of the complaint, including the date, time, and location of the incident and a narrative describing the nature of the allegations. • Written summaries of all interviews, including initial interviews of the Reporter, Respondent, and witnesses. • A case log that will track each complaint from intake through to resolution, including complaints handled through the informal process. <p>Case files should include notes, interview summaries, evidence collected (e.g., texts, photos, emails, etc.), and the investigator's report.</p>	<p>Described in pgs. 29-30 of the HFCRM. All intake documentation will be stored in the Ethics Point software as elements of the Incident Report (IR). IRs that make it through the prescreening process will also be stored as part of the respondents' permanent record in The Hub Case management module as outlined on pg. 38.</p>	<p><i>See Recommendations</i></p>	<ul style="list-style-type: none"> ▪ Ethics Point integration has been confirmed, and case logs have been reviewed. ▪ Post-adjudication “Growth Plans” are now being tracked in The Hub. ▪ Guidepost recommends Foursquare establish a formal, routine audit of a subcommittee within the Prevention Team to annually review a sampling of case studies to ensure the policies are being followed.

17	Create an Investigation Team to include a member of the Ethics Process Team and an Investigator.	<p>We currently use trained investigators as needed and plan to increase the pool of qualified persons.</p> <p>Guidepost’s recommendation of the IAT was renamed “Response Team.” Requesting Guidepost team perform a second review of revised role descriptions as outlined on pgs. 16-19 to ensure that the spirit of this recommendation was addressed.</p>	<p>See Recommendations</p>	<ul style="list-style-type: none"> ▪ HFRCM V.10 defines “Investigators” as a distinct role from “Response Team” (Page 18 & 28). ▪ Guidepost provides recommendations for revising role descriptions in the <i>Recommendations</i> section of this report.
18	Require investigation training for the selected pool of ministry elders who will serve on the Response teams, including trauma-informed interview training.	The training outlined in the description of “Review Panels.” Note that not every incident will require review panels to be added to a Response team. For example, issues that follow the escalation procedure and are clearly criminal or sexual abuse can be adjudicated without the aid of a panel members.	<p>See Recommendations</p>	<ul style="list-style-type: none"> ▪ Prevention Team update reports reference Response Team training materials. ▪ Guidepost provides recommendations regarding investigation training in the <i>Recommendations</i> section of this report.
19	Design a procedure requiring Foursquare to engage an independent third-party investigator for any complaints involving any member of Foursquare’s senior leadership, including the Board, for allegations of ethical concerns, violations of law, physical abuse, or sexual misconduct, including sexual abuse and sexual harassment, or if the nature of the investigation requires outside expertise due to the complexity of the matter, reputational concerns of the church, or other challenging circumstances.	Updated language on pg. 32. To receive a second review by Josh and Guidepost.	<p><input checked="" type="checkbox"/></p>	<ul style="list-style-type: none"> ▪ HFRCM V. 10 mandates external investigators for high-stakes/complex cases (Page 30, Item 2b). ▪ Ethics Process Team noted they have not yet had to trigger the use of a third-party investigator since the new policies were implemented.
20	Implement a procedure that requires investigators to establish a scope, plan, and timeline for the investigation that will be overseen by the Ethics Process Leader/Team to ensure the investigation is prompt, fair, and thorough.	Outlined on pg. 32 item #4. Added disclaimer language to the 60-day timeframe for investigations due to our inability to control all aspects of the data collection, investigation, and Reporter's responsiveness.	<p><input checked="" type="checkbox"/></p>	<ul style="list-style-type: none"> ▪ HFRCM V.10 outlines investigator’s procedures (Page 30, Item 3). ▪ Guidepost recommends revising the investigation timeline in HFRCM.

21	Establish a procedure that requires investigators, upon completion of an investigation, to prepare, with the assistance of the Ethics Process Team member, a formal written investigation report to include a description of the allegations, a summary of the steps of the investigation, the findings of fact, and the proposed recommendations to be submitted to the Adjudication Team for a decision.	Described on pg. 33 items #5 and 6	☑	HFRCM V.10 adequately outlines procedures for formal written investigation reports (Page 30, Item 6).
22	Design an adjudication process that provides the Adjudication Team and Board with the flexibility to reopen a matter for further investigation if needed.	See appeals process on pg. 33 and reinstatement of credentials process on pg. 36 and 37. Also, the fact that all investigations are in the permanent record in The Hub effectively allows any case to be re-examined.	☑	HFRCM V.10 adequately outlines the appeals process (Page 31).
23	Establish an evidentiary standard (preponderance of the evidence) to be used to assess whether allegations are substantiated.	Included on pg. 33. Item #2	☑	<ul style="list-style-type: none"> ▪ HFRCM v.10 adequately defines the “preponderance of the evidence” standard to be used for assessments (Page 30, Item 2).
24	Require written notices of the decision/written decisions to be shared with the Reporter, Respondent, and the supervising body of the Respondent.	Described on pgs. 38-39	☑	<ul style="list-style-type: none"> ▪ HFRCM V.10 outlines the requirement for providing written notices of the decision (Pages 35–36). EPT members confirmed they write and issue closure letters.

25	Create a process to permit a Reporter/Respondent to request reconsideration of a decision prior to the submission to the Board.	Described under “Appeals Process” on pg. 34	☑	<ul style="list-style-type: none"> ▪ HFRCM V.10 outlines a formal Appeals Process (Page 31).
26	Design a process that permits a Reporter/Respondent to submit a written statement as to why he/she believes the decision was incorrectly decided and to submit evidence in support of the claim to the Board.	Described under "Appeals Process" on pg. 34, but this was amended to appeal the Response team's recommendation to the Board vs. the board decision. Board decision is postured similarly to a supreme court decision under our polity.	☑	<ul style="list-style-type: none"> ▪ HFRCM V.10 states that appeal requests must include a statement on why the Response Team wrongly assessed the evidence, alongside any new supporting evidence (Page 31).
27	Design interim measures that describe a process for supporting the Reporter and Respondent and protecting the Foursquare community during a pending investigation (e.g., counseling, no contact order, suspension, etc.).	Outlined on pg. 34	☑	<ul style="list-style-type: none"> ▪ HFRCM V.10 outlines Interim Measures including No Contact Orders, referrals to counseling or medical services, and paid or unpaid leaves of absence (Page 31–32).
28	Establish a procedure that describes criteria for placing a Respondent on administrative leave and a process for a Respondent to object and challenge the suspension.	Included in interim measures on pgs. 34-35	☑	<ul style="list-style-type: none"> ▪ HFRCM V.10 states that a leave of absence will be required where the Respondent is considered a serious threat to the Reporter or the ministry community (Page 32).
29	Implement a procedure for handling complaints and investigations if there is a pending parallel criminal investigation, including a procedure for suspending Foursquare’s investigation while a criminal investigation is ongoing.	Included on pg. 35	☑	<ul style="list-style-type: none"> ▪ HFRCM V.10 states Foursquare will suspend its internal investigation pending the resolution of a law enforcement matter (Page 32).

Training

Rec. #	Guidepost Recommendations	Foursquare Response	Verification Status (February 2026)	Evidence/Notes
30	<p>Develop training requirements to inform ministry leaders of relevant topics to prevent abuse, harassment, and misconduct and enhance the discovery and reporting of misconduct. Consider the following training requirements:</p> <ul style="list-style-type: none"> All ministry leaders should complete training on the following: abuse of power, trauma, sexual abuse, reporting procedures, whistleblower policy, and how to interact with/care for survivors/Reporters. Ministry leaders should be trained to provide training on the above-listed topics to church elders, lay leaders, volunteers, staff, ministerial candidates, and others who will be working with Foursquare children/youth/vulnerable persons. <p>Foursquare should establish a timeframe for completing training requirements and keep records of completed training and refresher requirements for ministers.</p>	<p>This will fall under the purview of the Prevention Team described on pg. 20 item #2.K</p> <p>Toolkit will be online and include courses available through Foursquare’s Learning Management System (Maple) that tracks completion in The Hub.</p>	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> HFCRM V.10 outlines specific training requirements (trauma-informed response, child/youth protection, sexual abuse awareness, abuse of power) for the Ethics Process Team (Page 16), Investigators (Page 17), and Prevention Team (Page 19). Foursquare has tied mandatory training (training video and affirmation of compliance with the <i>Child and Youth Protection Manual and the Misconduct Handbook</i> via a quiz in “The Hub”) to the annual credential renewal process.

PHASE 2

Handbook of Operations

Rec. #	Guidepost Recommendations	Foursquare Response	Verification Status (February 2026)	Evidence/Notes
31	Revise language in the Handbook of Operations to make Child and Youth Protection (CYP) training and the review of the CYP manual mandatory. [Currently, it states that “Staff and volunteers should view the Child and Youth Protection Training Videos and Manual prior to serving with minors.”]	Plan to incorporate as part of a bi-annual policy refresh (every other year) Policies would be staggered so work is done each year. This is phase 2 – beginning in 2024	<i>Partially Implemented</i>	<ul style="list-style-type: none"> ▪ <i>Handbook of Operations</i> has not been updated. However, Foursquare has tied mandatory training (training video and affirmation of compliance with the <i>Child and Youth Protection Manual</i> and the <i>Misconduct Handbook</i> via a quiz in “The Hub”) to the annual minister’s credential renewal process.
32	Add to the lists of church records that are required to be maintained, records of complaints, investigations, and adjudications (page 30).	Updates to Handbook of Ops is phase 2 – beginning in 2024	<i>Partially Implemented</i>	<ul style="list-style-type: none"> ▪ <i>Handbook of Operations</i> has not been updated. HFCM V.10 outlines recordkeeping requirements (Page 16 & 30).

Child and Youth Protection Manual

Rec. #	Guidepost Recommendations	Foursquare Response	Verification Status (February 2026)	Evidence/Notes
33	Review the Child and Youth Protection Manual every two years to keep current and revise the manual following any major changes in federal or state laws related to this subject.	Updates to CYPM is phase 2 – beginning in 2024.	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <i>Child and Youth Protection Manual V7</i> was updated in 2025. All Foursquare ministers were required to implement the new procedures by January 1, 2026.

Inappropriate Sexual Behavior Manual

Rec. #	Guidepost Recommendations	Foursquare Response	Verification Status (February 2026)	Evidence/Notes
34	Review the Inappropriate Sexual Behavior Manual every two years to keep current and revise the manual following any major changes in federal or state laws related to this subject.	Plan to incorporate as part of a bi-annual policy refresh (every other year) Policies would be staggered so work is done each year. This is phase 2 – beginning in 2024	Guidepost did not review the <i>Inappropriate Sexual Behavior Manual</i> (out of scope)	<ul style="list-style-type: none"> <i>Handbook of Operations</i> has not been updated.

Internet Acceptable Use Policy

Rec. #	Guidepost Recommendations	Foursquare Response	Verification Status (February 2026)	Evidence/Notes
35	Expand the Internet Acceptable Use Policy to: <ul style="list-style-type: none"> • Cover church-issued mobile phones, computers, and systems (e.g., email). • Advise that the misuse of church-issued property may result in disciplinary action, including up to termination. • Provide examples of unauthorized use and inappropriate conduct, including the use of offensive language, harassment, bullying, defamation, spamming, and viewing or sending sexually explicit materials. • Advise employees that they have no expectation of privacy when using church-issued mobile phones, computers, and systems. • Advise that the church has a right, but not a duty, to access and monitor usage. 	Updates to Internet policy will be incorporated into the Handbook of Operations update in phase 2 – beginning in 2024.	Guidepost did not review the <i>Internet Acceptable Use Policy (out of scope)</i>	<ul style="list-style-type: none"> ▪ <i>Handbook of Operations</i> has not been updated.