

Due Process and the Rights of Persons in the Church and in Religious Life

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As Americans, we are persons fiercely protective of what we perceive as "our rights." Our country's founders refused to ratify the Federal Constitution until a statement of those rights we hold inviolate was amended to the document, and both the Fifth and Fourteenth Amendments of the Constitution make reference to due process of law and the protection of individual rights. There has been a growing awareness of the rights of individuals in society stemming from varied sources: the ongoing civil rights movement in this country; concern for human rights following the two World Wars; the United Nations' Universal Declaration of Human Rights; the Second Vatican Council's Constitution on the Church in the Modern World and the Decree on the Laity; the women's rights movement; and the revision of the Code of Canon Law with its section on rights.¹

In order to understand the profound effect these events have had on awareness of rights within the Church structure and on the individuals who comprise the Church, the following reflections will identify the principles that guided the work of the Second Vatican Council and the "new way of thinking" reflected in the 1983 Code of Canon Law. Rights of the Christian faithful, and in particular, the rights of religious, both implied or specified, will be studied and their effectiveness considered. The strength and power of "proper law," an Institute's own Constitution, will be discussed, and due process, a still developing institution within the Church will be examined.

Vatican Council II and Awareness of Human Rights

The Second Vatican Council gave great impetus to the development of awareness of human rights in the Church. The Council taught the fundamental equality of all the baptized in their Christian dig-

nity. Whatever else may differentiate us in the Church, we share a common dignity as God's people and a common call to eternal salvation. The affirmation of the fundamental equality of all the baptized is thought to be a "revolution" compared to the views held by some officials of the Church earlier in the twentieth century. Such is the effect of Vatican II in our Church today.²

It was imperative that the new Code of Canon Law reflect the work of the Council. So formulation of the Code began after the Council documents were complete. A Pontifical Commission was established to revise the Code, and Pope Paul VI challenged this Commission to put on a *novus habitus mentis*, "a new way of thinking," which was to permeate the mind and heart of the Church.³ It was not to be considered simply a new way of perceiving the Law, but rather a new method of law itself. Thus, following the direction taken by the Council and under the influence of the documents generated by it, work on the revision of the Code of Canon Law began.

This revision process was guided by ten basic principles which reflected the "new way of thinking," and which stressed congruence between the pastoral decisions of the Council and the juridic content of the canons.⁴ Of particular interest are several of the key concepts that were included in these basic principles and that specifically mention concern for individual rights:

to determine and safeguard, acknowledge and protect the rights and obligations of each individual person

to acknowledge that all Christian Faithful possess the same fundamental rights because of their radical equality arising from personal human dignity and common baptism to safeguard and foster subjective rights through legal recourse

From the richness of Pope John XXIII's encyclical, *Pacem in Terris*, which articulates the inherent dignity of the human person, to the documents of Vatican II, which reaffirm the uniqueness of the individual person and the rights which flow from this, the foundation was laid for the delineation of rights in the new Code.

Rights in the Code of Canon Law

Rights are not a privilege bestowed by a superior, nor are they a duty, although they can arise from duties, or impose duties on others. A right is usually described as "that which a person is entitled to have, or to do, or to receive from another."⁵ Rights arise from the dignity of the human person, and human rights are those one possesses simply by virtue of being a human person; they are owed to all on an equal basis. Significantly, the Declaration on Religious Liberty of Vatican II begins with the words: "Contemporary man is becoming increasingly conscious of the dignity of the human person," and continues, "the right to religious freedom is based on the very dignity of the human person." The Pastoral Constitution *Guardium et Spes* declares that all human rights are based on the dignity with which men and women are endowed by God himself.⁶

There are no absolute rights. Rights are relative, since one person's rights and freedoms stop where another person's begin. In addition, rights are limited by their situation within the context of the common good and the rights of others. This can demand that a right be foregone in view of a greater good, or be restricted in certain circumstances. However, certain rights are inalienable and must be recognized as such. A case in point would be the dismissal of a religious. The Apostolic Signatura has held that the right to defense is "a right inherent in the very dignity of the human person" and could not be denied even if the right were not explicitly given in the law.⁷

The Code of Canon law lists some fundamental rights, usually in relation to corresponding obligations:

canons 208–223
obligations and rights of all the Christian faithful

canons 224–231
obligations and rights of lay Christian faithful
canons 273–289
obligations and rights of clerics
canons 662–672
obligations and rights in Consecrated Life

Rights Common to All

With the proclamation of the new Code, rights of the People of God were named and recognized, and religious women and men as members of the Christian faithful experienced a growing awareness that they, too, had rights as well as obligations. Since religious are simultaneously members of the Christian faithful and members of their particular Institutes, they are uniquely situated in Church law.

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Canons cc.208–223 identify basic rights common to all the Christian faithful. Religious, as part of the Christian faithful and the laity, are included as recipients of these rights and obligations. It is important to note that c. 208 qualifies the exercise of these rights with the statement "in accord with each one's own condition and function."⁸ This reflects the efforts to reconcile the theological reality of equality in virtue of baptism, with the observable fact that people differ in their capacities and involvement in the life of the church (20.1). These canons contain specific identified rights that we all possess as Christian faithful within the Church:

We have the right to share in the Church's mission of proclaiming the gospel, to make known our spiritual needs and desires to the pastors of the Church, and to express our opinions on matters pertaining to the good of the Church (cc.211, 212).

Baptism gives us the right to request from our pastors the spiritual goods of the Church, namely, the word of God and the sacraments. We also hold the right to worship according to our own approved rite, and to follow our own form of spiritual life consonant with the teaching of the Church (cc.213, 214).

We hold the right to found and govern associations for charitable and religious purposes, to promote or sustain apostolic action, the right to a Christian education, the right to lawful freedom of inquiry when engaged in the sacred disciplines (graduate studies in seminaries and universities) and the right to freedom from coercion in choosing a state of life (cc.215–219).

We have the basic human right to a good reputation which is not to be damaged unlawfully, and the right to protect our privacy. In addition, we have the right to vindicate and defend our rights, using a competent forum in the Church to do this. If we are summoned to judgment, we have the right of defense according to due process of law, and we have the right not to be punished except in accord with the norms of law (cc.220–221).

A religious Institute has the right to specify how members will observe the evangelical counsels, thus reflecting the particular charisms of the Institute.

Certain rights that pertain specifically to the lay Christian faithful are also applicable to religious men and women:

Lay Christian faithful hold the right to the same civil liberties that all citizens enjoy (c.227).

Competent lay persons who are so qualified may be assigned to certain ecclesiastical offices and may act as experts or advisors to their pastors in accord with the norms of law;

lay persons may also be invited to exercise prominent roles in liturgical services (c.228). Laity have the right to theological formation by acquiring knowledge of Christian doctrine and by obtaining academic degrees in the sacred sciences; they may receive a mandate to teach in this field (cc.229, 230).

If lay persons are employed by the church they have the right to decent remuneration to provide for themselves and their family, as well as the right to pension, social security and health benefits (c.231).

Rights of Institutes and Members

Canons 662–672 comprise the section of the Code headed “The Obligations and Rights of Institutes and Their Members.” Ironically, despite the title given to this section, the term “rights” is not used in any of the eleven canons. Two of the canons, 663 and 670, speak of rights by implication. In c. 663, this is done indirectly by mandating that the religious include prayer, meditation, Eucharist, spiritual reading, and annual retreat as part of her daily religious life. It follows then, that she has the right to expect the availability of time and opportunity to perform these obligations.

In the second canon, 670, a specific mandate is given to the Institute to furnish for its members that which is necessary for achieving the purpose of their vocation. One might say then, that a religious “has the right” to the spiritual and material resources necessary to fulfill her vocation, including such things as retreats, days of recollection, conferences, adequate housing, clothing, education, professional updating, counseling, etc.

There are additional canons within the general section entitled “Institutes of Consecrated Life” which refer either to implied rights or name specific rights held by religious Institutes or individual Religious.

A religious Institute has the right:

to its own autonomy, especially with regard to governance (c. 586).

to specify how members will observe the evangelical counsels, thus reflecting the particular charisms of the Institute (c. 598).

to expect that the Bishop's approval to erect a religious house within his Diocese includes freedom to live according to the character and purpose of that Institute and to exercise those works proper to that Institute (c. 611).

According to Law, individual Religious have the right:

to expect that any house of the Institute will supply their temporal and spiritual needs (c. 610).

to contribute to the life of the Institute and the local community by offering observations and suggestions at the time of the Visitation (c. 628).

to freedom of conscience regarding the Sacrament of Penance and spiritual direction; to availability of suitable confessors, especially where members have limited access to the sacrament, as in houses of formation or retirement, or infirmaries, while still maintaining the right not to approach such confessors; not to be forced to make a manifestation of conscience to their superiors (c. 630).

to structures of participation or consultation involving all the members, allowing them to participate and express concerns in their own way (c. 633).

to live religious life after incorporation into an Institute, and to be free from arbitrary limitation or denial of the rights and obligations of this incorporation (c. 654).

to spiritual, doctrinal and practical formation throughout their entire religious life, and to expect that time and resources will be provided so this can be done (c. 661).

Should a religious face dismissal from an Institute the following rights are stated in the Code (cc. 694-5, 697-8, 702):

to know the accusations and proofs brought against her

to be advised of the right of defense and the right to legal counsel

to receive written, documented warnings of the pending dismissal, or verbal warnings in the presence of two witnesses

to understand that the dismissal depends on refusal to reform

to be allowed the specified time for response to the accusations

to appeal directly to the Supreme Moderator of the Institute

to be informed of the right to make recourse to the Apostolic See

to be treated with equity and evangelical charity by the Institute at the time of separation

Each charism is a unique gift to the church. There is wide latitude in Church law so that the apostolic ministry, charitable works, practice of vows, governance structures, and forms of prayer which a particular Institute brings to enrich the Body of Christ can receive the approval of Law.

An important and affirming theme throughout the Religious Law section of the Code, is its repeated reference to and reliance on the "proper law," i.e., the Constitutions, of religious Institutes. Of the more than 157 canons that treat of Institutes of Consecrated Life, at least half defer to the proper law of the Institute. This is clearly a reflection of the deep respect in which the Church holds the particular charisms of each Institute. Each charism is a unique gift to the church. There is wide latitude in Church law so that the apostolic ministry, charitable works, practice of vows, governance structures, and forms of prayer which a particular Institute brings to enrich the Body of Christ can receive the approval of Law. Canon after canon presents the norm of law regarding a particular topic, and then reads: however, this will be done "according to the proper law of each Institute." Not only does the law of the Church offer protection for at least some of the rights of

religious men and women, but it also strongly supports the charisms of Religious Institutes through the incorporation of proper law into the canons dealing with Institutes of Consecrated Life.

Following from this, we recognize there are two primary sources for the rights of religious, the Code of Canon Law and the Constitutions of their respective Institutes. In the Constitutions of the Sisters of Mercy of the Americas,⁹ these rights are specifically mentioned:

- to retain ownership of personal property and to acquire additional property through any personal title of inheritance (#25).
- to participate in dialogue and share insights in community (#28).
- to receive religious formation, to be prepared for ministry, to have time for personal and communal prayer, to have access to the sacraments, to receive a Christian burial, and suffrages after death (#30).
- to enjoy active and passive voice after first profession of vows except where restricted by law or policy, and to enjoy active and passive voice in all elections after having made perpetual vows (#56).
- to take part in the participative structures and decision-making processes of the Institute, and of the regional and local communities (#76, #78).
- to regional governance structures which will guarantee rights of all members (#77).

While incorporation into religious life is considered an "acquired right," i.e., a right based on fulfilling certain prerequisites, it brings with it canonical restriction of a number of other rights freely held by those who are not so incorporated, and who do not profess poverty, chastity and obedience.¹⁰ Again, we see the relative position of rights within

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law. What is an obligation for one person may also be for that person the source of certain rights; what is a right for one may result in an obligation for another. One or more rights that are held or acquired may result in the loss of certain other rights. Within this apparent "shifting" of rights and obligations, the question arises as to how rights can actually be protected and enjoyed.

Protection of Rights and Due Process

Much has been written in the last twenty years commenting on the bright promise of the 1983 Code with its exciting and challenging "Bill of Rights." But now canonists are asking if indeed these rights are real; they wonder if there is too much idealism in our expectations, or perhaps too much individualism—a result of our American preoccupation with personal, individual rights.¹¹ The social mission of the Church, and indeed its very credibility, "will depend in large part on its setting forth and exemplifying in its structure and practice a standard of justice which does not fall below the legitimate expectations of men and women of good will."¹²

"If rights are to be real, they must be defensible"; so rights must find a system of protection and vindication within the Church.¹³ If the rights of religious are real, there must be systems and structures within which these rights can be protected and defended. Having seen the frequency with which the Constitutions are called upon within the Code to "enflesh" or enlarge upon laws pertaining to religious life, it follows that proper law would seem to be the locus for a process of protection of rights of Religious. Admittedly, this places a serious burden on individual Institutes and on those in governance positions. It demands that an Institute:

through appropriate consultation and involvement of all members, provide and implement a legal structure which is forward looking, possible to observe, clear and coherent, stable in content, open to necessary adaptation, responsible in distribution and exercise of authority, and inclusive of accountability and consistency in application. Since proper law is so often referred to by the universal law, this may be the best possible vehicle for protecting the rights of members of religious Institutes, provided it does address itself to the need for protection of rights, and provided it is consistently and honestly observed.¹⁴

While the proper law could briefly indicate the availability of some form of due process, specify those for whom it is intended, and identify the situations that would warrant its use, the details of the process and its implementation would appropriately be found in those congregational documents supplementary to the Constitution. This would allow for ease of revision, updating, and adaptation to changing needs.

If the existence and effectiveness of means to protect rights are a criterion for whether rights expressed on paper are more than mere words, then it is necessary to know if these well-written words actually bring about what they describe.¹⁵ Is the process used? Does it work? And if not, why?

To a certain degree, it is understandable why due process procedures are not well known. Few of us are interested in rules, regulations, or procedures until they directly touch our immediate circumstance—and then, unfortunately, we frequently find it is too late. The burden of making known the process lies largely with either diocesan authorities or congregational leadership. Access to due process in the Church is dependent chiefly upon the endorsement of and participation by the diocesan bishop, and in religious communities, by endorsement and participation of the elected leadership.¹⁶ Sadly, the most common reasons for failure to utilize due process have been ignorance of the process on the part of the people needing it, reluctance on the part of responsible authority to make the process known, and lack of cooperation when the process is known and attempts are made to use it.¹⁷

Development of Due Process in the United States

Given impetus by the Second Vatican Council's concern for the protection of rights of individuals, the National Council of Catholic Bishops (NCCB) began a study process that was to extend over thirty years. In the late 1960s, they invited the Canon Law Society of America (CLSA) to compile specific suggestions for a means of promotion of "adequate protection of human rights and freedoms."¹⁸ A report was presented to the bishops of the United States in 1969 and subsequently accepted by them. They in turn passed a resolution recommending

that its membership, the U.S. bishops, experiment with the procedures outlined in the 1972 report on due process, adapt them where necessary to local circumstances, and implement them promptly on diocesan, provincial, and regional levels, so that human rights and freedoms would be securely protected by the Church.¹⁹

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Hierarchical recourse is the ordinary method for vindication of rights of the faithful when an act of administrative power is involved (c. 1732). But the average Catholic is most often not able to take advantage of this for a variety of reasons:²⁰

the only superior of a bishop is the Apostolic See, and recourse is usually quite distant from the place of the petitioner, is carried on in a foreign language, and requires specialized procedures not found in the Code. finding a suitable advocate with consideration to language, admission to curial practice, and sufficient time, can become a major problem. recourse at this level takes considerable time, and can involve considerable expense. since there is no regular system of reporting of Curial decisions, the praxis of the Curia regarding a particular issue is generally unknown, as is the reasonableness of undertaking the distance, time and expense required for recourse.

Upon learning that the proposed canons related to administrative tribunals at a more local level had

been excluded from the 1983 revised Code, the CLSA decided to explore future options in due process on diocesan, regional, and national levels. First, theoretical issues were explored,²¹ and then a survey was taken of actual diocesan experiences with due process since 1969.²² Additional studies produced a revised report of diocesan experiences which was compiled and presented in 1991. Further testing took place in selected sites throughout the country, studying and evaluating methods of alternate dispute resolution. A final report, the culmination of a study begun over thirty years earlier, was presented at the annual CLSA meeting in 1999 and included summaries of goals, concerns, procedures, outcomes, and possible future directions. There were many valuable findings, some disappointments, and some surprises, and throughout, the conviction that there is still much work to be done in this area of serious concern in the Church.²³

The CLSA studies have disappointingly found that the recommendations of the due process report have not been implemented in a majority of United States dioceses, and even where they have been implemented, there is reluctance to publicize its availability.

Particular attention has been given to the apparent reluctance of the Apostolic Signatura to allow the required indult for local administrative tribunals. This reflects the earlier removal of proposed norms for such courts from the drafting stage of the revised Code. It is felt that despite CLSA's recommendations regarding the usefulness of such courts, Ordinaries will not take the initiative with an administrative court, knowing that the Roman indult is not forthcoming. Interestingly, the Signatura sees such courts peculiar to the administrative style of a particular bishop, and suggests that a succeeding ordinary may not find such a court useful. And it is possible that even

participants in a particularly difficult case may ignore a summons to court, should they discover Rome's interest in them to be minuscule.²⁴

The CLSA studies have disappointingly found that the recommendations of the due process report have not been implemented in a majority of United States dioceses, and even where they have been implemented, there is reluctance to publicize its availability. The conciliation and arbitration procedures it provides are not effective unless both parties agree to it, and in practice are not effective when a bishop is involved as one of the parties.²⁵ Provost observes that we are in a major period of transition regarding our understanding of Church, the role of individual Christians, and the place of rights in the Church. For the rights to become "real," a conscious, deliberate effort must be made to put on the *novus habitus mentis*, the "new way of thinking" proposed by Vatican II. This is not a given, and must be worked at and acquired afresh at each stage of the journey, just as we must continually struggle to actualize rights in the Church as a means of living the Christian life.²⁶ As American Catholics we seem to be uniquely prepared for the struggle:

The 1983 Code of Canon Law, particularly its second book, impacts on the church in America, perhaps, in ways unlike other churches. We read those canons differently because we enjoy a keen sense of justice and equality and free speech in this land of opportunity. Ideas of democratic participation and pluralistic opinion run through our veins. In this mix, our culture does not tolerate misuse of persons, denying fair process or overlooking the qualified counsel of participating individuals and groups. Should either inadvertent or calculated action cause someone hurt or loss, we are used to processes for restoration, mediation and reconciliation. Our Church stands to be embarrassed, therefore, when no provisions for redress of grievances are generously offered or, where they exist, are grudgingly provided.²⁸

Due Process and Religious Life

Many religious communities have developed sound and hopefully effective processes for the redress of grievances and the protection of rights of their members. Conciliation and arbitration are two of the principal forms of dispute resolution used by the legal community in the United States today and are the ones usually referred to in canonical discussions

of due process. However, some religious Institutes include an intermediary step, mediation.²⁸ Because members of religious Institutes take vows of poverty and obedience, and because of their commitment to a life lived in community, the perception of violation of rights is differently nuanced. Consider this observation made by a vowed Religious woman who is also canon lawyer:

The fundamental legal canonical concept of vowed obedience still addresses commands given by competent superiors. Basically this means that, irrespective of dialogical positions, eventually a decision will be made, and most likely, this decision will be made by the superior. One cannot discuss forever if a decision is expected or needed. The issue to be remembered is that the superior need not acquiesce to my expectations or demands, but I have a right to be heard. This is where it is important that proper law provide the processes and the procedures for legitimate dissent to protect the rights of all parties concerned.²⁹

It is important to keep in mind that arbitration is not designed or intended to contradict the ordinary lines of authority established in the Constitutions. Matter appropriate for referral to the process, and the persons for whom the process is intended must be clearly delineated. And finally, if the process it going to be used and be effective, it must be shared and explained to all the members.

The forms of reconciliation developed by each Institute should reflect the uniqueness of its charism and mission, in addition to being true to the virtues of forgiveness, peace-making, and fraternal charity. This suggests that resolving disputes should involve conciliation of human persons, rather than the assertion of human rights.³⁰ This is the challenge that due process presents—to incorporate, observe, and dispense right order, fairness, and justice, while still reverencing and holding those values on which we have built our Church and our congregations.

However, we must keep in mind that “No affirmation of rights ensures their acquisition, no establishment of structures guarantees their effectiveness, and no requirement of procedures renders them self-implementing.”³¹ These words are a reminder that legislation is given life, meaning and effectiveness by the people it touches, and as this people are human, weak and sinful, so their efforts often fall short of their goal. But the Church, and

the religious Institutes within it, continue to strive for the perfection of the Godhead and the perfection of Law.



Notes

- 1 Due Process Committee, “The Final Report of the Committee on the Experiment in Due Process in the Church,” *Proceedings of the Sixty-first Annual Convention of the Canon Law Society of America*, 61 (1999), 138.
- 2 James H. Provost, “The Nature of Rights in the Church,” *Proceedings of the Fifty-third Annual Convention of the Canon Law Society of America* 53(1991), 7.
- 3 John Alesandro, “Law and Renewal: A Canon Lawyer’s Analysis of the Revised Code,” *Proceedings of the Forty-fourth Annual Convention of the Canon Law Society of America*, 44 (1982), 2.
- 4 John Alesandro, “General Introduction,” in *The Code of Canon Law: A Text and Commentary*, eds. J. Coriden, T. Green and D. Heintschel (New York/Mahwah: Paulist Press, 1985), 6–7.
- 5 Richard A. Hill, “Recognition and Protection of Rights in Consecrated Life, Part I,” *Proceedings of the Fifty-third Annual Convention of the Canon Law Society of America*, 53 (1991), 180.
- 6 John Langan, “Can There Be a Human Rights Problem in the Church?” *The Jurist*, 46 (1986), 21.
- 7 Daniel J. Ward, “The Rights of Christians within the Code of Canon Law,” in *Readings, Cases, Materials in Canon Law: A Textbook for Ministerial Students*, eds. J. Hite and D. Ward (Collegeville: The Liturgical Press, 1990), 183.
- 8 James A. Coriden, T. Green and D. Heintschel, eds. *The Code of Canon Law: A Text and Commentary*, (New York/Mahwah: Paulist Press, 1985). All references to canons are taken from this edition.
- 9 Sisters of Mercy, *Constitutions*, (Silver Spring: Institute of the Sisters of Mercy of the Americas, 1992).
- 10 Elizabeth McDonough, “The Protection of Rights in Religious Institutes,” *The Jurist*, 46 (1986), 176.
- 11 James A. Coriden, “What Became of the Bill of Rights?” *Proceedings of the Fifty-second Annual Convention of the Canon Law Society of America*, 52 (1990), 49.
- 12 John Langan, 41–42.
- 13 James H. Provost, “Rights in Canon Law: Real, Ideal, or Fluff?” *Proceedings of the Sixty-first Annual Convention of the Canon Law Society of America*, 61 (1999), 318.
- 14 McDonough, 198.
- 15 Provost, 1991, 13–14.
- 16 Joseph N. Perry, “The Accessibility of Due Process for the Laity,” *Proceedings of the Fifty-first Annual Convention of the Canon Law Society of America*, 51 (1989), 73–75.

- 17 James H. Provost, 1991, 16.
- 18 Ricardo E. Bass, "Due Process: Conciliation and Arbitration," *Proceedings of the Fifty-third Annual Convention of the Canon Law Society of America* 53 (1991), 63-76.
- 19 Robert T. Kennedy, "Remarks to the General Membership of the NCCB" in *On Due Process*, rev. ed. (Washington: USCC, 1972).
- 20 James H. Provost, (1999), 336-337.
- 21 Elizabeth McDonough, John Langan, James Provost, *et al*, in *The Jurist* 46 (1986).
- 22 James H. Provost, ed., *Due Process in Dioceses in the United States 1970-1985, Report on a Task Force Survey*, (Washington: CLSA, 1987).
- 23 Due Process Committee, 138-139.
- 24 *Ibid.*, 147-148, 153.
- 25 *Due Process in Dioceses in the United States 1970-1985, Report on a Task Force Survey*, ed. James H. Provost (Washington: CLSA, 1987).
- 26 Provost, (1999), 341-342.
- 27 Joseph N. Perry, 82.
- 28 Sisters of Mercy, "Due Process Document of the Institute of the Sisters of Mercy of the Americas," (Silver Spring: 1992).
- 29 Jeanne-Margaret McNally, "Due Process in Consecrated Life," *Proceedings of the Fifty-fifth Annual Convention of the Canon Law Society of America*, 55 (1993), 91.
- 30 Bass, 63-64.
- 31 McDonough, 204.

Book Notice

Marie Gaudry, R.S.M. *With Catherine, My Spirit Mother: A Retreat with Catherine McAuley for Sisters of Mercy and for Those Inspired by Mercy.* Sisters of Mercy of Paramatta: Castle Hill, N.S.W., Australia, 1999. 67 pp., 8 1/2" x 11", spiralbound, \$10.00.

The chapters in this book were originally presented in a number of retreats to Sisters of Mercy and reflect the author's conviction that the personality, life, and spirituality of Catherine McAuley, as "spirit mother," are resources for both men and women. The book is now made available for use by individuals, group retreats, days of recollection, and for formation programs for new members of the Institute and Mercy Associates. Each reflection is accompanied by suggestions for prayer, reflection, and journaling. Annotations cite Catherine McAuley's letters as well as secondary scholarly studies.

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