

COMMUNITY CONFINEMENT FACILITIES



Auditor Information			
Auditor name: Gerald McCormac			
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Telephone number: 267-679-2308			
Date of facility visit: August 10th – 12th, 2015			
Facility Information			
Facility name: Centennial Community Transitional Center			
Facility physical address: 14485 East Fremont Avenue, Englewood CO 80112			
Facility mailing address: (if different from above)			
Facility telephone number: 303-627-0987			
The facility is:	<input type="checkbox"/> Federal	<input type="checkbox"/> State	<input type="checkbox"/> County
	<input type="checkbox"/> Military	<input type="checkbox"/> Municipal	<input checked="" type="checkbox"/> Private for profit
	<input type="checkbox"/> Private not for profit		
Facility type:	<input type="checkbox"/> Community treatment center	<input type="checkbox"/> Community-based confinement facility	<input type="checkbox"/> Other
	<input checked="" type="checkbox"/> Halfway house		
	<input type="checkbox"/> Alcohol or drug rehabilitation center		
Name of facility's Chief Executive Officer: Rory Grnyiewicz			
Number of staff assigned to the facility in the last 12 months: 20			
Designed facility capacity: 107			
Current population of facility: 104			
Facility security levels/inmate custody levels: Minimum			
Age range of the population: 18-65+			
Name of PREA Compliance Manager: Rory Grnyiewicz		Title:	Director
Email address: rgrnyiewicz@c-m-i.com		Telephone number:	303-627-0987
Agency Information			
Name of agency: Correctional Management, Inc. (CMI)			
Governing authority or parent agency: (if applicable)			
Physical address: 570 West 44th Avenue, Denver CO 80206			
Mailing address: (if different from above)			
Telephone number: 720-854-0264			
Agency Chief Executive Officer			
Name: Shannon Carst		Title:	President
Email address: carsts@c-m-i.com		Telephone number:	720-854-0264
Agency-Wide PREA Coordinator			
Name: Mike Koob		Title:	Vice-President
Email address: koobm@c-m-i.com		Telephone number:	720-854-0264

AUDIT FINDINGS

NARRATIVE

On August 10, 2015, the onsite portion of the PREA audit was conducted at Centennial Community Transitional Center (CCTC). Centennial Community Transitional Center is a 107 bed male facility currently operating under contract with the Colorado Division of Criminal Justice and Arapahoe County, respectively, to provide community reentry services for offenders. CCTC is operated by Correctional Management, Inc. (CMI).

The PREA audit notice was posted by the CCTC Staff on June 29, 2015; six weeks prior to the onsite audit. No communication or correspondence from CCTC residents, staff, visitors, or other third party individuals were received by this auditor related to the CCTC Facility and their PREA audit.

The onsite audit commenced shortly after 9:00 am on August 10, 2015. Following a brief entrance meeting, in which the expected audit schedule and format was discussed, a tour of the CCTC facility was conducted. The tour of the CCTC Facility was conducted in accordance with the PREA audit compliance tool, "Instruction for PREA Audit Tour", with emphasis on resident living quarters, resident shower and bathroom areas, intake area, cafeteria, kitchen, laundry room, recreational area, and other resident accessible areas as it relates to staff's ability to monitor, supervise and otherwise detect, prevent, and deter incidents of sexual assault and sexual harassment within the CCTC Facility. The CCTC Facility has actively worked to minimize, if not eliminate, potential blind spots utilizing multiple tools to enhance CMI staff's ability to prevent, detect, and deter incidents of sexual abuse and sexual harassment within the CCTC Facility. Upon conclusion of the facility tour, random staff and resident interviews commenced.

Random and specialized staff interviews were conducted using the format and protocols for community confinement centers available on the National PREA Resource Center's website. In total, well over 70% of the CCTC staff were interviewed and the staff sample group included CMI staff from all job classifications as well as encompassing staff from all shifts. Additionally, approximately 15% of the CCTC resident population were interviewed during the onsite portion of the audit. All resident interviews followed the interview protocols for community confinement centers available on the PREA resource center website with emphasis on ensuring the sample size of residents interviewed included residents from each of the populations served at Centennial Community Transitional Center, those specifically identified in the resident interviews protocols, and from varying room assignments.

Prior to the onsite audit, and as part of the post audit review, supporting documentation provided by the CCTC Facility was reviewed. These items included: Organizational Chart, CCTC Facility floor plan, CMI Personnel Manual, CMI 2014 Residential policies and procedures, CMI PREA Advisements (staff, resident, contractors, etc.), MOUs with local community entities and supportive services (as will be noted and named throughout this report), CMI training curriculum, CMI employee personnel files (background checks) and training records, CMI Coordinated Response plan and flow chart, pre-audit questionnaire, and other documentation referred to in the remainder of this audit report.

FACILITY CHARACTERISTICS

Located at 14485 East Fremont Avenue, Centennial Community Transitional Center is situated in a section of Centennial, Colorado comprised of both commercial buildings and residential dwellings. The Centennial Community Transitional Center facility is a 18,585 square foot single floor building. The Centennial Community Transitional Center facility has a maximum rated capacity of 107 male offenders with risk factors ranging from minimum to low-medium risk offenders.

With the exception of two rooms, resident living quarters are primarily located along the north and south sides of the western corridor which extends from the otherwise rectangular shaped facility. CMI staff offices occupy the exterior perimeter of the of the building and are separated from the residential areas by a security station strategically placed so as to allow an unobstructed view of the residential corridor, cafeteria and patio area. On the interior of this area are staff conference rooms and two residential rooms. There is one large multi-person restroom containing toilets, urinals and sinks for the residential population located on the aforementioned residential corridor. Adjacent to the residential bathroom is a large multi-person shower room with a changing area for the CMI residents to utilize prior to returning to their assigned room/bed. The facility is also equipped with staff restrooms and a bathroom used for resident urine screenings.

Centennial Community Transitional Center provides residents with adequate privacy when showering, changing, or using the lavatory. To that point, female staff assigned to the CCTC facility do not enter the resident bathrooms where residents may be showering and/or changing. Female staff stand in the hallway and at the threshold to the bathroom conduct head counts verbally with follow up visual confirmation of the resident's presence at the security office. This practice is consistent throughout all CMI programs. All female staff are required to "knock and announce" their presence prior to entering any area in which a male resident may be in any state of undress. These practices were confirmed through staff and resident interviews.

CCTC provides non-residential day reporting services in an adjacent section of the facility. Unlike the residential side of CCTC's operations, the non-residential services are not provided 24/7. Rather, the staffing for this program is more limited than its residential counterpart. The non-residential area contains: two bathrooms, a reception area, and case manager offices. It should be noted, as was discussed during the onsite audit, the two residential rooms located in the administrative/staff office area have egress doors on both the west and east side of the room. The western most door opens to the staff/office area and is visible via the residential security desk while the eastern most door opens to the hallway providing access to the non-residential area.

The Centennial Community Transitional Center facility is currently equipped with one DVR recording video footage from 25 cameras strategically placed so as to eliminate blind spots and assist staff in detecting, deterring and preventing sexual abuse and sexual harassment.

SUMMARY OF AUDIT FINDINGS

Centennial Community Transitional Center did have one PREA related allegation in the 12 months prior to the onsite audit. This allegation was investigated administratively by CMI initially and then promptly forwarded to the legal entity responsible for criminal investigations and prosecution once the evidence suggested pursuit of criminal charges were in order. Arapahoe County Sherriff's Department conducted the criminal investigation and determined the allegation to be substantiated. The alleged perpetrator was arrested, charged, and is awaiting trial. The final disposition on this criminal case has not yet been determined; however, CCTC, in coordination with CMI executive staff and colleagues in the Colorado Division of Criminal Justice, have remained informed of the developments of this case.

The Centennial Community Transitional Center staff, in conjunction with their colleagues at the other six CMI facilities and under the direction and supervision of the CMI PREA coordinator, have actively worked to achieve and maintain their level of compliance with the PREA standards. There are PREA posters posted throughout the facility which contain toll free telephone numbers and addresses for PREA reporting, information related to emotional supportive services available to CMI residents, and the facility's zero tolerance policies on sexual abuse and sexual harassment. This information is available through a variety of printed materials (Resident Handbook, PREA advisement, and PREA informational pamphlet). Centennial Community Transitional Center resident's, in addition to having access to community resources, also have access to emergency services through their own approved cell phones or through CMI provided payphones for which the calls to the posted help line telephone numbers are toll free. During the onsite audit the auditor was able to confirm contact with the posted tip lines from the residential payphones.

As conveyed during the random resident interviews, residents of the Centennial Community Transitional Center were each provided with the facility's resident handbook, PREA pamphlet, CMI PREA advisement and have all received screenings related to assessment of the individuals' potential for victimization and/or abusiveness during the intake process. Residents also relayed that staff "knock and announce" their presence whenever entering a resident's housing area and when entering the bathroom/shower area. Centennial Community Transitional Center residents were generally aware of the process for reporting PREA related concerns and were also generally aware of community resources available to them.

The Centennial Community Transitional Center staff also actively work to implement a safe, secure environment for residents and staff alike. The staff, for the most part, were generally aware of their responsibilities to create a zero tolerance environment, reporting responsibilities, and first responder duties as was conveyed to this auditor during the staff interviews. Staff were also able to confirm receipt of PREA related trainings during their orientation, a recent PREA refresher training, and frequent review of aspects of the PREA standards during staff meeting called "TeachBack". This was consistent with the information contained in the CCTC employee training logs provided. It is recommended that staff members responsible for conducting administrative investigations of PREA incidents receive additional training as there was less clarity communicated from these staff members as it related to expectations of the standards. A similar recommendation was made for CCTC management staff and their need for additional training so as to ensure management personnel have a comprehensive understanding of CMI's application of the national PREA standards. It is also recommended, as will be noted later in this report, that CMI implement the staff member PREA re-affirmation/disclosure with this year's annual employee review.

With regards to the physical plant, at the time of the onsite audit, Centennial Community Transitional Center was encouraged to keep all unoccupied offices, rooms, closets, etcetera secured. Additionally, there was concern noted regarding the unlocked non-residential entrances/egresses as these doors were unsecured and allowed for entrance into this area from the parking lot. The non-residential area, unlike the residential area, is not staffed 24/7; rather, the staffing hours for the non-residential area of the facility are more limited than its residential counterpart. Two CCTC residential rooms also have doors which open in the non-residential area of the facility. While there is video surveillance in portions of this area, there are also areas which are not under video surveillance. The combination of these three elements (unsecured exterior doors, unsecured interior doors, and limited staffing/surveillance tools) present an obstacle to be considered in order to ensure the safety of the CCTC community. At the time of the audit, it was recommended that the side exterior non-residential door (providing access to the hallway adjacent to the Director's office) be secured in the overnight hours and when this portion of the facility is not actively being used. It was also recommended that the two residential dormitory doors (opening into the non-residential section of the facility) either be better captured on existing video surveillance, through use of audible alarm so as to better alert staff to anyone attempting to gain access to the non-residential section of the facility through the residential rooms, or any other viable method to assist staff in their efforts to provide a safe and secure environment.

A thorough review was performed of the supporting documentation provided by the Centennial Community Transitional Center facility. The results of this review, along with the information gathered from the tour as well as the interviews, were used to generate this report. Noted throughout this report will be references to the documentation used to support the determinations of compliance, non-compliance, or non-applicable. Overall, the audit findings for the Centennial Community Transitional Center facility are as follows:

Number of standards exceeded: 2

Number of standards met: 35

Number of standards not met: 0

Number of standards not applicable: 2

115.211- Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Correctional Management, Inc. (CMI), as an agency, has written policies mandating zero tolerance toward all forms of sexual abuse and sexual harassment (CMI PREA Policy and Procedures, CMI Zero Tolerance Staff Acknowledgement, CMI Personnel Manual). These policies also outline the Agency's response to preventing, detecting, and responding to such conduct. Collectively, these policies meet the requirements of 115.211(a) and outline the expectations and required actions of staff when such conduct occurs or is suspected of having occurred.

CMI has established an upper-level, agency wide PREA Coordinator who has sufficient time, authority, empowerment within the position to effectively implement policies and procedures aimed at preventing, detecting, and responding to all incidents of sexual abuses and sexual harassment. The CMI PREA Coordinator is actively involved with each of the CMI facilities to ensure compliance with the CMI "Zero Tolerance" environment. The CMI organizational chart establishes the CMI Vice President/PREA Coordinator position as a "direct report" to the CMI President and is empowered to act in accordance with the expectations of the PREA standards.

CMI- CCTC has met all the requirements of this standard.

115.212 Contracting with other entities for the confinement of residents

This section does not apply to the CMI –CCTC Facility. CMI does not sub-contract with other entities to house offenders.

115.213 Supervision and Monitoring

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CMI has created a Staffing Plan specific to the Centennial Community Transitional Center Facility. The CCTC Facility staffing plan utilizes staffing levels (based on full complement of staffing positions filled) and video surveillance equipment in their efforts to protect residents from sexual abuse. In calculating the adequacy of staffing levels at the Centennial Community Transitional Center Facility, the staffing plan addresses all four required components of 115.213(a)(1-4) and was developed utilizing input from both the CCTC management staff and the CMI agency wide PREA coordinator.

The CCTC staffing plan provided was the facility's initial staffing plan. Annual review of the staff plan (115.213(c)) will be required moving forward. Year to date, Centennial Community Transitional Center has not deviated from the staffing plan identified, the only noted concerns involved the “call outs” of scheduled correctional technicians; however, minimum staffing was maintained as other CMI staff were re-assigned in order to maintain compliance with the identified staffing patterns.

CMI-CCTC has met all the requirements for this standard.

115.215 Limits to cross-gender viewing and searches

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Centennial Community Transitional Center, as outlined in Residential Policy 2.030 (“*Contraband Control/Searches*”, Procedures: 3 (c-e)) prohibit staff from performing cross gender strip searches and/or cross gender visual body cavity searches. CMI employees are also prohibited from performing a search of a resident in order to determine their genital status (Residential Policy 2.030, Procedures: Section C, 8). While strip searches are permitted (Residential Policy 2.030, Procedures: Section E, 1-5), provided the employee is directed to do so by an executive director level and the employees conducting the strip search are both of the same sex as the offender to be strip searched, visual body cavity searches are never permitted (Residential Policy 2.030, Procedures: Section E, 4).

Transgender and intersex resident pat down searches would be conducted by a female staff member (if it were to occur) and would be performed using the “knife” technique. This practice is consistent with PREA expectations as noted on the PRC FAQs. All searches performed are documented in the facility’s computer software program per contractual requirements. All employees are provided trainings on the performance of pat down searches, strip searches, and searches of transgender and intersex residents in a professional, respectful, and the least intrusive manner possible while not compromising the safety and security of the facility.

Centennial Community Transitional Center has developed and implemented policies and practices which require staff members of the opposite gender to knock and announce their presence when entering an area where residents are likely to be changing, showering, or performing bodily functions (CMI Residential Policy 2.100, Procedure; Section 2). The current placement of the cameras do not allow for cross gender staff viewing of a male resident while showering, changing, or performing any other bodily functions.

CMI-CCTC has met all the requirements for this standard.

115.216 Residents with disabilities and residents who are limited English proficient

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CMI, through a MOU with the Spring Institute for Intercultural Learning, has established a method and mechanism by which their facilities, to include CCTC specifically, have access to interpreters who can impartially, accurately, and effectively communicate via sign language and with limited English proficient individuals in many languages to include rare and exotic languages spoken in Asia, Africa, Middle East, Eastern and Western Europe. Additional auxiliary aids can also be arranged through the Facility Director if needed. Centennial Community Transitional Center does not utilize resident interpreters, confirmed via resident and staff interviews, and this is a practice that is prohibited by CMI policy unless delays in communicating with an individual would present immediate danger to the individual's safety, compromise the performance of first responder duties, or the investigation of PREA allegations.

Centennial Community Transitional Center has written materials provided in formats and through methods that ensure effective communication with residents with disabilities, including intellectual disabilities, limited reading skills, or who are blind or have low vision. All the PREA education materials, aside from PREA signage posted throughout the facility, are published in English and Spanish (resident training video, Centennial Community Transitional Center PREA pamphlet, CMI Resident PREA Advisement). CMI, as noted above, also has the ability to provide translated materials in other languages through their agreement with the Springs Institute.

CMI-CCTC has met all the requirements for this standard.

115.217 Hiring and Promotion Decisions

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

As described throughout the CMI Personnel Manual, the Agency clearly establishes zero tolerance for all forms of sexual abuse and sexual harassment (Items: #6 - *Code of Ethics*, Section B (36-38, 40, and 41; and item 51, Sections A-C)). Background checks are conducted on all employees and on contractors and volunteers having contact with CMI residents (as described, page 25, in Item #48 of CMI Personnel Manual, Screening/Hiring/Orientation/Training: sections D and E).

CMI does not hire or promote anyone who may have contact with residents who has engaged in any of the activities notated in §115.217(a) (1-3). Furthermore, incidents of sexual harassment are factored in to any offer of employment and/or promotion once hired.

A review of all employee personnel files revealed the facilitation of employee background checks prior to commencement of the employee's employment and performance of an updated employee background check every five years.

CMI, through both policy and practice, and in accordance with governing federal, state, and local laws, engages in the exchange of information, as it relates to substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse, between agencies for both potential employees and former employees respectively (CMI Personnel Manual, page 24, items #44 and 46 respectively).

Finally, with regards to the requirements of §115.217(f)-(h), as recommended during the CMI PREA audit process, CMI has incorporated a mechanism to capture staff's continuing duty to disclose all incidents as part of the annual employee evaluation process as is required and described in §115.217(a)-(h).

CMI-CCTC has met all the requirements for this standard.

115.218 Upgrades to facilities and technologies

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.218(a) is not necessarily applicable to the Centennial Community Transitional Center Facility as there has not been any substantial expansion to the facility nor acquisition of a new facility; however, CMI has taken efforts to upgrade their technology.

As evidenced in the Centennial Community Transitional Center staffing plan and through the information acquired through the on-site staff interviews, virtually all blind spots in the facility have been eliminated utilizing the strategic placement of the facility's cameras, mirrors, and staff monitoring.

CMI-CCTC has met all the requirements for this standard.

115.221 Evidence protocol and forensic medical examinations

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CMI is responsible for conducting Administrative Investigations of sexual abuse. Sexual abuse investigations that do not appear to be criminal in nature are conducted by the facility's director, the PREA coordinator, and other HR staff. All CMI staff responsible for conducting administrative investigations have received specialized investigator's training, and the training curriculum utilized is in accordance with §115.234.

Criminal investigations would be conducted by either the Centennial Police Department or the Colorado Department of Corrections Inspector General, depending on the classification of the victim. Policies for the Colorado Department of Corrections were provided and do reflect the directives for the adherence to a uniform evidence protocol adapted from the "United States Department of Justices' Office on Violence Against Women publication, 'A National Protocol for Sexual Assault Medical Forensic Examinations' Adult/Adolescents', or a similar protocol".

CMI has entered into a MOU with the St. Anthony North Neighborhood Health Center to provide CMI resident victims with access to Sexual Assault Forensic Examiners and Sexual Assault Nurse Examiners 24 hours a day and seven days a week without financial cost to the resident victim. In said MOU, CMI residents would be taken to Denver Health in the event that they are involved in an incident of sexual assault. St. Anthony North Neighborhood Health Center would deploy SAFE/SANE who, while following a uniform evidence protocol that maximizes the potential for obtaining usable evidence consistent with the requirements of 115.221(b).

CMI also has entered into a MOU with the Blue Bench to provide resident victims with: support through the forensic exam and investigatory interview process; crisis intervention; emotional support; follow-up services and referrals to other community agencies.

As CMI is not responsible for conducting criminal investigations, CMI, per the requirements set forth by 115.221(f) is mandated to request the entity (or entities) responsible for conducting criminal investigations follow a uniform evidence protocol consistent with 115.221(b). Centennial Community Transitional Center has identified two agencies that would be responsible for conducting criminal investigations at the CCTC facility. These entities are the Colorado Department of Corrections and the Arapahoe County Sheriff's Department.

MI has formally requested of Colorado Department of Corrections and the Centennial Police Department, their compliance with the national PREA standards when conducting a sexual abuse or sexual harassment investigation involving a CMI resident. Documentation of said requests has been retained by CMI and provided to the auditor to be retained with the Centennial Community Transitional Center audit records.

CMI- CCTC has met all the requirements of this standard.

115.222 Policies to ensure referrals of allegations for investigations

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

As stated in the CMI PREA Policy, all allegations of sexual abuse and/or sexual harassment will be fully investigated either criminally or administratively if there is not a criminal element involved (PREA Policy, page 3, section 3 (b)). CMI PREA policy, page 7, section 8 (1-11) outline the responsibilities of both CMI internal staff (first responders, investigators, and management staff) as well as the expected responsibilities of external parties. In that regard, CMI is compliant with §115.222(a) and §115.222(c).

The CMI PREA policy, to include the portion of the policy pertaining specifically to the requirements of §115.222, is available on the CMI website, <http://c-m-i.com/CMI%20PREA%20Policy.pdf>. The CMI PREA Policy, and its availability for public consumption, were areas in which CMI and this auditor worked collaboratively to ensure compliance with this standard.

CMI-CCTC has met all the requirements of §115.221

115.231 Employee Training

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

As revealed following a review of CMI employee training records and the PREA related training curriculum, CMI -CCTC staff have all received training on the identified required elements of the §115.231(a) (1-8). The training curriculum, "Colorado Community Corrections PREA: Prison Rape Elimination Act 2003", initially captured many, but not all, of the required elements of 115.231(a) (1-10). Specifically, this training curriculum addressed eight of the ten required training items. Those eight topics being: the zero tolerance policy for sexual abuse and sexual harassment; how to fulfill their duties; the resident's rights to be free from sexual abuse and sexual harassment; the resident's and employee's rights to be free from retaliation for reporting sexual abuse and sexual harassment; fulfillment of staff responsibilities under the agency sexual abuse and sexual harassment prevention, detection, reporting, and responding to incidents; the dynamics of sexual abuse and sexual harassment in confined settings; common reactions of sexual abuse and sexual harassment victims; how to detect and respond to signs of threatened and actual sexual abuse; and how to avoid inappropriate relationships with resident. Of the two remaining required training topic items of 115.231(a) (1-10), not specifically covered in the initial version of the training curriculum identified above, during the audit process CMI revised the curriculum so as to incorporate specific LGBTI sensitivity training which includes communicating effectively and professionally with all residents including those who may identify as lesbian, gay, bisexual, transgender, intersex or gender non-conforming and mandatory reporting laws for the State of Colorado. All CCTC staff have been trained in all aspects required by §115.231 to include all of the aforementioned added training topics.

As CMI, as an agency, houses both male and female residents, staff have been trained using the curriculum which covers both populations. All employee trainings are recorded and documented with acknowledgment from the employee of the receipt and understanding of the training materials presented. This training material is also routinely covered during staff meetings, also called "TeachBacks". Staff member interviews confirmed the receipt of the aforementioned trainings, refreshers, and the routine reviews of the CMI PREA materials, expectations, and processes during the "TeachBacks".

CMI, to include CCTC specifically, complies with all aspects of §115.231 and exceed the frequency of refresher trainings required by the standard via the performance of regular "TeachBacks".

115.232 Volunteer and contractor training

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CMI provides notification to all visitors of their zero tolerance policies related to sexual abuse, sexual harassment, and sexual misconduct. Volunteers and Contractors having unsupervised access/contact with CMI residents are provided additional training on their duties and responsibilities as it relates to the CMI zero tolerance policies in preventing, detecting, deterring, and responding to incidents of sexual abuse, sexual harassment, and/or sexual misconduct. Training sessions are documented and retained. Confirmation of said trainings was provided and reviewed during the audit process.

CMI - CCTC has met all the requirements for this standard.

115.233 Resident Education

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Upon intake, as was confirmed in a review of the facility's supporting documentation and as was communicated through the Centennial Community Transitional Center resident interview process, all residents receive information educating them on: the agency's zero-tolerance policy regarding sexual abuse and sexual harassment; how to report incidents or suspicions of sexual abuse and sexual harassment; their right to be free from retaliation for reporting such incidents; and, the agency policies and procedures for responding to such incidents. This information is provided to all residents upon their intake via a PREA pamphlet, PREA advisement, and through a short PREA video all residents watch as part of the intake process.

CMI, as noted previously in the auditor's summary for PREA standard 115.216, has established a MOU with the Spring Institute for Intercultural Learning, in order to provide their facilities, to include the CCTC facility specifically, with access to interpreters who can impartially, accurately, and effectively communicate via sign language and with limited English proficient individuals. Additional auxiliary aids can also be arranged through the Facility Director. Staff can also contact colleagues and co-workers at nearby CMI facilities; some of whom are bilingual and can also assist as needed. All PREA education and information are available to CMI's CCTC residents in both English and Spanish; the two most common languages spoken amongst the CCTC resident population. The educational and informational materials include the CMI resident handbook including a PREA specific section, PREA related orientation videos, PREA Advisement, and the PREA pamphlets are only available in English. The material is provided to all CMI residents immediately upon intake and also reviewed with each resident in an individualized setting within the first few days of the resident's admission in the program to ensure all the resident's questions and/or concerns are addressed.

CMI - CCTC has met all the requirements for this standard.

115.234 Specialized training: Investigations

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Select CCTC staff, CMI executive staff, and other upper management personnel have been selected and have been trained on conducting administrative specialized investigations in community settings. The curriculum used for CMI administrative investigators covers all required topics as identified in 115.234. As with the employee training records noted in 115.231, documentation of the selected management staff members responsible for conducting administrative investigations is

retained in the employee's training records along with formal acknowledgment of receipt of the training by the employee.

CMI staff do not conduct criminal investigations but rather refer sexual abuse and sexual harassment allegations appearing to be of possible criminal nature to either the contract agency, Colorado Department of Corrections Office of the Inspector General, for criminal investigation by law enforcement, or directly to the Centennial Police Department.

CMI - CCTC has met all the requirements for this standard.

115.235 Specialized training: Medical and mental health care

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Centennial Community Transitional Center does not have mental health or medical staff who work in the facility regularly or irregularly whether on a fulltime or part-time basis. As such, this standard would not apply to CMI.

CMI -CCTC has met all the requirements for this standard.

115.241 Screening for risk of victimization and abusiveness

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

As outlined in CMI policy 3.020, “Assessments” (page 118, procedure 6 (a-f)) CMI -CCTC residents are assessed at identified placement milestones in order to determine their risk levels for possible victimization and/or possibility of abusiveness. These placement milestones are: upon admission, within 30 days of their admission; upon receipt of new information; upon receipt of an allegation involving the resident (alleged victim and/or alleged abuser); and, upon transfer to another facility. The final assessment milestone, that being upon transfer to another facility, was added to CMI Policy 3.020 as a result of the audit process. CMI Policy 3.020 further stipulates the initial assessment must occur within 72 hours of their admission into the facility which reflects the requirement set forth in the national PREA standard §115.241. All assessments are performed utilizing an objective screening instrument, encompassing all ten criteria identified in §115.241(d) and documented in the resident’s electronic case file.

A review of randomly selected completed risk assessments revealed that all of the residents’ screenings reviewed were completed within the 72-hour time frame identified in the PREA standard. The performance of a re-assessment/review of the individual’s risk levels of victimization and/or abusiveness within 30 days of their intake date was greater than 80% compliant.

As noted in CMI policy 3.020(6)(f), and as required standard 15.241(i), CMI staff are informed to maintain confidentiality with regards to information obtained as a result of the risk assessment. The CMI staff resident tracking software, containing each resident’s electronic case file and respective client case notes, is equipped with mechanisms to limit each permitted user’s scope of access dependent upon individual needs related to the performance of expected duties. Staff are further instructed, per 3.020(6)(e) not to discipline residents who fail to disclose complete information or for refusing to answer.

Throughout the audit process the CMI staff and the auditor worked in collaboration to ensure the screening tool, the CMI policies, and screening process were substantially compliant with all PREA requirements.

CMI -CCTC, as of issuance of this report, has met all of the requirements for this standard

115.242 Use of screening information

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CMI Policy 3.020(7)(a-f) speaks directly to the standard requirements set forth by 115.241(a-f). In the review of documentation and as relayed by staff during the onsite random staff interviews, information acquired by Centennial Community Transitional Center staff in the assessment to include but not limited to the assessments performed pursuant to 115.241, is used to help management staff determine the most appropriate housing assignment and to allow for residents at greater risk of victimization to be housed in closer proximity to posted staff positions. CCTC management staff have developed a unique housing assignment tool which aids staff in the bed placement of newly admitted residents. This housing assignment tool is utilized and coded in such a way as to protect the privacy of each CCTC resident.

As noted above in 115.241, the electronic software program utilized by the CCTC staff and containing each resident’s electronic case file is equipped with mechanisms to limit each permitted user’s scope of informational access dependent upon individual needs related to the performance of expected duties. All CMI staff are informed of the Code of Ethics governing their respective positions and acknowledge their responsibility to maintain the confidential nature of information they may receive.

Centennial Community Transitional Center has the ability to accommodate individualized showers for their transgender and/or intersex residents and provide each resident with a PREA related pamphlet at intake in which residents are informed that individualized shower accommodations can be made available if needed.

Finally, within the scope of their authority as conveyed via the staff interview process, the Centennial Community Transitional Center staff consider the safety and health of a transgender or intersex individual in the determination of housing placement. Centennial Community Transitional Center staff employs due diligence in the determination of which room (or bed) the individual is placed. It is recommended that Centennial Community Transitional Center continue to utilize the information gathered during the assessment process and document the manner and times this information is used in housing or program assignments.

CMI - CCTC has met all the requirements for this standard.

115.251 Resident reporting

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Centennial Community Transitional Center staff informs and provides residents with multiple channels for reporting sexual abuse and sexual harassment, retaliation and other PREA related violations. All residents are provided contact information for the Colorado Department of Corrections Tip Line (1-877-DOC-TIPS), contact information for rape crisis counseling through the Blue Bench organization with whom CMI has a MOU and does accept toll free calls. In addition to these resources, Centennial Community Transitional Center residents are also encouraged to contact local law enforcement, their assigned parole officer, and/or any staff member. This information is available in written format for all residents to retain during their placement at the CCTC facility and is also posted throughout the facility and is available in English and Spanish. CMI has also established a mechanism in which this information can be translated into several other languages should the need arise. CMI accepts all reports of sexual abuse and/or sexual harassment to include anonymous and third party reporting, without weighted differentials for verbal or written reports. Finally, as is required by 115.253(d), CMI has established several mechanisms for staff to utilize in reporting PREA related concerns privately including a PREA staff line which has been established for CMI employees to utilize in communicating their concerns and/or suspicions.

CMI - CCTC has met all the requirements for this standard.

115.252 Exhaustion of Administrative Remedies

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CMI Policy 1.140 (11)(a-e) details the agency’s procedures related to resident grievances. The CMI policy does not impose a time restriction for the filing of a grievance related to sexual abuse or sexual harassment. The CMI policy also provides for emergency grievance procedures if the resident alleges he/she is at substantial risk for imminent sexual abuse. The CMI policy also conforms to the deadlines set forth in standard 115.252(d)(f) respectively. The Centennial Community Transitional Center PREA Pamphlet provided to CCTC residents also articulates that

disciplinary action against a resident can only be taken if the allegation was made in bad faith.
CMI - CCTC has met all the requirements for this standard.

115.253 Resident access to outside confidential supportive services

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

As previously noted, CMI has entered into a MOU with the Blue Bench to provide emotional supportive services to residents of their programs to include the CCTC facility specifically. This MOU also covers rape crisis advocacy; hospital accompaniment; support and accompaniment of the victim through the forensic examination process and the investigatory process; crisis intervention services, referrals for follow-up services and/or additional community resources as needed. The contact information for the Blue Bench is included in the Centennial Community Transitional Center PREA pamphlet provided to all residents at intake and is posted throughout the facility. A signed acknowledgment of the resident's receipt of the PREA information, via a PREA Advisement form, is retained in the resident's case file.

Speaking specifically to the standard's requirement that the facility "enable reasonable communication between residents and these organizations in as confidential a manner as possible", Centennial Community Transitional Center residents are permitted to possess and use cell phones as well as having access to a plethora of community resources outside the facility. The payphones provided by the Centennial Community Transitional Center facility can make out going toll free phone calls. Additionally, Centennial Community Transitional Center staff inform residents the extent to which their communication with community resources will be monitored and which information will be sought in communication with these external entities via the completion of a release of information form.

CMI - CCTC has met all the requirements for this standard.

115.254 Third-party reporting

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Pursuant to the requirements set forth through 115.254(a), CMI has publically distributed through its website, the methods through which incidents of sexual abuse and/or sexual harassment can be reported. This can be found at <http://c-m-i.com/PREA.html>.

CMI - CCTC has met all the requirements for this standard.

115.261 Staff and agency reporting duties

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

In review of CMI Personnel Manual (Code of Ethics, Section B, item 41), CMI PREA Policy (section 7(a)(1)), CMI PREA Policy Acknowledgement form as well as the supporting documentation submitted in conjunction with the pre-audit questionnaire and pertaining to §115.261, the directives set forth in these documents fully meet and appropriately capture all of the requirements of the §115.261(a-e). Speaking specifically to the requirement of §115.261(a), the CMI -CCTC audit team through a concerted effort with their CMI colleagues serving on the audit teams of their respective programs, worked to revise the CMI PREA policy to specifically articulate that neither the location of an alleged incident nor the time period in which it is alleged to have occurred will impact the CMI staff's responsibility/obligation to report the allegation in accordance with the CMI coordinated

response and the PREA standards. CMI's revised PREA policy now states:

"If staff receives any information, regardless of its source and without regard with the length of time between the receipt of an allegation and the location and date of the alleged incident of sexual abuse and or sexual harassment, concerning any suspected prohibited sexual behavior, observes an incident of prohibited sexual behavior, or has suspicion or knowledge of retaliation against clients or staff for reporting an incident, staff is required to immediately report the incident to his/her supervisor and/or Director."

CMI policies capture the remaining components of the standard in that CMI has: placed sufficient levels of control on communication of information received by CMI employees consistent with the requirements of §115.263(b) (CMI PREA Policy, Section 7(a)(6)(d); and outlines the duties and responsibilities of the CMI staff, as mandated reporters within the State of Colorado (CMI PREA Policy Section 6(e) referencing CRS 19-3-304).

§115.263(c) would not apply to CMI-CCTC as they do not employ medical or mental health care practitioners.

CMI-CCTC has met all the requirements for this standard.

115.262 Agency protection duties

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Through a thorough review of CMI PREA Policy (Section 7(b)), Centennial Community Transitional Center Residential Policies as well as information acquired during the staff interviews, Centennial Community Transitional Center staff has mechanisms in place to immediately ensure the resident's safety. Staff members interviewed expressed knowledge of the agency coordinated response (specifically their duties as first responders), management responsibilities for the coordination of external parties with whom CMI has a MOU, and consideration of resident safety in the facilitation of their respective job duties. In that regard, CMI has the ability to transfer residents to additional housing units within the CCTC facility in order to be closer to the posted security technicians and/or temporarily transfer a resident to another CMI facility until permanent arrangements can be made. CMI operates seven facilities in Colorado, with at another CMI facility within close proximity to the CCTC facility.

CMI-CCTC has met all the requirements for this standard.

115.263 Reporting to other confinement facilities

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CMI PREA policy (Section 7(c)(1-4)) outlines the Agency's expectation for staff members to communicate information pertaining to allegations of sexual abuse which occurred at another confinement facility to the facility director. The Director, in turn, will consult with the CMI PREA Coordinator. The Facility Director, will make notification to the facility head of the institution at which the alleged sexual abuse/sexual harassment is to have occurred. CMI policy clearly identifies: the 72-hour time frame mandated by PREA standard 115.263(b) (CMI PREA Policy: section 7(c)(2)); said notification is to be formally documented (CMI PREA Policy: Section 7(c)(3)) as required in 115.263(C); and, the expectation that the facility director receiving the allegation ensures the allegation is investigated in accordance with the PREA standards as noted in 115.263(d) (CMI PREA Policy: Section 7(c)(4)).

CMI-CCTC has met all the requirements for this standard.

115.264 Staff first responder duties

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CMI PREA Policy, section 7(d) (1-3) and the aforementioned CMI -CCTC coordinated response plan covers all of the requirements in §115.264(a) (1-4) (b) with overall intent of preserving any evidence and protecting the crime scene and exceed the requirements of the standard with regards to ensuring all staff are trained in first responder duties. The CMI PREA policy, staff training curriculum, and the CMI -CCTC written coordinated response clearly capture all requirements of §115.264(a) (1-4). Year to date, CMI -CCTC has not had any incidents requiring a first responder response.

While CMI ensures all staff are trained in and familiar with first responder duties, to be enacted following an allegation of sexual abuse, and does not differentiate between the job classifications of the first CMI staff member to respond to a sexual abuse incident, the PREA standard does make that distinction in §115.264(a) and §115.264(b) instructing non-security first responder staff only to request that the alleged victim not take any actions that could destroy evidence and then notify security staff. To that point, the CMI PREA audit teams, to include input from representatives for CMI -CCTC, worked collaboratively to revise the CMI PREA policies in an effort to ensure there are both no missteps or mishandling of evidence (the crime scene, victim, perpetrator(s), etc.) and addressing the immediate needs of the victim while maintaining compliance with all aspects of the PREA standards. Following the audit team's revisions, the CMI PREA policy and coordinated response plans (to include the articulated first responder duties) provide specific direction to those individuals not trained in first responder duties. The policy now directs individuals not trained in first responder duties to instruct the alleged victim not to shower, change, etc. and "then notify a trained staff member".

CMI - CCTC meets all the requirement for this standard and exceeds the staff training requirement.

115.265 Coordinated response

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CMI has a written institutional plan of coordinated actions taken in response to an incident of sexual abuse (flow chart) as well as in written policy (CMI PREA Policy). While the basis for the written plan is a template used by all CMI facilities, the CMI CCTC coordinated response plan is specific to the CMI CCTC facility, in that staff are directed to use specific locations within the CMI CCTC facility to separate the alleged victim and abuser.

The coordinated plan, per §115.265(a), shall also be developed to coordinate actions between first responders, facility management staff and external parties such as those with whom CMI has a MOU to provide services for CMI clients who are the victim of sexual abuse. At the time of issuance of the initial auditor summary report for CMI CCTC, the CMI CCTC coordinated response plan captured and outlined the responsibilities of the CMI CCTC staff (first responders, CCTC management staff, and CMI corporate staff); however, did not capture the expected duties/responsibilities of the external agencies. These parties included, but were not limited to: law enforcement entities; victim advocacy services, and SAFE/SANE services at no cost to the resident victim.

The CMI CCTC coordinated response plan, as a result of the audit process, now outlines the expected actions/services the aforementioned organizations will provide (per the agreements identified in the respective MOU's).

CMI CCTC has a comprehensive written coordinated response plan with all staff members trained and very much aware of their responsibilities as first responders, etc.

CMI CCTC has met all the requirements for this standard.

115.266 Preservation of ability to protect residents from contact with abusers

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CMI employees, including those employed at their Centennial Community Transitional Center facility, are not unionized and no collective bargaining agreement exists. As such, there is nothing prohibiting the management staff of the Centennial Community Transitional Center facility, as empowered through the CMI PREA Policy, PREA Acknowledgment and Agreement form, code of ethics, and other expected employee practices described in the CMI Personnel Manual from removing any alleged staff abusers from contact with any residents.

CMI-CCTC has met all the requirements for this standard.

115.267 Agency Protection against retaliation

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

In review of CMI PREA Policy, section 7(f)(1-3), Centennial Community Transitional Center has established multiple mechanisms to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse and/or sexual harassment investigations from retaliation by other residents or staff. CMI further identifies which staff members/departments are responsible for monitoring of both residents and non-resident persons. In the case of Centennial Community Transitional Center residents, the assigned case manager is responsible for completing the monitoring, through periodic status checks. The Centennial Community Transitional Center has identified the staffing position responsible for monitoring "any other individual who cooperates with an investigation" and/or "expressed a fear of retaliation".

Year to date, Centennial Community Transitional Center has not had one PREA related reports/allegations requiring retaliation monitoring. Retaliation monitoring was conducted on the victim, the perpetrator, and the witness (witnesses) to the incident. Per CMI PREA Policy, monitoring will occur for at least 90 days following a report and can extend the monitoring period if circumstances and/or evidence suggest otherwise. Monitoring, per policy and per PREA standard 115.267(f) would terminate if the allegation was determined to be unfounded. Retaliation monitoring conducted related to this incident was performed in accordance with the requirements of 115.267.

CMI-CCTC has met all the requirements for this standard.

115.271 Criminal and administrative investigations

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

As outlined in CMI PREA Policy (Procedures, Section 8(a)(1-11) CMI has established policies for investigating allegations. CMI staff do not conduct criminal investigations; rather, these are forwarded to local law enforcement (Centennial Police Department) and/or the Colorado Inspector General's Office depending on the classification of the alleged victim. As noted in 115.221, CMI has formally requested of both entities their compliance with the national PREA standards.

In the 12 months prior to this audit, CCTC has had two allegations of sexual abuse reported. Both incidents were fully investigated with one case being referred to local law enforcement once the evidence supported the suggestion of potential criminal activity. Though referred to the Centennial Police Department for criminal investigation, the case was closed without the filing of criminal charges due to lack of probable cause. Administratively, CCTC staff also conducted an investigation into this incident and took immediate and appropriate remedial actions.

CMI staff responsible for conducting such investigations have received specialized investigation trainings covering all required components as identified in 115.234.

CMI-CCTC has met all the requirements for this standard.

115.272 Evidentiary standard for administrative investigations

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CCTC had one noted occurrence of a sexual abuse incident involving a CMI resident. This allegation was promptly investigated to determine if, based on a preponderance of the evidence, a criminal act was likely to have occurred. In turn, and upon determination the criminal charges may result, the allegation was immediately forwarded to the Arapahoe County Sheriff’s Department (ACSD) for criminal investigation. ACSD Department concluded their criminal investigation without any criminal charges being filed.

CCTC staff members, now with specialized investigations training, also conducted an administrative investigation into the allegations; ensuring throughout the process not to jeopardize any potential criminal investigation. Detailed documentation of the investigation, to include follow-up correspondence with Arapahoe County Sheriff’s Department and administrative investigation materials, was retained by CCTC and provided as part of the audit review.

CMI PREA policy (Procedures, Section 8(b)) is consistent with the intent, expectations and spirit of PREA Standard 115.272. CMI as an organization, and Centennial Community Transitional Center as an extension of agency, utilizes the “preponderance of the evidence” as the standard in determining whether allegations of sexual abuse and/or sexual harassment are substantiated.

CMI- CCTC has met all the requirements of this standard.

115.273 Reporting to residents

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CMI PREA Policy (Procedures, Section 8(c)) outlines the expectation that resident victims of sexual abuse suffered in an agency facility will be informed of the outcome of an investigation into an allegation. CMI further expresses the expectation that the Director of their facilities, in this case CMI CCTC , to be vigilant in their efforts to remain informed about an ongoing investigation so as to be

able to keep the resident victim informed.

The CMI policy covers all aspects of the requirements of §115.273. It did not completely capture the specific requirements of §115.273 in that, CMI policy initially identified four notification milestones (employee no longer employed at the facility, employee no longer employed with the company, CMI learns the staff member was indicted/charged with an offense related to sexual abuse within the facility, and CMI learns the staff member was convicted on said charges), the policy also accounts for the possibility of suspension of the employee pending the outcome of an investigation, which is, essentially, the employee being removed from his/her "post" within the resident's "housing unit". Throughout the audit process the audit team worked to refine the CMI PREA policy so as to incorporate specific language aimed at providing both clear direction for CMI staff and capturing all the required notification milestones, verbiage, and intent of §115.273.

CMI- CCTC has met all the requirements of this standard.

115.276 Disciplinary sanctions for staff

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CMI CCTC, through the CMI PREA Policy, CMI PREA Policy Staff Acknowledgement form, and CMI Personnel clearly identifies CMI employee prohibited behaviors including all forms of harassment, abuse, and otherwise inappropriate behaviors, actions and/or non-verbal gestures. The CMI PREA Policy (Procedures, Section 9(b)) refers the reader to the CMI Personnel Manual, Corrective and Disciplinary Action which appears on page 14 of said manual. In this section of the manual, the disciplinary process does not fully capture the expectation in 115.276(b) in which "termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse". This is clearly articulated in both the PREA standards and the CMI Personnel Manual (page 11, "Code of Ethics", item 38). Similarly, CMI should verbalizes the criteria in §115.276(c) when taking disciplinary action relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse).

The criteria, established through this subsection of §115.276, are that disciplinary action be: commensurate with the nature and circumstances of the acts committed; the staff member's disciplinary history; and, the sanctions imposed for comparable offenses by other staff with similar histories. Additionally, reporting of staff members terminated, or who would have been terminated if not for their resignation, to relevant licensing agencies was not specifically captured either in

policy or in the CMI Personnel Manual; though this information did appear in the CMI Zero Tolerance Staff Acknowledgement. To complete the circuit and to fully capture the requirements of this particular PREA standard as expected practice within the organization, the CMI audit team (to include representatives from various CMI facilities, senior management, and corporate staff members) was tasked to specifically include these aspects within written policy and in the CMI Personnel Manual – Discipline and Corrective Action section as this is the section of the manual referred to in policy.

With these aspects included in the CMI Personnel Manual and/or written policy, CMI-CCTC has met the requirements of this standard.

115.277 Corrective action for contractors and volunteers

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Similar to the suggestions for the previous standard’s audit narrative, while CMI’s Zero Tolerance Acknowledgement form does accurately reflect the requirements set forth in §115.277(a) and (b); the CMI Audit team was tasked with inclusion of similar verbiage in either the CMI Personnel Manual speak to the four mandatory actions to be taken by CMI CCTC following receipt of a report of sexual abuse of a CMI CCTC resident by a volunteer/contractor. Those required actions included:

- Removal of contractor’s and/or volunteer’s from contact with CMI CCTC residents when alleged to have engaged in sexual abuse
- Notification to law enforcement (when appropriate);
- Notification to relevant licensing agencies; and,
- Taking remedial measures up to and including prohibition from further contact with residents for any other violation of the CMI Zero Tolerance policy (aside from engaging in sexual abuse).

With these aspects included in the CMI Personnel Manual and/or written policy, CMI-CCTC has met the requirements of this standard.

115.278 Disciplinary sanctions for residents

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CMI Residential Policy 1.110, Procedures, Section 5 (a-f) (page 30 of the CMI Residential Policy Manual) outlines the disciplinary sanctions for CMI residents to include Centennial Community Transitional Center residents. The aforementioned policy accurately captures and mirrors the requirements of 115.278 (a-f) with the notable exception of the requirements identified in 115.278(d) requiring facilities who provide therapy, counseling, etc. to "offer therapy, counseling, or interventions designed to address and correct underlying reasons or motivations for the abuse". In that regard, 115.278(d) would not be applicable to Centennial Community Transitional Center for two reasons. First, CMI does not offer therapy, counseling or other interventions; rather, CMI outsources these services from approved vendors as identified by the contractor. To that point, CMI has mechanisms in place (as referenced in CMI Residential Policy 3.200) to access community resources and continued dialogue with said community resources to help address deviant or prohibited behaviors and/or concerns in advance of any sexual abuse. Second, it is important to note, as a private contractor providing services to Colorado Department of Corrections, Colorado Division of Criminal Justice (DCJ), et al, CMI would not be permitted to retain a resident accused of sexual abuse; rather, the appropriate legal entities (DOC, Centennial Police Department, etc.) would remand the alleged abuser until final disposition. As such, with confirmation of CMI's request of these respective law enforcement entities to adhere to the federal PREA standards currently in hand, as noted in 115.221, CMI, and Centennial Community Transitional Center specifically, has demonstrated due diligence in their efforts to comply with all aspects of the PREA standards.

CMI- CCTC has met all the requirements of this standard.

115.282 Access to emergency medical and mental health services

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The CMI PREA Policy (Procedures, section 10 (a) (1-4)) outlines the Agency’s stated objectives to provide resident victims of sexual abuse with access to emergency medical treatment and crisis intervention services. CMI’s MOU with the Blue Bench also provides for advocacy and emotional supportive services; furthermore, CMI’s MOU with St. Anthony North Neighborhood Health Center outlines the expected duties of both CMI and St. Anthony North Neighborhood Health Center respectively. In the MOU, section D – “Roles And Understanding Of The Parties: Access to Emergency Medical Health Services”, the requirements set forth in §115.282(a)(c)(d) are specifically covered and articulated.

Additionally, speaking to §115.282(b), CMI has set forth written directives (as noted in 115.265) to ensure that notification to appropriate medical and mental health practitioners occurs upon determination that an incident of sexual abuse has occurred (CMI PREA Policy, Procedures, Section 10(a)(1-4)) and, following suggested revisions to said policy, also imposes the expectation that the notification to medical and/or mental health practitioners is “immediate” as noted in the latter part of §115.282(b) (CMI PREA Policy, Procedures, Section 10 (a)(1).

CMI-CCTC has met all the requirements for this standard.

115.283 Ongoing medical and mental health care for sexual abuse victims and abusers

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CMI PREA Policy (Procedures, Section 10(b)(1-8)) captures each of the applicable elements of PREA standard 115.283(a-h) with the notable exceptions of 115.283(d)(e) which would not be applicable as CMI CCTC is an all-male facility. The remaining portions of the standard (115.283(a)(b)(c)(f)(g) and (h) are fully articulated in the above referenced policy. As has been previously noted, CMI CCTC has not had an occurrence of sexual abuse nor a report of sexual abuse occurring at another facility (while the resident is housed at CMI CCTC).

The existing arrangements with local community resources, as captured in the aforementioned MOU's (Blue Bench, St. Anthony North Neighborhood Health Center, etc.) and via documented efforts to establish said MOU's, provide for the ongoing medical and mental health care for sexual abuse victims consistent with the level of care offered in the community.

CMI-CCTC has met all the requirements for this standard.

115.286 Sexual abuse incident reviews

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CMI PREA Policy and Procedures, Procedure Section 11(a)(1-5) outline the Agency's expectation on the scope, the participants, responsibilities and areas to be reviewed, and functionality of sexual incident review committee and its quorum. During the pre-audit and onsite audit, the auditor worked with the facility to develop a template for recording the sexual abuse incident review committee's meeting minutes. The template includes all the criteria identified in 115/286(d)(1-6).

Centennial Community Transitional Center convened one Sexual Abuse Incident Review committee as CCTC had one (unsubstantiated) PREA related allegations in the twelve months prior to the on-site audit. A Sexual Abuse Incident Review committee consisted of a multi-dimensional team of executive, upper, and middle management personnel. The results of the sexual abuse incident review were forwarded to auditor for review and audit record retention.

Moving forward, CCTC, as is articulated with the CMI PREA policy, should aim to conduct the sexual abuse incident review within the time frame stipulated within the standard; that time frame being within 30 days of an allegation that has been substantiated or unsubstantiated. A sexual abuse incident review would not be required to be convened if an incident was determined to be unfounded.

CMI- CCTC has met all the requirements of this standard.

115.287 Data Collection

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

As an agency, CMI, as directed by CMI’s PREA Policy and Procedure, Procedures, Section 11(b)(1-4), collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control and does so by using a set of definitions. Information is gathered at each CMI facility, to include Centennial Community Transitional Center, and forwarded to the CMI PREA Coordinator. At the time of this initial report, the CMI sexual abuse data is posted and available on the CMI website. The data includes aggregate information for each individual facility, including Centennial Community Transitional Center, and the agency as a whole.

CMI-CCTC has met all the requirements for this standard.

115.288 Data review for corrective action

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CMI PREA Policy and Procedures, Procedures section 11(c)(1-4) captures all of the required elements set forth in 115.288(a-d) and as noted above in 115.287, data collected pursuant to 115.287 has been aggregated, analyzed, and made available on the CMI website in the form of a 2014 Annual PREA report. The report provides a comparison of 2014 and 2013 data for each CMI facility. Consistent with the compiled data showing only isolated reports/allegations in the CMI facilities and the utilization of ample video surveillance coverage and strategically placed convex mirrors, there were no identified “problem areas” requiring identification of corrective actions.

It is recommended that future Annual PREA reports speak to an assessment of the agency’s progress in preventing, detecting, deterring, and investigating incidents of sexual abuse and/or sexual harassment. As CMI, and CCTC specifically, have demonstrated significant staff effort to implement and maintain a zero tolerance culture throughout their facilities, the inclusion of progress in all PREA related aspects (policy revisions, specialized trainings, etc.) is recommended so as to speak to evolution of the comprehensive CMI PREA policies and practices.

CMI- CCTC has met all the requirements of this standard.

115.289 Data storage, publication, and destruction

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

CMI, through the CMI PREA Policy and Procedures, Procedure Section 11(d)(1-4) capture each of the requirements of PREA standard 115.289 and, as has been noted in the previous two standards, CMI has compiled, aggregated and published data collected for 2013 and 2014 respectively in their Annual PREA Report. As noted in the standards 115.288, it is recommended that future annual reports include or speak to an assessment on the agency’s progress in addressing sexual abuse.

CMI- CCTC has met all the requirements of this standard.

AUDITOR CERTIFICATION

I certify that:

- The contents of this report are accurate to the best of my knowledge.
- No conflict of interest exists with respect to my ability to conduct an audit of the agency under review, and
- I have not included in the final report any personally identifiable information (PII) about any resident or staff member, except where the names of administrative personnel are specifically requested in the report template.

Auditor Signature

_____ 2-25-2016

Date