

# Community, Counseling and Correctional Services, Inc.

## START Program



## 2024 Annual PREA Review

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The Sanction Treatment Assessment Revocation and Transition (START) Program posts an annual report of PREA investigations and outcomes.

As a requirement and at least on an annual basis, the START management team, including the PREA Coordinator from the corporate office, will meet and review the staffing plan for an adequate level of staffing and video monitoring to protect clients against sexual abuse and sexual harassment. The review includes the physical layout of the facility, population, substantiated and unsubstantiated incidents of sexual abuse and sexual harassment and any other relevant factors.

START staff receives annual training on PREA. Our training curriculum includes Transgender and Cross-Gender pat searches, various PREA power points from the PREA Resource Center website, and PREA policies review. START Specialized services such as Mental Health, Medical and Investigative staff have all received specialized PREA training from the NIC website.

START trains all contractors, volunteers and visitors on PREA as stated per PREA training policy.

START has had 4 federal PREA audits conducted, the first in November of 2016 (exceeded 1 standard, complied with 37 standards). 2 others in November of 2018 and November 2021 both which exceeded 4 standards, and met or complied with 37 standards. The most recent federal audit was conducted in November of 2024. START's Program Administrator, PREA Manager and all staff strive to consistently meet or exceed the PREA standards.

The following are standardized definitions offered by the Prison Rape Elimination Act. This ensures everyone is using the same language and has the same understanding of key terms.

**Sexual Abuse** includes:

1. Sexual abuse of an inmate, detainee, or client by another inmate, detainee or client; and

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2. Sexual abuse of an inmate, detainee, or client by a staff member, contractor or volunteer.

Sexual abuse of an inmate, detainee or client by another inmate, detainee or client includes any of the following acts, if the victim does not consent, is coerced into such act by overt or implied threats of violence, or is unable to consent or refuse:

1. Contact between the penis and the vulva or the penis and the anus, including penetration, however slight;
2. Contact between the mouth and the penis, vulva, or anus;
3. Penetration of the anal or genital opening of another person, however slight, by a hand, finger, object, or other instrument; and
4. Any other intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, or the buttocks of another person, excluding contact incidental to a physical altercation.

Sexual abuse of an inmate, detainee, or resident by a staff member, contractor, or volunteer includes any of the following acts, with or without consent of the inmate, detainee, or resident:

1. Contact between the penis and the vulva or the penis and the anus, including penetration, however slight;
2. Contact between the mouth and the penis, vulva, or anus;
3. Contact between the mouth and any body part where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire;
4. Penetration of the anal or genital opening, however slight, by a hand, finger, object, or other instrument, that is unrelated to official duties or where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire;
5. Any other intentional contact, either directly or through the clothing, of or with the genitalia, anus, groin, breast, inner thigh, or the buttocks, that is unrelated to official duties or where the staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire;
6. Any attempt, threat, or request by a staff member, contractor, or volunteer to engage in the activities described in paragraphs (1)-(5) of this section;
7. Any display by a staff member, contractor, or volunteer of his or her uncovered genitalia, buttocks, or breast in the presence of an inmate, detainee, or resident, and
8. Voyeurism by a staff member, contractor, or volunteer.

**Voyeurism** by a staff member, contractor, or volunteer means an invasion of privacy of an inmate, detainee, or resident by staff for reasons unrelated to official duties, such as peering at an inmate who is using a toilet in his or her cell to perform bodily functions; requiring an inmate to expose his or her buttocks, genitals, or breasts; or taking images of all or part of an inmate's naked body or of an inmate performing bodily functions.

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**Sexual harassment** includes:

1. Repeated and unwelcome sexual advances, requests for sexual favors, or verbal comments, gestures, or actions of a derogatory or offensive sexual nature by one inmate, detainee, or resident directed toward another; and
2. Repeated verbal comments or gestures of a sexual nature to an inmate, detainee, or resident by a staff member, contractor, or volunteer, including demeaning references to gender, sexually suggestive or derogatory comments about body or clothing, or obscene language or gestures.

**Substantiated Allegation** means an allegation that was investigated and determined to have occurred.

**Unsubstantiated Allegation** means an allegation that was investigated and the investigation produced insufficient evidence to make a final determination as to whether or not the event occurred.

**Unfounded Allegation** means an allegation that was investigated and determined not to have occurred.

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START has compiled the following data regarding PREA reports and subsequent PREA investigation results for the year of 2024.

### **There were 3 PREA investigations in 2024**

#### **Client allegations made towards staff for the year of 2024:**

Sexual Abuse:	(0) Unsubstantiated	(0) Substantiated	(0) Unfounded
Sexual Harassment:	(0) Unsubstantiated	(0) Substantiated	<b>(1) Unfounded</b>
Voyeurism:	(0) Unsubstantiated	(0) Substantiated	(0) Unfounded

#### **Client allegations made towards clients for the year of 2024:**

Sexual Abuse	(0) Unsubstantiated	<b>(1) Substantiated</b>	(0) Unfounded
Sexual Harassment	(0) Unsubstantiated	(0) Substantiated	<b>(1) Unfounded</b>

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### COMPARATIVELY – 2023 STATISTICS

#### Client allegations made towards staff for the year of 2023:

Sexual Abuse:	(0) Unsubstantiated	(0) Substantiated	(0) Unfounded
Sexual Harassment:	(0) Unsubstantiated	(0) Substantiated	(0) Unfounded
Voyeurism:	(0) Unsubstantiated	(0) Substantiated	(0) Unfounded

#### Client allegations made towards clients for the year of 2023:

Sexual Abuse	(0) Unsubstantiated	(0) Substantiated	(1) Unfounded
Sexual Harassment	(1) Unsubstantiated	(1) Substantiated	(0) Unfounded

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### Data Comparison

#### Reviewing the previous 3 years:

- 2021, there was one 3<sup>rd</sup> party report of staff sexual harassment/abuse that was completely unfounded, as well as a report of client on client harassment. This report was also unfounded.
- 2022, an administrative staff noted red flags with another staff member and an investigation was launched. The result was a substantiated sexual assault allegation. 2 allegations of sexual harassment were made, 1 client on client (unsubstantiated) and one staff on client (unfounded).
- 2023, 3 total allegations were made, all client on client. 1 for sexual abuse which was determined to be completely unfounded, the other 2 were for sexual harassment, 1 was unfounded, 1 unsubstantiated.

In 2024, there were a total of 3 allegations. 2 were determined to be completely unfounded allegations of sexual harassment, 1 against staff, 1 against another client. There was a 3<sup>rd</sup> party report filed on behalf of a client, by a client exiting the facility that alleged sexual abuse had occurred. The allegation was investigated and was determined to be substantiated. The investigation was turned over to local law enforcement and at the time of this report, no charges have been filed against the 2 alleged abusers. A SART was completed following this investigation and all staff had updated training on the red flags of abuse. This data review shows that both staff and clients are well educated in PREA and understand all allegations will be investigated. Each client is made aware of START's zero-tolerance policy upon intake. START new employees are educated in PREA and read all PREA policies before ever having contact with the clients.

## Community, Counseling and Correctional Services, Inc.

Please allow the above-mentioned information to serve as the START Program's annual review for 2024. These numbers are reviewed annually in order to assess and improve the effectiveness of START's zero-tolerance sexual abuse and sexual harassment policies.



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Program Administrator – START

1/22/25  
Date



Marwan Saba  
PREA Coordinator – CCCS, Inc.

1/22/25  
Date



Mike Thatcher  
CEO – CCCS, Inc.

1/14/25  
Date