

**Community, Counseling and Correctional Services, Inc.**  
**START Program**



**2021 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 offenders 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 had its first federal PREA audit conducted in November of 2016. The facility was found to have exceeded 1 standard, met and/or complied with 37 standards, and had one corrective action to complete. START was found 100% compliant on January 5, 2017. The facility's second federal PREA audit was conducted in November of 2018. START was found to have exceeded 4 standards, met or complied with 37 standards with two corrective actions to complete. The two corrective actions were completed well within the given timeline and the START facility was found 100% compliant on February 27, 2019. START's most recent federal audit was conducted in November of 2021. The final results are pending at the time of this report.

Due to the global-wide pandemic and COVID-19 restrictions, 2021 was very different than previous years. It is very hard to social distance in a correctional facility, therefore all new intakes had to quarantine for a mandatory 14-day period. START began quarantining clients for

the two week period for other facilities as well. PREA assessments remained a top-priority when quarantining offenders together. Staff training was conducted in different settings due to restrictions on group gatherings. Most trainings were conducted on-line or one-on-one with the PREA Manager. Though COVID-19 introduced numerous challenges, staff and offenders were trained and educated on PREA policies and procedures.

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 offender by another inmate, detainee or offender; and
2. Sexual abuse of an inmate, detainee, or offender by a staff member, contractor or volunteer.

Sexual abuse of an inmate, detainee or offender by another inmate, detainee or offender 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.

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.

START has compiled the following data regarding PREA reports and subsequent PREA investigation results for the year of 2020.

### **There were 2 PREA investigations in 2021**

**Offender allegations made towards staff for the year of 2020:**

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

Voyeurism: (0) Unsubstantiated (0) Substantiated (0) Unfounded

**Offender allegations made towards offenders for the year of 2021:**

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

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

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**Data Comparison**

In 2019, there was one allegation by an offender against another and zero allegations against staff; in 2020, there was one allegation against staff that was also determined to be unfounded. In looking back at 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 offender on offender harassment. This report was also unfounded. While comparing the past few years, there were more reports in 2021 and both allegations were made in good faith. The data shows that offenders and staff both are well educated on PREA policies and procedures and that allegations made in bad-faith will not be tolerated. Each offender 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 offenders.

Please allow the above-mentioned information to serve as the START Program's annual review for 2021. These numbers are reviewed annually in order to assess and improve the effectiveness of START's zero-tolerance sexual abuse and sexual harassment policies.



Bob Olson  
Program Administrator – START

3-2-2022  
Date



Marwan Saba  
PREA Coordinator – CCCS, Inc.

3-6-22  
Date



Mike Thatcher  
CEO – CCCS, Inc.

3/12/22  
Date