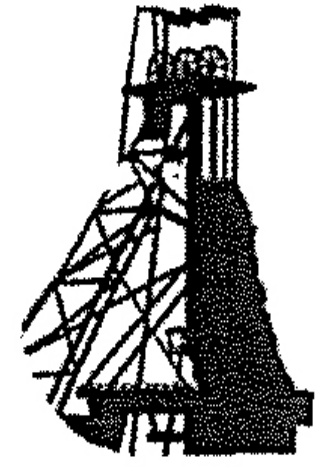


**Community, Counseling and Correctional Services, Inc.**

**Sanction Treatment Assessment Revocation Transition**



**Annual PREA Comparative Reports (§115.87 and §115.88) for years 2014, 2015, and 2016**

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

As a requirement and at least on an annual basis, START management team including the Program Administrator and the PREA Coordinator from the corporate office will meet and review the staffing plan for 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 monthly training on PREA and an annual refresher course. Our training curriculum includes Transgender and Cross gender Pat Searches, various PREA power points from the PREA Resource Center website, PREA Gender Responsive and PREA standards review. START's specialized services such as Mental Health, Medical and investigative staff have all received specialized PREA training from the NIC Website. START revised its PREA policies in 2015 and again in 2016 to meet and comply with all PREA Standards.

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

The following are standardized definitions offered by the Prison Rape Elimination Act. This ensures everyone is using the same language, and has the same understandings 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 offender by a staff member, contractor, or volunteer includes any of the following acts, with or without consent of the inmate, detainee, or offender:

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 above.
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 offender, 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 offender 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 offender directed toward another; and
2. Repeated verbal comments or gestures of a sexual nature to an inmate, detainee, or offender 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.

**Unfounded allegation** means an allegation that was investigated and determined not 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.

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START has compiled the following data regarding PREA reports, and subsequent PREA investigation results for the year of **2014**.

- ***There were (5) PREA Investigations in 2014***

**Offender allegations made towards staff in 2014:**

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

Sexual Harassment: (2) Unsubstantiated (0) Substantiated (0) Unfounded

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

**Offender allegations made towards offenders in 2014:**

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

Sexual Harassment: (3) Unsubstantiated (0) Substantiated (0) Unfounded

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

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START has compiled the following data regarding PREA reports, and subsequent PREA investigation results for the year of 2015.

- ***There was (1) PREA Investigation in 2015***

**Offender allegations made towards staff in 2015:**

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

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

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

**Offender allegations made towards offenders in 2015:**

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

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

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

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START has compiled the following data regarding PREA reports, and subsequent PREA investigation results thru September of 2016.

- *There were (2) PREA Investigations in 2016*

**Offender allegations made towards staff 2016**

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

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

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

**Offender allegations made towards offenders 2016**

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

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

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

**DATA Comparison**

While looking at data from the previous three years, it is clear that staff and START offenders are more educated about PREA and how to prevent and detect sexual abuse and sexual harassment. Staff is more proactive rather than reactive in preventing prison rape. One of the key factors in this is the training on red flags of sexual abuse and harassment in a confinement setting. START has made several updates in the facility, the biggest being the installation of observation mirrors in certain blind spot areas.

**Pursuant to PREA standards for data review (§115.88), the following will serve as an annual review for 2016 in order to assess and improve the effectiveness of START's sexual abuse and sexual harassment prevention, detection, response policies and training.**

START completed its first audit regarding the level of compliance with implementation of 39 PREA standards, which includes compliance of many subsets of each standard on November 14-16. Ken Arnold, DOJ Certified PREA Auditor of Castle Rock, Colorado, completed the audit.

The interim report was provided January 5, 2017 to the START Program, reporting 01 exceeded standards; 37 standards met; 01 not met standard; and 04 not applicable. By January 6, 2017 all corrective action had been completed. The summary of the **final audit findings** for START is listed below.

- Number of standards exceeded: 01
- Number of standards met : 37
- Number of standards not met: 01
- Number of standards not applicable: 04

The following PREA standard met compliance after corrective action:

**115.86 Data Collection and Review of Sexual Abuse Incident Reviews**

115.86 Data Collection and Review of Sexual Abuse Incident Reviews (a) states that START will conduct a sexual abuse incident review at the conclusion of every criminal or administrative sexual abuse or sexual harassment investigation whether the incident is substantiated or unsubstantiated. START will not conduct a review if the incident is determined to be unfounded. The lack of an incident review on one incident was discussed during the PREA audit exit interview.

START's Sexual Abuse Response Team (SART) and the agency PREA Coordinator met and conducted a mock SART on the incident in question on January 5, 2017. The Agency Coordinator created a SART checklist documenting the staff present and fully reviewing the incident in question. By following this checklist and reviewing any investigation that is not determined to be unfounded, START has completed the corrective action required.

The following (1) PREA Standard was found to have exceeded standard compliance:

**115.11 Zero Tolerance of Sexual Abuse and Sexual Harassment**

START requires the completion of a PREA Compliance Agreement by all visitors, volunteers and contractors. The acknowledgement addresses definitions of sexual abuse, sexual harassment, and voyeurism. Entrants to the facility are instructed to read and sign the acknowledgment. The form certifies the understanding of the PREA standard for zero tolerance of sexual abuse and harassment of any kind. The verbiage of the form states the understanding of IMMEDIATELY reporting any suspicion to a START staff member. The document is used as constant PREA reminder to each person that enters the START facility.

  
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**PREA Coordinator**  
Marwan Saba

2/14/2017  
\_\_\_\_\_  
**Date**

  
\_\_\_\_\_  
**START Administrator**  
Travis Hettick

2/14/17  
\_\_\_\_\_  
**Date**

  
\_\_\_\_\_  
**Chief Executive Officer CCCS Inc.**  
Mike Thatcher

2/14/17  
\_\_\_\_\_  
**Date**