

**PREA AUDIT REPORT INTERIM FINAL
COMMUNITY CONFINEMENT FACILITIES**

NATIONAL
PREA
RESOURCE
CENTER



BJA
Bureau of Justice Assistance
U.S. Department of Justice

Auditor Information			
Auditor name: Susan Jones			
Address: Post office Box 283, Canon City, CO 81215-0283			
Email: sjjcanoncity@gmail.com			
Telephone number: 719-275-7603			
Date of facility visit: June 15 and June 16, 2015			
Facility Information			
Facility name: Larimer County Criminal Justice Services: Community Corrections and Alternative Sentencing Division-Work Release			
Facility physical address: 2307 and 2255 Midpoint Dr, Fort Collins, CO 80525			
Facility telephone number: 970-980-2671			
The facility is:	<input type="checkbox"/> Federal	<input type="checkbox"/> State	<input checked="" type="checkbox"/> County
	<input type="checkbox"/> Military	<input type="checkbox"/> Municipal	<input type="checkbox"/> Private for profit
	<input type="checkbox"/> Private not for profit		
Facility type:	<input type="checkbox"/> Community treatment center	<input checked="" type="checkbox"/> Community-based confinement facility	<input type="checkbox"/> Other
	<input type="checkbox"/> Halfway house	<input type="checkbox"/> Mental health facility	
	<input type="checkbox"/> Alcohol or drug rehabilitation center		
Name of facility's Chief Executive Officer: Gary Darling			
Number of staff assigned to the facility in the last 12 months: 174			
Designed facility capacity: 506			
Current population of facility: 408			
Facility security levels/inmate custody levels: Community			
Age range of the population: 18-68			
Name of PREA Compliance Manager: Sean Grogan		Title:	PREA coordinator
Email address: grogansb@co.larimer.co.us		Telephone number:	970-980-2675
Agency Information			
Name of agency: Larimer County Criminal Justice Services			
Governing authority or parent agency: (if applicable) Larimer County			
Physical address: 2307 Midpoint Dr, Fort Collins, CO 80525			
Mailing address: (if different from above)			
Telephone number: 970-980-2671			
Agency Chief Executive Officer			
Name: Gary Darling		Title:	Division Director
Email address: darlinga@co.larimer.co.us		Telephone number: 970-980-2671	
Agency-Wide PREA Coordinator			
Name: Sean Grogan		Title:	PREA Coordinator
Email address: grogansb@co.larimer.co.us		Telephone number:	970-980-2675

AUDIT FINDINGS

NARRATIVE

The audit of the Larimer County Criminal Justice Services: Community Corrections and Alternative Sentencing Division-Work Release was conducted by Susan Jones, Certified PREA auditor. This audit was communicated in advance to staff and offenders by a posted notice. This notice was posted in areas throughout the facilities beginning on April 22, 2015. The notice provided contact information for the auditor and directed that any information be forwarded to the post office box listed, at least ten days in advance of the on-site portion of the audit. No letters or information were received by the auditor prior to the audit.

Prior to the on-site audit, the facility provided policies, procedures and facility documentation for each standard. Prior to the on-site audit communication occurred between the auditor and the PREA coordinator regarding specific standards and compliance issues.

The on-site audit was conducted beginning at 8 a.m. on June 15. The auditor remained at the facility until approximately 10 p.m. on that date. The auditor returned on June 16 at approximately 9 a.m. and completed the audit on-site visit at approximately 11:35 a.m.

During the on-site portion of the audit, the auditor was allowed free access to all areas of the facility, access to interview offenders and to any documentation requested. Free access was also provided to conduct random staff interviews on each of the three shifts.

The on-site portion of the audit included a tour of housing units, day rooms, inmate program areas, intake areas, recreation areas, and cafeterias.

Interviews of specialized staff included the Agency Head, Facility Directors, PREA Coordinator, the Agency Contract Administrator, Mental Health Coordinator, human resources staff, volunteers, contractors, agency investigative staff, incident review team members, and the staff member designated with monitoring retaliation. Staff who perform screening for risk of victimization and abusiveness and intake staff were also interviewed. Additionally, staff members on each shift were also interviewed. These staff were selected on a random basis by the auditor.

Offender interviews included those who with Limited English Proficiency, those who identified as transgender, intersex, gay, lesbian or bisexual, and those who have reported a violation of sexual abuse or harassment. A random number of offenders were also interviewed, including those who worked outside of the facility at a variety of times.

The exit meeting was held on June 16 at 11:30 a.m. The Facility Directors and the PREA coordinator were present for this meeting.

DESCRIPTION OF FACILITY CHARACTERISTICS

The Larimer County Criminal Justice Services: Community Corrections and Alternative Sentencing Division Work Release are located in two buildings that sit next to each other on Midpoint Drive in Fort Collins, Colorado. These facilities are adjacent to the Larimer County Sheriff's office and jail.

Community Corrections:

The community corrections center houses both female and male offenders who are either directly sentenced to Community Corrections or are transitioning out of prison prior to release on Parole. Clients live at the residential program for an average of eight to nine months, stabilizing their life in regards to issues such as treatment needs, employment, and residence. Progress with court requirements such as payment of restitution or completion of community service hours are monitored. Staff manages client finances initially and monitors their budgets throughout supervision. Structure is provided through drug and alcohol screening, urinalysis or breathalyzer tests, security searches, facility counts and monitoring community locations of work, treatment or passes.

The community corrections facility houses offenders in dormitory style rooms with attached bathroom facilities, which include single showers. The male side has the capacity for 250 and the female side as the capacity for 92 offenders. There are 40 such dorm/bathroom combinations. The offenders in the community corrections program have access to outdoor recreation areas that include: a basketball court, a walking trail, a handball court, and an herb/vegetable garden. Additionally, community corrections offenders may be allowed to use community recreation resources.

The program for female offenders is treatment focused. It offers female offenders a supportive environment and empowers them to take responsibility for the direction of their lives. An opportunity to address substance use and addiction issues, parenting, mental health and past trauma issues is offered in this program. They learn to become self-sufficient by assisting them in gainful employment, and learning to budget their finances. The goal is to facilitate internal change in a safe and compassionate environment. This program employs specially trained staff who deliver a specific in-house curriculum.

Alternative Sentencing Division Work Release (ASD):

This division was implemented in 1983 as a measure to reduce sentencing costs. This unit includes many different sentencing options, but only the work release program was audited for compliance with the PREA standards. This program is designed to enable offenders to maintain employment and live at the facility when not working. This program is housed in a facility that was opened in October of 2012 and houses up to 164 offenders. This facility was designed with the operational needs in mind, including the PREA standards. The layout of this facility makes it easy to observe staff and offenders. The line-of-sight options from many points within the facility allow for a very broad view the offender living and common areas.

The housing areas include a total of 14 dorms with adjacent bathrooms, which includes single showers. Most of these units have two dorm areas sharing the same bathroom. Two of these dorm units have only one dorm area adjacent to a bathroom, so the number of offenders interacting within these areas is reduced. One is in the female housing area and the other is in the male housing area. This allows for a great deal of flexibility in housing for offenders who have additional vulnerabilities. The work release offenders have access to an area near the employee's station where they are permitted to store and use personal cell phones. They also have an area outdoors for smoking and a basketball court.

SUMMARY OF AUDIT FINDINGS

Number of standards exceeded: 6

Number of standards met: 32

Number of standards not met: 0

Number of standards that are not applicable: 1

Throughout this audit process, the written documentation, observations of staff and offender interaction, and the interviews with staff and offenders demonstrated a commitment to the principles of PREA that often exceeded the specific standard language. The protection of offenders from sexual abuse or harassment and protection against retaliation is a part of the culture of this facility. The diligence with which staff perform their duties was observed by this auditor and was confirmed by offenders during random interviews.

**Larimer County Criminal Justice Services: Community Corrections and Alternative Sentencing Division
Work Release is in full compliance with the PREA standards.**

Standard 115.211 Zero tolerance of sexual abuse and sexual harassment; PREA Coordinator

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

The policy that is in place at this facility is very comprehensive and covers the specific requirements of this standard. The zero tolerance mandate and the specific prohibited activities are very clear. The designated PREA coordinator has sufficient time and authority to oversee the efforts of this agency's PREA compliance.

Standard 115.212 Contracting with other entities for the confinement of 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)
- XX Not Applicable

This agency does not contract with any other facilities or entities for the confinement of any offenders sentenced to their facility and/or programs.

Standard 115.213 Supervision and monitoring

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

This agency has developed a staffing plan that allows for adequate supervision and monitoring of offenders. This plan has been developed based upon operational needs and an evaluation of PREA concerns. The plan is monitored daily and reviewed annually.

Standard 115.215 Limits to cross-gender viewing and searches

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

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This facility does not conduct any strip searches or visual body cavity searches on any offenders, at any time. Cross gender pat searches are not done for any offender, absent exigent circumstances. Policy, practice and staff interviews all concluded that staff of the opposite gender announce their presence when entering an area where offenders are likely to be showering, performing bodily functions, or changing clothing. This agency strictly enforces the expectation that offenders must be fully clothed at all times, unless they are in the bathrooms and behind a stall door or a shower partition.

Standard 115.216 Residents with disabilities and residents who are limited English proficient

- XX 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)

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This agency has gone beyond the minimum standard language towards providing access to the PREA process. A review of policy and observation of practice confirmed the ways that meaningful access is provided to offenders during orientation and at any point they may have a concern related to a PREA issue. Interviews with staff also confirmed that the policy requirements were in place and understood. A language translation registry is available for interpreters in many different languages and dialects. Additionally, they have many staff who speak Spanish. Any offender who has difficulty reading or understanding is provided an orientation in a one-on-one format with a staff member who will make whatever accommodations are necessary to impart the necessary information. Additionally, information is offered in a variety of media formats, including written brochures, videos, and staff presentations.

Standard 115.217 Hiring and promotion decisions

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

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The hiring and promotion of staff is conducted in a manner that is fully compliant with this standard. The background and integrity process includes valid attempts to examine any issues, including sexual abuse or sexual harassment of potential employees. Criminal background checks are completed on all current employees every four years. All current and future employees sign a release of information that states that the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.

Standard 115.218 Upgrades to facilities and technologies

- XX 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)

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The Alternative Sentencing Work Release program was opened after the PREA standards were published. Observation of the design and operational procedures make it obvious that the ability to protect offenders from sexual abuse was a consideration. Additionally, the Agency director confirmed that the PREA standards were discussed a many times during the construction and design of the unit. The resulting physical plant is a testament to the commitment to sexual safety for their offenders.

Standard 115.221 Evidence protocol and forensic medical examinations

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

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This agency does not conduct investigations for allegations of sexual abuse. These investigations are conducted by the Larimer County Sheriff's Office (LCSO). All PREA incidents are screened by the agency with the LCSO for potential criminal charges, unless the incidents are clearly not criminal in nature. The agency has requested, in writing that the LCSO follow the requirements in "a-e" of this standard. The agency, in conjunction with the LCSO refers all victims of sexual abuse to the Medical Center of the Rockies where SANE services are available. Additionally, the agency has entered into an agreement with a local victims advocate organization: Sexual Assault Victims Services. As part of this audit, a phone interview was conducted with the Executive Director.

Standard 115.222 Policies to ensure referrals of allegations for investigations

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

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During the on-site review of investigative files, this auditor confirmed that investigations were conducted in compliance with this standard. The website (larimer.org/cjs/prea) was also reviewed and information concerning the role of the agency and the investigating entity was clear.

Standard 115.231 Employee training

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

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The training that is provided to the employees thoroughly covers all aspects of this standard. An annual refresher is offered and each employee signs and acknowledges this training. Interviews with staff supported the documentation and policy. Staff have a clear understanding of their roles and responsibilities related to PREA incidents and sexual safety of offenders.

Standard 115.232 Volunteer and contractor training

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

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The training provided to volunteers and contractors is consistent with the requirements of this standard. Documentation of the receipt of this training is readily accessible and complete. Two volunteers and one contract staff member were interviewed during the on-site audit and they were able to explain the training they received. Each volunteer interviewed seemed very earnestly committed to being part of a program that valued sexual safety and a harassment free environment.

Standard 115.233 Resident education

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

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The education that is provided to offenders covers all aspects of this standard. This education is provided in a format that is accessible to offenders who are deaf, visually impaired, have limited reading skills or are limited in their English proficiency. The documentation of this education program is maintained for each offender. Information regarding the process to report PREA violations or access support services is provided to offenders in a handbook and is available on area bulletin boards in English and Spanish.

Standard 115.234 Specialized training: Investigations

- Exceeds Standard (substantially exceeds requirement of standard)
- XX Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

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This agency does not conduct investigations into allegations of sexual abuse. Agency staff do conduct administrative investigations. Based upon a review of the training curriculum and interview with agency staff who are assigned investigative duties, the training provided for the administrative investigations is appropriate.

Standard 115.235 Specialized training: Medical and mental health care

Exceeds Standard (substantially exceeds requirement of standard)

XX Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

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This agency does not employ any medical staff. All medical needs of offenders are referred to community providers. The training for the mental health staff includes the general training provided to all employees as well as the training provided by the Sexual Assault Victim Advocate Center (SAVA). All aspects of this particular standard are covered in the training for the mental health staff.

Standard 115.241 Screening for risk of victimization and abusiveness

Exceeds Standard (substantially exceeds requirement of standard)

XX Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

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The screening instrument is completed by staff within 72 hours upon intake. This screening instrument is then repeated when needed, but within the first 30 days. The information in this screening instrument is secured electronically, but it is available to all full-time employees. This availability is based upon the team concept that is a key part of the agency's culture.

Standard 115.242 Use of screening information

Exceeds Standard (substantially exceeds requirement of standard)

XX Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

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The screening information is used to ensure the safety of the offenders within the housing assignments. The views of individual transgender or intersex residents are taken into consideration when making housing assignments. There is no dedicated housing area at this facility that houses transgender or intersex offenders. I interviewed an offender who identified themselves as a transgender, intersex, lesbian, gay, bisexual or

gender nonconforming individual. This offender was placed in a dorm that was located next to the staff desk that houses fewer offenders and was described as a safer, easier place to do time. The individual offender I interviewed believed that her opinion about her housing and safety were seriously considered.

Standard 115.251 Resident reporting

- XX 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)

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A review of policy and information gleaned from interviews with offenders and employees confirms that there are multiple valid ways to privately report sexual abuse or sexual harassment. This agency has entered into a MOU with the Sexual Assault Victim Advocacy Center (SAVA). I interviewed Jennifer Jones, Executive Director, regarding the services offered. SAVA provides a 24 hour service to receive reports of abuse. The number provided to offenders may go to an answering service, but they can be immediately connected to an on-call person after hours. The agency's policy also allows for staff to take reports in writing, anonymously, verbally, and from third parties. The specific standard requirements are being met in the policy and procedures adopted by this agency; however, this is one more example of where the culture of the agency is in complete compliance with the intent of PREA. During staff and offender interviews, each person was able to articulate more than one way to report an issue related to sexual harassment or abuse.

Standard 115.252 Exhaustion of administrative remedies

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

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This agency provides an administrative process for any grievances related to sexual abuse. The PREA policy specifically requires that all such grievances are handled outside of the grievance process for other issues. This policy allows for a grievance to be filed with no timeline if the subject is regarding PREA. No informal process is required and no offender is required to submit the grievance to the staff member who is the subject of the complaint. All PREA grievances are screened immediately and first responder protocols are initiated.

Standard 115.253 Resident access to outside confidential support services

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

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This agency has entered into a MOU with the Sexual Assault Victim Advocate Center (SAVA). Offenders are able to contact this agency through the pay phones and personal cell phones (if allowed). The pay phones within the agency are not monitored. I interviewed Jennifer Jones, Executive Director of SAVA, who confirmed that they have received reports from offenders. She also confirmed that they have provided services to offenders that include emotional support services.

Standard 115.254 Third-party reporting

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

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The Website for this agency provides information for third party reporting for any allegations of sexual abuse of harassment. The following is an excerpt from that website:

All reports of neglect, misconduct, and abuse are taken seriously, and we are committed to investigating each report to the fullest extent possible — through administrative and, if appropriate, criminal channels. If you wish to report anonymously, channels for such reporting are also available. All anonymous and third-party reports are investigated with the same level of commitment as any other report.

In order to maintain a culture of safety and accountability, we have set up several different ways in which anyone — offender, staff, or the public — can report neglect, misconduct, or abuse in either Community Corrections or Alternative Sentencing. Substantiated allegations of sexual misconduct that approach a criminal threshold are referred to the Larimer County Sheriff's Office for full investigation. Allegations which are screened for criminal charges but are not brought forward for charges will be investigated administratively through CJSD and Larimer County HR processes.

Standard 115.261 Staff and agency reporting duties

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

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The policy requires all staff, including mental health practitioners, to immediately report any suspicion or information regarding sexual abuse or harassment. State statute requires reporting abuse or exploitation of a vulnerable adult who is 70 years of age or older. The agency complies with this requirement. All allegations are referred for to the agency investigator for a criminal or administrative investigation.

Standard 115.262 Agency protection duties

- Exceeds Standard (substantially exceeds requirement of standard)

XX Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

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The professional conduct policy includes:

Employees shall not allow any offender of the division in their custody and control to be physically or mentally abused by any person, nor will any employee impose physical or mental abuse on any offender. In the event that any staff member becomes aware of a substantial risk of imminent danger to an offender, including but not limited to, physical abuse or sexual abuse by any person or persons, immediate action shall be taken to protect the offender, including emergency measures such as lockdown, law-enforcement involvement, or temporary placement of the offender into protective custody at the Larimer County Jail.

Interviews with specialized and random staff confirmed that this policy is followed and that they understand what is expected of them.

Standard 115.263 Reporting to other confinement facilities

Exceeds Standard (substantially exceeds requirement of standard)

XX Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

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In the previous 12 months, this agency has received five (5) reports of PREA incidents in previous facilities. These reports were forwarded to the facility identified by the reporting offender. In each case, the Department Director notified the appropriate office of the facility at which the incident allegedly occurred. The notification occurred within 72 hours of when the information was initially reported, and was documented. This documentation is forwarded to the PREA coordinator for retention. Interviews with the Agency Head and facility directors confirmed that this policy has been used and that they have complied with these particular guidelines.

Standard 115.264 Staff first responder duties

XX 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)

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All employees with this agency receive the same training, so that there is no difference between the security staff and any other staff member who may become aware of an allegation of sexual abuse or harassment. Interviews with staff confirmed that they were aware the first responder duties. I also interviewed an offender who filed a complaint and she confirmed that the first responder duties were done in compliance with the policy. This agency has developed a first responder manual that is a specific color and format. In

every interview conducted with random staff, the staff member made a reference to this manual and what it contained. This approach to first response has worked very well for this agency and the completeness of this process is exceptional.

Standard 115.265 Coordinated response

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

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The PREA response manual outlines a coordination of actions between a variety of staff members. This plan includes participation and direction of first responders, mental health practitioners, investigators, and facility leadership. Interviews of specialized and random staff confirmed that they understood the multi-disciplinary nature of the PREA response expectations.

Standard 115.266 Preservation of ability to protect residents from contact with abusers

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

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This agency has not entered into any collective bargaining agreement or any other agreement that limits the agency's ability to remove an alleged abuser from the contact with any offender. Larimer County Human Resources Policy and Procedures manual govern the corrective and adverse actions for any employee who is the subject of an investigation.

Standard 115.267 Agency protection against retaliation

- XX 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)

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Protection from retaliation for staff and offenders is a very high priority for the leadership in this agency. Specialized and random staff confirmed during interviews that retaliation would not be tolerated in this agency. The monitoring and follow-up procedures that are in place far exceed the specific requirements of this standard. The agency employs a full time Victim Services Coordinator. This employee assigned to this position is responsible to monitor retaliation for any offender or staff member who files a complaint for sexual harassment or abuse. Monitoring includes making personal contact with individuals and reviewing any adverse actions that involve offenders or staff who have made a complaint.

Standard 115.271 Criminal and administrative agency investigations

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

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This agency does not conduct its own investigations into allegations of sexual abuse or any criminal actions. These investigations are conducted by the Larimer County Sheriff’s office. The agency has requested, in writing, that the Larimer County Sheriff’s office complies with the PREA standards, specifically “a-e” of this standard.

The agency does conduct administrative investigations, but even these incidents are reviewed by the Larimer County Sheriff’s investigators before being deemed to be “non-criminal”. All investigations include a process that determines whether staff actions or failure to act contributed to the incident. This agency maintains a very close relationship with the Larimer County Sheriff and they have the ability to check on the progress of any investigation through a secure computer system and by contacting the assigned investigator. This finding was based upon interviews with the PREA coordinator, the investigators, and the Agency Head. If the alleged abuser leaves employment the investigation, either criminal or administrative, would continue until resolution. If the allegation is substantiated, the proper notations would be placed in the former personnel file to note that termination or resignation was result of substantiated PREA-related sexual misconduct and appropriate notifications would be made.

Standard 115.272 Evidentiary standard for administrative investigations

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

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The investigators assigned to conduct administrative investigations confirmed that the level of evidence they depend upon is preponderance. The PREA policy also is in compliance with this standard.

Standard 115.273 Reporting to residents

- XX 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)

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This agency has in place a great process that is more than a reporting mechanism with offenders. The process allows for the Victim Service Coordinator to connect with the offenders who have made allegations. The Victim Services Coordinator develops a process and a relationship that ensures that the individual is

apprised of all steps of the process, including the outcome of any investigation and the status of abuser.

Standard 115.276 Disciplinary sanctions for staff

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

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The Professional Conduct policy specifically states that the presumptive discipline for acts of sexual misconduct in the workplace is termination from employment. To date, the agency has had one (1) incident that failed to meet the threshold of sexual abuse but that crossed professional boundaries and resulted in an emotionally intimate relationship. The case was investigated under the PREA protocols. No sexual or criminal activity was discovered by the assigned officer during his investigation. The staff member resigned in lieu of termination.

Standard 115.277 Corrective action for contractors and volunteers

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

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To date, there have been no incidents reported of sexual abuse or harassment by a contractor or volunteer at this agency. Interviews with the Agency Head and the PREA coordinator indicated that if an allegation involving a volunteer or contractor were to occur, that volunteer or contractor would not be allowed contact with any offender until the investigation is concluded.

Standard 115.278 Disciplinary sanctions for residents

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

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In the past 12 months, no offender has been administratively or criminally found to have engaged in resident-on-resident sexual abuse. The interview with the PREA coordinator confirmed that if such an incident were to occur, the mental disability or illness would be considered. I was able to review at least one disciplinary packet (for another charge) that indicated that this is part of their process.

Standard 115.282 Access to emergency medical and mental health services

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

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This agency does not provide on-site medical treatment. Medical care is provided in the community and an MOU has been entered into with the SAVA center (Sexual Assault Victim Advocate Center). On-site mental health services are also available to any victim of sexual abuse or harassment. The scope of services offered includes counseling and advocacy services. These services are offered to any offender who reports any type of sexual misconduct, abuse or harassment, including incidents that may have occurred in the community or in the past. The agency's PREA policy includes the following statement: All victim services offered to an offender sexually assaulted while in the custody or under the jurisdiction of CJSD shall be offered at no cost to the victim.

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

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

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This agency does not provide on-site medical treatment. Medical care is provided in the community and an MOU has been entered into with the SAVA center (Sexual Assault Victims Awareness). On-site mental health services are also available to any victim of sexual abuse or harassment. Any offender who makes an allegation of sexual harassment or abuse would be evaluated by on-site mental health staff. Treatment and follow-up services may include referral to community providers, on-site individual counseling, or placement in a specialized on-site treatment program. This agency has not had any offender who was known to be a perpetrator of resident-on-resident abuse, and given the criteria for admission to this agency's facilities; it is unlikely that they would ever accept such an offender. The Clinical Director stated during the interview that if they did in fact house such an offender, an evaluation and treatment plan would be developed.

Standard 115.286 Sexual abuse incident reviews

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

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The PREA response process for this facility includes a process for incident reviews at the conclusion of an investigation. The incident review process includes upper-level management, line supervisors, investigators and mental health staff. The review team considers all items required by section "d" of this standard. Recommendations from this process are documented and a follow-up process is in place to ensure implementation. At this point, none of the recommendations of this team have been rejected.

Standard 115.287 Data collection

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

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 This agency has collected all data as required by the Survey of Sexual Violence and has published their annual report on the agency website: <http://larimer.org/cjs/prea.htm>

Standard 115.288 Data review for corrective action

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

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 The annual report is available for the first time on the agency’s website: <http://larimer.org/cjs/prea.htm>. This information will be used as a comparison for the next year’s data. The PREA coordinator is the person responsible for the collection and compilation of this report. All personal identifiers have been redacted from this report.

Standard 115.289 Data storage, publication, and destruction

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

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 As confirmed during the interview with the PREA coordinator, all data collected as required by these standards shall be retained at least ten years. All data needed for the annual report and the Survey of Sexual Violence is maintained and aggregated in his office. This agency does not contract with other facilities for offender housing, so no such data will be published or collected.

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.

July 16, 2015



Auditor Signature

Date