

COMMUNITY CONFINEMENT FACILITIES



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| Auditor Information | | | |
| Auditor name: Gerald McCormac | | | |
| Address: PO Box 15561, Colorado Springs CO 80910 | | | |
| Email: mccormacjer@gmail.com | | | |
| Telephone number: 267-679-2308 | | | |
| Date of facility visit: March 7, 2016 | | | |
| Facility Information | | | |
| Facility name: Mesa County Criminal Justice Services Department Community Corrections | | | |
| Facility physical address: 650 South Avenue Grand Junction CO 81501 | | | |
| Facility mailing address: <i>(if different from above)</i> PO Box 20,000 Grand Junction CO 81501 | | | |
| Facility telephone number: 970-244-3301 | | | |
| 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"/> Alcohol or drug rehabilitation center | | |
| Name of facility's Chief Executive Officer: Matthew Sullivan | | | |
| Number of staff assigned to the facility in the last 12 months: 83.5 | | | |
| Designed facility capacity: 244 | | | |
| Current population of facility: 208 | | | |
| Facility security levels/inmate custody levels: Community | | | |
| Age range of the population: 18-65+ | | | |
| Name of PREA Compliance Manager: n/a | | Title: | |
| Email address: | | Telephone number: | |
| Agency Information | | | |
| Name of agency: Mesa County Criminal Justice Services Department | | | |
| Governing authority or parent agency: <i>(if applicable)</i> | | | |
| Physical address: 636 South Avenue Grand Junction CO 81501 | | | |
| Mailing address: <i>(if different from above)</i> PO Box 20,000 Grand Junction CO 81501 | | | |
| Telephone number: 970-244-3302 | | | |
| Agency Chief Executive Officer | | | |
| Name: Dennis Berry | | Title: | Department Director |
| Email address: dennis.berry@mesacounty.us | | Telephone number: | 970-244-3331 |
| Agency-Wide PREA Coordinator | | | |
| Name: Eileen Wygant | | Title: | Administrative Officer |
| Email address: eileen.wygant@mesacounty.us | | Telephone number: | 970-244-3302 |

AUDIT FINDINGS

NARRATIVE

On March 7, 2016, the onsite portion of the PREA audit was conducted at Mesa County Criminal Justice Services' (CJSD) Community Corrections center. Mesa County CJSD operates 244 bed co-ed program offering a myriad of programs and services for residents, most of whom are under supervision of the court systems, the Colorado Department of Corrections, and/or are currently under supervision of probation/parole department(s). Males and females are housed separately.

The PREA audit notice was posted by the Mesa County Criminal Justice Services Department staff on January 25, 2016; six weeks prior to the onsite audit. No communication or correspondence from Mesa County Criminal Justice Services Department community corrections residents, staff, visitors, or other third party individuals were received by this auditor related to the Mesa County Criminal Justice Services Department community corrections program and their PREA audit.

The onsite audit commenced shortly after 9:00 am on March 7, 2016. Following a brief entrance meeting, in which the expected audit schedule and format was discussed, a tour of the Mesa County Criminal Justice Services Department community corrections program was conducted. The tour of the Mesa County Criminal Justice Services Department physical plants housing the male and female clients 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 Mesa County Criminal Justice Services Department community corrections program. The community corrections program has actively worked to minimize, if not eliminate, potential blind spots utilizing multiple tools to enhance Mesa County Criminal Justice Services' Community Corrections center staff's ability to prevent, detect, and deter incidents of sexual abuse and sexual harassment within the Mesa County Criminal Justice Services Department Community Corrections program. Upon conclusion of the program 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. The interviews conducted included staff from all job classifications as well as encompassing staff from all shifts. Additionally, random interviews were conducted with the various resident populations served through the Mesa County Criminal Justice Services Department's Community Correction's program. All resident interviews followed the interview protocols for community confinement centers available on the PREA resource center website.

Prior to the onsite audit, and as part of the post audit review, supporting documentation provided by the Mesa County Criminal Justice Services Department were thoroughly reviewed. These items included: Mesa County CJSD Organizational Chart; Mesa County Criminal Justice Services' Community Corrections center PREA Advisements; Facility Access Agreement; Professional Standards of Conduct; Client Intake packets; Client Handbooks; MOUs with local community entities and supportive services (as will be noted and named throughout this report); Mesa County Criminal Justice Services' Community Corrections center training outline and materials; Mesa County Criminal Justice Services' Community Corrections center employee personnel files (background checks and training records); Mesa County Criminal Justice Services' Community Corrections Coordinated Response plan and flow chart; pre-audit questionnaire; Mesa County Human Resources Policies and Procedures Manual; Mesa County Criminal Justice Services Department policies (as will be identified and referenced throughout this report), and other documentation to be referred to in the remainder of this audit report.

FACILITY CHARACTERISTICS

Mesa County Criminal Justice Services Department is located at 636 South Avenue in Grand Junction, Colorado. The Mesa County Criminal Justice Services Department Community Corrections program operates within two buildings. The males are housed at the Powell Building (located at 650 South Avenue) which is a three-story facility separated into five residential housing units. The females are housed in the Chipeta Building (located at 436 South 7th Street in Grand Junction, CO) which is a one-story facility and offers the females many of the same amenities as their male counterparts as well as being equipped with more personalized shower and bathroom space. Combined, the Mesa County Criminal Justice Services Department community corrections program has a maximum rated capacity of 244 individuals. Within the community corrections programs the myriad of services offered bring together a range of clientele from "self-admission" clients who may have had no prior contact with the criminal justice system to high-very high risk offenders transitioning to/from the community.

Mesa County Criminal Justice Services Department provides residents with adequate privacy when showering, changing, or using the lavatory. The Mesa County Criminal Justice Services Department Community Corrections program is currently equipped with five DVR recording video footage from 32 cameras and 12 convex mirrors strategically placed so as to actively reduce blind spots and assist staff in detecting, deterring and preventing sexual abuse and sexual harassment.

SUMMARY OF AUDIT FINDINGS

Mesa County Criminal Justice Services Department had received fourteen PREA related allegations in the 12 months prior to the onsite audit.

The Mesa County Criminal Justice Services Department staff have actively worked to achieve 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 Mesa County Criminal Justice Services' Community Corrections center residents, and the facility's zero tolerance policies on sexual abuse and sexual harassment. This information is also available through a variety of printed materials (Resident Handbook, PREA advisement, and PREA informational pamphlet). Mesa County Criminal Justice Services Department resident's, in addition to having access to payphones within their respective housing areas. Posted throughout the housing units are toll free telephone numbers and other contact information for external reporting of client concerns. 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 Mesa County Criminal Justice Services Department were each provided with the facility's resident handbook, PREA pamphlet, Mesa County Criminal Justice Services' Community Corrections center 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. Mesa County Criminal

Justice Services Department residents were generally aware of the process for reporting PREA related concerns and were also generally aware of community resources available to them.

The Mesa County Criminal Justice Services Department 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 and recent PREA refresher training(s).

A thorough review was performed of the supporting documentation provided by the Mesa County Criminal Justice Services Department Community Corrections program. 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 Mesa County Criminal Justice Services Department Community Corrections program are as follows:

Number of standards exceeded: 1

Number of standards met: 37

Number of standards not met: 0

Number of standards not applicable: 1

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.

Mesa County Criminal Justice Services’ Department has established and implemented written policies mandating zero tolerance towards all forms of sexual abuse, sexual harassment, and sexual misconduct. Collectively, the policies referenced below, clearly outline the agencies approach to preventing, detecting, and responding to incidents and/or allegations of such prohibited conduct.

Mesa County Criminal Justice Services’ Department has also established a PREA Coordinator position to oversee the department’s efforts to implement policies, practices and procedures consistent with the department’s expectations and as required by the national PREA standards. The Mesa County Criminal Justice Services Department’s Organizational Chart confirms the PREA coordinator position as an upper level position with sufficient authority and empowerment to accomplish the departments objectives.

Mesa County Criminal Justice Services Department has met the requirements of this standard.

Policy Referenced: 1.7010

§115.212 - Contracting with other entities for the confinement of residents

This section does not apply to the Mesa County Criminal Justice Services Department. M.C.C.J.S. 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.

Mesa County Criminal Justice Services Department has created a Staffing Plan specific to their community correction center. The Mesa County Criminal Justice Services Department 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 Mesa County Criminal Justice Services Department, the staffing plan addresses all four required components of §115.213(a) (1-4) and was developed utilizing input from both the Mesa County Criminal Justice Services Department management staff and the Mesa County Criminal Justice Services Department PREA coordinator.

The Mesa County Criminal Justice Services Department provided both the facility's initial staffing plan and their annual review. Annual review of the staff plan contained and addressed each of the required elements as identified via §115.213(c). Year to date, Mesa County Criminal Justice Services Department has not deviated from the staffing plan identified.

Mesa County Criminal Justice Services Department has met the requirements of this standard.

Policy Referenced: 1.7080

§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.

Mesa County Criminal Justice Services Department policy (referenced below) prohibits staff from performing cross gender strip searches and cross gender visual body cavity searches. Mesa County Criminal Justice Services Department employees are also prohibited from performing a search of a resident in order to determine their genital status.

Staff are formally trained in transgender and intersex resident pat down searches and procedures and Mesa County Criminal Justice Services Department also identifies a mechanism by which performance of a pat search on a transgender or intersex individual will be established with input from the individual clients as required by §115.242.

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.

Mesa County Criminal Justice Services Department has developed and implemented 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. This is also specifically identified in Mesa County Criminal Justice Services Department policy.

The current placement of the cameras does not allow for cross gender staff viewing of residents while showering, changing, or performing any other bodily functions.

Mesa County Criminal Justice Services Department has met the requirements of this standard.

Policy Referenced: 1.7030, 1.7080, 2.4205

§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.

Mesa County Criminal Justice Services Department, is actively attempting to establish an MOU with the Spring Institute for Intercultural Learning, in order to establish a method and mechanism by which their residents 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. In that regard, Mesa County Criminal Justice Services Department has demonstrated due diligence in their attempts to secure a written agreement with the Springs Institute.

Additional auxiliary aids can also be arranged through the Mesa County Criminal Justice Services Department staff if needed. Mesa County Criminal Justice Services Department does not utilize resident interpreters, confirmed via resident and staff interviews, and this is a practice that is prohibited by the Mesa County Criminal Justice Services Department PREA policy(policies), referenced below, 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.

Mesa County Criminal Justice Services Department's client educational materials are 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. As a result, all the PREA educational and informational materials are published in English and Spanish (resident training video, Mesa County Criminal Justice Services Department PREA pamphlet, Mesa County Criminal Justice Services Department Resident PREA Advisement). Mesa County Criminal Justice Services Department, is hopeful it will have the ability to provide translated materials in other languages (if needed) through their agreement with the Springs Institute once established.

Mesa County Criminal Justice Services Department has met the requirements of this standard.

Policy Referenced: 1.7010, 1.7030, 1.7040, 1.7050, 1.7060, 1.7080

§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.

Mesa County Criminal Justice Services Department policy (referenced below) outlines the process and expectations on the performance of background checks for all employees prior to being hired. This policy also speaks to background checks being performed for contractors and volunteers having contact with Mesa County Criminal Justice Services Department and identifies the expectation to perform background checks every five years for staff, contractors and interns having access to the client populations.

In both policy and practice, Mesa County Criminal Justice Services Department does not hire or promote anyone who may have contact with residents who may have questionable characteristics, morals, etc., The Mesa County Criminal Justice Services Department policy speaks to the disqualification of candidates or employees who have engaged in any of the activities notated in §115.217(a) (1-3). Furthermore, Mesa County Criminal Justice Services Department also employs the use of various hiring practices in order assess and quantify the integrity of those in their employ. In that regard, the agency exceeds the requirements of this standard.

Mesa County Criminal Justice Services Department appears to be in accordance with governing federal,

state, and local laws, engage 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; however, though not pertaining to this particular standard, a review of Mesa County Human Resources Policies and Procedures Manual will need to be performed to ensure all required elements of §115.276 and §115.277 appear in policies and procedures mandating and governing expected Mesa County Criminal Justice Services Department staff actions.

Finally, with regards to the requirements of §115.217(f)-(h), Mesa County Criminal Justice Services Department 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). This is now done annually in addition to any continuity duty to disclose signed by staff upon being hired.

Mesa County Criminal Justice Services Department has met all the requirements for this standard and exceeds the requirements for background checks as well as screening of prospective employees through the utilization of "integrity interviews".

Policies Referenced: 1.2010, 1.2050, 1.2060, Mesa County HR Policies/Procedures

§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 Mesa County Criminal Justice Services Department facility as there has not been any substantial expansion to the facility nor acquisition of a new facility; however, Mesa County Criminal Justice Services Department has taken efforts to upgrade their technology.

As evidenced in the Mesa County Criminal Justice Services Department staffing plan and through the information acquired through the on-site staff interviews, Mesa County Criminal Justice Services Department is actively attempting to eliminate blind spots in the facility utilizing the strategic placement of the facility's cameras, mirrors, and staff monitoring.

The placement of cameras as well as upgrades to the surveillance equipment is factored into the purchase, installation and placement of additional equipment and resources to aid staff in their efforts to detect, deter, and prevent incidents of sexual abuse and/or sexual harassment. The use and usefulness of surveillance monitoring equipment and other auxiliary tools are also considered in the Mesa County Criminal Justice Services Department's annual PREA staffing plan review.

Mesa County Criminal Justice Services Department 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.

Mesa County Criminal Justice Services Department is responsible for conducting Administrative Investigations of sexual abuse. Sexual abuse investigations that do not appear to be criminal in nature are conducted by Mesa County Criminal Justice Services Department management staff who were selected and trained in accordance with §115.234. Documentation of said training was provided for these staff members.

Criminal investigations would be conducted by the Grand Junction Sherriff’s Department. Mesa County Criminal Justice Services Department and GJSD have established a memorandum of understanding consistent with §115.221(f) and reflective of 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” when investigating alleged incidents of sexual abuse involving Mesa County Criminal Justice Services Department resident victims.

Mesa County Criminal Justice Services Department has entered into a MOU with the Western Slope Center for Children in order to provide Mesa County Criminal Justice Services Department 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, Mesa County Criminal Justice Services Department residents would be taken to St. Mary’s Hospital in the event that they are involved in an incident of sexual assault. The Western Slope Center for Children has agreed to provide a Sexual Abuse Nurse Examiner or Sexual Abuse Forensic Examiner per the established MOU. The Western Slope Center for Children has SAFEs/SANEs available 24 hours a day to provide medical and forensic response to victims of sexual assault and follow a uniform evidence protocol that maximizes the potential for obtaining usable evidence consistent with the requirements of §115.221(b) and are identified in the Colorado’s Coalition Against Sexual Assault’s medical forensic/sexual assault nurse examiner’s program listing.

Mesa County Criminal Justice Services Department is also actively pursuing entering into an MOU with the Hilltop Domestic Violence and Sexual Assault Services at Latimer House to provide resident victims with a variety of services to include: support through the forensic exam and investigatory interview process; crisis intervention; emotional support; follow-up services; mental health services; and referrals to other community agencies as needed.

Mesa County Criminal Justice Services Department has met all the requirements for this standard.

Policies Referenced: 1.7050

§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.

Mesa County Criminal Justice Services Department has created policies (referenced below) and implemented practices to ensure all allegations of sexual abuse and/or sexual harassment are promptly completed, documented, and performed pursuant to the requirements set forth in national PREA standards. MCCJSD policies speaking to the handling of investigations are posted on the Mesa County Criminal Justice Services Department website: <http://cjsd.mesacounty.us/PREA.aspx>

Mesa County Criminal Justice Services Department has met the requirements of this standard.

Policy Referenced: 1.7040

§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 Mesa County Criminal Justice Services Department employee training documentation and materials pursuant to §115.231, Mesa County Criminal Justice Services Department Community Corrections staff will need to receive training on the identified required elements of the §115.231(a) (1-10). To that point, Mesa County Criminal Justice Services Department was provided with the employee training power point developed by the Colorado Department of Corrections titled "Colorado Community Corrections PREA: Prison Rape Elimination Act 2003".

Please note, the "Colorado Community Corrections PREA: Prison Rape Elimination Act 2003" captures many, but not all, of the required elements of 115.231(a) (1-10). Specifically, this training curriculum addresses eight of the ten required training items. In order for this training curriculum to meet all ten elements of §115.231(a), development of power point slides for 115.231(9) and (10) should be added. Upon training of Mesa County Criminal Justice Services Department staff in all aspects required by §115.231 to include the "to be added" training topics, documentation should be forwarded to the auditor for review and audit record retention.

Mesa County Criminal Justice Services Department houses both male and female offenders and all staff have been trained using the curriculum which covers search procedures for clients to include universal pat search techniques and specialized pat search procedures for transgendered and/or intersex clients.

All employee trainings are recorded and documented with acknowledgment from the employee of the receipt and understanding of the training materials presented. Staff member interviews confirmed the receipt PREA related trainings and the routine reviews of the Mesa County Criminal Justice Services Department PREA materials, expectations, and processes during recent staff meetings. All staff were found to be very aware of their respective duties as it relates to prevention, detection, deterring and reporting sexual abuse and sexual harassment.

As noted above, it is recommended that all Mesa County Criminal Justice Services Department staff are trained using the Colorado Community Corrections power point curriculum (along with the revisions to include materials to address the two missing elements) with documentation of staff training being forwarded to the auditor for review and audit record retention. It is also recommended the Mesa County CJSD policies (referenced below) be revised to incorporate PREA specific training requirements. Such inclusions may include: general staff training process during onboarding, frequency of refreshers (as required by the national PREA standards); and, speak to the specialized training requirements specific to §115.234, §115.235 and §115.231 respectively.

Update: The Mesa County Criminal Justice audit team worked diligently to address and enact all recommended corrective actions, as noted and detailed above. Documentation of compliance with auditor recommendation was forwarded to the auditor for review and audit record retention.

Mesa County Criminal Justice Services Department has met the requirements of this standard.

Policy Referenced: 1.2100

§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.

Mesa County Criminal Justice Services Department has developed a multi-tiered level of training and education for visitors, interns, and contractors wishing to have access to their client population. Mesa County Criminal Justice Services Department provides notification to all visitors of their zero tolerance policies related to sexual abuse, sexual harassment, and sexual misconduct. For those individuals having heightened access to the facility, not necessarily the client population, these individuals are provided an individualized acknowledgement sheet outlining both the agency's zero tolerance policy on sexual abuse and sexual harassment but also on their duties and obligations to report such conduct.

Mesa County Criminal Justice Services Department also provides a more in-depth and comprehensive onboarding process for those individuals who will not only have access to the facility but also have access with the Mesa County Criminal Justice Services Department client population. For these individuals, in addition to the material provided to the previous two categories of contractors/interns/volunteers, this third group receives information about their limited duties as potential first responders to the extent that §115.264(b) is applicable to non-security personnel.

During the audit process, these informational acknowledgment sheets, which form the basis for the training of contractors/volunteers/interns/etc., were revised so as to better capture and mirror the verbiage, intent, and spirit of the national PREA standards. As such, the revised orientation materials for those contractors/volunteers/interns in the second and third tiers should be disseminated. Contactor/Volunteer/Intern acknowledgement of receipt of these revised materials should be documented and retained. Confirmation of said trainings should be forwarded to the auditor for review and audit record retention. Additionally, similar to the comments above, upcoming policy revisions should include language specific to contractor, volunteer, and intern training as it pertains to compliance with §115.232.

Update: The Mesa County Criminal Justice audit team worked diligently to address and enact all recommended corrective actions, as noted and detailed above. Documentation of compliance with auditor recommendation was forwarded to the auditor for review and audit record retention.

Mesa County Criminal Justice Services Department has met the requirements of this standard.

Policy Referenced: 1.2100

§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 Mesa County Criminal Justice Services Department 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.

M.C.C.J.S.D., as noted previously in the auditor's summary for §115.216, is attempting to establish a MOU with the Spring Institute for Intercultural Learning, in order to provide their clients/staff 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 Mesa County Criminal Justice Services Department staff. All PREA educational and informational materials are available to M.C.C.J.S. Community Correction residents in both English and Spanish; the two most common languages spoken amongst the Mesa County Criminal Justice Services Department resident population.

The translated educational and informational materials include: PREA related orientation videos, PREA Advisement, and the Mesa County Criminal Justice Services Department PREA pamphlets. The material is provided to all Mesa County Criminal Justice Services Department 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.

Mesa County Criminal Justice Services Department should endeavor to provide current clients (as well as incoming clients) with the PREA related grievance procedures via an acknowledgement and through the posting of this grievance process in the client's respective dayrooms. Moving forward, during the next client handbook revision, the PREA related grievance procedure should be included the client handbooks. Additionally, amendments to some of the PREA informational and acknowledgement forms speaking to potential resident disciplinary actions and expected client practices should be enacted in order to better relay to their clientele the full extent of reporting avenues available to them for reporting incidents, concerns, and/or the consistent with the requirements set forth in §115.251, §115.253, and 115.254 respectively. Additionally, in order to better reflect the limitations of potential resident disciplinary actions as identified via §115.278 (f). To those points, the following revisions are suggested:

1. Form: Mesa County Criminal Justice Service’s Department - Community Corrections program’s “PREA Advisement: Facts on Expected Sexual Conduct” (Client Intake Form #10)
 - Page 2, “False Allegations” – Suggest revision to include verbiage speaking to false allegations “made in bad faith” as compared to “false allegations”.
2. Mesa County Criminal Justice Services Department – Client Acknowledgement of PREA Advisement (Client Intake Form #10b)
 - Page 1, fourth bullet – This sentence, directing clients “who need to report suspected sexual contact” that they “will [do] so by talking with an available member of CJSD administration” is in direct conflict with §115.251, §115.253, and §115.254.

Collectively, these standards allow for “multiple” reporting channels for clients to report such concerns. Clients cannot be forced to report internally when concerns arise; they can, however, be encouraged to report such concerns to staff. That said, clients who opt to report such concerns to the DOC Tip Line (and other venues with whom the agency is actively using for client reporting) are afforded the right to do so by the national PREA standards. To that point, a client could potentially feel that he/she is violating agency rules by choosing not to report such concerns to CJSD administrative staff and, therefore, fear they may incur disciplinary actions for not adhering to written staff directives.

With notification to all existing clients and development of procedures to ensure all incoming clients are also aware of the PREA grievance process, approved reporting lines, and the threshold for taking disciplinary action for false allegations, Mesa County Criminal Justice Services Department will have met all the requirements for this standard.

Update: The Mesa County Criminal Justice audit team worked diligently to address and enact all recommended corrective actions, as noted and detailed above. Documentation of compliance with auditor recommendation was forwarded to the auditor for review and audit record retention.

Mesa County Criminal Justice Services Department has met the requirements of this standard.

Policy Referenced:

§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.

Mesa County Criminal Justice Services Department selected and trained upper level staff members who

will be tasked with conducting administrative PREA investigations. These employees attended a training focused on the handling of investigations of sexual offered through the Colorado Jail Association and County Sheriffs of Colorado. A review of the curriculum confirms all required training topics, as identified in §115.234, are covered as part of said training. Employee training records include documentation of the selected staff members responsible for conducting administrative investigations attendance and successfully completion of said training.

Mesa County Criminal Justice Services Department staff do not conduct criminal investigations but rather refer sexual abuse and sexual harassment allegations appearing to be of possible criminal nature to the County Sheriff's Department for criminal investigation in accordance with and pursuant to the collective requirements set forth in §115.221, §115.222, and §115.271 respectively.

Mesa County Criminal Justice Services Department has met all the requirements for this standard.

Policies Referenced: 1.2100

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| §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.

As Mesa County Criminal Justice Services Department's organizational chart does include a position which would qualify as either a medical or mental health position who works "regularly" within the community corrections facility, this standard would apply to M.C.C.J.S.D.

As such, this staff member will need to be scheduled for training specific to the requirements set forth in §115.235(a) in order to demonstrate compliance with this standard.

Update: The Mesa County Criminal Justice audit team worked diligently to address and enact all recommended corrective actions, as noted and detailed above. Documentation of compliance with auditor recommendation was forwarded to the auditor for review and audit record retention.

Mesa County Criminal Justice Services Department has met the requirements of this standard.

Policy Referenced: 1.2100

§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 Mesa County Criminal Justice Services Department policy (referenced below), Mesa County Criminal Justice Services Department 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: within 72-hours of the client's 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). Mesa County Criminal Justice Services Department policy (referenced below) does not speak to the performance of a PREA risk assessment upon transfer to another facility (unsuccessful discharge). Additionally, this policy statement is missing 115.241(d)(5) from the criteria to be evaluated.

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 less than 60% 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 also less than 50% compliant.

Mesa County Criminal Justice Services Department PREA Policy Statement and as required in standard 115.241(i), Mesa County Criminal Justice Services Department staff are informed to maintain confidentiality with regards to information obtained as a result of the risk assessment. Furthermore, this policy provides staff with information/direction on how Mesa County Criminal Justice Services Department staff the timeframes/situations for conducting such assessments, how to use the information acquired, the confidential nature of client information, and the manner in which the information gathered should be securely stored in the client's case files.

Staff are further instructed, per Mesa County Criminal Justice Services Department policy (referenced below), not to discipline residents who fail to disclose complete information or for refusing to answer.

Update: The Mesa County Criminal Justice audit team worked diligently to address and enact all recommended corrective actions, as noted and detailed above. Documentation of compliance with auditor recommendation was forwarded to the auditor for review and audit record retention.

Mesa County Criminal Justice Services Department has met the requirements of this standard.

Policy Referenced: 1.7030

§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.

Mesa County Criminal Justice Services Department policies (referenced below), collectively, speak 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 Mesa County Criminal Justice Services Department staff during the clients’ assessments (to include but not limited to the assessments performed pursuant to §115.241) are 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 or in housing units which have a greater visual prominence on the video surveillance monitors.

As noted above in §115.241, the electronic software program utilized by the Mesa County Criminal Justice Services Department staff, and containing each resident’s electronic case file, is equipped with mechanisms to either limit each permitted user’s scope of informational access or expand the user’s scope of informational access dependent upon individual needs related to the performance of expected duties. For instance, to ensure resident safety pursuant to §115.242 and §115.262, the resident’s electronic case file information is available to staff who would need such information to make an immediate and appropriate housing assignment change. Staff are also held to strict ethical standards governing client confidentiality and the appropriate use of client information.

Mesa County Criminal Justice Services Department 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 Mesa County Criminal Justice Services Department staff consider the safety and health of a transgender or intersex individual in the determination of housing placement. Mesa County Criminal Justice Services Department staff employs due diligence in the determination of which room (or bed) the individual is placed. It is recommended Mesa County Criminal Justice Services Department 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.

Mesa County Criminal Justice Services Department has met all the requirements for this standard.

Policy Referenced: 1.7030

§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 Mesa County Criminal Justice Services Department 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 toll free Tip Line (1-877-DOC-TIPS), contact information for rape crisis counseling through the victim advocacy organization with whom Mesa County Criminal Justice Services Department has an MOU to provide a myriad of victim advocacy and crisis intervention services.

The Hilltop Domestic Violence and Sexual Assault Services at Latimer House, as agreed upon in the MOU, is willing to crisis calls on their 24-hour crisis hotline and has agreed to advise M.C.C.J.S.D. clients of the 24-Hour Crisis Hotline number. In addition to these resources, Mesa County Criminal Justice Services Department residents are also encouraged to contact local law enforcement, their assigned parole officer, DOC liaison, and/or any staff member.

This information is available in written format for all residents to retain during their placement at the Mesa County Criminal Justice Services Department facility and is also posted throughout the facility and is available in English and Spanish. Mesa County Criminal Justice Services Department is attempting to establish a mechanism in which this information can be translated into several other languages should the need arise. Mesa County Criminal Justice Services Department 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), Mesa County Criminal Justice Services Department has established several mechanisms for staff to utilize in reporting PREA related concerns privately through the Colorado Department of Corrections.

Mesa County Criminal Justice Services Department has met all the requirements for this standard.

Policy Referenced: 1.7040

§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.

Mesa County Criminal Justice Services Department policies (referenced below) mirrors the requirements, time frames and thresholds set forth in §115.252; however, as was recommended in the audit narrative for §115.233 of this report, the M.C.C.J.S.D. clients will need to be formally advised and informed of the PREA specific grievance procedures as this is not captured in a written format accessible to the client population. To that point, Mesa County Criminal Justice Services Department staff should endeavor to create and distribute a client acknowledgement sheet that outlines the process to be used by clients who wish to submit a PREA related grievance as opposed to using the grievance process outlined in the client handbooks. This process should also be posted in the various dayrooms and provided to all incoming clients. Upon revision of the Mesa County Criminal Justice Services Department client handbook, this grievance process should be added to said handbooks.

Update: The Mesa County Criminal Justice audit team worked diligently to address and enact all recommended corrective actions, as noted and detailed above. Documentation of compliance with auditor recommendation was forwarded to the auditor for review and audit record retention.

Mesa County Criminal Justice Services Department has met the requirements of this standard.

Policy Referenced: 1.7040

§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, Mesa County Criminal Justice Services Department has entered into a MOU with the Hilltop Domestic Violence and Sexual Assault Services at Latimer House and the Western Slope Center for Children to provide emotional supportive and mental health services to residents of their program. 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 these entities is provide to the Mesa County Criminal Justice Services Department clients via intake paperwork, facility postings, and PREA pamphlets/advisements provided to all residents at intake. A signed acknowledgment of the resident's receipt of the PREA information received during the intake process is retained in the resident's case file and, additionally, the clients are provided with similar information to retain on their person for future reference (if needed).

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", Mesa County Criminal Justice Services Department residents, are permitted movement from the center and therefore are afforded access to a plethora of community resources outside the facility. The payphones provided by the Mesa County Criminal Justice Services Department facility can make out going toll free phone calls. Additionally, Mesa County Criminal Justice Services Department 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.

Mesa County Criminal Justice Services Department has met all the requirements for this standard.

Policy Referenced: 1.7010, 1.7050

§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), Mesa County Criminal Justice Services Department has publicly distributed the methods through which incidents of sexual abuse and/or sexual harassment can be reported. This information appears on the Mesa County Criminal Justice Services Department website: <http://cjsd.mesacounty.us/PREA.aspx>

Mesa County Criminal Justice Services Department has met all the requirements for this standard.

Policy Referenced: 1.7040

§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 Mesa County Criminal Justice Services Department policies (referenced below) as well as the supporting documentation submitted throughout the audit process, the directives set forth in these documents accurately capture all of the requirements of the §115.261(a-e). Speaking specifically to the requirement of §115.261(a), Mesa County Criminal Justice Services Department specifically articulates that neither the location of an alleged incident nor the time period in which it is alleged to have occurred will impact the Mesa County Criminal Justice Services Department staff’s responsibility/obligation to report the allegation in accordance with the Mesa County Criminal Justice Services Department coordinated response and the PREA standards. Additionally, the policy references CRS 19-3-304 be and

instructs staff on their duties as mandated reporters within the State of Colorado as per §115.261(e).

Mesa County Criminal Justice Services Department policies, overall, accurately capture the remaining components of the standard in Mesa County Criminal Justice Services Department has placed sufficient levels of control on communication of information received by Mesa County Criminal Justice Services Department employees consistent with the requirements of §115.263(b) and dictates the staff reporting expectations consistent with §115.261(c) and (d) respectively.

Mesa County Criminal Justice Services Department has met all the requirements for this standard.

Policy Referenced: 1.7060

§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 information acquired during the staff interviews, Mesa County Criminal Justice Services Department staff have mechanisms in place to immediately ensure the resident's safety. The Mesa County Criminal Justice Services Department PREA Policy Statements fully articulate how staff will accomplish compliance with this standard and ensure protection of the resident from imminent harm. Additionally, staff members have been empowered to make immediate, temporary, housing decisions in order to protect the safety of the Mesa County Criminal Justice Services Department clients with prompt notification to on-call administrators for follow-up and/or additional actions.

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 Mesa County Criminal Justice Services Department has a MOU, and consideration of resident safety in the facilitation of their respective job duties. In that regard, Mesa County Criminal Justice Services Department has the ability to transfer residents to additional housing units within the Mesa County Criminal Justice Services Department facility in order to be closer to the posted security technicians.

Mesa County Criminal Justice Services Department has met all the requirements for this standard.

Policy Referenced: 1.7040

§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.

Mesa County Criminal Justice Services Department policy (referenced below) outlines the agency’s expectation for communication of information pertaining to allegations of sexual abuse which occurred at another confinement facility to the head of said institution/agency/facility. The policy statement specifies which Mesa County Criminal Justice Services Department staff member will make notification to the facility head of the institution at which the sexual abuse/sexual harassment is alleged to have occurred. Mesa County Criminal Justice Services Department policy clearly identifies the 72-hour time frame mandated by §115.263(b)

Mesa County Criminal Justice Services Department Policy Statement (referenced below) outlines the expectation that notification is to be formally documented as required in §115.263(C).

In the 12 months prior to this audit, Mesa County Criminal Justice Services Department has not received information nor allegation requiring notification to another confinement facility.

Mesa County Criminal Justice Services Department has met all the requirements for this standard.

Policy Referenced: 1.7030, 1.7040

§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.

Mesa County Criminal Justice Services Department Policy Statement(s) (referenced below) and the Mesa County Criminal Justice Services Department coordinated response plan covers many, but not all the requirements in §115.264(a) (1-4) (b). Developed with the 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 first responder duties should be fully articulated as this, in essence, is the most critical part of preserving obtainable usable physical evidence immediately following a sexual abuse incident. Specifically, the following should be incorporated into Mesa County Criminal Justice Services Department's policies and procedures:

- Victim: In addition to separating and protecting the alleged victim, staff should instruct said victim to refrain from taking any actions that could destroy evidence (washing, brushing teeth, changing clothes, etc.).
- Abuser: Policy should reflect staff's obligation to separate the alleged abuser and requesting this individual also refrain from taking any actions that could destroy evidence.

In addition to these suggested additions, Mesa County Criminal Justice Services Department policies should also speak to the limitation of non-first responder trained staff members who may be the first to encounter a sexual abuse incident and/or crime scene. To that point, verbiage should be added to the policies covering first responder duties consistent with the intent of this §115.264(b).

The Mesa County Criminal Justice Services Department PREA policy statements and the Mesa County Criminal Justice Services Department written coordinated response clearly capture all requirements of §115.264(a) (1-4). Year to date, Mesa County Criminal Justice Services Department has not had any incidents requiring a first responder response.

With the suggested policy revisions formalized and implemented, Mesa County Criminal Justice Services Department would meet the requirements of this standard. A copy of the revised policy (policies) should be forward to the auditor for review and audit record retention.

Update: The Mesa County Criminal Justice audit team worked diligently to address and enact all recommended corrective actions, as noted and detailed above. Documentation of compliance with auditor recommendation was forwarded to the auditor for review and audit record retention.

Mesa County Criminal Justice Services Department has met the requirements of this standard.

Policy Referenced: 1.7060

§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.

Mesa County Criminal Justice Services Department 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 (Mesa County Criminal Justice Services Department Policy). Mesa County Criminal Justice Services Department coordinated response plan is specific to the Mesa County Criminal Justice Services Department facility, as Mesa County Criminal Justice Services Department operates only one community corrections facility.

The coordinated plan, per §115.265(a), identifies the expected actions between first responders, facility management staff and external parties such as those with whom Mesa County Criminal Justice Services Department has MOUs to provide services for Mesa County Criminal Justice Services Department clients who are the victim of sexual abuse. The current coordinated response plan captures and outlines the responsibilities of Mesa County Criminal Justice Services Department staff (first responders, management staff, and Mesa County Criminal Justice Services Department executive staff) and also speaks to the expected duties/responsibilities of the external agencies. These external parties include, but are not limited to: law enforcement entities; victim advocacy services, and SAFE/SANE services.

Mesa County Criminal Justice Services Department has met all the requirements for this standard.

Policy Referenced: 1.7040, 1.7060

§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.

Mesa County Criminal Justice Services Department employees, including those employed at their community corrections facility, are not unionized and no collective bargaining agreement exists. As such, there is nothing prohibiting the management staff of the Mesa County Criminal Justice Services Department from removing any alleged staff abusers from contact with any residents.

Mesa County Criminal Justice Services Department has met the requirements of standard §115.266.

Policy Referenced:

§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.

Mesa County Criminal Justice Services Department policy (referenced below) 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. Mesa County Criminal Justice Services Department has also identified which staff member(s)/department(s) are responsible for monitoring of both residents and non-resident persons

following the receipt of an allegation of sexual abuse and/or sexual harassment.

Per Mesa County Criminal Justice Services Department policy (referenced below), retaliation monitoring would be conducted on the victim for both incidents and on the perpetrator, and the witness (witnesses) to the incident occurring at M.C.C.J.S. Monitoring would occur for at least 90 days following a report and can extend the monitoring period if circumstances and/or evidence suggest otherwise. Finally, monitoring, per policy and per §115.267(f) would terminate if the allegation was determined to be unfounded or if the resident is released from supervision prior to the expiration of the ninety-day monitoring period.

Mesa County Criminal Justice Services Department should forward documentation, confirming the performance of retaliation monitoring for the incidents and allegations reported in the previous 12-month period prior to the onsite audit, to the auditor for review and audit record retention.

Update: The Mesa County Criminal Justice audit team worked diligently to address and enact all recommended corrective actions, as noted and detailed above. Documentation of compliance with auditor recommendation was forwarded to the auditor for review and audit record retention.

Mesa County Criminal Justice Services Department has met the requirements of this standard.

Policy Referenced: 1.7060

§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 Mesa County Criminal Justice Services Department Policy Statement (referenced below), Mesa County Criminal Justice Services Department has established policies for investigating allegations. Mesa County Criminal Justice Services Department staff do not conduct criminal investigations; rather, these are forwarded to local law enforcement (Grand Junction Police Department). As noted in §115.221, Mesa County Criminal Justice Services Department has entered into an MOU with Grand Junction Police Department establishing their collective efforts to remain in compliance with the national PREA standards.

In the 12 months prior to this audit, Mesa County Criminal Justice Services Department received seven reports or allegations of sexual abuse.

Mesa County Criminal Justice Services Department staff are responsible for conducting administrative investigations of sexual abuse and/or sexual harassment involving Mesa County Criminal Justice Services

Department residents. In addition to the sexual abuse training received, administrative investigations are also driven and governed by Mesa County Criminal Justice Services Department investigative policies. Incorporated into this policy is an overview of the responsibilities of external agencies when conducting a PREA related investigation within their facility and/or when involving their clientele.

A review of the investigative documents, findings, and follow-up reviews (as required by §115.286) was performed as part of the audit process. The investigations were generally very thorough and accompanied by excellent notes, debriefings, and reports. During the course of the onsite audit, the audit team spoke to areas in which the investigative process could be enhanced and the scope of the investigation follow up on all plausible evidentiary channels moving forward so as to ensure continued compliance with all aspects of this standard. All allegations of sexual abuse received by Mesa County Criminal Justice Services Department were promptly investigated.

As suggested by the evidence collected, notification to local law enforcement of potential criminal acts was performed for one of the allegations received by Mesa County Criminal Justice Services Department.

Mesa County Criminal Justice Services Department has met all the requirements for this standard.

Policy Referenced: 1.7060

§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.

Mesa County Criminal Justice Services Department has had fourteen reported incidents involving the sexual harassment or sexual abuse in the 12 months prior to this audit. All incidents were fully investigated and the investigatory findings were well documented.

Mesa County Criminal Justice Services Department policy (referenced below) is consistent with the intent, expectations and spirit of §115.272. Mesa County Criminal Justice Services Department utilizes the “preponderance of the evidence” as the standard in determining whether allegations of sexual abuse and/or sexual harassment are substantiated, unsubstantiated, or unfounded.

Mesa County Criminal Justice Services Department has met all the requirements for this standard.

Policy Referenced: 1.7060

§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.

Mesa County Criminal Justice Services Department policy (referenced below) 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. Mesa County Criminal Justice Services Department accurately captures the notification thresholds pursuant to 115.273(c). Those thresholds being:

- Employee removed from post/position (possibly pending investigation)
- Employee no longer employed with the company
- Mesa County Criminal Justice Services Department learns the staff member was indicted/charged with an offense related to sexual abuse within the facility, and
- Mesa County Criminal Justice Services Department learns the staff member was convicted on said charges

The Mesa County Criminal Justice Services Department policy also accurately captures the notification requirements as it pertains to an alleged resident abuser. In that regard, Mesa County Criminal Justice Services Department policy identifies those notification threshold as the last two bullets above. During the course of the Mesa County Criminal Justice Services Department investigations, notifications required pursuant to this standard and consistent with thresholds noted above were made by Mesa County Criminal Justice Department staff following the outcome of the investigation(s).

Mesa County Criminal Justice Services Department has met all the requirements for this standard.

Policy Referenced: 1.7060

§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.

Mesa County Criminal Justice Services Department, in addition to their personnel policies referenced below, is also governed by the Mesa County Human Resources Policies and Procedures Manual. It is the latter that the reader is referred to when dealing with employee disciplinary measures. While the Mesa County Human Resources Policies and Procedures Manual clearly identifies Mesa County Criminal Justice Services Department employee prohibited behaviors which may lead to termination, however, said agreement does not contain all elements of required elements by §115.276.

Specifically, incorporation of language indicating that terminations for violations of the agency's zero tolerance policies on sexual abuse and sexual harassment shall be reported to law enforcement (if potentially criminal) and licensing agencies as appropriate. Additionally, the same would apply for the voluntary departure of an employee from employment with Mesa County (and Mesa County Criminal Justice Services Department) who would have otherwise been terminated for said violations.

The revised manual/policies once formally approved and implemented should be forwarded to the auditor for review and audit record retention. Please note, as the revision of the county manual may require approval of County Commissioners, etc., a temporary resolution may be to issue an addendum to the Mesa County Criminal Justice Services Department policies until the more permanent solutions can be implemented.

Update: The Mesa County Criminal Justice audit team worked diligently to address and enact all recommended corrective actions, as noted and detailed above. Documentation of compliance with auditor recommendation was forwarded to the auditor for review and audit record retention.

Mesa County Criminal Justice Services Department has met the requirements of this standard.

Policy Referenced: 1.2015

§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 audit narrative above, Mesa County Criminal Justice Services Department's policies (referenced below), Mesa County Human Resources Manual, nor the Contractor orientation materials (PREA and Professional Standards of Conduct form and Facility Access Agreement form) capture the reporting of sexual abuse incidents to relevant licensing bodies (as appropriate). At a minimum, this possible reporting action should be incorporated into the Mesa County Criminal Justice Services Department's contractor/volunteer/intern orientation materials and the Mesa County Criminal Justice Services Department's policy (policies).

Update: The Mesa County Criminal Justice audit team worked diligently to address and enact all recommended corrective actions, as noted and detailed above. Documentation of compliance with auditor recommendation was forwarded to the auditor for review and audit record retention.

Mesa County Criminal Justice Services Department has met the requirements of this standard.

Policy Referenced: 1.7040

§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.

Mesa County Criminal Justice Services Department policy (referenced below) mirror the requirements of 115.278. Additionally, as noted throughout this report, elements of the PREA standards (in this case possible client disciplinary actions pursuant to §115.278) should also be incorporated into client resident handbooks moving forward; however, in the meantime, amendments to some of the PREA informational and acknowledgement forms speaking to potential resident disciplinary actions and expected client practices should be revised to better relay to their clientele the full extent of reporting avenues available to them for reporting incidents, concerns, and/or the consistent with the requirements set forth in §115.251, §115.253, and 115.254 respectively. Additionally, in order to better reflect the limitations of potential resident disciplinary actions as identified via §115.278 (f). To those points, the following revisions are suggested:

1. Form: Mesa County Criminal Justice Service's Department - Community Corrections program's "PREA Advisement: Facts on Expected Sexual Conduct" (Client Intake Form #10)

Page 2, "False Allegations" – Suggest revision to include verbiage speaking to false allegations "made in bad faith" as compared to "false allegations".

2. Mesa County Criminal Justice Services Department – Client Acknowledgement of PREA Advisement (Client Intake Form #10b)

Page 1, fourth bullet – This sentence, directing clients "who need to report suspected sexual contact" that they "will [do] so by talking with an available member of CJSD administration" is in direct conflict with §115.251, §115.253, and §115.254. Collectively, these standards allow for "multiple" reporting channels for clients to report such concerns. Clients cannot be forced to report internally when concerns arise; they can, however, be encouraged to report such concerns to staff. That said, clients who opt to report such concerns to the DOC Tip Line (and other venues with whom the agency is actively using for client reporting) are afforded the right to do so by the national PREA standards. To that point, a client could potentially feel that he/she is violating agency rules by choosing not to report such concerns to CJSD administrative staff and, therefore, fear incur potential disciplinary actions for not adhering to written staff directives.

§115.278(d) would not be applicable to Mesa County Criminal Justice Services Department for two reasons. First, Mesa County Criminal Justice Services Department does not offer therapy, counseling or other interventions; rather, Mesa County Criminal Justice Services Department outsources these services from approved vendors as identified by the contractor. To that point, Mesa County Criminal Justice Services Department has mechanisms in place (as is required by DCJ standard 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. Note: The latter is also covered through the Colorado Sex Offender Management Board supervision guidelines for identified sex offenders.

Second, it is important to note, as a county agency providing services to Colorado Department of Corrections, Colorado Division of Criminal Justice (DCJ), et al, Mesa County Criminal Justice Services Department would not retain a resident accused of sexual abuse; rather, having the ability to utilize the appropriate county resources for temporary, secure custody of any alleged client abuser by law enforcement until final disposition can be reached.

Update: The Mesa County Criminal Justice audit team worked diligently to address and enact all recommended corrective actions, as noted and detailed above. Documentation of compliance with auditor recommendation was forwarded to the auditor for review and audit record retention.

Mesa County Criminal Justice Services Department has met the requirements of this standard.

Policy Referenced: Resident Handbook, PREA Advisement

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| §115.282 - Access to Emergency Medical and Mental Health Services |
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- 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 Mesa County Criminal Justice Services Department policy (referenced below), outlines the Agency’s stated objectives to provide resident victims of sexual abuse with access to emergency medical treatment and crisis intervention services. Mesa County Criminal Justice Services Department MOU with the Hilltop Domestic Violence and Sexual Assault Services at Latimer House and the Western Slope Center for Children provide for advocacy, mental health, and emotional supportive services; furthermore, Mesa County Criminal Justice Services Department has also identified St. Mary’s Hospital as the local medical facility at which medical and S.A.N.E. services would be performed for resident victims. The policy outlines the expected duties of both Mesa County Criminal Justice Services Department and the conglomeration of external entities to be involved so as to adhere to the requirements set forth in §115.282(a)-(d).

Mesa County Criminal Justice Services Department has met all the requirements for this standard.

Policy Referenced: 1.7050

§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.

The existing arrangements with local community resources, as captured in the aforementioned MOU’s (Blue Bench, Denver Medical 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.

As has been previously mentioned, Mesa County Criminal Justice Services Department policies, collectively, provide clear, cohesive instruction directing staff actions and outlining Mesa County Criminal Justice Services Department expectations consistent with the requirements, intent, and spirit of the national PREA standards.

Mesa County Criminal Justice Services Department has met all the requirements for this standard.

Policy Referenced: 1.7050

§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.

Mesa County Criminal Justice Services Department policy (referenced below) outlines the agency's expectation on the scope, the participants, responsibilities and areas to be reviewed, and functionality of sexual incident review committee. Mesa County Criminal Justice Services Department developed 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).

Mesa County Criminal Justice Services Department has had seven incidents of sexual abuse occurring, or allegedly occurring, at Mesa County Criminal Justice Services Department's community corrections facilities in the 12-month period prior this audit. As required, Mesa County Criminal Justice Services Department has convened a Sexual Abuse Incident Review committee meeting following the conclusion of their investigations into these allegations. The committee's discussion points, conclusions, recommendations stemming from these meetings is captured and memorialized using the template describe above and were reviewed as part of the audit process.

Mesa County Criminal Justice Services Department has met all the requirements for this standard.

Policy Referenced: 1.7060, 1.7080

§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, Mesa County Criminal Justice Services Department, as directed and driven by the policy referenced below, collect accurate, uniform data for every allegation of sexual abuse at its facility and do so by using a set of definitions. Consistent with the requirements set forth in §115.287, this information is collected, aggregated annually, and based on all available incident based documentation. The data collected meets the minimum requirements set forth via §115.287(c).

This information, formally captured in the form of an annual report, has been generated, approved and formally published for public consumption. The Mesa County Criminal Justice Services Department's Annual Report can be found at: <http://cjsd.mesacounty.us/PREA.aspx>

Mesa County Criminal Justice Services Department has met all the requirements for this standard.

Policy Referenced: 1.7010, 1.7080

§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.

As an agency, Mesa County Criminal Justice Services Department, as directed and driven by the policy referenced below, collect accurate, uniform data for every allegation of sexual abuse at its facility and do so by using a set of definitions. Consistent with the requirements set forth in §115.287, this information is collected, aggregated annually, and based on all available incident based documentation. The data collected meets the minimum requirements set forth via §115.287(c).

This information, formally captured in the form of an annual report, has been generated, approved and formally published for public consumption. The Mesa County Criminal Justice Services Department's Annual Report can be found at: <http://cjsd.mesacounty.us/PREA.aspx>

Mesa County Criminal Justice Services Department has met all the requirements for this standard.

Policy Referenced: 1.7010, 1.7080

§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.

As noted above in the two previous audit narratives, Mesa County Criminal Justice Services Department,

as directed and driven by the policy referenced below, collect accurate, uniform data for every allegation of sexual abuse at its facility and do so by using a set of definitions. Consistent with the requirements set forth in §115.287, this information is collected, aggregated annually, and based on all available incident based documentation. The data collected meets the minimum requirements set forth via §115.287(c).

This information, formally captured in the form of an annual report compliant with the expectations set forth in §115.288, has been generated, approved and formally published for public consumption. The Mesa County Criminal Justice Services Department's Annual Report can be found at: <http://cisd.mesacounty.us/PREA.aspx>

Consistent with the requirements set forth in §115.289, Mesa County Criminal Justice Services Department's policy (referenced below) accurately captures and mirrors the standard's expectations regarding storage and retention of data collected pursuant to §115.287 and §115.288 respectively.

Mesa County Criminal Justice Services Department has met all the requirements for this standard.

Policy Referenced: 1.7080, 1.7010

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

January 3, 2017

Date