

PREA AUDIT: AUDITOR'S SUMMARY REPORT

COMMUNITY CONFINEMENT FACILITIES

NATIONAL
PREA
RESOURCE
CENTER



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

Name of facility: **BISHOP HOUSE**
Physical address: **31 Bishop St., Waterbury, CT 06704**
Date report submitted:

Auditor Information

Address: **321 Farmington Ave., Bristol, CT 06010**
Email: **WCSparks@SparksSecurityCT.com**
Telephone number: **(860) 841-0416**
Date of facility visit: **21 January 2015**

Facility Information

Facility mailing address: *(if different from above)* **N/A**

Telephone number: **(203) 236-9990**

The facility is:

| | | |
|--|-----------|---------|
| Military | County | Federal |
| Private for profit | Municipal | State |
| <input checked="" type="checkbox"/> Private not for profit | | |

Facility Type:

| | |
|--|--------------------------------------|
| <input checked="" type="checkbox"/> Community treatment center | Community based confinement facility |
| <input checked="" type="checkbox"/> Halfway house | Mental health facility |
| Alcohol or drug rehabilitation center | Other: |

Name of Facility Head: **MARK STRANGE** Title: **PROGRAM DIRECTOR**

Email address: **mstrange@newoppinc.org**

Name of PREA Compliance Manager (if applicable): **SAA** Title: **SAA**

Email address: Telephone number: **SAA**

Agency Information

Name of agency: **NEW OPPORTUNITIES INC.**

Governing authority or parent agency: *(if applicable)*

Physical address: **232 North Elm Street, Waterbury, CT 06702**

Mailing address: *(if different from above)* **SAA**

Telephone number: **(203) 575-9799**

Agency Chief Executive Officer

Name: **James H. Gatling, Ph.D.** Title: **President & Chief Executive Officer**

Email address: **DrGatling@NewOpportunitiesInc.org** Telephone number: **(203) 575-4202**

Agency-Wide PREA Coordinator

Name: **MARK STRANGE** Title: **SAA**

Email address: **SAA** Telephone number: **SAA**

AUDIT FINDINGS

NARRATIVE:

A PREA Audit was conducted at the New Opportunities Inc., Bishop House, Waterbury, CT on January 19, 2015. The audit team consisted of certified PREA Auditor W.C. Sparks (certified by the U.S. Department of Justice to conduct PREA Audits) and one assistant, Todd Sturgeon from Sparks Security LLC. Interviewed was Mark Strange in the capacity of Agency Head designee, Program Director, PREA Compliance Manager, PREA Compliance Coordinator, Investigator, and Retaliation Manager. Human Resources Director Lori Lehan was also interviewed. During the sixty days prior to the audit, a comprehensive review was conducted of both Agency and Facility policy and procedures.

On January 19, 2015, the audit team arrived at the Bishop House and began the day meeting with Program Director Mark Strange. Mark Strange lead a tour of the entire Bishop House. A Bishop House inmate listing was furnished. There were no inmates identifying as transgender, intersex, gay, bisexual, not English proficient or disabled or that had reported sexual abuse. The audit team interviewed random inmates with at least one selected from each housing. In all, nine inmates were identified and were interviewed. The audit team also interviewed eight random staff representing all three shifts. Specialized staff interviewed on-site included those noted above, one member of the incident review team, two staff that screen/reassess and two Intake staff. The facility does not employ medical or mental health staff, utilizing those services from the community. Bishop House provided the audit team with two private locations to conduct interviews with both staff and inmates. Interviews were conducted during the Day Watch with staff from all three shifts. The staff interviewed was both articulate and knowledgeable on the subject of their duties and specifically those aspects of PREA that were of potential impact to their positions. The overall impression was one of a well-trained and professional work force.

DESCRIPTION OF FACILITY CHARACTERISTICS:



Bishop House, administered by New Opportunities Inc. in conjunction with the Connecticut Department of Correction (DOC), is a 48 bed halfway house that serves Greater Waterbury. The all-male residents there participate in a work-release program.

Potential residents of the program are referred by the DOC Community Services Division. These referrals must meet the eligibility criteria for community release as established by the DOC. The average length of stay at Bishop House is three and one half months for individuals within six to eight months of discharge from sentence or release to Parole or Transitional Supervision. Admission is only by DOC referral.

The Program emphasizes work release. All participants must be able to work and pay weekly room and board. As required, contributions are also made to the State's Victim's Compensation Fund. In-house substance abuse monitoring is conducted routinely.

The Bishop House program of New Opportunities, Inc. maintains a zero tolerance toward all forms of sexual assault/harassment. Any person who becomes aware of or suspects sexual assault/abuse or sexual harassment must report it immediately to the Program Manager or an higher authority. Any incident determined to be a criminal matter will be reported to law enforcement

During the previous year, there were no sexual assault or harassment allegations.

SUMMARY OF AUDIT FINDINGS:

Number of standards exceeded: **0**

Number of standards met: **36**

Number of standards not met: **0**

Number of standards not applicable: **3**

§ 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)
- Standard is Not Applicable

The Bishop House maintains a zero tolerance policy toward all forms of sexual assault, abuse and harassment. Governing policy is "PREA Policy," Section 1 and "General Policy and Procedure," Section 1. These documents define what PREA is, the actions of the PREA Coordinator, staff responsibilities for monitoring, response plan, referrals and investigation protocols. The agency has designated an upper-level, agency-wide PREA coordinator, with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its community confinement facilities. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 115. 212 Contracting with other entities for the confinement of residents.

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

The Bishop House does not contract with other entities for the confinement of their residents. The standard is determined to be "**Not Applicable**" to the Bishop House.

§ 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)
- Standard is Not Applicable

The Bishop House has an "Annual Community Program Staffing Schedule." This documents staff deployment over all shifts for all staff. The deployment plan dictates that the program is not permitted to deviate from authorized deployment levels, even if it results in management having to fill vacant slots. The annual security review shows that the facility does perform annual reviews of the requisite areas mandated in the standard. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

The facility does not conduct cross-gender, or any other type of strip search, such searches prohibited by policy except in exigent circumstances. There have been no instances of a strip search ever occurring at the Bishop House. The facility does not accept female inmates. Training provided to all staff covers a policy prohibition against conducting any kind of search of a transgender or intersex inmate for the sole purpose of determining genital status. Training provided to all staff covers the methods and manner of how to conduct cross-gender pat-down searches, and searches of transgender and intersex inmates, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. Training attendance was verified through inspection of training logs and sign-in sheets. Curriculum was contained in "PREA Standards Training," slide #25, power point presentation. Governing policy includes the "New Opportunities PREA Policy," section 4 and "General Policy and Procedure" section C-6. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

Governing policy includes the "New Opportunities PREA Policy," section 4 that states that residents with disabilities and/or limited English proficiency will have every opportunity to participate in all aspects of sexual abuse and sexual harassment prevention, detection and response. That same policy prohibits the utilization of inmate interpreters, readers, or assistants in matters involving PREA issues. Interpretive services are available through the CT DOC and may be accessed via the assigned Parole Officer. Training lesson plan as contained in "PREA Standards Training," slide #52, power point presentation contains information pertaining to disabilities and limited English proficiency. It must be noted that, as a work release center, the Bishop House does not accept significantly disabled inmates. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

"General Policy and Procedure", Attachment HR-400 "Background Checks" and HR-425 "Hiring and Selection" as well as the "PREA Interview Questionnaire" serve to show that the agency takes significant steps to ensure that they do not hire staff or contractors or promote anyone who may have contact with residents who has any history of having engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. § 1997) or has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or has been civilly or administratively adjudicated to have engaged in the activity described above. It is also evident from review of these documents and interviews conducted with the Human Resources Director that the agency considers any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with residents. HR-400 shows the policy mandating five-year background checks conducted on current employees. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

The Bishop House has not designed or acquired any new facility nor has it planned any substantial expansion or modification of existing facilities within the reporting period. The Bishop House has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology within the reporting period. "PREA Policy" section 4, "Prevention Planning" mandates that, should the aforementioned activities occur; the agency will consider the effect of the design in protecting inmates from sexual abuse. They will also consider video equipment upgrades to enhance protection of inmates from sexual abuse. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" 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)
- Standard is Not Applicable

Relevant documentation reviewed includes a signed memorandum from the Chief of Police, Waterbury Police Department, Waterbury, CT acknowledging their receipt of a written notice from the Bishop House informing them of the requirements of 115.221 as they pertain to evidence protocol and forensic medical examinations resulting from incidents alleged to occur in the Bishop House. Bishop House does not accept youthful inmates as defined in PREA standards. SAFE/SANE examinations are conducted at St. Mary's Hospital, Waterbury, CT at no cost to the victim. This is affirmed in the "PREA Policy," section 10, "Medical, and Mental Health Care." The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

Bishop House does maintain policies which mandate that all reported incidents of sexual assault/abuse will be immediately reported to Waterbury Police Department for investigation. Said policy further states that the PREA Coordinator shall ensure any report of sexual assault/abuse or harassment, determined to be non-criminal by law enforcement will be administratively investigated. Governing policy is "PREA Policy" section 5, "Response Planning". There have been no such incidents or allegations made during the reporting period, thus there is no sample documentation available for review. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

Bishop House trains all employees who may have contact with residents on all of the requisite points as mandated in the standard. Governing standard is "PREA Policy" Section 6, "Training and Education" which mandates that, during employee orientation as well as annually, employees are trained on PREA policies and obligations. Review of the lesson plan contained in the "PREA Standards Training" power point shows all required areas are covered. Sign-in sheets were reviewed showing that employees sign in and acknowledge the training received. One hundred percent of the Bishop House work force has been successfully trained. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

Bishop House has a policy in place to train contractors and volunteers in the form of ,"PREA Policy", Section six, "Training and Education". That same policy mandates that, absent this training, no contractor or volunteer will be permitted contact with inmates and will be escorted and supervised by staff at all times. In fact, there are no volunteers, nor have there ever been any volunteers. Those contractors entering the house are limited to maintenance functions and are always under constant escort by staff. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

The Bishop House ensures that inmates receive information explaining the requisite subjects during the intake process. Inmates receive information explaining the facility's zero-tolerance policy regarding sexual abuse and sexual harassment, how to report incidents or suspicions of sexual abuse or sexual harassment, their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. Bishop House is not a Direct Intake facility, in that all inmates are transferred from other facilities and are subject to the intake procedures. All inmates receive a handout entitled, "Sexual Assault Prevention for Residents." They also receive a copy of the facility "PREA Policy" and an "Inmate Handbook," both of which serve to provide the necessary education. The Bishop House also provides resident education in formats accessible to all residents, including those who are limited English proficient, and deaf. Visually impaired or otherwise disabled inmates are not accepted at Bishop House, as this is a work release facility without provisions for those types of inmates. Ten inmate files were reviewed and documentation of education was determined to be in order. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

Bishop House maintains one PREA Investigator who also is the Program Director and fulfills a plethora of other functions within the facility. Specialized training consists of an NIC sponsored course entitled, "Investigating Sexual Abuse in a Confinement Setting." This "on-line" course generates a printed certificate of achievement upon successful completion. The certificate was reviewed for the Bishop House Program Director and determined to be in order. The course covers the requisite subjects and material as outlined in the standard. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

The Bishop House has no Medical or Mental Health staff that work regularly, or even occasionally, in their facility. All medical and mental health services are obtained at local hospitals, clinics or through the CT Department of Correction. The standard is determined to be "**Not Applicable**" to the Bishop House.

§ 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)
- Standard is Not Applicable

The Bishop House subjects each arriving inmate to screening in order to ascertain potential risk of sexual abuse by other inmates or being sexually abusive toward other inmates. Intake screening occurs immediately upon arrival at the facility. The Case Manager accomplishes intake screening. The "Client Intake Screening" form is utilized to ensure that all of the requisite factors are evaluated, including; whether the resident has a mental, physical, or developmental disability; the age of the resident; the physical build of the resident; whether the resident has previously been incarcerated; whether the resident is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming; the intake screening shall consider prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to the agency, in assessing residents for risk of being sexually abusive; whether the resident has a serious and/or lengthy history of violent offenses; whether the resident has previously experienced sexual victimization; and the resident's own perception of vulnerability. Per the "Policy and Procedure Manual", Policy 1(a)-1, "Admission", section g, the Bishop House does not accept any inmate with a history of sexual offenses or misconduct. Per, "PREA Policy", section 6, "Training and Education", subsection, "Screening for Risk of Victimization and Abusiveness" mandates that reassessment will occur after fourteen business days, but never later than thirty days after arrival. Reassessment will be accomplished by the Case Manager and noted in the inmate's case notes. In the event of any new information or any incident related to an inmate's safety or risk of victimization the Program Manager will conduct the reassessment and immediately take appropriate action to ensure the inmate's safety. This policy also states that inmates will not be disciplined for refusing to answer, or discuss information related to mental/physical disability, sexual orientation, previous victimization, or a resident's perception of vulnerability. All information gathered pursuant to intake screening and subsequent reassessment(s) is contained within the inmate file that is restricted to Case Managers and Program Director access. A random review of ten inmate files showed intake screening and reassessments were occurring as mandated by policy. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

Bishop House uses information from risk screening to assess housing, bed, work, education, and program assignments with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive. "Intake Policy", page 5, section 6, "Screening For Risk of Victimization and Abusiveness" states that upon obtaining any new information or incident related to safety or risk of victimization the Program Manager will conduct a reassessment and take immediate action to ensure the safety of a potential victim. The "PREA Policy," states that risk factors are considered in making housing and programming assignments. During screening, the intake package is reviewed for indicators and staff makes individualized determinations about how to ensure the safety of each resident. Bishop House does not accept female inmates. There were no transgender or intersex inmates at the facility. There were no dedicated facilities, units, or wings solely for housing inmates based on such identification or status. All showering is accomplished separately. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

The Bishop House provides multiple internal ways for inmates to privately report sexual abuse and sexual harassment, retaliation by other inmates or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. Inmates can report directly to staff, including to the Program Director, via written memo, verbally, anonymously, or from a third party to any staff member. Inmates are permitted to retain cell phones and thus are able to contact facility administration, outside agencies, DOC hotlines or law enforcement agencies telephonically. Since these are private phones, they are not monitored. In short, there are no limitations placed on inmates or their ability to report issues of this sort. Reporting rights are outlined in the "Inmate Handbook," p.11 and the "Intake Handout," p.7. Staff is mandated to document any verbal reports

immediately. Staff are permitted to report issues privately, as stated in the PREA Training power point lesson plan, slide #58. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

The Bishop House does not have administrative procedures to address resident grievances regarding sexual abuse. Facility Grievance policy states that any issues related to sexual abuse will be handled as an Administrative Investigation rather than a Grievance. The standard is determined to be "**Not Applicable**" to the Bishop House.

§ 115.253 Resident access to outside confidential support 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)
- Standard is Not Applicable

Bishop House "PREA Policy" Section 6, "Training and Education" mandates that the facility shall provide inmates with contact information to outside victim advocates and support services. Since inmates retain personal cell phones, contact is made in as confidential a manner as possible. Since these are private cell phones, the extent to which such communications will be monitored is zero. Bishop House has entered into an MOU with Safe Haven of greater Waterbury to provide these services and maintains copies of that agreement. Inmates are not limited to that organization as they have the ability to contact anyone, anywhere. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

The Bishop House has the PREA poster prominently displayed throughout the facility, in all inmate occupied areas, with contact numbers for the CT DOC PREA Hotline and the CSP PREA Hotline, CONNSACS, Safe Haven, State of CT Office of the Victim Advocate, National Sexual Violence Resource Center, and the Rape/Abuse Incest National Network. Bishop House has established a method to receive third-party reports of sexual abuse and sexual harassment by posting their phone number and email address on their publicly available web page as well as their stance of zero tolerance and mandatory reporting of sexual abuse and sexual harassment. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

Bishop House requires all staff to report immediately any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment; retaliation against residents or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. The requirement is embodied within "PREA Policy, sections 1, "Policy" and 5, "Response Planning". PREA Standards Training power point slide #58 documents the requirement and training of staff to maintain confidentiality of information related to a sexual abuse report. Bishop House does not have medical or mental health practitioners working in the facility. Bishop House does not accept inmates under the age of 18. Bishop House mandates all allegations of sexual abuse and sexual harassment, including third party and anonymous reports, be forwarded to the facility's designated investigator. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

Bishop House mandates that immediate action to protect the inmate be taken upon learning that an inmate is subject to a substantial risk of imminent sexual abuse. This mandate is encompassed within "PREA Policy," section 7, "Official Response Following Resident Report." There have been no such determinations within the reporting period. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

Bishop House "PREA Policy" section 7, "Official Response Following Resident Report" states that, upon receiving an allegation that an inmate was sexually abused while confined at another facility, the Program Director shall notify the Connecticut Department of Correction Parole Office. All inmates accepted to Bishop House arrive under the custody of the Connecticut Department of Correction Parole Office and arrive from a CTDOC facility or another halfway house but still under their custody. Policy mandates such notification shall be provided immediately after receiving the allegation. There have been no such incidents; however, the policy mandates that such notification shall be documented. There have been no such determinations within the reporting period. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

Bishop House "PREA Policy" sections 5, "Response Planning" and 7, "Official Response Following Resident Report" outline the responsibilities of first responder staff members. The Bishop House also provides a PREA Incident Checksheet to ensure that all mandated requirements and processes are accomplished. Upon learning of an allegation that a resident was sexually abused, the first security staff member to respond to the report shall be required to: ensure the safety of the alleged victim from the alleged aggressor/ abuser; notify a supervisor, duty officer and program manager; identify, separate and secure the inmates involved; ensure that the victim is not left alone; identify the crime scene; maintain the security and integrity of the crime scene. If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, changing clothes, defecating, drinking, or eating. All staff members at the Bishop House are "Security Staff" by definition. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

Bishop House maintains a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, investigators, and facility leadership. Said plan is delineated in "PREA Policy" section 5, "Response Planning" and "PREA Incident Check sheet". The plan generally outlines the actions of the various personnel in order to achieve a unified and coordinated response. There have been no occasions requiring a coordinated response during the reporting period. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

The Bishop House has not entered into or renewed any collective bargaining agreement or other agreement of any sort during this reporting period or at any other time that limits their ability to remove alleged staff sexual abusers from contact with inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

The Bishop House has established "PREA Policy" section 7, "Official Response Following Resident Report, Agency Protection Against Retaliation" to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff and to designate which staff members are charged with monitoring retaliation. Inmate victims or abusers may be subject to transfer or remand at the discretion of the CT DOC Parole Services. Alleged staff abusers would also be subject to removal from inmate contact, again at the discretion of the CT DOC Parole Services. Emotional support services for inmates are handled via MOU with CONNSACS and/or Safe Haven of Greater Waterbury. The Bishop House Program Director/PREA Coordinator would monitor the conduct and treatment of inmates or staff. During interview, the Program Director indicated that he would accomplish detection of retaliation by watching for isolation, mood changes, behaviors other than normal and different interactions between staff and inmates. He also indicated that he would utilize other staff to gain information on issues of this nature. Monitoring would take place on individuals who reported the sexual abuse and/or who were reported to have suffered sexual abuse in order to detect changes that may suggest possible

retaliation by inmates or staff and would enable the administration to act promptly to remedy any such retaliation. Monitoring would continue for as long as those individuals were in the Bishop House program. No such incidents of retaliation have ever occurred at the Bishop House. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be **"Meets Standard"** for this standard.

§ 115.271 Criminal and administrative agency 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)
- Standard is Not Applicable

The Bishop House conducts its own administrative investigations into allegations of sexual abuse and sexual harassment in a prompt, thorough and objective manner for all allegations, including third-party and anonymous reports. The Bishop House Program Director has received specialized training in sexual abuse in the form of an NIC sponsored course entitled, "Investigating Sexual Abuse in a Confinement Setting." This "on-line" course generates a printed certificate of achievement upon successful completion. The certificate was reviewed for the Bishop House Program Director and determined to be in order. The course covers the requisite subjects and material as outlined in the standard, including; gathering and preservation of direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; interviewing alleged victims, suspected perpetrators, and witnesses; and review of prior complaints and reports of sexual abuse involving the suspected perpetrator. Policy governing investigations is promulgated via "PREA Policy" sections 4, "Prevention Planning", and section 5, "Response Planning" and section 8 "Investigations". Bishop House has no authority to compel interviews. Bishop House has no authority to mandate polygraph examination or other truth-telling devices for any reason. Standard investigation protocols are utilized for investigations. Written reports document investigative findings including whether staff actions or failures to act contributed to the incident. Issues of a criminal nature are investigated by the Waterbury Police Department independently of the Bishop House. A letter was sent to and acknowledged by the Waterbury Police Department requesting that such investigations shall be conducted pursuant to the above requirements. To date, there have been no investigations arising from incidents occurring within the Bishop House. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be **"Meets Standard"** for this standard.

§ 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)
- Standard is Not Applicable

The Bishop House maintains a "preponderance of evidence" standard for administrative investigations as outlined in "PREA Policy" section 8 "Investigations". The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

(a) Bishop House has never had an incident/investigation that would necessitate notification pursuant to this standard. Bishop House does maintain a policy, "PREA Policy", section 8, "Investigations", subsection "Reporting to Residents" and Section 9, "Discipline Sanctions for Staff" and "Discipline Sanctions for Residents" which encompass all aspects of the standard. Notification will be documented via incident report. Obviously, when an investigation is conducted by an outside law enforcement agency, that agency has no obligation to share the results thereof with the Bishop House; however, a request for those results would be made and documented. It is noted that, under the current arrangement between the Bishop House and the CT DOC and Division of Parole, it is virtually inconceivable that an inmate would still be housed at the Bishop House by the time such an investigation was completed and notification became warranted, thus their obligation under this standard would be negated. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

Bishop House "PREA Policy" Section 9, "Discipline Sanctions on Staff" stipulates that staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. All allegations of violation of agency sexual abuse or sexual harassment policies would be referred to law enforcement agencies prior to any investigation on the part of the Bishop House unless the activity was clearly not criminal. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

Bishop House maintains a policy applicable to this standard; "PREA Policy", Section 9, "Corrective Action for Contractors and Volunteers". The policy encompasses all aspects of the standard. The Bishop House does not have any volunteers and contractors are only permitted access to resident occupied areas while under direct staff escort. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

Bishop House accepts inmates exclusively from the CT DOC. All inmates remain under the authority of the CT DOC while residing in the Bishop House. CTDOC Administrative Directive 9.5, "Code of Penal Discipline" encompasses the pertinent portions of the applicable standard while prohibiting all sexual activity on the part of an inmate, this regardless of the circumstances under which that activity occurs. The Code of Penal Discipline classifies all sexual activity as a Class A offense. A charge of "Sexual Misconduct" would result in immediate removal from the Bishop House and a return to a CT DOC facility where the disciplinary process would proceed. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 115.282 Access to emergency medical and mental health 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)
- Standard is Not Applicable

Bishop House policy "PREA Policy" section 10, "Medical and Mental Health Care" mandates that inmates shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services without financial cost. Bishop House does not maintain on-duty Medical and Mental Health Care staff. Emergency treatment would be handled at either Waterbury Hospital or UCONN Medical Center at the discretion of the CT DOC. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

Bishop House accepts inmates exclusively from the CT DOC. Inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility will be eligible for medical and mental health evaluation and, as appropriate, treatment from the CT DOC. The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody, this based upon determination by the CMHC (Correctional Managed Health Care) consistent with the community level of care. Treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Bishop House does not accept female inmates. Per the "Policy and Procedure Manual", Policy 1(a)-1, "Admission", section g, the Bishop House does not accept any inmate with a history of sexual offenses or misconduct. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

Bishop House policy, "PREA Policy" section 11, "Data Collection and Review" mandates that the PREA Coordinator will conduct a sexual abuse incident review at the conclusion of all sexual abuse investigations, including where the allegation has not been substantiated. The review will be conducted by the PREA Coordinator with input from any staff members with pertinent information. There has never been a sexual abuse incident at the Bishop House, thus there has never been a sexual abuse incident review conducted. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

Bishop House policy, "PREA Policy" section 11, "Data Collection and Review" mandates that the Bishop House will collect accurate, uniform data for every allegation of sexual abuse using the form "SSV-IA Survey of Sexual Victimization, 2013" published by the Department of Justice, Bureau of Justice Statistics. All sexual abuse data will be aggregated at least annually. Bishop House will maintain, review, and collect data as needed from all available incident-based documents including reports, investigation files, and sexual abuse incident reviews. To date, there have been no incidents of sexual abuse, thus there has been no data collected. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

Bishop House to date, has never had an incident of sexual abuse, thus there has been neither data collected nor any data to review nor any data to publish. The lack of data because of an absence of incidents is published on the Agency website located at, <http://www.newoppinc.org/news/2015/bishop-house-annual-review-data-released>. The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 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)
- Standard is Not Applicable

Bishop House to date has never had an incident of sexual abuse, thus there has been no data collected, nor any data aggregated or published. "PREA Policy" section 11, "Data Collection and Review" states that they will maintain records of all incidents related to incidents or allegations of sexual assault/abuse or harassment. Records will be maintained for ten years. The lack of data as a result of an absence of incidents is published on the Agency website located at <http://www.newoppinc.org/news/2015/bishop-house-annual-review-data-released> . The Bishop House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

CERTIFICATION:

The auditor certifies that the contents of the report are accurate to the best of his/her knowledge and no conflict of interest exists with respect to his or her ability to conduct an audit of the agency under review.


AUDITOR SIGNATURE

23 Feb 2015
DATE