Policy:

CJM has zero tolerance for all forms of resident on resident or staff on resident sexual abuse or sexual harassment. CJM will take all necessary steps to educate residents, staff, volunteers, and contractors about sexual assault and sexual harassment. All residents are provided information on how to report any such information directly to staff or third party. Any client deemed to be at risk will be monitored and referred to the appropriate services. Ongoing training will be provided for staff and residents on prevention, detection and responding to allegations.

Any person who becomes aware of or suspects sexual abuse, or sexual harassment must report it immediately to the Program Director, Duty Officer or higher authority.

Procedures:

CJM's Union House shall have designated unit-wide PREA Coordinator to ensure compliance with the Prison rape Elimination Act policies and procedures are met.

1. PREA Coordinator:

The PREA Coordinator responsibilities will include the following:

a.) Will develop and implement ongoing PREA trainings

b.) Monitor the intake screening procedures

c.) Ensure all incidents of sexual abuse are referred to the appropriate law enforcement authorities.

d.) Ensure reports and investigations are conducted on all incidents of sexual abuse or sexual harassment.
e.) Maintain data collection of incidents and coordinate reporting of such to DOC

f.) Review all incidents and take appropriate action to prevent any future occurrences.

2. Retaliation:

CJM will protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff.

The PREA Coordinator will monitor retaliation for CJM.

3. Expectations of All Staff:

CJM requires staff to ensure their conduct does not constitute or promote sexual abuse or sexual harassment as defined in the agency’s overarching PREA policy.

Staff are required to report any known or suspected act which violates PREA policy in any way.

Staff are required to cooperate truthfully and completely with any investigation conducted under all PREA policies.
Policy:

CJM is a private, non-profit agency. CJM does not contract for the confinement of its Union House residents with other private agencies or entities.

Procedures:

Not applicable.
Corporation for Justice Management  
Union House  
Transition Program  

PREA Standard: 115.213  
Supervision and Monitoring  

Policy:  

CJM shall develop a staffing plan to provide adequate staffing levels and where applicable, video monitoring to ensure staff and resident safety and to protect residents against sexual abuse. When developing a staffing plan, CJM shall take into account the layout, composition of the resident population, funding and any other relevant factors. Anytime there are deviations in the staffing plan, the Program Director/PREA Coordinator shall document the deviation and justify the reason.  

The facility Director/PREA Coordinator shall make annual assessments to determine and document whether adjustments are needed to the staffing plan, video monitoring equipment, and resources the facility has available to adhere to the staffing plan.  

Procedures:  

1. Staffing – The Program Manager/supervisory designee must develop a written plan that provides for adequate levels of staffing to protect residents against sexual abuse. This staffing plan must take into consideration the following:  

   - The composition of the resident population;  
   - The physical layout of the facility;  
   - The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and  
   - Any other relevant factors.  

   In any situation in which a deviation is made from the staffing plan, written justification for such deviation must be documented and sent to the PREA Coordinator.  

2. Video Monitoring – The Program Manager/supervisory designee must develop a written plan for the use of video monitoring to protect residents against sexual abuse. Such plan must specify how existing technology will be used in sexual abuse prevention and what additional specific technology would be helpful.
3. Assessment - At least once yearly, or whenever necessary, the PREA Team must assess the program and make adjustments, if necessary, to:

- The staffing plan;
- Prevailing staffing patterns;
- The video monitoring plan; and
- The resources available to commit to ensure adequate staffing levels.
Staffing Plan / PREA Standard 115.213

Corporation for Justice Management (CJM) mission is to provide environments that are physically and emotionally safe from sexual abuse and sexual harassment. Our mission is to facilitate successful adaptation of offenders into society.

CJM mandates ZERO Tolerance towards all forms of sexual abuse and sexual harassment. CJM shall make every effort to prevent, detect and respond to all allegations of sexual abuse or sexual harassment.

CJM/ Union House is a Community Correction Transitional program, located in the Bridgeport, Ct. area. Our facility houses 36 adult males that are pre-sentenced, and sentenced. The typical length of stay (LOS) is 30-60 days. However, the LOS may vary based on individual client needs.

CJM has a total of 12 full time staff and 7 Per-Diem staff. The Director serves both as Director and PREA Coordinator. All staff report directly to the Program Director. All staff with the exception of the Intake Coordinator, Cook and Director work Monday thru Friday 9AM-5PM. Case Managers and Client Monitors have schedules to accommodate the needs of the clients and facility.

After 4:00PM (1) Case Manager and (2) Client Monitors are on staff. The minimal staff required per shift is two. Any deviation from this staffing plan must be approved by the Director. CJM has trained Per-Diem staff to cover absences (holiday, sick, vacations) when necessary. In the event Per-Diem staffs are not available, the Director will step in to meet the needs of the facility or staff will be offered overtime.

CJM has recently updated our surveillance cameras. We rely on theses cameras as additional tools to monitor both clients and staff. Staffs are also expected to conduct hourly rounds as a deterrent to prevent bodily harm by a resident to self or others or to property. CJM continues to focus on the safety and security of both staff and clients.

The staffing plan will be reviewed annually as needed.
CJM's Union House does not conduct strip searches, or visual body cavity searches.
I. Policy:

CJM's Union House does not conduct strip searches or visual body cavity searches.

It is prohibited for staff to search or physically examine a transgender or intersex resident for the sole purpose of determining the resident's genital status.

The Union House shall enable residents to shower, perform bodily functions, and change clothing without staff of the opposite gender viewing such activity.

II. Procedures:

If the resident's genital status is unknown, it may be determined during conversations with the resident or by reviewing records from the referral source(s), if deemed necessary by the Program Manager.

Staff of the opposite gender will announce their presence when entering an area where residents are likely to be showering, performing bodily functions, or changing clothing.

Transgender and intersex residents will be given the opportunity to shower separately from other residents.
Policy:

CJM shall take appropriate steps to ensure residents who are LEP or have disabilities (including, for example, residents who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment.

Procedures:

1. To ensure effective communication with residents who are deaf or hard of hearing, the program shall provide access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

2. The program shall ensure written materials are provided in formats or through methods that ensure effective communication with residents with disabilities, including residents who have intellectual disabilities, limited reading skills, or who are blind or have low vision.

3. The program shall take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to residents who are LEP, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

4. The program shall not rely on resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-response duties, or the investigation of the resident's allegations.
Local Community Services:

- **Department of Rehabilitation Services (DRS)**
  Formerly called Commission on the Deaf and Hearing Impaired (CDHI)
  67 Prospect Avenue, 3rd Floor
  Hartford, CT 06106.
  (800) 708-6796 Voice/TTY (text telephone)
  (860) 231-8756 Voice/TTY

- **Oak Hill**
  120 Holcomb Street
  Hartford, CT 06112
  (860) 242-2274
  (860) 286-3113/TTY

- **American School for the Deaf (ASD)**
  139 North Main Street
  West Hartford, CT 06107
  (860) 570-2300/TTY
  (860) 570-2222

- **Bureau of Education Services for the Blind**
  184 Windsor Ave.
  Windsor, CT 06005
  (860) 602-4000
  (860) 602-4221
Corporation for Justice Management
Union House
Transition Program

PREA Standard: 115.217
Hiring and Promotion Decisions

Policy:
When making hiring and promotion decisions, CJM shall ensure PREA standards are met unless prohibited by law. CJM shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.

Procedures:

1. Hiring and Promoting:
CJM shall not hire or promote anyone who may have contact with residents, and shall not enlist the services of any contractor who may have contact with residents, who—

- Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution;

- 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 in the above.

CJM shall consider 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.
2. Background Checks:

Before hiring new employees who may have contact with residents, CJM shall:

➢ Perform a criminal background records check; and

➢ Consistent with Federal, State, and local law, makes its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse.

CJM shall also perform a criminal background records check before enlisting the services of any contractor who may have contact with residents.

CJM shall either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with residents or have in place a system for otherwise capturing such information for current employees.

3. Applicant and Employee Disclosure:

CJM shall also ask all applicants and employees who may have contact with residents directly about previous misconduct described in this policy in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees.

CJM shall also impose upon employees a continuing affirmative duty to disclose any such misconduct.

Material omissions regarding such misconduct, or the provision of materially false information, may be grounds for termination.
Policy:

CJM shall ensure PREA standards are considered when designing or acquiring or upgrading facilities and technologies.

Procedures:

1. **Facilities:** When designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, CJM shall consider the effect of the design, acquisition, expansion, or modification upon the agency’s ability to protect residents from sexual abuse.

2. **Technologies:** When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, CJM shall consider how such technology may enhance the agency’s ability to protect residents from sexual abuse.
Corporation for Justice Management
Union House
Transition Program

PREA Standard: 115.221
Evidence Protocol and Forensic Medical Examinations

Policy:

CJM shall contact local authorities to investigate allegations of sexual abuse. CJM shall offer all victims of sexual abuse access to forensic medical examinations without financial cost. CJM shall attempt to make available to the victim a victim advocate.

Definitions:

Rape Crisis Center: an entity that provides intervention and related assistance to victims of sexual assault.

Qualified Agency Staff/Community Based Staff: an individual who has been screened for appropriateness to serve in this role and has received education concerning sexual assault and forensic examination issues in general.

Procedures:

1. Access to Forensic Medical Examinations: CJM shall offer victims of sexual abuse access to forensic medical examinations via Bridgeport Hospital, without financial cost where evidentiary or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot be made available, the examination will be performed by other qualified medical practitioners. CJM shall document its efforts to provide SAFEs or SANEs.

2. Victim Advocate: CJM shall attempt to make available to the victim a victim advocate from a rape crisis center. If a rape crisis center is not available to provide victim advocate services, CJM shall attempt to make such services available through a qualified staff member from a qualified community based organization. The program shall document efforts to secure services from rape crisis centers.
3. **Staff Support**: As requested by the victim, the victim advocate, qualified CJM staff member, or qualified staff from a community based agency shall accompany and support the victim through the forensic medical examination process and investigatory reviews and shall provide emotional support, crisis intervention, information, and referrals.

4. **Qualifications of Investigating Agency**: CJM shall request that the investigating agency abide to PREA requirements/standards.
Policy:

CJM shall ensure that a trained administrative investigator assigned by CJM will conduct the administrative investigation. All investigation found to be of criminal nature will be conducted by the local Bridgeport authorities. All Administrative and Criminal investigations will be published on the agency’s website.

Procedures:

1. **Sexual Abuse/Harassment Allegations:** CJM maintains policies to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to local authorities to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. CJM shall document all such referrals.

2. **Conducting Criminal Investigations:** Local authorities, Bridgeport Police Department shall be responsible for conducting criminal investigations, not CJM. CJM shall attempt to secure the publication describing the responsibilities of the local authorities and publish it on the agency’s website.
Corporation for Justice Management
Union House
Transition Program

PREA Standard:  115.231
Employee Training

Policy:

CJM shall train all staff who may have contact with Union House residents. Such training shall be tailored to the gender of the residents, which in this case is male. The staff shall receive additional training if they are reassigned from a facility that houses only male residents to a facility that houses only female residents, or vice versa.

Procedures:

1. **Training Content:** Staff must be trained in, and must sign a statement that they understand, the following:
   
   ➢ CJM’s zero tolerance for all forms of sexual abuse and sexual harassment;
   
   ➢ The resident’s right to be free from sexual abuse and sexual harassment;
   
   ➢ How to fulfill their responsibilities under CJM’s sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures;
   
   ➢ The dynamics of sexual abuse and sexual harassment in residential settings, including determining which residents are most vulnerable;
   
   ➢ The right of residents and staff to be free from retaliation for reporting sexual abuse or sexual harassment;
   
   ➢ How to detect and respond to signs of threatened and actual abuse;
   
   ➢ The common reactions of sexual abuse and sexual harassment victims;
   
   ➢ How to maintain professional boundaries with residents at all times;
   
   ➢ How to communicate effectively and professionally with all residents;
How to comply with relevant laws related to the mandatory reporting of sexual abuse to authorities.

2. **Training for Staff**: all current employees who have not received PREA training shall be trained within one year of the effective date of the PREA standards. From the effective date of PREA forward, new staff will be trained in PREA as part of their new hire orientation. Such training will occur within 30 days of the employee’s start with Union House.

In addition, CJM shall provide each staff with refresher training every two years to ensure they understand the agency’s current sexual abuse and sexual harassment policies and procedures. In years in which a staff does not receive refresher training, CJM shall provide refresher information on current sexual abuse and sexual harassment policies.
Policy:

CJM shall ensure that all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency’s sexual abuse and sexual harassment prevention, detection, and response policies and procedures.

Procedures:

A. Zero Tolerance:

All volunteers and contractors who have contact with residents will be notified and provided a copy of the agency’s zero tolerance policy regarding sexual abuse and sexual harassment and informed how to report sexual abuse.

B. Training:

The level and type of training provided to volunteers and contractors will be based on the services they provide and the level of contact they have with residents.

C. Documentation:

The agency will maintain documentation confirming that volunteers and contractors understand the training they have received.
Policy:

CJM shall ensure Union House residents receive information explaining the agency'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.

Procedures:

1. During the intake process, staff must notify all Union House residents that CJM:
   - Has zero tolerance for all forms of sexual abuse and sexual harassment;
   - Has multiple ways for residents to privately report sexual abuse and sexual harassment, retaliation by other residents or staff for reporting sexual abuse and sexual harassment and staff neglect or violation of responsibilities that may have contributed to such incidents; and
   - Has a way to report sexual abuse or sexual harassment to authorities, allowing the reporting resident to remain anonymous.

2. During intake, staff must complete the required form for each resident which indicates the resident has received the required notices. This form will be signed by the resident, along with the staff conducting the intake, and retained in the resident's file.
   - Once a resident has received the notices that resident does not need to acknowledge receipt of notice again, for a period of one year, so long as he remains in the Union House.

3. During intake, the resident must be referred to signage posted in the facility stating the zero tolerance policy.
4. CJM must utilize language assistance services to obtain a translation of this signage, if necessary. CJM must not rely on the services of residents to provide assistance to other residents with disabilities or who are limited English proficient.

5. CJM must provide refresher information whenever a resident is transferred to a different facility.

6. Union House must provide resident education in formats accessible to all residents, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled as well as residents who have limited reading skills. The programs must maintain documentation of resident participation in these education sessions.

7. In addition to providing such education, the Union House must ensure key information is continuously and readily available or visible to residents through posters, resident handbooks, or other written formats.
Corporation for Justice Management  
Union House  
Transition Program

PREA Standard:  115.234  
Specialized Training:  Investigations

Policy:

The PREA Coordinator shall investigate promptly, thoroughly and objectively all allegations of sexual abuse or sexual harassment including those from a third party. Any allegations determined to be criminal in nature shall be immediately reported to law enforcement for investigation. CJM shall cooperate with and assist with any request made by law enforcement. The PREA Coordinator shall endeavor to remain informed about the progress of the investigation.

If law enforcement determines there is no criminal activity, the facility will conduct its own administrative investigation into the incident. An administrative investigation shall be documented listing all findings including a determination whether staff actions or failures to act contributed to the incident.

Procedures:

Allegation of Sexual Abuse: upon learning a resident was sexually abused, the first staff member to respond must:

Not leave the victim alone;

Call the Person in Charge to request assistance from the Residential Supervisor, Program Manager, or Senior Management staff;

Call 911 to obtain transportation for the resident to Bridgeport Hospital for care and examination. Bridgeport Hospital is PREA compliant.

Separate the alleged victim and abuser, if applicable;

Preserve and protect the crime scene, if applicable;
If the abuse occurred within a time period that would still allow for the collection of physical evidence, request that the alleged victim not take any action that could destroy physical evidence, including washing, drinking or eating, unless medically indicated. If toileting needs to take place, the resident should be instructed to not wipe.

As soon as practical, CJM shall contact the CT Sexual Assault Crisis Center Services to arrange for a sexual assault advocate to go to Bridgeport Hospital where the resident is being transported.

CJM shall ensure the local and/or state authorities investigating the abuse have completed the required specialized training in conducting sexual abuse investigations and maintain documentation of such.
Policy:

CJM's Union House does not employ medical and mental health care staff.

Procedure:

Not applicable.
Corporation for Justice Management
Union House
Transition Program

PREA Standard: 115.241
Screening for Risk of Victimization and Abusiveness

Policy:

Upon admission CJM must ensure all residents are screened within 72 hours of intake to assess their risk of being sexually abused or being sexually abusive toward other residents utilizing the PREA intake screening assessment.

The resident shall be reassessed no later than 30 days from the arrival at the facility. This shall be incorporated in the resident’s service plan and reviewed in 30 days. Reassessments shall be noted in the progress notes of the resident’s files.

Residents shall also be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the resident’s risk of sexual victimization or abusiveness.

Residents will not be disciplined for refusing to answer or discuss information requested by the intake form.

Procedures:

1. **Assessment**: staff must follow the instructions on the assessment form for making this assessment by asking each resident questions about their perceived risk of being abused. Staff may also consider their own assessment of risk factors. Completed assessments must be retained with the program’s daily paperwork as well as in the resident’s file.

2. **Assessment Timeframe**: residents shall be assessed during the intake process or upon transfer to another facility. The assessment must take place within 72 hours of arrival at the facility.

3. **Assessment Content**: the screening shall consider, at a minimum, the following criteria to assess residents for risk of sexual victimization:
   - 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's criminal history is exclusively nonviolent;
- Whether the resident has prior convictions for sex offenses against an adult or child;
- Whether the resident is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;
- Whether the resident has previously experienced sexual victimization; and
- The resident's own perception of vulnerability.

The assessment 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.

4. **Re-assessment:** within a set time period, not to exceed 30 days from the resident's arrival at the facility, the facility will reassess the resident's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening.

A resident's risk level shall be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the resident's risk of sexual victimization or abusiveness.

5. **Failure to Answer Assessment Questions:** residents must not be disciplined for refusing to answer, or for not disclosing complete information in response to assessment questions.

6. **Confidentiality:** CJM shall implement appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this PREA Standard to ensure sensitive information is not exploited to the resident's detriment by staff or other residents.
Corporation for Justice Management
Union House
Transition Program

PREA Standard: 115.242
Use of Screening Information

Policy:

CJM is responsible for ensuring the safety of each resident in Union House.

Procedures:

1. **Risk Screening Information:** CJM shall use information from the risk screening required in PREA Standard 115.241 to inform 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.

2. **Individualized Determinations:** CJM shall make individualized determinations about how to ensure the safety of each resident.

   A. **Transgender or Intersex Residents:**
      
      - In deciding whether to assign a transgender or intersex resident to Union House and in making other housing and programmatic assignments, CJM shall consider on a case-by-case basis whether the placement would ensure the resident’s health and safety, and whether the placement would present management or security problems.
      
      - A transgender or intersex resident’s own views with respect to his safety shall be given serious consideration.
      
      - Transgender and intersex residents shall be given the opportunity to shower separately from other residents.

3. **Residential Placement:** CJM shall not place lesbian, gay, bisexual, transgender, or intersex residents in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated facility unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such residents.
Policy:

CJM shall provide multiple internal ways for residents and staff to privately report sexual abuse and sexual harassment, retaliation by other residents or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.

Procedures:

1. Resident Reporting:

   ➢ During the intake process, residents will be informed about the multiple ways to privately report sexual abuse and sexual harassment, retaliation by other residents or staff for reporting such behavior and staff neglect or violation of responsibilities that may have contributed to such incidents. How to report an incident of sexual abuse and/or sexual harassment will also be outlined in the resident handbook given at intake. All residents sign an acknowledgement form that they have received the handbook.

   ➢ Residents will also be informed of at least one way to report abuse or harassment to an office that is not part of the Union House programs and that is able to receive and immediately forward resident reports of sexual abuse and sexual harassment to CJM senior management, allowing the resident to remain anonymous upon request.

   ➢ The following are the ways in which an incident of sexual abuse and/or sexual harassment can be reported:

     1- Report the incident directly to your assigned Case Manager or any program staff;
     2- Make an anonymous written report of the incident and place it in the Grievance/Incident Box outside the monitor's office;
     3- Report the incident to the Program Manager;
     4- Report the incident to the Program Operations Director (Kim Harris or Vanessa Otero)
     5- Report the incident to Statewide 24 Hour Toll FREE Hotline
        1-888-999-5545 (ENGLISH)
        1-888-568-8332 (SPANISH)
Staff Reporting:

➤ Staff shall accept reports of sexual abuse and sexual harassment, retaliation by other residents or staff for reporting such behavior and staff neglect or violation of responsibilities that may have contributed to such incidents made verbally, in writing, anonymously, and from third parties, and shall promptly document any verbal reports.

➤ CJM shall provide a method for staff to privately report sexual abuse and sexual harassment of residents as described in the CJM Employee Handbook. (Refer to the “Communication and Problem Solving” and “Open Door” sections of the Handbook).
Corporation for Justice Management
Union House
Transition Program

PREA Standard: 115.252
Exhaustion of Administrative Remedies

Policy:

CJM shall have a formal process in place to address resident grievances regarding sexual abuse. CJM prohibits informal grievance processes or attempts to resolve with staff an alleged incident of sexual abuse.

Procedures:

1. **Time Limit:** CJM shall not impose a time limit on when a resident may submit a grievance regarding an allegation of sexual abuse.

2. **Grievance Process Guidelines:**
   - A resident who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint;
   - CJM shall ensure such grievance is not referred to a staff member who is the subject of the complaint;
   - CJM shall ensure a final decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance;
   - Computation of the 90-day time period shall not include time consumed by residents in preparing any administrative appeal;
   - CJM may claim an extension of time to respond, of up to 70 days, if the normal time period for response is insufficient to make an appropriate decision; CJM shall notify the resident in writing of any such extension and provide a date by which a decision will be made;
   - At any level of the administrative process, including the final level, if the resident does not receive a response within the time allotted for reply, including any properly noticed extension, the resident may consider the absence of a response to be a denial at that level;
   - Third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, shall be permitted to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of residents;
If a third party files such a request on behalf of a resident, CJM may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process;
If the resident declines to have the request processed on his or her behalf, CJM shall document the resident's decision; CJM shall establish procedures for the filing of an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse; After receiving an emergency grievance alleging a resident is subject to a substantial risk of imminent sexual abuse, CJM shall immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken, shall provide an initial response within 48 hours, and shall issue a final decision within 5 calendar days. The initial response and final agency decision shall document the agency's determination whether the resident is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance; CJM may discipline a resident for filing a grievance related to alleged sexual abuse only where the agency demonstrates that the resident filed the grievance in bad faith.
Corporation for Justice Management
Union House
Transition Program

PREA Standard: 115.253
Resident Access to Outside Confidential Support Services

Policy:

CJM shall provide residents with access to outside victim advocates for emotional support services related to sexual abuse.

Procedures:

1. Union House shall inform residents, prior to giving them access, of the extent to which their communications with outside victim advocates will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws.

2. Union House shall provide residents with mailing addresses and telephone numbers, including toll free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations. CJM shall enable reasonable communication between residents and these organizations in as confidential a manner as possible.

3. CJM shall maintain or attempt to enter into memoranda of understanding or other agreements with community service providers able to provide residents with confidential emotional support services related to sexual abuse. CJM shall maintain copies of such agreements or documentation showing attempts to enter into such agreements.
Corporation for Justice Management  
Union House  
Transition Program  

PREA Standard: 115.254  
Third Party Reporting  

Policy:  

CJM shall ensure a method exits to receive third party reports of sexual abuse and sexual harassment and shall distribute publicly information on how to report sexual abuse and sexual harassment on behalf of a resident via telephone, fax or in person. The facility email address, telephone and facsimile numbers are available publicly on CJM website.  

Procedures:  

1. Third Party Reporting:  

   ➢ All reports of sexual abuse and sexual harassment received from third parties shall be responded to according to CJM policy by agency staff.  

   ➢ Any staff receiving a third party report of sexual abuse or sexual harassment shall forward such report to their immediate supervisor who will in turn forward to the Program Manager and/or PREA Coordinator who will follow the proper PREA reporting guidelines.  

   ➢ Third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, shall be permitted to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of residents;  

   ➢ If a third party files such a request on behalf of a resident, CJM may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process;  

   ➢ If the resident declines to have the request processed on his or her behalf, CJM shall document the resident’s decision.
Corporation for Justice Management
Union House
Transition Program

PREA Standard: 115.261
Staff and Agency Reporting Duties

Policy:

CJM shall require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency; 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.

Procedures:

1. **Reporting Duties:** All staff must immediately report to the PREA Coordinator, the Program Manager/supervisory designee, the HR Director, or any supervisor or manager or senior management staff any knowledge, suspicion, or information regarding:

   - An incident of sexual abuse or sexual harassment that occurred in the program;
   - Retaliation against residents or staff who reported an incident of sexual abuse or sexual harassment;
   - Any staff neglect or violation of responsibilities that may have contributed to such an incident or retaliation.

   a. All reports of sexual abuse and sexual harassment that are received from third parties must be received and responded to according to policy by all staff.

   b. As soon as practical, CJM must report all allegations of sexual abuse, including third party and anonymous reports, to the local authorities for further investigation:

      - Call 911 to obtain transportation for the resident to Hartford Hospital which is PREA compliant;
      - When a resident states they have been sexually abused, staff must request that the resident not take any action that could destroy physical
evidence, including washing, drinking or eating, unless medically indicated; If toileting needs to take place, the resident should be instructed to not wipe;

➢ The Program Manager/supervisory designee must contact Connecticut Sexual Assault Crisis Services to arrange for a sexual assault advocate to go to the hospital where the resident is being transported.

c. All allegations of sexual harassment must be reported for investigation to the PREA Coordinator:

➢ Allegations of sexual harassment between residents will be reported for investigation by Union House;
➢ Allegations of sexual harassment of residents by staff will be reported for investigation by the Administrative Office of CJM.

d. Upon receiving an allegation that a resident was sexually abused while residing at Union House, the staff receiving this information must immediately notify the PREA Coordinator, the Program Manager or supervisory designee, the HR Director, or a supervisor, manager, or senior management staff.

➢ The person receiving such notice will immediately notify the PREA Coordinator, if the PREA Coordinator was not initially notified;
➢ The PREA Coordinator will notify the Administration of CJM as soon as possible, but not longer than by the end of the business day of the day the report of the allegation was received;
➢ The senior management of CJM must:

1. Institute the Incident Report process; and
2. Call the local authorities to begin a criminal investigation.

e. Upon receiving an allegation that a resident was sexually abused the Supervisor/Manager receiving this information must immediately notify the PREA Coordinator and document such report and notification in the facility log:

➢ The PREA Coordinator will notify the Administration of CJM as soon as possible, but not later than by the end of the business day of the day the report of the allegation was received.

1. The PREA Coordinator will keep a record of the details of the notification, including:

- All persons notified;
- Date and time of notification;
- Date and time notice of allegation was received;
- Any details of the allegation.
f. If the allegations of sexual abuse are reported to staff after the alleged victim has been transported to a medical facility, staff must:

- Notify the receiving facility of the allegation of sexual abuse and the victim's potential need for medical or social services unless the victim has requested otherwise;
- Complete an Incident Report in accordance with CJM procedures.

g. Apart from reporting to designated supervisors or agency officials, staff shall not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions.
Policy:

CJM shall conduct due diligence in ensuring all reasonable efforts to keep residents safe are consistently maintained.

Procedures:

1. Assessment:

All residents will be screened to assess their risk of being sexually abused. Staff will follow the instructions on the assessment form for making this assessment by asking each resident questions about their perceived risk of being abused. Staff will also consider their own assessment of risk factors.

Such assessment will first take place during intake and then every 30 days unless there is a need to conduct it more often. The completed assessments will be retained with the Union House daily paperwork as well as in the resident’s file.

2. Addressing Risk:

Substantial Risk of Imminent Sexual Abuse - When the program learns by any means of notice listed in this policy or by any other means that a resident is subject to a substantial risk of imminent sexual abuse, staff must take immediate action to protect the resident which may include:

- Consultation with Referral Source;
- Direct sight and sound supervision;
- Single room housing if available;
- Placement in a room with a staff member close enough to intervene quickly.

Any resident found to be at risk will be segregated during transportation in a CJM vehicle.
Corporation for Justice Management 
Union House 
Transition Program 

PREA Standard: 115.263 
Reporting to Other Confinement Facilities 

Policy: 

CJM shall respond to allegations that a resident was sexually abused while confined at another facility.

Procedures: 

1. Reporting Protocol: 

Upon receiving an allegation that a resident was sexually abused while confined at another facility, the Program Manager/PREA Coordinator of the program that received the allegation shall notify the head of the facility or appropriate office of the agency where the alleged abuse occurred.

2. Timely Reporting: 

Such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation.

3. Documentation: 

CJM shall document that is has provided such notification.

4. Investigation Responsibilities: 

The facility head or agency office that receives such notification is responsible for ensuring the allegation is investigated in accordance with PREA Standards.
Policy:
CJM shall take immediate action upon learning a resident was sexually abused via the Staff First Responder.

Procedures:

1. Allegation of Sexual Abuse:

Upon learning a resident was sexually abused, the first staff member to respond must:

- Not leave the victim alone;
- Call the Person in Charge to request the assistance from the Residential Supervisor, Program Manager, or Senior Management staff;
- Call 911 to obtain transportation for the resident to Bridgeport Hospital;
- Separate the alleged victim and abuser;
- Preserve and protect the crime scene;
- As soon as is practical contact the CT Sexual Assault Crisis Center to arrange for a sexual assault advocate to go to the hospital to meet with the resident.

2. Preserving the Crime Scene:

If the abuse occurred within a time period that would still allow for the collection of physical evidence, request that the alleged victim not take any action that could destroy physical evidence, including as appropriate washing, brushing teeth, changing clothes, smoking, urinating, defecating, drinking or eating, unless medically indicated. If toileting needs to take place, the resident should be instructed to not wipe.

If the abuse occurred within a time period that would still allow for the collection of physical evidence, request that the alleged abuser not take any action that could destroy physical evidence, including as appropriate washing, brushing teeth, changing clothes, smoking, urinating, defecating, drinking or eating, unless medically indicated. If toileting needs to take place, the resident should be instructed to not wipe.

3. PREA Incident Check Sheet:

The Staff First Responder will utilize the "PREA Incident Check Sheet" to ensure first responder duties are fulfilled in the required manner.
Policy:

CJM shall ensure a coordinated response to any incident of sexual abuse among staff first responders, investigators, and agency leadership.

Procedures:

A. First Responder Duties:

1. Allegation of Sexual Abuse:

Upon learning a resident was sexually abused, the first staff member to respond must:

- Not leave the victim alone;
- Call the Person in Charge to request the assistance from the Residential Supervisor, Program Manager, or senior management staff;
- Call 911 to obtain transportation for the resident to Bridgeport Hospital;
- Separate the alleged victim and abuser;
- Preserve and protect the crime scene;
- As soon as is practical contact the CT Sexual Assault Crisis Center to arrange for a sexual assault advocate to go to the hospital to meet with the resident.

2. Preserving the Crime Scene:

If the abuse occurred within a time period that would still allow for the collection of physical evidence, request that the alleged victim not take any action that could destroy physical evidence, including as appropriate washing, brushing teeth, changing clothes, smoking, urinating, defecating, drinking or eating, unless medically indicated. If toileting needs to take place, the resident should be instructed to not wipe.

If the abuse occurred within a time period that would still allow for the collection of physical evidence, request that the alleged abuser not take any action that could destroy
physical evidence, including as appropriate washing, brushing teeth, changing clothes, smoking, urinating, defecating, drinking or eating, unless medically indicated. If toileting needs to take place, the resident should be instructed to not wipe.

3. PREA Incident Check Sheet:

The Staff First Responder will utilize the “PREA Incident Check Sheet” to ensure first responder duties are fulfilled in the required manner.

B. Investigative Responsibilities:

1. Local and/or State Authorities:

CJM shall rely on local and/or state authorities to investigate allegations of sexual abuse.

2. Qualifications of Local and/or State Authorities:

CJM shall ensure the local and/or state authorities investigating the abuse have completed the required specialized training in conducting sexual abuse investigations and maintain documentation of such.

C. Responsibilities of CJM Leadership:

1. Reporting Duties:

All CJM staff must immediately report to the PREA Coordinator, the Program Manager/supervisory designee, the HR Director, or any supervisor or manager or senior management staff any knowledge, suspicion, or information regarding:

- An incident of sexual abuse that occurred in the program;
- Retaliation against residents or staff who reported an incident of sexual abuse;
- Any staff neglect or violation of responsibilities that may have contributed to such an incident or retaliation.

a. All reports of sexual abuse that are received from third parties must be received and responded to according to policy by all staff.

b. As soon as practical, CJM must report all allegations of sexual abuse, including third party and anonymous reports, to the local authorities for further investigation.
c. Upon receiving an allegation that a resident was sexually abused while residing at Union House, the staff receiving this information must immediately notify the PREA Coordinator, the Program Manager or supervisory designee, the HR Director, or a supervisor, manager, or senior management staff.

- The person receiving such notice will immediately notify the PREA Coordinator, if the PREA Coordinator was not initially notified;
- The PREA Coordinator will notify the Administration of CJM as soon as possible, but not longer than by the end of the business day of the day the report of the allegation was received;
- The senior management of CJM must:

  1. Institute the Incident Report process; and
  2. Call the local authorities to begin a criminal investigation if they have not already been contacted.

d. Upon receiving an allegation that a resident was sexually abused the Supervisor/Manager receiving this information must immediately notify the PREA Coordinator and document such report and notification in the facility log:

- The PREA Coordinator will notify the Administration of CJM as soon as possible, but not later than by the end of the business day of the day the report of the allegation was received.

  1. The PREA Coordinator will keep a record of the details of the notification, including:

- All persons notified;
- Date and time of notification;
- Date and time notice of allegation was received;
- Any details of the allegation.

e. If the allegations of sexual abuse are reported to staff after the alleged victim has been transported to a medical facility, staff must:

- Notify the receiving facility of the allegation of sexual abuse and the victim’s potential need for medical or social services unless the victim has requested otherwise;
- Complete an Incident Report in accordance with CJM procedures.

f. Apart from reporting to designated supervisors or agency officials, staff shall not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions.
Corporation for Justice Management
Union House
Transition Program

PREA Standard:  115.266
Preservation of Ability to Protect Residents from Contact with Abusers

Policy:

CJM is a private, non-profit agency. CJM staff are not unionized. CJM does not enter into collective bargaining agreements pertinent to staffing.

Procedures:

Not applicable.
Policy:

CJM shall ensure the protection of all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff. CJM will take appropriate measures to protect the individual from retaliation. Staff shall monitor retaliation for at least 90 days following a report of sexual abuse. The monitoring shall include periodic checks, use of monitoring equipment, and modified staffing levels as needed.

Procedures:

1. Protection Measures:

CJM shall employ all available measures to protect vulnerable residents from abuse or prevent abusers from having the opportunity to abuse by:

- Consulting with Referral Source;
- Removing alleged resident abusers from contact with victims;
- Removing alleged staff abusers from contact with victims;
- Monitoring resident rooms, including by direct observation, if necessary;
- Transferring potential victims/abusers to other facilities, if operationally possible;
- Segregation during transportation in transport vehicles;
- Actively monitoring the conduct and treatment of residents or staff who have reported abuse and of residents who have reported to have suffered abuse for signs of retaliation;
- Protecting individuals who cooperate in investigations who express fear of retaliation.
For at least 90 days following a report of sexual abuse, CJM shall monitor the conduct and treatment of residents or staff who reported the sexual abuse and of residents who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff, and shall act promptly to remedy any such retaliation.

Items CJM will monitor include any resident disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. CJM shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need. In the case of residents, such monitoring shall also include periodic status checks.

2. Monitoring Responsibilities:

CJM’s PREA Coordinators shall be charged with monitoring retaliation. CJM must remedy any signs of retaliation detected.

3. Unfounded Allegations:

The program’s obligation to protect against retaliation ends if any allegation is unfounded.
Policy:

CJM will conduct administrative investigations into allegations of sexual abuse and sexual harassment in a prompt, through and objective manner, including third-party anonymous reports.

CJM does not conduct criminal investigations. CJM will contact local authorities for such investigations. CJM shall request of local authorities that they use investigators who have received special training in sexual abuse investigations pursuant to PREA Standard 115.234. It will be at the discretion of the local authorities as to whether allegations of conduct that appears to be criminal be referred for prosecution. CJM will fully cooperate with investigators and endeavor to remain informed about the progress.

Procedures:

1. Allegations of Abuse/Harassment:

Upon learning of alleged sexual abuse or sexual harassment, CJM shall ensure Administrative Investigations:

- Include an effort to determine whether staff actions or failures to act contributed to the abuse;
- Be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings, if provided to the agency by investigators.

2. Report Retention:

CJM shall retain all written reports referenced above for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

3. Departure of Abuser or Victim:

The departure of the alleged abuser or victim from the employment or control of the program/agency shall not provide a basis for terminating an investigation.
Policy:

CJM shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual harassment are substantiated.

CJM will not make a determination as to whether allegations of sexual abuse are substantiated. This determination will be at the discretion of the local authorities conducting the investigation.

Procedures:

1. Allegations of Sexual Harassment:

   Allegations of sexual harassment are handled by CJM’s Human Resources Department which maintains policies and procedures to guide the process.

2. Allegations of Sexual Abuse:

   Allegations of sexual abuse are referred to the local authorities for investigation.
Policy:

CJM shall ensure residents who report sexual abuse are kept informed as to the status of the allegation.

Procedures:

Following an investigation into a resident’s allegation of sexual abuse suffered at Union House, CJM shall inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.

Since the local authorities are responsible for conducting such investigations, CJM shall request the relevant information from them in order to properly inform the resident.

1. Allegation of Staff Abuse:

Following a resident’s allegation that a staff member has committed sexual abuse against the resident, CJM shall subsequently inform the resident (unless it has determined the allegation is unfounded) whenever:

- The staff member is no longer posted within the resident’s unit;
- The staff member is no longer employed at the facility;
- The agency learns the staff member has been indicted on a charge related to sexual abuse within the program; or
- The agency learns the staff member has been convicted on a charge related to sexual abuse within the program.

2. Allegation of Resident Abuse:

Following a resident’s allegation that he has been sexually abused by another resident, CJM shall subsequently inform the alleged victim whenever:

- The agency learns the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or
The agency learns the alleged abuser has been convicted on a charge related to sexual abuse within the facility.

3. Documentation:

All such notifications or attempted notifications shall be documented and maintained by the PREA Coordinator.

4. Termination of Obligation:

CJM’s obligation to report under this standard shall terminate when the resident is discharged from the program.
Policy:

CJM shall ensure a prompt response to any allegation of sexual abuse or sexual harassment by a contractor or volunteer.

Procedures:

1. Removal from Agency Duties:

Any substantiated allegation of sexual abuse or sexual harassment by a contractor or volunteer shall be immediate grounds for removal from the program/agency.

2. Sexual Abuse:

Any contractor or volunteer who engages in sexual abuse shall be immediately prohibited from contact with residents. Such conduct will be reported to local authorities and relevant licensing bodies as applicable.

3. Remedial Measures:

CJM shall take appropriate remedial measures and consider whether to prohibit further contact with residents in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or vendor.
Policy:

CPA prohibits all sexual activity between residents and may discipline residents for such activity. CPA will, however, deem such activity to constitute sexual abuse if it determines that the activity is not coerced.

Procedures:

1. Disciplinary Sanctions:

   Union House residents shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following a finding that the resident engaged in resident-on-resident sexual abuse or following a criminal finding of guilt for resident-on-resident sexual abuse. Sanctions shall be commensurate with the nature and circumstances of the abuse committed, the resident’s disciplinary history, and the sanctions imposed for comparable offenses by other residents with similar histories.

   The disciplinary process shall consider whether a resident’s mental disabilities or mental illness contributed to his behavior when determining what type of sanction, if any, should be imposed.

   Union House may discipline a resident for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

2. Limitations:

   Union House does not offer therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse.

3. Good Faith Reporting:

   For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.
Corporation for Justice Management  
Union House  
Transition Program

PREA Standard: 115.282

Access to Emergency Medical and Mental Health Services

Policy:

CJM's will assure victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services. CJM will make immediate referrals to a licensed medical and mental health professional, or any outside support services to assess for crisis intervention, potential for suicide, the presence of stress or anxiety disorders, and long-termed follow up as outlined in PREA standard 115.253. The nature and scope services will be determined by medical and mental health practitioners according to their professional judgment.

Procedures:

➢ CJM does not have qualified medical or mental health practitioners at the facility. Staff will take steps pursuant to PREA standard 115.262 to protect the victim and notify the appropriate medical or mental health practitioner

➢ Any victim(s) of sexual assault or sexual abuse will be provided treatment and information about sexually transmitted diseases. Contraceptives and transmitted infections prophylaxis will be provided in accordance with professionally accepted standard of care by SAFE/SANE qualified staff.

➢ Any victim of sexual abuse or sexual assault shall have access to medical and mental health without financial burden regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.
Corporation for Justice Management
Union House
Transition Program

PREA Standard: 115.283
Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers

Policy:

CJM does not employ medical or mental health care staff. All residents in need of such care shall be referred to local medical and mental health providers for assistance. Continued medical and mental health will be provided as deemed appropriate by professionals.

Victims of sexual abuse will receive timely unimpeded access to emergency treatment and crisis intervention services at financial burden to the resident regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

Procedures:

1. Evaluation and Treatment:

Union House shall refer residents in need of medical and mental health care, pertinent to sexual abuse, to local hospital for appropriate treatment and information about sexually transmitted diseases in accordance with professionally standards of care by SAFE/SANE qualified staff.

2. Cost of Treatment:

Union House will offer continued medical and mental health treatment for victims and abusers provided by local medical facilities as deemed appropriate. Treatment will be provided at no cost to the resident(s).

3. Resident on Resident Abusers:

A mental health evaluation of all known resident on resident abusers will be conducted within 60 days of learning of such abuse history and offered treatment when deemed appropriate by mental health practitioner.
Corporation for Justice Management
Union House
Transition Program

PREA Standard:  115.286
Sexual Abuse Incident Reviews

Policy:

CJM shall ensure a sexual abuse incident review is conducted at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded.

Procedures:

A. Timing of the Investigation:

Reviews shall occur within 30 days of the conclusion of the investigation.

B. Review Team:

The review team shall include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners if available and applicable.

The review team shall:

➢ Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;

➢ Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility;

➢ Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse;

➢ Assess the adequacy of staffing levels in that area during different shifts;
➤ Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff, and

➤ Prepare a report of its findings and recommendations for improvement and submit such report to CJM's Executive Director and PREA Compliance Manager.

C. Incident Review Report:

The program shall implement the recommendations for improvement, provided adequate resources are available, or shall document its reasons for not doing so.
Corporation for Justice Management
Union House
Transition Program

PREA Standard: 115.287
Data Collection

Policy:

CJM shall collect accurate, uniform data for every allegation of sexual abuse at its programs using a standardized instrument and set of definitions.

Procedures:

A. Frequency:

CJM shall aggregate the incident based sexual abuse data annually.

B. Content:

The incident based data collected shall include, at minimum:

➢ data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.

CJM shall maintain, review, and collect data as needed from all available incident based documents including reports, investigation files, and sexual abuse incident reviews.

C. Dissemination of Reports:

Upon request, CJM shall provide all such data from the previous calendar year to the Department of Justice no later than June 30th of each year.
Corporation for Justice Management
Union House
Transition Program

PREA Standard: 115.288
Data Review for Corrective Action

Policy:

CJM shall review data collected and aggregated pursuant to Standard 115.287. The annual report shall be approved by the CEO and made readily available to the public through its website or other means requested.

Procedures:

A. Assessment:

CJM shall assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training by:

- Identifying problem areas;
- Taking corrective action on an ongoing basis.

B. Annual Report:

CJM shall prepare an annual report of its findings and any associated corrective action for its programs as well as the agency as a whole.

Such report shall include a comparison of the current year's data and corrective actions with those from prior years (as available) and shall provide an assessment of CJM's progress in addressing sexual abuse.

The report shall be approved by CJM's CEO Heriberto Flores and made readily available to the public through the CJM website.

C. Redacting Material from Annual Reports:

CJM shall redact specific material from the reports when publication would present a clear and specific threat to the safety and security of its programs, but will include the nature of the material redacted.
Corporation for Justice Management
Union House
Transition Program

PREA Standard: 115.289
Data Storage, Publication, and Destruction

Policy:

CJM shall ensure data collected pursuant to Standard 115.287 are securely retained and published on the agency’s website or other means upon request.

Procedures:

A. Data Publication:

CJM shall make all aggregated sexual abuse data from its programs readily available to the public at least annually via its website.

B. Data Redaction:

Before making aggregated sexual abuse data publically available, CJM shall remove all personal identifiers.

C. Data Maintenance:

CJM shall maintain sexual abuse data collected pursuant to Standard 115.287 for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise.
Policy:

CJM shall ensure audits pursuant to Standards 115.401-405 are conducted.

Procedures:

Refer to policies and procedures for Standards 115.401-405
Corporation for Justice Management  
Union House  
Transition Program

PREA Standard:  115.401  
Frequency and Scope of Audits

Policy:

CJM shall ensure audits pursuant to Standards 115.401-405 are conducted.

Procedures:

A. Frequency of Audits:

During the three-year period starting on August 20, 2013, and during each three-year period thereafter, CJM shall ensure its programs are audited at least once.

During each one-year period starting on August 20, 2013, CJM shall ensure at least one-third of its programs are audited.

B. Scope of Audits:

CJM will rely on the Department of Justice to develop and issue an audit instrument that will provide guidance on the conduct of and contents of the audit.

The agency shall bear the burden of demonstrating compliance with the standards.

The auditor shall review all relevant policies, procedures, reports, internal and external audits, and accreditations for the program.

The audits shall review, at a minimum, a sampling of relevant documents and other records and information for the most recent one-year period.

The auditor shall have access to, and shall observe, all areas of the audited program.

The auditor shall be permitted to request and receive copies of any relevant documents (including electronically stored information).

The auditor shall retain and preserve all documentation (including, e.g., video tapes and interview notes) relied upon in making audit determinations. Such documentation shall be provided to the Department of Justice upon request.
The auditor shall interview a representative sample of residents, staff, supervisors, and administrators.

The auditor shall review a sampling of any available videotapes and other electronically available data that may be relevant to the provisions being audited.

The auditor shall be permitted to conduct private interviews with residents.

Residents shall be permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel.

Auditors shall attempt to communicate with community-based or victim advocates who may have insight into relevant conditions in the program.