

PREA AUDIT: AUDITOR'S SUMMARY REPORT

ADULT PRISONS & JAILS



[Following information to be populated automatically from pre-audit questionnaire]

Name of facility:	Columbiana County Jail		
Physical address:	8473 County Home Road Lisbon, Ohio 44432		
Date report submitted:	10/08/2014		
Auditor Information James L. Roland Jr. – The Nakamoto Group			
Address:	11820 Parklawn Drive, Suite 240 Rockville, MD 20852		
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Telephone number:	419-610-5668		
Date of facility visit:	September 29-30, 2014		
Facility Information			
Facility mailing address: <i>(if different from above)</i>			
Telephone number:	330-424-4065		
The facility is:	<input type="checkbox"/> Military	<input type="checkbox"/> County	<input type="checkbox"/> Federal
	<input type="checkbox"/> Private for profit	<input type="checkbox"/> Municipal	<input checked="" type="checkbox"/> State
	<input type="checkbox"/> Private not for profit		
Facility Type:	<input checked="" type="checkbox"/> Jail	<input type="checkbox"/> Prison	
Name of PREA Compliance Manager:	Amanda J. Kegelmeyer	Title: PREA Compliance Manager/CO	
Email address: amanda.kegelmeyer@cecintl.com		Telephone number:	330-424-4065 ext. 316
Agency Information			
Name of agency:	Community Education Centers, Inc.		
Governing authority or parent agency: <i>(if applicable)</i>			
Physical address:	35 Fairfield Place - West Caldwell, NJ 07006		
Mailing address: <i>(if different from above)</i>			
Telephone number:	832-325-5807		

Agency Chief Executive Officer			
Name:	Robert Mackey	Title:	Senior Vice President
Email address:	Robert Mackey@cecintl.com	Telephone number:	973-226-2900 x 231
Agency-Wide PREA Coordinator			
Name:	Scott Faunce	Title:	Corporate PREA Coordinator
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AUDIT FINDINGS

NARRATIVE:

The Columbiana County Jail is operated by the Community Education Centers and endeavors to provide security to traditional local detention of sentenced and un-sentenced misdemeanants and felons. This facility makes every effort to substantially comply with the "Standards for Jails in Ohio." The Columbiana County Jail houses male and female inmates. The Columbiana County Jail serves all Criminal Justice Agencies in Columbiana County.

Mission Statement

To provide a safe and secure facility while promoting lifestyle changes and assist those in building a productive lawful lifestyle for re-entry back into the community.

An attempt will be made to provide inmates held at this facility a wide range of service in the following areas:

Medical/Mental Health Services

Food Services

Educational Improvement

Vocational Skills

Substance Abuse Counseling

Religious Services

Passive Recreation

Productive interaction with Positive Role Models

The provision of these services will at all times be geared towards the facility's ultimate goal of returning inmates to society with increased knowledge and skills. For those inmates desirous of improving their interaction with other members of society such knowledge and/or skills will assist them in becoming more productive members of their respective communities.

These services shall be provided and the Columbiana County Jail shall always be operated with the security and safety of the community as a top priority.

DESCRIPTION OF FACILITY CHARACTERISTICS:

Columbiana County Jail opened in January 1997. The full service jail has two housing units consisting of seven pods for male inmates for sentenced and non-sentenced offenders. The full service jail additionally consists of one post with six pods for sentenced and non-sentenced female offenders. CEC additionally operates a minimum security misdemeanor jail (MSJ) for sentenced non-violent misdemeanors. The MSJ facility has a rated capacity of 82 beds and is a

converted nursing home which was operated by the county until the mid 90's when it became the misdemeanor facility. At the time of this Audit the population was 80 males and 16 females.

SUMMARY OF AUDIT FINDINGS:

An exit meeting was held on September 30, 2014. with the following staff in attendance. Scott Faunce Agency PREA coordinator, Michelle Coffin, Deputy Director of QM, Doug Conn, Director of Operations and Supply, Gary Grimm, Warden, Seth Francis, Lietenant, Van Kridler, Medical Supervisor, and Amanda Kegelmeyer, Training, PREA Coordinator.

Number of standards exceeded:	0
Number of standards met:	41
Number of standards not met:	0
Not Applicable:	2

§115.11 - 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)

The facility exceeds the standard with their policies and practice. CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard. The facility PREA Plan has a zero tolerance as required by the standard. In addition to the agency PREA Coordinator, and facility PREA Compliance Manager.

§115.12 - Contracting with other entities for the confinement of inmates

- 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)

Not Applicable -The agency has not contracted with other entities for the confinement of inmates.

§115.13 – 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)

Warden Grimm completes an annual review of the post audits and staffing plan. The staffing plan indicates a staffing ratio of 1:8 during daytime hours and 1:7 during evening hours. There are adequate resources to meet PREA and other confinement requirements. The review included an assessment of the facilities' video monitoring systems, phone access and staffing levels. They do not operate below the critical post requirements. CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly support this standard. Documentation of unannounced rounds that cover all shifts was reviewed. The post orders of the Shift Commander have been updated. The video camera system consists of 32 cameras.

§115.14 – Youthful Inmates

- 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)

Not Applicable - They do not house youthful inmates at this facility.

§115.15 – 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)

Staff of the opposite gender is required to announce their presence when entering the inmate-housing unit(s). This is also noted in the log book and has been added to the post orders. This was documented during interviews with staff and inmates, as well as recorded in housing unit log books. Privacy notices are posted in each housing unit. CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard. There have been no cross gender strip or visual body cavity searches by non-medical staff in the past year. Staff have been trained on conducting pat-down searches of transgender and intersex inmates in a professional manner.

§115.16 – Inmates with Disabilities and Inmates 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)

CEC Corporate policy PREA 1200.06 clearly meet this standard. There is a Memorandum of Understanding (MOU) for interpreter services. Resident interpreters are not used.

§115.17 – 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)

Based on interviews with HR, all components of this standard are being met. CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard. Practices are also located in the HR Facility Guide. All employees/contractors have recently had their criminal background check completed. A tracking system is in place to ensure they will be completed every five years.

§115.18 – Upgrades to Facilities and Technology

- 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)

Modifications have been made to improve the facilities ability to protect the inmates from sexual abuse This includes installing eleven (11) additional cameras, 4 convex mirrors, and shower curtains with clear panels at head level and short enough to view the inmates feet. These modifications were done based on reviews by the facilities PREA team and facility staff.

§115.21 – 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)

CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard. Medical personnel determine if the inmate should be transported to Salem General Hospital for SAFE/SANE exam. A MOU is in place with Cristian House and the Family Recovery Center for victim advocate services. The telephone number is posted in each housing unit.

§115.22 – 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)

CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard. There has been one allegations of sexual abuse or sexual harassment in the past twelve months. A investigation was done and reviewed by the auditor. The case was ruled unfounded.

§115.31 – 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)

Training is a primary concern and focus at the Columbiana County Jail . The institution exceeds the basic training requirement by insuring all staff receives PREA training. CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard. All staff interviewed indicated that they received the required PREA training.

§115.32– 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)

Reviewed contractor and volunteer sign-in sheets for training received. PREA Compliance Manager conducts the same required training for volunteers, contractors, and employees.

§115.33 – Inmate 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)

At booking, inmates receive PREA information in the inmate handbook, which is also available in Spanish. There are posters throughout the facility and the phone number to call to report an incident is in each housing unit. The auditor reviewed the inmate training roster and the Inmate Personal Property Storage Record. CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard.

§115.34 – 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)

Detective Michael Helman is the investigator for all sexual abuse and sexual harassment allegations for the Columbiana County Sheriff's Department. The auditor reviewed his specialized training #203-19-nos, Beyond the Silence, Part 1. CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard.

§115.35 – 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)

The Health Care Administrator, a Registered Nurse, and all medical staff have received specialized training on victim identification, interviewing, reporting, and interventions for medical and mental health staff. CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard.

§115.41 – 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)

CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard. Interviews with the Booking Corrections Officer and Nurse verified that there is a thorough system for collecting this information and providing continued re-assessment and follow-up services as needed. This auditor reviewed the Assessment instrument CEC PREA Screener, corporate form C-7. There have been no reports of inmates at risk of sexual abuse victimization or sexual abusiveness toward other inmates in the past twelve months.

§115.42 – 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)

CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard. Interviews with the Booking Corrections Officer and Nurse verified that there is a thorough system for collecting this information and providing continued re-assessment and follow-up services as needed. This auditor reviewed the Assessment instrument CEC PREA Screener, corporate form C-7. The C-7 form is used to evaluate special needs or considerations for treatment and placement. There have been one report of inmates at risk of sexual abuse victimization or sexual abusiveness toward other inmates in the past twelve months. The case was investigated and ruled unfounded.

§115.43 – Protective Custody

- 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)

If an inmate was at risk of sexual victimization, they could temporarily be placed in one of the special housing cells and then transferred to another unit once it was indicated that the inmate would be safe. Placement would be discussed with the inmate before making that decision. There have been no inmates placed in this status in the past twelve months. CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard.

§115.51 – Inmate 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)

Based on staff and inmate interviews, this is clearly documented. The procedures for reporting are clearly stated in the inmate handbook, on posters and CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard.

§115.52 – 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)

CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard. Grievances were reviewed for compliance of the facility policies. No grievances were filed in last year that alleged sexual abuse in the past twelve months.

§115.53 – Inmate 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)

A MOU is in place with Cristina House and Family Recovery Services to provide outside confidential support services. Numbers are also provided for the U.S. Department of Justice Rape Hotline, Crime Tip line. Inmates and staff can access these emergency services and support through the free phone call services. The number is posted in each housing unit. CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard.

§115.54 – 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)

This information is made available to inmates through posters and their handbook.

§115.61 – 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)

CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard. This was also verified through interviews with random staff.

§115.62 – 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)

If an inmate was at risk of sexual victimization, they could temporarily be placed in one of the special housing cells and then transferred to another unit once it was indicated that the inmate would be safe. Placement would be discussed with the inmate before making that decision. There have been no inmates placed in this status in the past twelve months. CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard. This was also verified through interviews with random staff.

§115.63 – 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)

Operating procedures include all the components of this standard. This was also verified through interviews with Superintendent and PREA Coordinator. There have been no allegations in the past twelve months.

§115.64 – 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)

CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard. This was also verified through interviews with random staff. Each officer carries a "Quick Card" listing all the steps required of the first responder.

§115.65 – 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)

CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard. Each Officer carries a "Quick Card" which lists all the steps to aid in a coordinated response.

§115.66 – Preservation of ability to protect inmates 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)

CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard.

§115.67 – 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)

PREA Compliance Manager Amanda Kegelmeyer and Lt. Seth Ferguson are assigned to monitor for possible retaliation. CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard.

§115.68 – Post-Allegation Protective Custody

- 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)

Inmates could temporarily be placed in one of the special housing cells and then they would be transferred to segregated housing for protective custody. CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard.

§115.71 – 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)

CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard. During the last 12 months there have been one allegations of sexual abuse. The case was investigated and was ruled unfounded.

§115.72 – 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)

CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard.

§115.73 – Reporting to Inmate

- 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)

CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard. There was one allegation of sexual abuse or harassment in the past twelve months. This was investigated and ruled unfounded. The auditor reviewed documentation to confirm the inmate was notified of the outcome.

§115.76 – 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)

CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard. No cases against staff in the last twelve (12) months.

§115.77 – 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)

CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard. No cases against volunteers or contractors in the last twelve (12) months.

§115.78 – Disciplinary sanctions for inmates

- 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)

This is clearly stated in the inmate handbook. CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard. Appropriate measures must be taken to protect the due process rights of inmates who are, or who may be, subject to discipline.

§115.81 – Medical and mental health screenings; history of sexual abuse

- 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)

CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly covers all of the components. Through interviews with specialized staff, the facility has a thorough system for collecting this information and also has the capacity to provide continued re-assessment and follow-up services as needed. No inmates disclosed prior victimization during screening.

§115.82 – 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)

CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard.

§115.83 – 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)

MOU's are in place for the Cristina House and Family Recovery Services, to provide mental health care for victims and abusers. The facility also has a contract Mental Health Clinician contract doctor.

§115.86 – 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)

CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard. The review team consists of the Warden, asst. Warden, Medical staff, Shift supervisor and others as needed.

§115.87 – 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)

CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard.

§115.88 – 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)

CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard. Yearly data is posted on the CEC website.

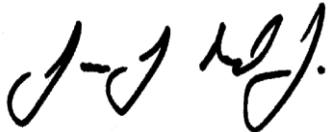
§§115.89 – Data Storage, Publication, and Destruction

- 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)

CEC Corporate policy PREA 1200.06 and Columbiana Standard Operating Procedure (SOP) 03.06.01 PREA clearly meet this standard. The 2013 Annual Report was reviewed.

AUDITOR 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.



October 8, 2014

Auditor Signature

Date