

**PREA AUDIT REPORT Interim Final
COMMUNITY CONFINEMENT FACILITIES**

Date of report: 18 November 2015

Auditor Information			
Auditor name: Thomas Donahue			
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Telephone number: (617) 909-0319			
Date of facility visit: 20 Oct 2015			
Facility Information			
Facility name: Stein House			
Facility physical address: 140 Sargeant St, Hartford, CT 06105			
Facility mailing address: SAA			
Facility telephone number: (860) 727-1974			
The facility is:	<input type="checkbox"/> Federal	<input type="checkbox"/> State	<input type="checkbox"/> County
	<input type="checkbox"/> Military	<input type="checkbox"/> Municipal	<input type="checkbox"/> Private for profit
	<input checked="" type="checkbox"/> Private not for profit		
Facility type:	<input type="checkbox"/> Community treatment center	<input type="checkbox"/> Community-based confinement facility	
	<input checked="" type="checkbox"/> Halfway house	<input type="checkbox"/> Mental health facility	
	<input type="checkbox"/> Alcohol or drug rehabilitation center	<input type="checkbox"/> Other	
Name of facility's Chief Executive Officer: Mark DeGiso			
Number of staff assigned to the facility in the last 12 months: Nine			
Designed facility capacity: Sixteen beds			
Current population of facility: Sixteen			
Facility security levels/inmate custody levels: Level One/Level One			
Age range of the population: 18 - 65 yrs.			
Name of PREA Compliance Manager: Mark DeGiso		Title: Program Director	
Email address: mdegiso@csimail.org		Telephone number: (860) 286-9633	
Agency Information			
Name of agency: Community Solutions Inc.			
Governing authority or parent agency: SAA			
Physical address: 340 West Newberry Rd., Hartford, CT 06002			
Mailing address: SAA			
Telephone number: (860) 683-7100			
Agency Chief Executive Officer			
Name: Robert Pidgeon		Title: President/CEO	
Email address: bpidgeon@csimail.org		Telephone number: (860) 683-7100	
Agency-Wide PREA Coordinator			
Name: Kristen Cappelletti		Title: PREA Coordinator	
Email address: kcappelletti@csimail.org		Telephone number: (860) 683-7100	

AUDIT FINDINGS

NARRATIVE

A PREA Audit was conducted at the Community Solutions Inc., Stein House, in Hartford, CT on 20 October, 2015. The two persons conducting the audit were Thomas Donahue (certified PREA Auditor employed by Sparks Security) and Todd Sturgeon (Vice President Operations for Sparks Security). Interviewed was Sherry Albert as designee Agency Head; Lyndsey McLaughlin, Human Resources Director; and Kristen Cappelletti as PREA Coordinator, Retaliation Monitor (in conjunction with the Program Director), Agency Wide PREA Investigator and Incident Review Team Member. Mark DeGiso is the Program Director and was interviewed in that capacity. During the six weeks prior to the audit, a comprehensive review was conducted of Agency and Facility policies and procedures.

The audit team interviewed approximately thirty five percent of the population, equal to six residents. The audit team also interviewed three random staff representing two of the three shifts. Additional staff interviewed included two Intake staff. The facility does not employ medical or mental health staff, utilizing those services from the community. Stein House provided the audit team with two private locations to conduct interviews with both staff and residents. Interviews were conducted during the Day Watch. The staff interviewed was both articulate and knowledgeable on the subject of their duties and specifically those aspects of PREA that were of potential impact to their positions. The overall impression was one of a well-trained and professional work force.

Stein House serves the Connecticut Department of Correction (CT DOC) as a male work release program that offers a continuum of services designed to prepare offenders for transition back into the community. Services include room and board, needs assessment and development of individual treatment plans, employment readiness, financial management, GED and housing referrals, cognitive behavioral groups, problem solving, life skills and individual and group counseling. Potential residents of the program are referred by the CT DOC Community Services Division. These referrals must meet the eligibility criteria for community release as established by the CT DOC. The average length of stay at Stein House is one hundred twenty days for individuals within one hundred twenty days of discharge from sentence or release to Parole or Transitional Supervision. Admission is only by CT DOC referral.

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

The Stein House maintains a zero tolerance toward all forms of sexual abuse/harassment. Staff that become aware of or suspect sexual abuse or sexual harassment must report it immediately. Any incident determined to be a criminal matter will be reported to law enforcement. During the previous year, there were no sexual abuse or harassment allegations.

DESCRIPTION OF FACILITY CHARACTERISTICS



Located 140 Sargeant St., Hartford, CT, the Stein House is a dated Victorian-style home located in a crowded, residential Hartford neighborhood. Entry doors are locked and the house is protected with a wrap-around, chain-link fence that completely encloses the rear of the facility. As a result, passersby do not have access to the Stein House through the rear entrance. The backyard is used for outdoor recreation and is supervised by a staff member.

Stein House is a four level building which includes: basement level for recreation and storage; street level with administrative offices, recreation room, and kitchen; second and third levels which are resident bedrooms. Bathrooms and showers on the second and third floors offer privacy.

There is no video monitoring system at the Stein House.

Multiple PREA postings (including PREA auditor notice) were posted throughout the Stein House, including the correct emergency hotline numbers.

Coin operated laundry facilities are on-site. Food service incorporates precooked food delivered from the CSI main kitchen located in Bloomfield, CT. There are kitchen facilities on-site. Resident rooms were two, three, or four beds each. Each bed appeared to have its own dresser. Electrical service appeared to be adequate for television and other electronics owned by the residents; however extension cords with multi-outlets were in evidence. The building has a resident lounge/TV room. All furniture observed appeared to be in fair condition. Outside grounds appeared to be adequately maintained.

SUMMARY OF AUDIT FINDINGS

Number of standards exceeded: 0
Number of standards met: 37
Number of standards not met: 0
Number of standards not applicable: 2

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

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

The Stein House maintains a zero tolerance policy toward all forms of sexual assault, abuse and harassment. Governing policy is "CSI Adult Work Release Policy Manual, Page 123, Section 38, "Sexual Abuse and Harassment", subsection 12.0, "PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES", Section 1 "Policy"" which describes the agency's zero tolerance policy. The "CSI Adult Work Release Policy Manual, Page 123, Section 38, "Sexual Abuse and Harassment", subsection 12.0, "PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES"" defines what PREA is, the actions of the PREA Coordinator, staff responsibilities for monitoring, response plan, referrals and investigation protocols. The agency has designated an upper-level, agency-wide PREA coordinator, with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its community confinement facilities. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

Standard 115.212 Contracting with other entities for the confinement of residents

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

The Stein House is not a "public agency" as stipulated in the standard, thus the standard is determined to be "**Not Applicable**" to the Stein House.

Standard 115.213 Supervision and monitoring

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

The Stein House has a "Master Staffing Schedule." This documents staff deployment over all shifts for all staff "CSI Adult Work Release Policy Manual, Page 123, Section 38, "Sexual Abuse and Harassment", subsection 12.0, "PREA (PRISON RAPE

ELIMINATION ACT) POLICIES & PROCEDURES", Section 4 "Prevention Planning", subsection B "Staffing Plan" dictates that the program is not permitted to deviate from authorized deployment levels, even if it results in management having to fill vacant slots. The annual security review shows that the facility does perform annual reviews of the requisite areas mandated in the standard. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

Standard 115.215 Limits to cross-gender viewing and searches

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

The Stein House does not conduct cross-gender, or any other type of strip search; such searches are prohibited by policy except in exigent circumstances. There have been no instances of a strip search occurring at the Stein House. This was also verified through staff and resident interviews. The facility does not accept female residents. Training provided to all staff covers a policy prohibition against conducting any kind of search of a transgender or intersex resident for the sole purpose of determining genital status. Training provided to all staff covers the methods and manner of how to conduct cross-gender pat-down searches, and searches of transgender and intersex residents, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. Training attendance was verified through inspection of training logs and sign-in sheets. Curriculum was contained in "CSI PREA Training" handout as well as in the "CSI PREA Training Power Point," slides #12 and 20. Governing policy includes the "CSI Adult Work Release Policy Manual, Page 123, Section 38, "Sexual Abuse and Harassment", subsection 12.0, "PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES", Section 4 "Prevention Planning," subsection C "Cross Gender Viewing and Searches". The Stein House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

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

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

Governing policy includes the "CSI Adult Work Release Policy Manual, Page 123, Section 38, "Sexual Abuse and Harassment", subsection 12.0, "PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES", section 4, subsection D "Residents with Disabilities and Residents That Are Limited English Proficient" which states that residents with disabilities and/or limited English proficiency will have every opportunity

to participate in all aspects of sexual abuse and sexual harassment prevention, detection and response. That same policy prohibits the utilization of resident interpreters, readers, or assistants in matters involving PREA issues. Interpretive services are available through the CT DOC and may be accessed via telephone. Education of residents is accomplished via CSI PREA Brochure (published in English and Spanish) and, "Ending Silence, Don't Touch Me", a graphic novel. It must be noted that, as a work release center, the Stein House does not accept significantly disabled residents. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

Standard 115.217 Hiring and promotion decisions

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

"CSI Adult Work Release Policy Manual, Page 123, Section 38, "Sexual Abuse and Harassment", subsection 12.0, "PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES", Section 4, "Prevention Planning", Subsection E, "Hiring and Promotion Decisions", and "CSI Administrative Policies" Section 2, "Personnel Policies" serve to show that the agency takes significant steps to ensure that they do not hire staff or contractors or promote anyone who may have contact with residents who has any history of having engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. § 1997) or has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or has been civilly or administratively adjudicated to have engaged in the activity described above. It is also evident from review of these documents and interviews conducted with the Human Resources Director that the agency considers any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with residents. "CSI Adult Work Release Policy Manual, Page 123, Section 38, "Sexual Abuse and Harassment", subsection 12.0, "PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES", Section 4, "Prevention Planning", Subsection E, "Hiring and Promotion Decisions" sub-section 1 stipulates the policy mandating five-year background checks conducted on current employees. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

Standard 115.218 Upgrades to facilities and technologies

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

The Stein House has not acquired any new facilities or upgraded any equipment during

the reporting period. “CSI Adult Work Release Policy Manual, Page 123, Section 38, “Sexual Abuse and Harassment”, subsection 12.0, “PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES”, Section 4, “Prevention Planning”, Sub-section F, “Upgrades to Facilities and Technology” mandates that, if the agency were to acquire a new facility or upgrade an existing facility, the agency will consider the effect of the design in protecting residents from sexual abuse. Stein House does not have a video monitoring system. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be **“Meets Standard”** for this standard.

Standard 115.221 Evidence protocol and forensic medical examinations

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

Relevant documentation reviewed includes a memorandum to the Hartford Police Department informing them of the requirements of 115.221 as they pertain to evidence protocol and forensic medical examinations resulting from incidents alleged to occur in the Stein House. The Stein House does not accept youthful residents as defined in PREA standards. SAFE/SANE examinations are conducted at Saint Francis Hospital, Hartford, CT or UCONN Medical Center, Farmington, CT at no cost to the victim. This is affirmed in “CSI Adult Work Release Policy Manual, Page 123, Section 38, “Sexual Abuse and Harassment”, subsection 12.0, “PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES”, section 11, “Medical, and Mental Health Care.” The Stein House complies in all material ways with the standard for the relevant review period and is determined to be **“Meets Standard”** for this standard.

Standard 115.222 Policies to ensure referrals of allegations for investigations

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

Stein House does maintain policies which mandate that all reported incidents of sexual assault/abuse will be immediately reported to the Hartford Police Department for investigation. Said policy further states that the PREA Coordinator shall ensure any report of sexual assault/abuse or harassment, determined to be non-criminal by law enforcement will be administratively investigated. Governing policy is “CSI Adult Work Release Policy Manual, Page 123, Section 38, “Sexual Abuse and Harassment”, subsection 12.0, “PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES”, section 8, “Official Response Following Resident Report” and section 9 “Investigations”. There have been no such incidents or allegations made during the reporting period, thus there is no sample documentation available for review. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be **“Meets Standard”** for this standard.

Standard 115.231 Employee Training

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

Stein House trains all employees who may have contact with residents on all of the requisite points as mandated in the standard. Governing standard is "CSI Adult Work Release Policy Manual", Page 123, Section 38, "Sexual Abuse and Harassment", subsection 12.0, "PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES", Section 6, "Training and Education" which mandates that, during employee orientation as well as annually, employees are trained on PREA policies and obligations. Review of the lesson plan contained in the "CSI PREA Training" power point shows all required areas are covered. Sign-in sheets were reviewed showing that employees sign in and acknowledge the training received. All nine of the Stein House work force (100%) has received their annual training. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

Standard 115.232 Volunteer and contractor training

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

Stein House has a policy in place to train contractors and volunteers in the form of "CSI Adult Work Release Policy Manual, Page 123, Section 38, "Sexual Abuse and Harassment", subsection 12.0, "PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES", Section 6 "Training and Education". That same policy mandates that, absent this training, no contractor or volunteer will be permitted contact with residents and will be escorted and supervised by staff at all times. Those contractors entering the house are limited to maintenance functions and are always under constant escort by staff. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

Standard 115.233 Resident Education

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

The Stein House ensures that residents receive information explaining the requisite subjects during the intake process. Residents receive information explaining the facility's zero-tolerance policy regarding sexual abuse and sexual harassment, how to

report incidents or suspicions of sexual abuse or sexual harassment, their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. Stein House is not a Direct Intake facility, in that all residents are transferred from other facilities and are subject to the intake procedures. All residents receive a handout entitled, “What You Should Know About Sexual Assault, Sexual Abuse and Sexual Harassment”. They also receive a copy of the facility “Zero Tolerance Policy” and a copy of the “CSI AWR Resident Handbook,” both of which serve to provide the necessary education. The Stein House also provides resident education in formats accessible to all residents, including those who are limited English proficient, and deaf. Visually impaired or otherwise disabled residents are not accepted at Stein House, as this is a work release facility without provisions for those types of residents. Fifty five inmates were admitted during the past twelve months and received resident education materials on entry. Five resident files were reviewed and documentation of education was determined to be in order. Resident interviews further indicated a well-informed population with sufficient knowledge and understanding of their rights to be free from sexual abuse/harassment and how to report such incidents should they occur. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be **“Meets Standard”** for this standard.

Standard 115.234 Specialized training: Investigations

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

Stein House does not conduct criminal investigations due to lack of jurisdiction. Prior to this audit, CSI was conducting Administrative Investigations without the requisite training and certification (as documented in their 2013-14 annual reports). This was non-compliant with standard 115.234. At the time of this report, CSI has one trained investigator who will conduct any future Administrative investigations of a PREA nature. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be **“Meets Standard”** for this standard.

Standard 115.235 Specialized training: Medical and mental health care

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

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

Standard 115.241 Screening for risk of victimization and abusiveness

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

The Stein House subjects each arriving resident to an Intake screening in order to ascertain potential risk of sexual abuse by other residents or being sexually abusive toward other residents. Intake screening occurs immediately upon arrival at the facility. Intake staff accomplishes the Intake screening. The "Sexual Violence Assessment Tool for Adult Males" form is utilized to ensure that all of the requisite factors are evaluated, including; whether the resident has a mental, physical, or developmental disability; the age of the resident; the physical build of the resident; whether the resident has previously been incarcerated; whether the resident is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming; the intake screening also considers prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to the agency, in assessing residents for risk of being sexually abusive; whether the resident has a serious and/or lengthy history of violent offenses; whether the resident has previously experienced sexual victimization; and the resident's own perception of vulnerability. Per agreement with the CT DOC, the Stein House does not accept any resident with a history of sexual offenses or misconduct. Per "CSI Adult Work Release Policy Manual, Page 123, Section 38, "Sexual Abuse and Harassment", subsection 12.0, "PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES", section 6, "Training and Education", subsection F, "Screening for Risk of Victimization and Abusiveness" mandates that reassessment will occur on the twenty-ninth day after arrival. Reassessment will be noted in the resident's case notes. In the event of any new information or any incident related to a resident's safety or risk of victimization the Program Manager will conduct the reassessment and immediately take appropriate action to ensure the resident's safety. This policy also states that residents will not be disciplined for refusing to answer, or discuss information related to mental/physical disability, sexual orientation, previous victimization, or a resident's perception of vulnerability. All information gathered pursuant to intake screening and subsequent reassessment(s) is contained within the resident file that is restricted to Case Managers and Program Director access. A random review of five resident files showed intake screening and reassessments were occurring as mandated by policy. During interviews, all of the residents stated they were asked the questions listed on the Sexual Violence Assessment Tool upon intake to the facility. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

Standard 115.242 Use of screening information

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

Stein House uses information from risk screening to assess housing, bed, work, education, and program assignments with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive. “CSI Adult Work Release Policy Manual, Page 123, Section 38, “Sexual Abuse and Harassment”, subsection 12.0, “PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES”, section 6, “Training and Education”, subsection F, “Screening for Risk of Victimization and Abusiveness” states that upon obtaining any new information or incident related to safety or risk of victimization the Program Manager will conduct a reassessment and take immediate action to ensure the safety of a potential victim. Subsection G of that same policy, “Use of Screening Information” states that individual determinations will be made on a case-by-case basis utilizing the screening information. The “CSI Adult Work Release Policy Manual, Page 123, Section 38, “Sexual Abuse and Harassment”, subsection 12.0, “PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES” states that risk factors are considered in making housing and programming assignments. During screening, the intake package is reviewed for indicators which would identify potential victims or predators. Stein House does not accept female residents. There were no transgender or intersex residents at the facility. There were no dedicated facilities, units, or wings solely for housing residents based on such identification or status. All showering is accomplished separately. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be **“Meets Standard”** for this standard.

Standard 115.251 Resident reporting

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

The Stein House provides multiple internal 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. Residents can report directly to staff, including to the Program Manager, via written memo, verbally, anonymously, or from a third party to any staff member. Residents are permitted to retain cell phones and thus are able to contact facility administration, outside

agencies, CT DOC hotlines or law enforcement agencies telephonically. Since these are private phones, they are not monitored. In short, there are no limitations placed on residents or their ability to report issues of this sort. Reporting rights are outlined in the "CSI Adult Work Release Policy Manual, Page 123, Section 38, "Sexual Abuse and Harassment", subsection 12.0, "PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES", section 7, "Reporting", subsection A, "Resident Reporting"; subsection B, "Staff Reporting"; PREA posters and flyers posted throughout the facility, and the "CSI AWR Resident Handbook" p.22, "Abuse". Staff is mandated to document any verbal or third party reports immediately. Staff is permitted to report issues privately, as stated in the "CSI PREA Training" power point lesson plan, slide #19. During the interview process, both staff and residents were aware of the reporting policies as stated above. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

Standard 115.252 Exhaustion of administrative remedies

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

The Stein House is subject to administrative remedies in the case of sexual abuse/harassment issues as outlined in "CSI Adult Work Release Policy Manual" page 78, "Client Grievance Procedures", subsection 6.0, "CSI Grievances Regarding Sexual Abuse". Said policy reads virtually word-for-word with PREA Standard 115.252. To date there have been no grievances filed under this section. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

Standard 115.253 Resident access to outside confidential support services

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

"CSI Adult Work Release Policy Manual, Page 123, Section 38, "Sexual Abuse and Harassment", subsection 12.0, "PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES", Section 7, "Reporting"; subsection D, "Resident Access to Outside Confidential Support Services" mandates that the facility shall provide residents with contact information to outside victim advocates and support services. Since residents retain personal cell phones, contact is made in as confidential

a manner as possible. Since these are private cell phones, the extent to which such communications will be monitored is non-existent. Stein House has entered into an MOU with Connecticut Sexual Assault Crisis Services (CONNSACS) on 30 January 2015 to provide these services and maintains copies of that agreement. Residents are not limited to that organization as they have the ability to contact anyone, anywhere. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be **“Meets Standard”** for this standard.

Standard 115.254 Third-party reporting

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

“CSI Adult Work Release Policy Manual, Page 123, Section 38, “Sexual Abuse and Harassment”, subsection 12.0, “PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES”, Section 7, “Reporting”; subsection D, “Resident Access to Outside Confidential Support Services” governs third party reporting of sexual abuse and harassment. The Stein House has the PREA poster prominently displayed throughout the facility in all resident occupied areas, with contact numbers for the CT DOC PREA Hotline, the CSP PREA Hotline, and the Connecticut Sexual Assault Crisis Services (CONNSACS) Hotline. Stein House has established a method to receive third-party reports of sexual abuse and sexual harassment by posting their phone number and email address on their publicly available web page as well as their stance of zero tolerance and mandatory reporting of sexual abuse and sexual harassment. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be **“Meets Standard”** for this standard.

Standard 115.261 Staff and agency reporting duties

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

The Stein House requires all staff to report immediately any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment; retaliation against residents or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. The requirement is embodied within “CSI Adult Work Release Policy Manual, Page 123, Section 38, “Sexual Abuse and Harassment”, subsection 12.0, “PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES”, sections 8, “Official Response Following Resident Report” subsection A, “Staff and Agency Reporting

Duties". "CSI PREA Training" power point slides #17 and #19 documents the requirement and training of staff to maintain confidentiality of information related to a sexual abuse report. Stein House does not have medical or mental health practitioners working in the facility. Stein House does not accept residents under the age of 18. Stein House mandates all allegations of sexual abuse and sexual harassment, including third party and anonymous reports, be forwarded to the facility's Program Manager. Staff members also indicated their knowledge and understanding of the reporting requirements during interviews. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be **"Meets Standard"** for this standard.

Standard 115.262 Agency protection duties

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

Stein House mandates that immediate action to protect the resident be taken upon learning that a resident is subject to a substantial risk of imminent sexual abuse. This mandate is encompassed "CSI Adult Work Release Policy Manual, Page 123, Section 38, "Sexual Abuse and Harassment", subsection 12.0, "PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES", section 8, "Official Response Following Resident Report" subsection B "Agency Protection Duties". There have been no such determinations within the reporting period. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be **"Meets Standard"** for this standard.

Standard 115.263 Reporting to other confinement facilities

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

"CSI Adult Work Release Policy Manual, Page 123, Section 38, "Sexual Abuse and Harassment", subsection 12.0, "PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES", section 8, "Official Response Following Resident Report" subsection C, "Reporting to Other Confinement Facilities" states that, upon receiving an allegation that a resident was sexually abused while confined at another facility, the Program Manager shall notify the CT DOC Parole Office. All residents accepted to Stein House arrive under the custody of the CT DOC Parole Office and arrive from a CT DOC facility or another halfway house but still under their custody. Policy mandates such notification shall be provided immediately after receiving the allegation and that such notification shall be documented. There have been no such incidents within the reporting period. The Stein House complies in all material ways

with the standard for the relevant review period and is determined to be **“Meets Standard”** for this standard.

Standard 115.264 Staff first responder duties

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

“CSI Adult Work Release Policy Manual, Page 123, Section 38, “Sexual Abuse and Harassment”, subsection 12.0, “PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES”, section 8, “Official Response Following Resident Report” subsection D “Staff First Responders” and subsection E “Coordinated Response” outline the responsibilities of first responder staff members. The Stein House also provides a “Sexual Abuse Incident Coordinated Response Plan” to ensure that all mandated requirements and processes are accomplished. Upon learning of an allegation that a resident was sexually abused, the first security staff member to respond to the report shall be required to: ensure the safety of the alleged victim from the alleged aggressor/abuser; notify a supervisor, duty officer and program manager; identify, separate and secure the residents involved; ensure that the victim is not left alone; identify the crime scene; maintain the security and integrity of the crime scene. If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, changing clothes, defecating, drinking, or eating. All staff members at the Stein House are “Security Staff” by definition. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be **“Meets Standard”** for this standard.

Standard 115.265 Coordinated response

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

Stein House maintains a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, investigators, and facility leadership. Said plan is delineated “CSI Adult Work Release Policy Manual, Page 123, Section 38, “Sexual Abuse and Harassment”, subsection 12.0, “PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES”, section 8, “Official Response Following Resident Report” subsection D “Staff First Responders” and subsection E “Coordinated Response” and in the “Sexual Abuse Incident Coordinated Response Plan”. The plan generally outlines the actions of the various personnel in order to achieve a unified and coordinated response. There have been no occasions requiring a coordinated response during the reporting period. The Stein House complies

in all material ways with the standard for the relevant review period and is determined to be **“Meets Standard”** for this standard.

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

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

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

Standard 115.267 Agency protections 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)

The Stein House has established “CSI Adult Work Release Policy Manual, Page 123, Section 38, “Sexual Abuse and Harassment”, subsection 12.0, “PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES”, section 8, “Official Response Following Resident Report” subsection G, “Agency Protection Against Retaliation” to 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 and to designate which staff members are charged with monitoring retaliation. Resident victims or abusers may be subject to transfer or remand at the discretion of the CT DOC Parole Services or removal at the discretion of CSI. Alleged staff abusers would also be subject to removal from resident contact, again at the discretion of the CT DOC Parole Services or CSI. Emotional support services for residents are handled via MOU with Connecticut Sexual Assault Crisis Services (CONNSACS). The Stein House Program Manager/PREA Coordinator would monitor the conduct and treatment of residents or staff. During interview, the Program Manager indicated that he would accomplish detection of retaliation by watching for isolation, mood changes, behaviors other than normal and different interactions between staff and residents. He also indicated that they would utilize other staff to gain information on issues of this nature. Monitoring would take place on individuals who reported the sexual abuse and/or who were reported to have suffered sexual abuse in order to

detect changes that may suggest possible retaliation by residents or staff and would enable the administration to act promptly to remedy any such retaliation. Monitoring would continue for as long as those individuals were in the Stein House program. No such incidents of retaliation have ever occurred at the Stein House. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be **“Meets Standard”** for this standard.

Standard 115.271 Criminal and administrative agency investigations

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

Administrative investigations into allegations of sexual abuse and sexual harassment at the Stein House would be conducted by the CSI Agency Wide PREA Coordinator Kristen Cappelletti. Investigations would be prompt, thorough and in an objective manner for all allegations, including third-party and anonymous reports. Policy governing investigations is promulgated via “CSI Adult Work Release Policy Manual, Page 123, Section 38, “Sexual Abuse and Harassment”, subsection 12.0, “PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES”, sections 9, “Investigations”, subsection A, “Criminal and Administrative Agency Investigations. Neither CSI nor Stein House has the authority to compel interview or to mandate a polygraph examination or utilize other truth-telling devices for any reason. By policy standard investigation protocols are utilized for investigations. Written reports document investigative findings including whether staff actions or failures to act contributed to the incident. Issues of a criminal nature are investigated by the Bloomfield Police Department independently of the Stein House. A letter was sent to and acknowledged by the Bloomfield Police Department requesting that such investigations shall be conducted pursuant to the above requirements. To date, there have been no investigations arising from incidents occurring within the Stein House. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be **“Meets Standard”** for this standard.

Standard 115.272 Evidentiary standard for administrative investigations

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

The Stein House maintains a “preponderance of evidence” standard for administrative investigations as outlined in “CSI Adult Work Release Policy Manual, Page 123, Section 38, “Sexual Abuse and Harassment”, subsection 12.0, “PREA (PRISON RAPE

ELIMINATION ACT) POLICIES & PROCEDURES", section 9 "Investigations" subsection B "Evidentiary Standard for Administrative Investigations". The Stein House complies in all material ways with the standard for the relevant review period and is determined to be "Meets Standard" for this standard.

Standard 115.273 Reporting to residents

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

Stein House has not had an incident/investigation that would necessitate notification pursuant to this standard. Stein House does maintain a policy, "CSI Adult Work Release Policy Manual, Page 123, Section 38, "Sexual Abuse and Harassment", subsection 12.0, "PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES", section 9,"Investigations", subsection C "Reporting to Residents" and Section 10, "Discipline" subsection A "Discipline Sanctions for Staff" and subsection C "Discipline Sanctions for Residents" which encompass all aspects of the standard. Notification will be documented via incident report. When an investigation is conducted by an outside law enforcement agency, that agency has no obligation to share the results thereof with the Stein House; however, a request for those results would be made and documented. It is noted that, under the current arrangement between the Stein House and the CT DOC Division of Parole, it is virtually inconceivable that a resident would still be housed at the Stein House by the time such an investigation was completed and notification became warranted, thus their obligation under this standard would be negated. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

Standard 115.276 Disciplinary sanctions for staff

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

The Stein House has established "CSI Adult Work Release Policy Manual, Page 123, Section 38, "Sexual Abuse and Harassment", subsection 12.0, "PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES", Section 10, "Discipline" subsection A "Discipline Sanctions for Staff" which encompasses all aspects of the standard and stipulates that staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. All allegations of violation of agency sexual abuse or sexual harassment policies would be referred to law enforcement agencies prior to any investigation on the part of the Stein House unless the activity was clearly not criminal. The Stein House complies in all

material ways with the standard for the relevant review period and is determined to be "Meets Standard" for this standard.

Standard 115.277 Corrective action for contractors and volunteers

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

Stein House maintains a policy applicable to this standard; "CSI Adult Work Release Policy Manual, Page 123, Section 38, "Sexual Abuse and Harassment", subsection 12.0, "PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES", Section 10 "Discipline," subsection B "Corrective Action for Contractors and Volunteers". The policy encompasses all aspects of the standard. The Stein House contractors, volunteers/interns have received the relevant training and there have been no relevant incidents or reported allegations. Contractors are only permitted access to resident occupied areas while under direct staff escort. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 115.278 Disciplinary sanctions for residents.

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

The Stein House accepts residents exclusively from the CT DOC. All residents remain under the authority of the CT DOC while residing in the Stein House "CSI Adult Work Release Policy Manual, Page 123, Section 38, "Sexual Abuse and Harassment", subsection 12.0, "PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES", Section 10 "Discipline", subsection C "Disciplinary Sanctions for Residents" stipulates that CT DOC Administrative Directive 9.5, "Code of Penal Discipline" encompasses the pertinent portions of the applicable standard while prohibiting all sexual activity on the part of an inmate/resident, this regardless of the circumstances under which that activity occurs. The Code of Penal Discipline classifies all sexual activity as a Class A offense. A charge of "Sexual Misconduct" would result in immediate removal from the Stein House and a return to a CT DOC facility where the disciplinary process would proceed. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 115.282 Access to emergency medical and mental health services.

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

The Stein House has established policy “CSI Adult Work Release Policy Manual, Page 123, Section 38, “Sexual Abuse and Harassment”, subsection 12.0, “PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES”, section 11, “Medical and Mental Health Care” which mandates that residents shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services without financial cost. Stein House does not maintain on-duty Medical and Mental Health Care staff. Emergency treatment would be handled at either Saint Francis Hospital or UCONN Medical Center at the discretion of the CT DOC. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be “**Meets Standard**” for this standard.

§ 115. 283 Ongoing medical and mental health care for sexual abuse victims and abusers.

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

The Stein House accepts residents exclusively from the CT DOC. Residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility will be eligible for medical and mental health evaluation and, as appropriate, treatment from the CT DOC. The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody, this based upon determination by the CT DOC’s health care provider and administrator, CMHC (Correctional Managed Health Care) consistent with the community level of care. Treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Stein House does not accept female residents, nor does it accept any resident with a history of sexual offenses or misconduct. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be “**Meets Standard**” for this standard.

§ 115. 286 Sexual abuse incident reviews.

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

The Stein House has established policy, "CSI Adult Work Release Policy Manual, Page 123, Section 38, "Sexual Abuse and Harassment", subsection 12.0, "PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES", section 12, "Data Collection and Review" subsection A "Sexual Abuse Incident Reviews" which mandates that the PREA Coordinator will conduct a sexual abuse incident review at the conclusion of all sexual abuse investigations, including where the allegation has not been substantiated. The review will be conducted by the PREA Coordinator with input from any staff members with pertinent information. There have been no sexual abuse or sexual harassment incidents at the Stein House, thus there has never been a sexual abuse incident review conducted. Documentation was provided from another CSI operated program and verified compliance with this standard. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 115. 287 Data collection.

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

The Stein House has established policy, "CSI Adult Work Release Policy Manual, Page 123, Section 38, "Sexual Abuse and Harassment", subsection 12.0, "PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES", section 12, "Data Collection and Review" which mandates that the Stein House will collect accurate, uniform data for every allegation of sexual abuse using the, form "SSV-IA Survey of Sexual Victimization, 2013" published by the Department of Justice, Bureau of Justice Statistics. All sexual abuse data will be aggregated at least annually. Stein House will maintain, review, and collect data as needed from all available incident-based documents including reports, investigation files, and sexual abuse incident reviews. To date, there have been no incidents of sexual abuse, thus there has been no data collected. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be "**Meets Standard**" for this standard.

§ 115. 288 Data review for corrective action.

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

To date, the Stein House has never had an incident of sexual abuse, thus there has been neither data collected nor any data to review or to publish. If there were any data collected from the Stein House, the data would be published and made publicly available on the Agency website @ <http://www.csi-online.org/prea.html>. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be **"Meets Standard"** for this standard.

§ 115. 289 Data storage, publication, and destruction.

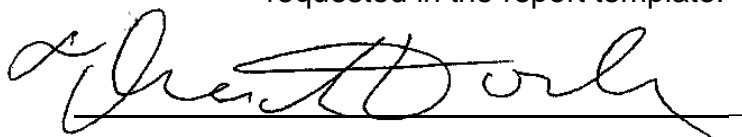
- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

The Stein House to date has never had an incident of sexual abuse, thus there has been no data collected, nor any data aggregated or published. "CSI Adult Work Release Policy Manual, Page 123, Section 38, "Sexual Abuse and Harassment", subsection 12.0, "PREA (PRISON RAPE ELIMINATION ACT) POLICIES & PROCEDURES", section 12, "Data Collection and Review" subsection C "Data Collection, Storage, Publication, and Destruction" states that they will maintain records of all incidents related to incidents or allegations of sexual assault/abuse or harassment. Records will be maintained for ten years. As a result of an absence of incidents no data is published on the Agency website located at <http://www.csi-online.org/prea.html>. The Stein House complies in all material ways with the standard for the relevant review period and is determined to be **"Meets Standard"** for this standard.

AUDITOR CERTIFICATION

I certify that:

- The contents of this report are accurate to the best of my knowledge.
- No conflict of interest exists with respect to my ability to conduct an audit of the agency under review, and
- I have not included in the final report any personally identifiable information (PII) about any inmate or staff member, except where the names of administrative personnel are specifically requested in the report template.



Auditor Signature

18 Nov 2015

Date