

PREA AUDIT: AUDITOR'S SUMMARY REPORT

ADULT PRISONS & JAILS



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

Name of facility:	Lorain Correctional Institution		
Physical address:	2075 S. Avon-Beldon Road, Grafton, Ohio 44044		
Date report submitted:	June 9, 2014		
Auditor Information			
Address:	26 Waterford Lane, Auburn, New York 13021		
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Telephone number:	315-255-2688		
Date of facility visit:	June 2-6, 2014		
Facility Information			
Facility mailing address: <i>(if different from above)</i>			
Telephone number:	440-748-1049		
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 type="checkbox"/> Jail	<input checked="" type="checkbox"/> Prison	
Name of PREA Compliance Manager:	Melissa Cantoni		Title: Operational Compliance Manager
Email: Melissa.Cantoni@odrc.state.oh.us			Telephone number: 440-748-1049
Agency Information			
Name of agency:	Ohio Department of Rehabilitation and Correction		
Governing authority or parent agency: <i>(if applicable)</i>			
Physical address:	770 West Broad Street, Columbus, Ohio 43222		
Mailing address: <i>(if different from above)</i>			
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Agency Chief Executive Officer			
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AUDIT FINDINGS

NARRATIVE:

Lorain Correctional Institution (LorCI) is an adult male Level 3 security institution and serves as one of two male reception centers in Ohio. Newly sentenced felons, parole violators, and returnees on suspended sentences are received from 25 northeast counties. The facility is located 18 miles south of Lake Erie in Grafton, Ohio, approximately 30 miles southwest of Cleveland, Ohio. Construction on Lorain Correctional Institution was started on June 12, 1986, with the official opening on April 11, 1990, as the 21st prison in the Ohio Department of Rehabilitation and Correction (ODRC).

As a reception center, LorCI plays an important role in identifying offender needs and risk of reoffending through the use of assessment tools. The Classification Specialists conduct a formal security level review and begin the ORAS program identification process. All incoming inmates receive a full orientation process and are reviewed for PREA concerns. Once the security level is identified the inmate is designated a parent institution by the Reception Coordinator. During the reception process the inmate is reviewed by other departments and could be recommended for special programming at specific institution. Most inmates stay at the reception center between three to four months before going to their parent institution.

DESCRIPTION OF FACILITY CHARACTERISTICS:

The campus style architecture consists of 14 buildings within a 111-acre compound, and a rated bed capacity of 750. A Modular Unit was added to the institution grounds in June 2002 for Recovery Services and in 2011 construction began on a medical reception building that opened in 2012.

The entrance building is designated as B-1 building and contains the Armory, Lock Shop, Visiting Office, Staff Clothing Office, Special Response Team Office, Security Post, and walk through metal detector which screens all staff and visitors entering the institution.

The next building located directly in front of B-1 is designated as B-2. This building is split into two sections, B-2 South and B-2 North. A common area that contains the Control Center that serves as the distribution point for all security equipment connects both these areas. The Warden and Warden's Assistant are located above the control center giving an excellent view of the interior compound.

B-2 South is located to the left from the control center. It contains the Cashier's Office, Business Office, Deputy of Administration Office, Personnel Office, employee break room, Inmate Visitation, Parole Board rooms, Staff Barbershop and Roll Call area.

B-2 North is located to the right from the control center. It contains the Records Office, Investigator's Office, Inspector's Office, Operations Compliance Manager, Labor Relations Office, Count Office, Employee Mailroom, Deputy of Operations Office, Majors Office, and the Shift Supervisors Office. Located outside but connected to B-2 North is the Segregation Isolation unit. The unit contains 76 beds that are used for security control, local control, and disciplinary control. Each range has two indoor and one outdoor recreation area. Also contained in this section is the Rules Infraction Board room.

As you continue through the northern area of the compound, the next block of buildings are designated as B-3, B-4, and B-5. Building B-3 is split into two housing pods. B-3A is a Reception Housing unit. B-3B houses Mental Health Offices, 6 crisis-holding cells and reception general population. Buildings B-4 is split into three housing units B-4A, B-4B, and B-4C. Housing unit 4A is reception general population, 4B and 4C are initial reception intake units where inmates are classified and undergo the initial screening process. B-4 also contains Classification Specialists Office, Reception Coordinators Office, Case Managers Offices, Correctional Counselors Office, and Unit Management Administrators Office. Continuing clockwise, the next building is designated as B-5. This building consists of receiving and discharge where newly arriving and transferring inmates are processed. Over the last twelve months, Lorain's average monthly intake was 723 inmates. The Medical Oversight Center and Mental Health Offices are located in the south side of the building. A full complement of mental health services is available to the inmate population.

Moving into the easterly side of the compound, the next building is designated as B-6. Building B-6 is the support building, which contains the Medical Department, Food Service, Central Chemical Distribution, Inmate Commissary, Quartermaster, Maintenance, Staff Training, Recovery Services, Recreation, Inmate Library, School, and Religious Services.

The Medical Department provides a full range of diagnostic and outpatient care to the population. Inmates requiring emergency care are transferred to a local hospital. The new medical building identified as B-11 consists of 5,854 square feet and allows for an efficient medical reception process under one roof. It includes space for medical processing of reception inmates as well as medical offices, dental services, x-ray, and mental health service. Food service contains two inmate dining areas, kitchen, storage areas, and a staff dining room. The recreation area consists of an inside gym, two softball diamonds, horseshoe pits, outside basketball courts, and a running track. Structured programs including intramural and activities are also available. Education opportunities are available to reception and cadre inmates.

The southern area of the compound is where the main inmate housing units are located. These buildings are designated as B-7, B-8, B-9, and B-10. Buildings B-7 and B-8 are reception-housing units. Building B-9 and B-10 houses the cadre work force.

SUMMARY OF AUDIT FINDINGS:

During the visit the auditor conducted 13 random inmate interviews, 3 random inmate interviews from a list that included potential “victims” based on criteria from appendix A and the Intake Screening Tool, 12 random staff, and all specialized staff as outlined in the Bureau of Justice Assistance documents. Inmates and staff were well aware of PREA. Inmates interviewed were knowledgeable about how and where to report sexual abuse and sexual harassment. They all indicated they had received written and video information either in the Receiving and Discharge area on their arrival or on the housing units for those that have been at the facility for a considerable amount of time. All staff at Lorain Correctional Institution is trained to be first responders. Each staff person was well versed on their responsibilities in reporting sexual assaults and suspected sexual abuse and responding. When questioned about evidence preservation and medical considerations staff responses reflected agency policy and standard requirements. Informational posters were viewed throughout the facility, in Spanish and English.

During the review period the institution had 4 allegations of sexual abuse and 4 cases of sexual abuse. Three of the sexual harassment allegations involved inmate against inmate and the fourth involved an inmate allegation against a staff member. Two of these harassment cases (inmate against inmate) are still being investigated. The third inmate against inmate was unsubstantiated as was the inmate allegation against the staff member.

Lorain investigated four allegations of sexual abuse. Three involved inmate-alleging abuse by another inmate and one involved an inmate allegation against a staff member. All of these cases were thoroughly investigated and are closed. Of the three-inmate allegation against inmate two of those cases were unfounded. One of these unfounded cases did involve a forensic exam at the Nord Center. The third case was substantiated. It involved an inmate improperly touching another inmate. A criminal investigation was conducted but was not prosecuted because the action by inmate did not rise to a felony. The inmate was dealt with the Rules Infraction Board. The one and final case by an inmate alleging sexual abuse by a staff member was thoroughly investigated and found to be unfounded. The facility has a very impressive relationship with the Ohio Highway Patrol, the Agency responsible for criminal investigations. They train together and each go out of their way to keep the other informed on all cases. They work extremely hard to ensure all cases are referred for prosecution.

Number of standards exceeded:	6
Number of standards met:	35
Number of standards not met:	0
Non-applicable:	2

§115.11 - Zero tolerance of sexual abuse and coordinator

Lorain Correctional Institution meets standard. Agency Policy, Prison Rape Elimination, 79-ISA-11 outlines the Agency zero tolerance toward all acts of sexual abuse and sexual harassment. The facility policy describes the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment and includes definitions of prohibited behaviors. PREA Coordinator and Facility Manager indicated, during their interviews, that they have sufficient time to handle their PREA duties.

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

Lorain Correctional Institution meets standard. State does contract with two private prisons. Interview with Kelly Sanders, Contract Manager indicates both contracts include provisions that each facility comply with PREA standards and she monitors facility compliance with both.

§115.13 – Supervision and Monitoring

Lorain Correctional Institution meets standard. The auditor reviewed the staffing plan with the Warden discussing the standard criteria that the facility takes into consideration. She indicated that all occasions where the plan is not followed she is notified. The plan is reviewed annually by the Executive staff (including PREA Manager) with recommendations sent to PREA Coordinator and discussed with the Director.

§115.14 – Youthful Inmates

This standard is not applicable to Lorain Correctional Institution as youthful offenders are not confined here.

§115.15 – Limits to Cross-Gender Viewing and Searches

Lorain Correctional Institution meets standard Agency policy does not allow for cross gender strip/cavity searches except in exigent circumstances or by medical staff. There have been no cross gender searches done to date. If and when they are done they must be approved and documented. All female staff is required to announce when entering the housing unit living areas. The facility utilizes a buzzer and light. During the inmate interviews they indicate they were aware of the announcement system. Random staff interviews indicated staff awareness to policy of not searching transgender and intersex inmates for the purpose of determining genitalia.

§115.16 – Inmates with Disabilities and Inmates English Proficient

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Lorain Correctional Institution meets standard. The facility ensures that inmates with disabilities and inmates, who are limited English proficient, have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. PREA information is available in Spanish and English. The facility shares a sign language staff person with the facility across the street. Facility has a contract with Affordable Languages Services, LTD to provide interpretive services for inmates for which staff no one to translate.

§115.17 – Hiring and Promotion Decisions

Lorain Correctional Institution meets standard. Agency policy 79-ISA-11 does not allow hiring or promotions including volunteers/contractors who have been convicted of sexual abuse in prison/jail or in community. Background checks are done on all employees, contractors and volunteers. All 5-year re-checks are done and are up to date. According to the attorney in Central Office Human Recourses, that handles all requests for employees seeking employment somewhere else, all substantiated allegations of sexual abuse and sexual harassment are reported to the prospective employer.

§115.18 – Upgrades to Facilities and Technology

Lorain Correctional Institution meets standard. During the interview with the Director he indicated when expanding or upgrading new technologies are taken into consideration to safeguard inmates. Warden interview indicated she was submitting requests for more cameras to enhance safety for her staff and inmate.

§115.21 – Evidence Protocol and Forensic Medical Examinations

Lorain Correctional Institution exceeds standard. The current Investigator and the previous Investigator detailed how the facility utilizes protocols adapted by recent DOJ National Protocol for Sexual Assault Medical Forensic Examinations. The Nord Center performs the forensic exams for Lorain if needed. Inmates that are victims of sexual assault are offered access to forensic exams at no cost. The Center has been used once during the review period. The Nord Center is also the community advocacy group that the facility has an MOU with. Posters are located throughout the facility with address and phone number.

§115.22 – Policies to Ensure Referrals of Allegations for Investigations

Lorain Correctional Institution Exceeds the Standard. As noted in the narrative statement, Lorain has an extremely cooperative working relationship with the OHIO State Highway Patrol. Both the Institution Investigator and the State Trooper attended PREA Investigator received the same PREA training. The auditor interviewed both the Warden and SIS Lieutenant and they each indicated they follow the Agency policy and initiate an investigation immediately upon notified of an allegation of sexual abuse or sexual harassment. The Agency Investigation Policy is readily available on the Ohio Agency web site.

§115.31 – Employee Training

Lorain Correctional Institution Exceeds the Standard. The training, for the Agency zero tolerance policy to prevent, detect, respond and report, that all employees receive is impressive. It requires each employee to take and pass a test at the conclusion of the training. If the staff member does not receive a passing grade, they must take the training again until they do. Interviews of random staff and general questions asked during the tour clearly indicated staff understands all policy aspects of responding to allegations of sexual abuse. A review of random staff training files demonstrated staff signatures indicating that they understood the PREA training they received.

§115.32– Volunteer and Contractor Training

Lorain Correctional Institution Meets the Standard. All contractors and volunteers receive training prior to assuming their responsibilities. Random interviews and review of training records of a contractor and volunteer confirmed the training was received

§115.33 – Inmate Education

Lorain Correctional Institution Meets the Standard. As previously indicated, Lorain is a reception Center and the auditor attended PREA training that was going on at the intake area that all inmates are required to attend. It was very informative. Posters about being free from sexual abuse are prevalent throughout the institution. Inmate interviews indicated that inmates received written and video information on PREA. Cadre inmates who have been at Lorain for a considerable amount of time have been trained as well.

§115.34 – Specialized Training: Investigations

Lorain Correctional Institution exceeds the standard. The facility Investigator and the Ohio Highway Patrol Investigator receive the same PREA investigation training to insure that administrative and criminal investigations are done to insure that confirmed allegations are not lost due to poor communication between both Investigators. The communication and cooperation between both agencies is impressive and was confirmed during the interviews of both.

§115.35 – Specialized training: Medical and mental health care

Lorain Correctional Institution Meets the Standard. A review of training records and interviews with Medical and Mental Health staff demonstrated compliance to the additional specialized training to detect and access signs of sexual abuse and sexual harassment, how to preserve evidence, how to respond to victims and how and to whom to report incidents.

§115.41 – Screening for Risk of Victimization and Abusiveness

Lorain Correctional Institution exceeds the standard. Lorain is one of the two reception centers used by the Department of Correction. The institution takes the intake and classification process very seriously. Each entity, in the process, has making sure no inmate is placed in any situation that may place them at risk of victimization as their priority. There is much redundancy in the process to insure this. During the medical portion of intake, done immediately on arrival, the inmate is asked about previous victimization/abuse, mental or physical disability, any prior sex offences and whether the inmate is or perceived to be gay, bisexual, transgender, intersex or gender nonconforming. A positive response to any of these questions initiates immediate medical and mental health review in the intake area.

§115.42 – Use of Screening Information

Lorain Correctional Institution Meets the Standard. The auditor verified how the intake form/information is used to determine work/ housing and education assignments. Central Office Committee does placement of transgendered and/or intersex inmates prior to assignment in any facility. Because of the reception status of the facility, transgender or intersex inmates, who may arrive at the facility, will be placed at the gender specific facility after the Central Office Committee review has been completed.

§115.43 – Protective Custody

Lorain Correctional Institution meets standard. Segregation is never used for any inmate at high risk of victimization. Lorain has a housing unit (3B) in general population that would be used if needed. This unit has no program, recreation, or education restrictions. It operates as the rest of the housing units in general population do. What makes this unit unique is that is has mental health offices adjoining the living area. Inmates at high risk of victimization are on this unit for a short period while they are assessed.

§115.51 – Inmate Reporting

Lorain Correctional Institution Meets the Standard. Inmates have access to multiple means of reporting sexual abuse. Facility does have a toll free number procedure to the Nord Center who reports the allegation immediately to the facility. Inmates are allowed to make anonymous reports. Posters throughout the facility indicate to the inmate how they can report. All inmates interviewed were questioned about ways to report and were able to disclose to the auditor ways to report including third party.

§115.52 – Exhaustion of Administrative Remedies

This standard is non applicable as Lorain Correctional Institution does not have administrative procedures to address inmate grievances regarding sexual abuse.

§115.53 – Inmate Access to Outside Confidential Support Services

Lorain Correctional Institution meets the standard. . Phone numbers and mailing addresses for the Nord Center are provided to the inmate on posters in the housing units and in the inmate handbook. The MOU describes all the services to be provided which includes confidential support and emotional services. Inmate interviews confirmed the inmates were informed and know of the confidential support services provided.

§115.54 – Third-Party Reporting

Lorain Correctional Institution meets the Standard. The facility has third party reporting of sexual abuse or sexual harassment through the Agency web site. The link on the web page clearly indicates PREA. Interviews with inmates indicated they were aware of third party reporting.

§115.61 – Staff and Agency Reporting Duties

Lorain Correctional Institution Meets the Standard. Staff duties for reporting are outlined in policy 79-ISA-11, reiterated in the training staff receives and were articulated by each staff member during interviews. Every employee that was interviewed knew their responsibility to immediately report knowledge, suspicion or information and also their obligation in confidentiality of information and disclosure only to their supervisor as required for an investigation.

§115.62 – Agency Protection Duties

Lorain Correctional Institution Meets the Standard. The Warden indicated what steps would be followed when the facility learned an inmate was at substantial risk of victimization. It included immediate removal from the danger, medical/mental intervention and complete investigation. Interviews with random staff also demonstrated they know the immediate steps to take to protect an inmate subject to risks of imminent sexual abuse.

§115.63 – Reporting to Other Confinement Facilities

Lorain Correctional Institution meets the Standard. Agency Policy 79-ISA-11 requires when a sexual abuse allegation is made that an inmate was sexually abused while confined at another facility, the Warden that received the allegation shall notify the Warden where the alleged abuse occurred within 72 hours after receiving the allegation. The warden confirmed the process during the interview.

§115.64 – Staff First Responder Duties

Lorain Correctional Institution meets the Standard. All staff is trained as first responders. During the interviews of staff, they were able to describe in detail the actions they would take if an inmate made a sexual abuse allegation to them. From the safety and protection of the victim including the preservation of all potential evidence.

§115.65 – Coordinated Response

Lorain Correctional Institution meets the Standard. Facility policy 079-01-02 describes institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership. Interviews with specialized staff confirmed they were knowledgeable about the PREA Plan and the coordinated duties and collaborative responsibilities.

§115.66 – Preservation of ability to protect inmates from contact with abusers

Lorain Correctional Institution meets the Standard. Central Office reported that there has been no collective bargaining agreements entered into or renewed since August 2012 that limits agency ability to remove staff sex abusers from inmate contact pending investigation outcome.

§115.67 – Agency protection against retaliation

Lorain Correctional Institution meets the Standard. Agency Policy 79-ISA 2 stipulates that the investigator is responsible for monitoring retaliation of inmates and staff. The new Investigator has been in this position for approximately 30 days. The PREA Compliance Manager held this position previously. The auditor interviewed both of them as Investigators and reviewed the documentation. The previous investigator and the current investigator conduct periodic checks up to 90 days but beyond if they feel the situation requires it. With inmates they looks at inmate disciplinary reports, housing or program changes. With staff they looks at performance reviews or reassignments and shift changes

§115.68 – Post-Allegation Protective Custody

Lorain Correctional Institution meets standard. Segregation is never used for any inmate at high risk of victimization. Lorain has a housing unit (3B) in general population that would be used if needed. This unit has no program, recreation, and education restrictions. It operates as the rest of the housing units in general population do for low functioning inmates. What makes this unit unique is that is has mental health offices adjoining the living area. Inmates at high risk of victimization are on this unit for a short period while they are assessed.

§115.71 – Criminal and Administrative Agency Investigations

Lorain Correctional Institution Exceeds the Standard. The institution investigator conducts the investigation immediately upon being notified of an allegation no matter what time of day. His training record and interview demonstrated the special PREA investigative training he received. Once his investigation substantiates the allegation the case is processed by the Ohio State Highway Patrol for a criminal investigation. The relationship between both Agencies is impressive. At the onset of the allegation the facility Investigator notifies the State Trooper and keeps him up to date at every step in the process. Once the administrative investigation turns to criminal the State Trooper keeps the Facility Investigator informed. Together both these people work closely with local prosecutors bringing confirmed cases to trial.

§115.72 – Evidentiary Standard for Administrative Investigations

Lorain Correctional Institution Meets the Standard. Facility Policy 79-ISA-2 states that only a preponderance of evidence is required when determining sexual abuse allegations are substantiated. This was also confirmed during the interview with the Investigator.

§115.73 – Reporting to Inmate

Lorain Correctional Institution meets the Standard. Facility Policy 79-ISA-2 indicates that the Investigator report to the inmate if any sexual abuse or sexual harassment allegation is substantiated, unsubstantiated and unfounded. In each case file was written notice of notification of completed investigations where the inmate was informed of the outcome of the investigations whether it had been determined to be substantiated, unsubstantiated, or unfounded. For sexual abuse by a staff member the inmate is informed in writing to include whenever: the staff member is no longer posted within the inmate's unit; the staff member is no longer employed at the facility; the agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or the agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility. If the inmate was alleged to have been sexually abused by another inmate, the investigator informs the alleged victim whenever: the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or been convicted on a charge related to sexual abuse within the facility. This was also confirmed in the interview with the Investigator.

§115.76 – Disciplinary sanctions for staff

Lorain Correctional Institution meets the Standard. Standards of Employee Conduct 31-SEM-02 states staff will be terminated for any sexual abuse conduct. The auditor interviewed the Central Office Human Resource person who confirmed the Agency Policy of termination. In the past 12 months there have been no staff from the facility that have violated agency sexual abuse or sexual harassment policies.

§115.77 – Corrective action for contractors and volunteers

Lorain Correctional Institution Meets the Standard. Agency Policy 79-ISA-01 indicates removal from the facility for any sexual abuse by either a contractor or volunteer.

Interview with the Human Resource staff indicated they have not had any incident with contractors or volunteers but any occasions but removal from the facility and others would be the action taken.

§115.78 – Disciplinary sanctions for inmates

Lorain Correctional Institution meets the Standard. Inmate Rules of Conduct stipulates what the penalties are for inmate on inmate sexual abuse and employee sexual abuse where the employee did not consent. Inmates are not disciplined for any sexual abuse report made in good faith even if unsubstantiated.

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

Lorain Correctional Institution meets the Standard. Agency policy 79-ISA-04 requires that any inmate reporting any prior victimization is seen no longer than 14 days after arrival. Any inmate screening indicating sex abuse is also seen within 14 days. Medical and Mental Health staff get written consent before reporting prior sex victimization, which took place not in an institutional setting. Interviews with Medical staff and Mental Health practitioners confirmed the policy and their actions.

§115.82 – Access to emergency medical and mental health services

Lorain Correctional Institution meets the Standard. Agency Policy 79-ISA-02 mandates immediate access to medical and mental health services. The institution and Nord Center provides this care. Inmates receive immediate access to sexually transmitted infection prophylaxis at the Center. Upon return from the Nord Center the inmate is placed in the Infirmary until seen by the Doctor. There is no cost to the inmate for treatment. The entire process was explained during the interview with the Health Services Director.

§115.83 – Ongoing medical and mental victims and abusers

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Lorain Correctional Institution meets the Standard. Agency policy 79-ISA-04 requires all inmates be offered medical and mental health evaluations to those who were sexually abused in any prison, jail or juvenile facility including follow up services. FCI Berlin also attempts to conduct mental health evaluations on all known inmate abusers, offering treatment when appropriate. This practice was confirmed by interviews with Medical and Mental Health staff.

§115.86 – Sexual abuse incident reviews

Lorain Correctional Institution Meets the Standard. Post incident reviews are done in accordance with Policy 79-ISA-03 within 30 days of conclusion of an investigation in all cases except unfounded. The incident review looks at contributing factors including race, gang, ethnicity, gender staff response or lack. This incident review process was confirmed in interviews with the Investigator, PREA Manager and the Warden, all members of the Review Team.

§115.87 – Data Collection

Lorain Correctional Institution meets the Standard. The Agency collects data on all allegations of sex abuse and aggregates the information annually. This was confirmed in the interview with the Agency PREA Coordinator

§115.88 – Data Review □ for Corrective Action

Lorain Correctional Institution meets the Standard. The Agency reviews all allegations of sexual abuse to make improvements to the Agency as whole. The Director reviews the data and insures it is published on the Agency web site. This was confirmed in the interview with the Agency Director, PREA Coordinator and a check of the Agency web page.

Lorain Correctional institution meets the Standard. Agency Policy 79-ISA-01 states all sexual abuse case records are securely maintained for a minimum of 10 years. The data is available on the Agency web page. The Agency PREA manager confirmed the retention schedule and web site publication during the interview.

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.

Thomas Eisenschmidt

June 10, 2014

Auditor Signature

Date