

**PREA Hearing
September 10, 2008
Jim Dennis' Opening Statement**

I want to thank the panel for this opportunity. I want to thank Mr. McFarland for coming to northwest Ohio and CCNO. I believe that truly personalizes this process. While CCNO is a jail, it is not a prison. CCNO houses both male and female offenders. Jails house both pretrial and sentenced prisoners. As a former prison warden, I know that they are different entities. It is important to the process that the panel understands this distinction. However, as it applies to preventing and addressing sexual abuse, we have a very common mission.

CCNO's Mission Statement is to protect the public, employees, and offenders while operating a cost effective detention center for Defiance, Fulton, Henry, Lucas and Williams Counties and the City of Toledo. Preventing sexual abuse with a zero tolerance policy fits our mission. I am the PREA Coordinator because it is that important to me. I am also the PREA contact for Ohio on the American University website.

We believe that training both staff and offenders creates a more informed environment. This protects the public from civil suits that are a drain on tax dollars. Staff training ensures understanding of a consistently enforced policy. Offenders understand staff limits and their own limits. They know we take sexual abuse allegations serious. Therefore they will come forward and file complaints and seek protection. Staff, contract staff and volunteers are all trained in the sexual abuse policy and understand their role in fulfilling the mission. They are trained by me. I read the sexual battery law to them and then say "you have been told this by me – don't try to deny it later." It sets the tone and standard.

In 2000, CCNO had its own anecdotal sexual misconduct incident that captured headlines. A supervisor was investigated, terminated, prosecuted successfully and spent 2 ½ years in prison. A victim sued myself and the organization civilly. This gut wrenching experience led to many changes at CCNO.

In 2002 myself, Director of Security Sullivan and Human Resources Manager Hill attended the NIC Staff Sexual Misconduct training at American University conducted by Brenda Smith, Susan McCampbell, A.T. Wall, Susan Poole and others. The NIC/American University training in 2002 resulted in an action plan to assess the organization and implement changes. At the encouragement of the Rhode Island Investigator Aaron Aldridge, Dir. Sullivan re-opened every investigation concerning sexual misconduct and undue familiarity and reassessed what we did right and wrong, identified needed policy changes, physical plant changes and determined how to use these lessons learned in training in hopes of preventing further reoccurrences. These lessons learned and materials have been a part of our own training since 2002. I have also used them as examples for other agencies and states to develop their own resources.

To assure staff understands the importance, training is conducted by myself and Dir. Sullivan. As you can tell in 2007, training on this topic remains a priority as noted in response 34. Also in 2007 staff were trained concerning trauma, recognizing trauma, understanding and recognizing trauma triggers and when possible working with offenders on their triggers. CCNO has a women's trauma program via a grant. We are a "Trauma Informed" facility. In 2007 staff received almost 80 hours of training each.

The civil suit discovery process resulted in me having staff review all documents before release to our attorney. We identified a lot of inconsistencies in operations. We felt our best way to be more consistent and find best practices was to become a certified jail in the State of Ohio by being compliant with 100% of the Ohio Minimum Jail Standards. This was accomplished in 2005 and 2008. We were also accredited by the American Correctional Association in 2005 and reaccredited in 2008. This also prompted us to count and track sexual abuse allegations. In corrections, we count what is important to us.

At CCNO, programs are provided by contractors and volunteers. CCNO programs are consistent with aiding offenders with successful re-entry and addressing personal needs to make them a better person and law abiding citizens. Programs also balance our tight security with a climate of care and concern. All program staff and volunteers have received PREA related training and trauma training to make them better prepared to receive complaints, listen and forward them to the right person. CCNO's responses to questions 23 and 26 are consistent with my statement.

CCNO averages about 200 active volunteers each year. They receive four hours of mandatory pre-service training that includes this topic. They receive four hours of annual mandatory in-service training with this topic refreshed. Volunteers do report complaints about staff, write incident reports and are members of the CCNO team. We have 32 religious programs weekly, provided by 17 separate denominations.

All new inmates are oriented by their unit case managers. They discuss sexual abuse and reporting, give them the sexual assault pamphlet, reference the inmate handbook and then create a case note to that effect in the inmate record system, an example was provided in response 36. Case managers introduce themselves as a helper and first responder. The case managers have been trained in pre-service and in-service training. They are a member of the classification team where sexual orientation and alleged sexual activity are openly and professionally discussed.

Inmates can report allegations of sexual misconduct to any CCNO staff member, contract staff or volunteer. In addition, they can call the inmate hot line that goes to the CCNO's Investigator's voice mail. Inmates can also write the complaint down on a request to staff or grievance form. Inmates that file complaints are informed of the findings before the investigation is concluded. They have the opportunity to add or refute a conclusion or maybe a dead end. Inmates that disagree with an outcome or finding can file a grievance like staff.

In the first four to five months of 2007, we addressed many issues around sexual activity, sexual harassing behavior, homophobia, verbally aggressive gays and intimidated heterosexuals. We formed a committee and did some focus group activity and recommended strategies. These included first responder training, investigator training, a sexually aggressive code to be entered into the inmate records system for all staff to see, shift briefing training with special coaching and emphasis for the evening shift. Supervisors also assisted in developing checklists for staff that are first responders and supervisors checklists that may be in charge of a crime scene.

We took the inmate "sexual victimization" survey very seriously. We devoted staff and overtime to assure the surveyors had access to the requested inmates. We held planning meetings. CCNO had the most inmates surveyed although we were not the largest jail. Staff sacrificed their offices near or in units to reduce movement and save time. The surveyors, while at times spread out had access to their escorts and security staff. Staff and inmates were informed about PREA because of the inmate orientation and training prior to the survey. All staff and inmates were notified of the survey once given the green light. This was treated like an ACA audit, an important and serious event. The surveyors were treated like special guests. The inmates willingly participated because the organization was prepared, could answer questions and understood their role. The survey shouldn't be a secret anymore than sexual abuse should be a secret.

Last summer in preparing for the PREA survey process the BJS packet included names and addresses of statewide Ohio agencies for victims of sexual abuse or rape, but we decided that wasn't enough; it needed to be relevant and local. We posted in the units our local agencies. Our local rape crisis agency also contracts to provide our Domestic Violence Awareness program. The program at CCNO is provided by the agency manager who is at CCNO almost weekly. That agency is a resource and is currently active with inmate programming.

We focus on staff being approachable by inmates; can they ask staff for help. Sexual abuse complaints start with face to face contacts, requests to staff (kites) and the hotline. That is better than relying on the grievance process. Our grievance process is alive, well and used, but this process deserves and is managed best through approachability.