

# PREA AUDIT: AUDITOR'S SUMMARY REPORT

## ADULT PRISONS & JAILS



<b>Name of facility:</b>		Federal Bureau of Prisons FPI Manchester	
<b>Physical address:</b>		805 Fox Hollow Road, Manchester, KY 40962	
<b>Date report submitted:</b>		January 13, 2014 (Final Report May 16, 2014)	
<b>Auditor Information</b>		<b>Jo Glazier</b>	
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<b>Telephone number:</b>		518-470-3824	
<b>Date of facility visit:</b>		December 10-13, 2013	
<b>Facility Information</b>			
<b>Facility mailing address:</b> <i>(if different from above)</i>		P.O. Box 3000 Manchester, KY 40962	
<b>Telephone number:</b>		606-598-1900	
<b>The facility is:</b>	<input type="checkbox"/> Military	<input type="checkbox"/> County	<input checked="" type="checkbox"/> Federal
	<input type="checkbox"/> Private for profit	<input type="checkbox"/> Municipal	<input type="checkbox"/> State
	<input type="checkbox"/> Private not for profit		
<b>Facility Type:</b>	<input type="checkbox"/> Jail	<input checked="" type="checkbox"/> Prison	
<b>Name of PREA Compliance Manager:</b> Ruben Salinas		<b>Title:</b>	Assoc Warden
<b>Email address:</b> <a href="mailto:rsalinas@bop.gov">rsalinas@bop.gov</a>		<b>Telephone number:</b>	606-598-1900 ext 4483
<b>Agency Information</b>			
<b>Name of agency:</b>		Federal Bureau of Prisons	
<b>Governing authority or parent agency:</b> <i>(if applicable)</i>		U.S. Department of Justice	
<b>Physical address:</b>		320 First St. NW Washington, DC 20534	
<b>Mailing address:</b> <i>(if different from above)</i>			
<b>Telephone number:</b>		202-307-3198	
<b>Agency Chief Executive Officer</b>			
<b>Name:</b>	Charles E Samuels	<b>Title:</b>	Director
<b>Email address:</b>	<a href="mailto:BOP-CPD/PREA_COORDINATOR@BOP.GOV">BOP-CPD/PREA_COORDINATOR@BOP.GOV</a>	<b>Telephone number:</b>	202-353-3506
<b>Agency-Wide PREA Coordinator</b>			
<b>Name:</b>	Sean Marler	<b>Title:</b>	Acting PREA Coordinator
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# AUDIT FINDINGS

## NARRATIVE:

### The Audit Process

#### Transportation

The auditor was escorted to the facility by Robert Cannon ACA Accreditation Manager, External Auditing Branch, Program Review Division FBOP.

#### Entrance Interview

On 12/10/2013 at 8:30 am the auditor proceeded to the office of Karen Edenfield, Warden. A brief summary of the audit activities and the schedule were discussed. The Warden escorted the auditor to the Executive Office Conference Room where the formal entry meeting was held. The following persons were in attendance:

Robert Cannon	BOP External Auditing
Betina Rice	BOP Quality Assurance
Marva Allen	Ohio DOC PREA Observer
Heather Smith	Ohio DOC PREA Observer
Ron Herman	RIC, PRC, Central Office
Madonna Carver	HRM, LEE
Clarice Prout	HRM, ALD
Shawn Cerrato	HRS, MCR
Mary Priddy-Nash	Examiner, Financial Mgmt. Section
Karen Edenfield	Warden
Ruben Salinas	Associate Warden, Programs/PREA
William Hutchings	Associate Warden, Operations
Phequitta Boyce	Associate Warden, I&E
Bryan Birkholz	Exec. Asst. /Camp Administrator
Shelia Messer	Asst. Case Management Coordinator
Wade Thompson	Captain
Robin Blair	Case Management Coordinator
Robert Bruner	Computer Services Manager
J.P. Benge	Correctional Systems Supervisor
Keith Pray	Supervisor of Education
Dr. Cynthia Hanson	Chief Psychologist
Angel Wilson	Health Services Administrator
Thomas Jahr	Chief Chaplain
Carl Hoskins	Acting UNICOR Factory Manager
Chuck Broughton	Business Administrator

Elaine Asher	Food Service Manager
Jennifer Morris	Human Resources Manager
Tim Powers	Environmental/Safety Compliance
Shelia England	Trust Fund Supervisor
Albert Thomas	Clay/Knox Unit Manager
Betty Outlaw	Laurel/Whitley Unit Manager
Pam Clark	Facility Manager
Susan Lamoree	Camp Unit Manager

It was explained that the goal of the auditor was to be as helpful and non-intrusive as possible during the conduct of the audit. The auditor discussed the purpose and role of the auditor in the PREA audit process. The auditor briefed the facility staff on specific areas that would be examined and the audit schedule was discussed at this time.

### **Facility Tour**

The auditor toured FCI from 9:00 a.m. to 4:00 p.m. on Tuesday and on the second day of the audit, FPC and the outside perimeter operations were toured from 8:00 a.m. to 11:00 a.m. The following persons accompanied the auditor on the tour and responded to the auditor's questions concerning facility operations:

Karen Edenfield	Warden
Ruben Salinas	Associate Warden, Programs/PREA
William Hutchings	Associate Warden, Operations
Tim Powers	Safety Manager
Bryan Birkholz	Executive Assistant/Accreditation
Robert Cannon	BOP Central Office
Betina Rice	BOP Central Office

### **Department Visits:**

COMPUTER SERVICES  
HUMAN RESOURCES  
TRUST FUND  
BUSINESS OFFICE  
LOCK SHOP  
SPECIAL INVESTIGATIVE SERVICES (SIS)  
CONTROL  
VISITING ROOM  
CASE MANAGEMENT COORDINATOR / MAILROOM  
ASSOCIATE WARDEN'S COMPLEX  
CAPTAIN'S COMPLEX  
CORRECTIONAL SYSTEMS DEPARTMENT / RECEIVING & DISCHARGING (R&D)  
HEALTH SERVICES  
DENTAL  
Special Housing Unit (SHU)  
RECREATION  
EDUCATION  
PSYCHOLOGY

CHAPLAIN  
UNICOR  
VOCATIONAL TRAINING  
FOOD SERVICE  
COMMISSARY  
BARBER SHOP  
LAUNDRY  
SAFETY  
FACILITIES  
LAUREL UNIT  
KNOX UNIT  
CLAY UNIT  
ADMINISTRATION BUILDING  
RECREATION  
MANCHESTER HOUSING UNIT  
ONEIDA HOUSING UNIT  
TRUST FUND WAREHOUSE  
UNICOR WAREHOUSE  
OUTSIDE FACILITIES  
GARAGE  
POWER HOUSE  
OUTSIDE FOOD SERVICE WAREHOUSE  
GREENHOUSE  
MOBILE PATROL

## **INTERVIEWS**

On December 10-13, 2013 an audit was conducted at the Federal Correctional Institution Manchester to determine compliance with the Prison Rape Elimination Act standards finalized August 2012.

Document review: A folder for each PREA standard was available and contained the available primary and secondary documentation.

Formal interviews were conducted with 12 inmates selected at random from different housing units and included an inmate with limited English. Fifteen random staff interviews were conducted and included a Counselor, Secretary, Case Manager, 5 Correction Officers, 4 Senior Officers, Lieutenant, and 2 Security Officers. In addition 9 specialized staff were interviewed that included the Warden, PREA Compliance Manager, Medical Quality Improvement/Infection Disease Coordinator, Dental Assistant Contractor, Special Investigative Section Lieutenant and Incident Review Team member, Unit Manager who performs Screening for Risk of Victimization and Abusiveness, SHU Lieutenant, Captain Charged with Monitoring Retaliation, Case Management Coordinator conducting Intake. In addition, approximately 35 inmates and 75 staff were informally interviewed during the 4 day audit.

## **DESCRIPTION OF FACILITY CHARACTERISTICS:**

The Federal Correctional Institution Manchester (FCI) is located in southeastern Kentucky, approximately 99 miles southeast of Lexington, Kentucky. It is located 4 miles north of Manchester, Kentucky, and consists of 25 buildings. The facility is located on 240 acres with 36.8 acres inside the fence. The FCI consists of a medium security prison and a Federal Prison Camp (FPC) located adjacent of the FCI. The setting is beautiful with hills surrounding each set of buildings. There are a few residential homes located within sight of the facility. There is also a manufacturing plant within sight of the prison. Many of the employees are residents of Clay County the location of the facilities and surrounding counties such as Laurel, Knox, and Owsley also supply a large contingent of the workforce.

The facility is physically located at 805 Fox Hollow Road. Upon entering the compound signage directs pedestrian traffic to either the FCI or FPC. The Camp is to the left from the entrance and the Prison is to the right. The FCI is an attractive set of buildings of concrete and a green metal roof. The parking lot is well lighted and located in front of the FCI.

A similar parking lot is located at the Camp in the same position as the FCI. Pedestrians enter through the front entrance and are required to sign in and go through a security check point including a walk-through metal detector. On the left side of the security check point are the Warden and executive staff member's offices. To the right of the security check point are the administrative support offices including human resources and business offices. Proceeding in a straight line from the security check point are stairs (also elevator) to a higher level where the main Control Center is located. Identification is also required of visitors at this point before being allowed inside the secure perimeter. Once inside the secure fenced area a second security gate allows pedestrian traffic to enter into the compound controlled by the Control Center. In a clockwise manner starting at the left of the gate are four housing units with an A and B in each pod. The units are named after nearby counties, and are Clay, Laurel, Whitley, and Knox. The housing units are two stories in height and are of a similar design with 252 cells in each some of which have two beds or in some three beds. Each cell has its own wash basin and toilet. Showers are located in each pod and meet the ratios established by the standards. A computer room for inmates to access email and institution notifications are at the upper tier above the Officer Station. A day room is located in the center of each pod and meets the various requirements of the standards in terms of space and lighting. In each day room area are several tables with chairs to allow offenders to play board games, talk, and telephones are also located in this area. Each pod has two washers and dryers. (A centralized laundry is available to wash linens and heavier clothing such as winter coats.) Continuing in a clockwise manner after the housing units are the support services buildings including, Facilities, Laundry, Safety, Food Service, including a staff dining lounge, Religious Services, Psychology, a Unicorn Factory, Recreation with a large outside space for every conceivable sport or recreational activity, the Special Housing Unit (SHU), Medical, Captains Complex, Case Management, and Associate Warden's Complex and Visitation. The visitation area also features an outdoor seating area including tables with umbrellas for hot summer days. The inside visitation area also features a small play area for children and is painted attractively with murals featuring children themes. In the middle of the Compound is an amphitheater.

The Federal Prison Camp (FPC) consists of administrative offices, Food Service, visitation with an outdoors children’s playground. The playground was built by the Carpentry Shop offenders under staff supervision. The Camp also features indoor and outdoor recreation facilities with a variety of fixed and movable equipment. There are two housing units. Each housing unit meets requirements for space, lighting, wash basins, showers and toilets and has 256 sleeping rooms. The housing units are named Manchester and Oneida. A half wall separates each offender sleeping room that allows some degree of privacy. Maintenance, Warehouse, Greenhouse, and shooting range are located outside the FCI area. The shooting range is not viewable by offenders but the area has a high wall fence visible from the facility.

It is the mission of the Federal Correctional Institution (FCI), Manchester, Kentucky, to provide a safe, secure, and humane environment for inmates and staff. Opportunities for self-improvement including work, education, vocational training, religious, and counseling programs are provided. These programs are designed to assist inmates during confinement and upon release, as well as, to facilitate the orderly operation of the institution.

**SUMMARY OF AUDIT FINDINGS:**

Number of standards exceeded:	3
Number of standards met:	39
Number of standards not met:	0
Number of standards not applicable:	1
TOTAL:	43

**Standard number here** 115.11

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

**Auditor comments: Verified in P/P review.**

**Standard number here** 115.12

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

**Auditor comments: Verified in P/P review.**

**Standard number here** 115.13

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

**Auditor comments: Verified in P/P review.**

**Standard number here** 115.14

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)

**N/A no youthful offenders**

**Standard number here** 115.15

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

**Auditor comments: Verified in P/P review.**

**Standard number here** 115.16

X 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)

**Auditor comments, including corrective actions needed if does not meet standard**

Staff translators are on site and Language lines services are available. Written materials are provided in formats that ensure effective communication with inmates with disabilities.

**Standard number here** 115.17

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

**Auditor comments: Verified in P/P review.**

**Standard number here** 115.18

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

**Auditor comments, including corrective actions needed if does not meet standard**

No renovations, modifications or expansions have occurred in the past year.

**Standard number here** 115.21

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

**Auditor comments: Verified in P/P review.**

**Standard number here** 115.22

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

**Auditor comments: Verified in P/P review.**

**Standard number here** 115.31

X 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)

**Auditor comments, including corrective actions needed if does not meet standard**

Experienced instructors, extensive training resources and policy information is reinforced throughout the year via PREA Meetings, Department Head Meetings, Psychology Meetings, Staff E-Mail distribution.

**Standard number here** 115.32

Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

**Auditor comments, including corrective actions needed if does not meet standard**

Based on interviews and review of training records.

**Standard number here** 115.33

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

**Auditor comments, including corrective actions needed if does not meet standard**

Interviews with inmates revealed that substantial efforts have been made to ensure all inmates have received the training.

**Standard number here** 115.34

- X 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)

**Auditor comments, including corrective actions needed if does not meet standard**

Extensive training resources available and includes National Institute of Corrections. 100% of Medical/Mental Health Care staff and contractors have received the training. Interviews indicate that training is highly professional.

**Standard number here** 115.35

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

**Auditor comments, including corrective actions needed if does not meet standard**

All forensic exams would be performed at an outside hospital .

**Standard number here** 115.41

- 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)

**Auditor comments, including corrective actions needed if does not meet standard**

Confirmed by documentation and interviews.

<b>Standard number here</b> 115.42
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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)

**Auditor comments, including corrective actions needed if does not meet standard**

There were no transgender or intersex inmates housed at FCI Manchester.

<b>Standard number here</b> 115.43
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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)

**Auditor comments, including corrective actions needed if does not meet standard**

Policy review meets the standard. There were no inmates in involuntary segregation due to being at risk for sexual victimization in the past 12 months.

<b>Standard number here</b> 115.51
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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)

**Auditor comments, including corrective actions needed if does not meet standard**

Based on inmate and staff interviews and review of training records/P&P

**Standard number here** 115.52

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

**Auditor comments, including corrective actions needed if does not meet standard**

Based on review of Policy/Procedures and interviews.

**Standard number here** 115.53

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

**Auditor comments, including corrective actions needed if does not meet standard**

Based on review of P/P, inmate handbook and all inmates interviewed confirmed ability to contact an outside source.

**Standard number here** 115.54

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

**Auditor comments, including corrective actions needed if does not meet standard**

Confirmed in inmate interviews.

**Standard number here** 115.61

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

**Auditor comments, including corrective actions needed if does not meet standard**

Verified during interviews with staff and review of P/P

**Standard number here** 115.62

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

**Auditor comments, including corrective actions needed if does not meet standard**

Verified during interviews with staff and P/P review.

**No Standard number here** 115.63

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

**Auditor comments, including corrective actions needed if does not meet standard**

Verified during interviews with staff and P/P review.

**Standard number here** 115.64

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

**Auditor comments, including corrective actions needed if does not meet standard**

Staff interviews confirmed that staff are well-trained in these requirements.

**Standard number here** 115.65

- Exceeds Standard (substantially exceeds requirement of standard)
- X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

**Auditor comments, including corrective actions needed if does not meet standard**

Verified in review of Institutional Plan.

<b>Standard number here</b> 115.66
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Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

**Auditor comments, including corrective actions needed if does not meet standard**

It was reported that there have been no new collective bargaining agreements since August 2012.

<b>Standard number here</b> 115.67
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Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

**Auditor comments, including corrective actions needed if does not meet standard**

Verified in staff interviews and P/P review.

<b>Standard number here</b> 115.68
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Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

**Auditor comments, including corrective actions needed if does not meet standard**

Verified in staff interviews and P/P review.

<b>Standard number here</b> 115.71
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Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

**Auditor comments, including corrective actions needed if does not meet standard**

Verified in review of P/P

<b>Standard number here</b> 115.72
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Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

**Auditor comments, including corrective actions needed if does not meet standard**

Based on interview with Investigator.

<b>Standard number here</b> 115.73
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Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

**Auditor comments, including corrective actions needed if does not meet standard**

There have been no allegations of abuse. Verified P/P.

<b>Standard number here</b> 115.76
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Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

**Auditor comments, including corrective actions needed if does not meet standard**

Verified by review of P/P.

**Standard number here** 115.77

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

**Auditor comments, including corrective actions needed if does not meet standard**

Verified by review of P/P.

**Standard number here** 115.78

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

**Auditor comments, including corrective actions needed if does not meet standard**

Verified in interviews and P/P review.

**Standard number here** 115.81

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

**Auditor comments, including corrective actions needed if does not meet standard**

Verified in inmate interview and review of P/P.

**Standard number here** 115.82

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

**Auditor comments, including corrective actions needed if does not meet standard**

Verified with interviews and P/P review.

**Standard number here** 115.83

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

**Auditor comments, including corrective actions needed if does not meet standard**

Verified with interviews and P/P review.

**Standard number here** 115.86

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

**Auditor comments, including corrective actions needed if does not meet standard**

Verified in P/P review and interviews.

**Standard number here** 115.87

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

**Auditor comments, including corrective actions needed if does not meet standard**

Verified in review of P/P.

**Standard number here** 115.88

- Exceeds Standard (substantially exceeds requirement of standard)
- X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

**Auditor comments, including corrective actions needed if does not meet standard**

Verified in review of P/P.

<b>Standard number here</b> 115.89
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Exceeds Standard (substantially exceeds requirement of standard)

X Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

**Auditor comments, including corrective actions needed if does not meet standard**

Verified in review of P/P.

**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.

Auditor Jo Glazier \_\_\_\_\_ January 13, 2014 (FINAL May 16, 2014)