

PREA AUDIT: AUDITOR'S SUMMARY REPORT

ADULT PRISONS & JAILS

NATIONAL
PREA
RESOURCE
CENTER



BJA
Bureau of Justice Assistance
U.S. Department of Justice

Name of facility:	Metropolitan Correctional Center (MCC)		
Physical address:	808 Union Street, San Diego, CA 92101		
Date report submitted:	May 23, 2014		
Auditor Information	Wynnie T. Samuels		
Address:	P.O. Box 694415 Miami, FL 33269		
Email:	wynnie@wtsconsultant.com		
Telephone number:	786-258-4951		
Date of facility visit:	Tuesday, April 15 th – Friday, April 18 th , 2014		
Facility Information			
Facility mailing address: (if different from above)			
Telephone number:	619-232-4311		
The facility is:	<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		
Facility Type:	<input type="checkbox"/> Jail	<input checked="" type="checkbox"/> Prison	
Name of PREA Compliance Manager:	Salazar, J.	Title:	Associate Warden
Email address:	jxxsalazar@bop.gov	Telephone number:	(619) 232-3411 x1464
Agency Information			
Name of agency:	Federal Bureau of Prisons		
Governing authority or parent agency: (if applicable)	U.S. Department of Justice		
Physical address:	320 First St., NW, Washington, DC 20534		
Mailing address: (if different from above)			
Telephone number:	202-307-3198		
Agency Chief Executive Officer			
Name:	Charles E. Samuels	Title:	Director
Email address:	BOP-CPD/PREA COORDINATOR@bop.gov	Telephone number:	202-353-3506
Agency-Wide PREA Coordinator			

Name:	Sean Marler	Title:	National PREA Coordinator
Email address:	smarler@bop.gov	Telephone number:	202-353-3506

AUDIT FINDINGS

Narrative

The PREA audit of Metropolitan Correctional Center (MCC), San Diego was conducted on April 15th—18th, 2014 by Wynnie Testamark-Samuels, Certified PREA auditor. I was greeted by Warden Young, D. and his command staff and converse with them briefly. I toured the facility from 9a.m. – 12noon. During the tour, I was accompanied by Young, D., (Warden), Salazar, J., (Associate Warden, Operations), Benefiel, R., (Associate Warden, Programs), Soto, J., (Captain, Special Investigation Agent), Dr. Banks, K., (Chief Psychologist) Joseph F. Pecoraio, (Deputy Administrator, External Auditing Branch, Federal Bureau of Prisons), Burch, C. and Cannon, R. both from (External Auditing Branch, Federal Bureau of Prisons).

MCC has a total of 13 housing units, which is comprised of 7 multiple occupancy cells housing units, 3 open bay / dorms and 40 segregation(administrative and disciplinary) cells. Additional areas toured were, Special Management Unit (SMHU), medical, intake, reception screening, recreation, laundry, kitchen, library, program areas and various work areas. I was given a listing of all inmates housed in the various units at the facility and randomly selected inmates from each housing unit as well as any inmates who were limited English speaking or had hearing/vision impairment to be interviewed. There were no vision impaired inmates; I did interview 4 limited English speaking inmates utilizing an interpreter, 1 transgender inmate, 1 gay and 1 lesbian inmate. MCC does not house juvenile inmates. I conducted a total of 50 random inmate interviews.

I received shift rosters from all three shifts, (morning, day and evening watch) and randomly selected line security and non security staff, shift supervisors, special investigations, medical & mental health practitioners, and personnel from human resources, food services, facility maintenance, programs, volunteers and chaplaincy unit to interview. Moreover, I interviewed 2 representatives from Community Center for Solutions, which is an external source that provides victim advocates, crisis intervention and counseling services to the inmates. All specialized staff was interviewed except SANE/SAFE, all SANE/SAFE exams are performed at the hospital. I conducted a total of 45 staff interviews.

There were 7 sexual assault/harassment allegation cases, within the past year. Of the seven, 6 resulted in administrative investigations; as a result three were referred for criminal investigation. Consequently, three cases remain under investigation and the FBI declined one case.

DESCRIPTION OF FACILITY CHARACTERISTICS:

The Metropolitan Correctional Center (MCC) is located at 808 Union Street, San Diego, California. The institution is in the heart of downtown San Diego. Located across the street from the U.S. Court House and federal Building, the MCC services the Southern District of California (one of the busiest court districts nationwide). [REDACTED]

[REDACTED] Construction of the facility began in November 1972, and the first prisoners were accepted in late 1974. The MCC was the first high-rise correctional facility operated by the Bureau of Prisons. The MCC is a 24-story building with 225,000 square footage of floor space, [REDACTED] level, and sits on a plot of land only 200' by 217'. MCC employs 246 full time professionals. The current average daily population is 1,005.

MCC San Diego is unique from other pre-trial institutions due to it being located only 15 miles from the International Border. The facility houses pretrial inmates for the Southern District of California which encompasses San Diego and Imperial Counties, with two significant international ports of entry (San Ysidro and Calexico). As an administrative facility, MCC houses inmates of all security levels. The facility accepts both male and female inmates who are in pre-trial, holdover, or designated status. The most common violations (illegal entry and alien smuggling) and narcotic offenses. A small percentage of low security inmates are designated to serve their sentence at the facility and to serve as the institution's work details.

Inmate housing begins on the 4th floor (D Unit) and currently serves three unit missions: Admission & Orientation for male inmates and court returnees, Special Housing Overflow, and Outgoing Trips. Incoming inmates are classified and assigned to a housing unit within approximately one week. The Special Housing Unit is located on the 5th floor, and female inmates are housed on the 6th floor. Outdoor recreation and commissary sales are available on the rooftop at scheduled times.

SUMMARY OF AUDIT FINDINGS:

Based upon confidential interviews and onsite assessment, I found the staff and inmates to be well aware of PREA. The staff was exceptionally knowledgeable about their agency's zero tolerance policy, reporting responsibilities and protocol dealing with victims of sexual assault and/or sexual harassment. Additionally, Medical and Mental Health staff did an exceptional job providing additional educational training to all staff on how to identify and treat victims of sexual assault and/or sexual harassment, and provide excellent services parallel to that in the community to the inmates that's entrusted in their care.

On April 15th – 18th, 2014, one site visit was completed at Metropolitan Correctional Center, in San Diego, California. The results indicate : 100% compliance

Number of standards exceeded:	5
Number of standards met:	37
Number of standards not met:	0
Number of standards not applicable:	1

Standard number here 115.11 Zero Tolerance

- 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 PS5324.11; postings and interviews with Warden and PREA compliance manager

Standard number here 115.12 Contracting with other agencies for confinement of inmates

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

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

Based upon review of contracts

Standard number here 115.13 Supervision and monitoring

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

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

Excellent documentation of unannounced rounds, staff and inmate interviews confirmed practice

Based on PS3000.03, PP04, Workforce Utilization Committee Mtg, IS 5502.10D, Operations Lieutenant Post Orders and interviews with Captain, Lieutenant, and PREA Compliance Manager

Standard number here 115.14 Youthful inmates

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

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

Standard not applicable (n/a) Facility does not house youthful inmates

Standard number here 115.15 Limits to cross gender viewing and searches

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

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

Based on PS 5324.11, pg18 and interviews with staff and female inmates

Standard number here 115.16 inmates with disabilities and limited English speaking

- 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 PS 5324.11, contract review, language line, inmate handbook and staff training lesson plan

Standard number here 115.17 Hiring and promotion decisions

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

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

Based on PS3000, PS3420, Pre-Employment Guide, BOP Recruitment Flyer, interviews with the Warden and HR personnel

Standard number here 115.18 Upgrades to facilities and technology

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

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

Review of camera locations and interviews with Warden , Associate Warden (Programs), PREA Compliance Manger, Captain (SIS) and Facilities Manager.

Since PREA implementation, agency has installed additional cameras to enhance their monitoring capabilities. It is highly recommended to add half dome cell observation mirrows to the housning units to enhance officer visability as well as inmate safety.

Standard number here 115.21 evidence protocol and forensic medical exams

- 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 PS5324.11, Guide for First Responders, and interviews with Warden, Medical/Mental Health practitioners, PREA Compliance Manager and Captain (SIS)

Standard number here 115.22 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)

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

Based on PS5324.11; IS pg 2; review policy on agency website and interviews with Warden, PREA Compliance Manager and Captain (SIS)

Standard number here 115.31 Employee training

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

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

Reviewed PS5324.11, IS, Training Curriculum, sign in sheets as well as random interviews with staff

Standard number here 115.32 Volunteer and contractors 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)

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

Reviewed Training Lesson plan, and sign-in sheets and interviews

Standard number here 115.33 Inmate education

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

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

Review of inmate handbook, pamphlets and BOP zero tolerance posters in

(English, & Spanish),PS5290.14, BP-S518.052; and PREA sign-in sheets for pretrial inmates and random inmate interviews

Standard number here 115.34 Specialized training:Investigators

- 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

Review of PS5324.11, pg 29, Training Curriculum, training records, correspondence from FBI Principal Deputy General Counsel dated April 2, 2014 and interviews with Deputy Administrator, External Auditing Branch (BOP), Warden, Captain (SIS), special investigators

Standard number here 115.35 Specialized training: Medical and mental health care

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on PS5324.11 p29-30, course completion documentation, Regional Directors' memo; Warden's memo and interview of medical and mental health practitioners.

All forensic exams are performed at the hospital.

Standard number here 115.41 Screening for risk of victimization and abusiveness

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on PS5324.11, screening instrument, review of completed screening forms and follow-up PDS notes and interviews with random inmates, intake screening staff and medical staff

Standard number here 115.42 Use of screening information

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on review of PS5324.11, Screening Protocol, and interviews with PREA Compliance Manager, Medical and Mental Health practitioners and staff

Standard number here 115.43 Protective custody

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

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

Based on PS5324.11, pgs 34&35, PREA Compliance Manager memo-30 day review and interviews with random inmates, staff, PREA Compliance Manager, Warden and Associate Warden,(Programs)

Standard number here 115.51 Inmate reporting

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

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

Based on PS5324.11 pg36, IS5324.11 pg1, PREA Poster, Trulincs Bulletin Board and interviews with random inmates, staff , PREA Compliance Manager, and Center For Community Solutions personnel

Standard number here 115.52 exhaustion of administrative remedies

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

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

Based on PS1330.18

Standard number here 115.53 Inmate access to outside confidential support services

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

Does Not Meet Standard (requires corrective action)

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

Based on PS5324.11 pg37, IS pg3, inmate handbook, Trulincs Re-entry tool kit, and interviews with random inmates , Medical/Mental Health Practitioners and Center For Community Solutions personnel

Standard number here 115.54 Third party reporting

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

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

Based on review of notice on agency website, posters in the facility, pamphlet as well as interviews with PREA Compliance Manager, and random inmates.

Standard number here 115.61 Staff and agency reporting duties

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

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

Based on PS5324.11 and interviews with random staff, Warden, Captains, Lieutenants and Medical/mental health staff

Standard number here 115.62 Agency protection duties

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

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

Based on PS5324.11 pg39 and interviews with Warden and random staff

Standard number here 115.63 Reporting to other confinement facilities

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

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

Based on PS5324.11 pg40, review emails regarding allegations, and interview with Warden, PREA Compliance Manager and Captain (SIS)

Standard number here 115.64 Staff first responder duties

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

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

Based on PS5324.11 pg40 & 41, random staff interviews and Medical/mental Health staff

Standard number here 115.65 Coordinated response

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

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

Based on PS5324 pg 41; IS pg 3, First Responder Guide and interviews with Warden, PREA Compliance Manager, Medical/mental Health staff

Standard number here 115.66 Preservation of ability to protect inmates from contact with abusers

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

Does Not Meet Standard (requires corrective action)

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

Based on review of agreements and interview with Warden

Standard number here 115.67 Agency protection against retaliation

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on PS5324.11 pgs 43 & 44, IS pg3 , review of segregation housing documents and interview with Warden and PREA Compliance Manger

Standard number here 115.68 Post allegation protective custody

Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

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

Based on PS5324.11 pg44. No instances in the past 12 months

Standard number here 115.71 Criminal and administrative agency investigation

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 PS5324.11 pgs 44-46, correspondence from FBI Principal Deputy General Counsel dated April 2, 2014 and interview with Captain(SIS) and investigating staff

Standard number here 115.72 Evidentiary standard for administrative investigation

- 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 PS5324.11, pg46 and interview with Captain(SIS) and PREA Compliance Manager

Standard number here 115.73 Reporting to inmates

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

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

Based on review of OIA (2012) annual report, Trunintel documentation and interview with Warden, PREA Compliance Manager and Captain(SIS)

Standard number here 115.76 Disciplinary sanctions for staff

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

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

Based on PS3420.11 pgs6-7 and interviews with Warden, PREA Compliance Manager and Captain(SIS)

Standard number here 115.77 Corrective action for contractors and volunteers

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

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

Based on PS3420.11 and interview with Warden, PREA Compliance Manger and Captain(SIS)

Standard number here 115.78 Disciplinary sanctions for inmates

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

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

Based on PS5324.11, pg 49 , reviewed disciplinary records and interview with Warden and Associate Warden,Programs confirm procedure

Standard number here 115.81 Medical and Mental health screening; history of sexual abuse

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

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

Based on review of Medical and Mental Health Screening , tracking log, Psychology Services Confidentiality Poster, as well as interviews with intake staff, medical and mental health staff

Standard number here 115.82 Access to emergency medical and mental health services

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

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

Based on Medical and Mental Health Protocol reports; Evaluations Notes(PDS/BEMR), guidelines for treatment, as well as interviews with medical and mental health staff.

Standard number here

115.83 ongoing medical and mental health care for sexual abuse victims

- 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 Medical and Mental Health Protocol reports; Evaluations Notes(PDS/BEMR), guidelines for treatment, as well as interviews with medical and mental health staff and Center For Community Solutions personnel

Standard number here

115.86 Sexual abuse incident reviews

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

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

Based on PS5324.11, pgs. 53&54, review of incident reviews and interviews with Warden and PREA Compliance Manager

Standard number here

115.87 Data collection

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

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

Based on PS5324.11 pgs. 55&56 and review of data collected

Standard number here 115.88 Data review for corrective action

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

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

Based on review of corrective actions and annual report on website

Standard number here 115.89 Data storage, publication and destruction

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

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

Based on PS5324.11, pgs 57 & 58 and interview with PREA Compliance Manager

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.

Wynnie Testamack - Samuels

Auditor Signature

May 23, 2014

Date