

PREA AUDIT: AUDITOR'S SUMMARY REPORT

COMMUNITY CONFINEMENT FACILITIES



Name of facility: 180 Degrees Inc			
Physical address: 236 Clifton Ave South Minneapolis, MN 55403-3466			
Date report: 01/14/15			
Auditor Information Timothy Pippo			
Address: 3800 Braddock Ave NE Buffalo, MN 55313			
Email: tim.pippo@co.wright.mn.us			
Tel 763-684-2380			
Date of facility visit: December 15, 2014			
Facility Information			
Facility mailing address: (if different from above)			
Telephone number: 612-813-5000			
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 type="checkbox"/> State
	<input type="checkbox"/> XXPrivate not for profit		
Facility Type:	<input type="checkbox"/> Community Confinement	<input type="checkbox"/> Community based confinement facility <input type="checkbox"/> Mental health facility	<input type="checkbox"/> Other:
	<input type="checkbox"/> XXHalfway house		
	<input type="checkbox"/> Alcohol or drug rehabilitation center		
Name of Facility Head: Richard Gardell		Title: CEO	
Email address: Richard@180degrees.org		Telephone number: 6128135010	
Name of PREA Compliance Manager (if applicable): Jake Nowak		Title: Senior Manager	
Email address: jake@180degrees.org		Telephone number: 6128135014	
Agency Information			
Name of agency: 180 Degrees Inc			
Governing authority or parent agency: (if applicable)			
Physical address: 236 Clifton Av S Minneapolis, MN			
Mailing address: (if different from above)			
Telephone number: 612-813-5000			
Agency Chief Executive Officer			
Name: Richard Gardell		Title: CEO	

Email address: Richard@180degrees.org	Telephone number:	612-813-5010
Agency-Wide PREA Coordinator		
Name: Jake Nowak	Title:	Senior Manager
Email address: jake@180degrees.org	Telephone number:	612-813-5014

AUDIT FINDINGS

NARRATIVE:

The Audit of 180 Degrees Inc was conducted on December 15, 2014 by Timothy Pippo, Certified PREA Auditor. At approximately 7:00 AM I arrived at the facility and shortly thereafter started to interview a random sampling of residents chosen from a roster that was sent to me by e-mail on a previous date. The facility refers to their residents as **clients**. The facility only houses Male clients. The majority of clients housed at 180 degrees are on a release program of some type, either work release or release for job searches. Because of this factor I took the opportunity to interview 7 clients before they were released out of the facility for the day. On the day of the Audit, the facility had zero clients housed that were determined to be LGBTI or at risk for sexual victimization. I also interviewed a night shift staff member before the end of his shift.

At 9:00 AM I met with the Senior Manager and PREA Coordinator Jake Nowak. Jake and I toured the facility including the intake area, kitchen, laundry room, bathrooms and living quarters. After the tour I began to interview staff members starting with the CEO of 180 Degrees, Richard Gardell. I interviewed 5 random staff and 5 specialized staff members. I conducted three subsequent phone interviews with staff and volunteers after the audit.

There were zero client sexual abuse/sexual harassment allegations reported within the last 12 months. There were zero allegations against a staff member for sexual abuse/harassment in the past 12 months. There were zero administrative and or criminal allegations within the last 12 months.

DESCRIPTION OF FACILITY CHARACTERISTICS:

180 Degrees is a renovated three story home that houses up to 34 adult males that are on supervised release programs from the Minnesota Department of Corrections along with some pre-trial Federal clients. 180 degrees has been in operation since 1973, they receive over 200 male clients per year and have a 70% success rate for graduation from their 60 day reentry program. 180 degrees has only male staff working in the facility. The facility has 16 total residential rooms 5 of which are single occupancy. Clients housed at 180 degrees are self sufficient, they prepare their own meals, and they are allowed furloughs and are out of the facility frequently on release programs. The facility does not conduct any searches other than having the residents walk through a metal detector at the entrance. The clients are intensely supervised by State Probation Officers and the facility has little or no tolerance for bad behavior and will have the client(s) removed from the facility if deemed appropriate. The residential rooms in the facility are double occupancy. The clients have their own room key and come and go to their rooms at their own discretion with the exception of night time sleeping hours. There are bathroom facilities on each floor of the building and separate lockable showers. The facility has a video monitoring system that is monitored by staff members and accessible to supervisors.

Mission Statement and Code of Ethics

180 Degrees turns lives around to ensure safer communities

Maintain respect, objectivity and professionalism at all times

Maintain a commitment to provide high quality services through hard work, dedication and utilization of any other professionals which may benefit the client

Contribute time and professional expertise to activities that promote respect for the utility, integrity and competence of those in the field of community-based services

SUMMARY OF AUDIT FINDINGS

Number of standards exceeded:

Number of standards met: 38

Number of standards not met:

Number of standards not applicable 1

Standard number here 115.211 Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

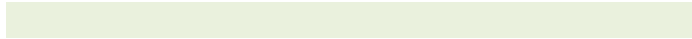


■ XXX Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)



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

- (a) The agency has a policy of zero tolerance found in the agencies Residential Policies and Procedures Manual page 36, Employee Handbook page 7 and the Code of Ethics page.
- (b) Interview with the CEO of the agency confirmed they have a designated PREA Coordinator with ample time to comply with the standards. The PREA Coordinator works under the direction of the CEO per the agencies organizational chart page 6 of the Residential Policy and Procedures Manual.



Standard number here 115.212 Contracting with other entities for the confinement of residents

■ Not Applicable

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

The agency does not nor has ever contracted with outside agencies for supervision or management of the residents housed at 180 degrees



Standard number here 115.213 Supervision and monitoring



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



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

(a)The agency has a documented staffing plan. Employee Handbook pages 22, 23, 24 and Residential Operations Manual page 18

(b) The facility does not waiver from it’s staffing plan, staff are not allowed to leave their post until relieved by another staff member and they have on-call staff.

(c) The facility has upgraded some video monitoring systems in the last year and have documentation to verify the upgrades



Standard number here 115.215 Limits to cross-gender viewing and searches



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



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

- (a) The facility only houses males and has only male staff, no strip searches are every done.
- (b) The facility does not perform pat searches they only have a metal detector.
- (c) No strip searches or body cavity searches ever performed.
- (d) The facility only has male staff with male residents.
- (e) The facility would only house Transgender persons that identify as male.
- (f) No pat searches are performed on any residents.

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

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

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

- (a) The facility utilizes an online service “purple communications” Spanish speaking staff, translation software programs and the client’s Probation Officer for interpretations
- (b) The facility utilizes these resources during the intake process where the PREA education takes place, the facility has plans to install a web-cam for deaf/hard of hearing clients.
- (c) The facility has access to emergency resources

Standard number here 115.217 Hiring and promotion decisions

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

- (a) Addressed in policy and Employee Handbook page 4, 67, 68, 69, 78
- (b) (c) (d) (e) Verified by an interview with Human Resource staff
- (f) Questions from paragraph (a) 1,2,3, were added to interview questions
- (g) Employee Handbook page 6

Standard number here 115.218 Upgrades to facilities and technologies

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

- (a) The facility considers all types of assaults including sexual when installing new surveillance equipment
- (b) The facility installed 6 new cameras in 2013 and have plans for installing 9 new cameras in 2015. Locations are in blind spots and outside bathroom areas.

Standard number here 115.221 Evidence protocol and forensic medical examinations

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

The facility has protocols for evidence preservation and would send any clients to "Hennepin County Medical Center for forensic and medical examinations. The hospital has SANE and SAFE practitioners on staff. Residents may contact the Minnesota Department of Corrections Sexual Assault Helpline as a toll free service. 180 Degrees has made several attempts to enter into a MOU with "Sexual Violence Center" 3757 Fremont Av N Minneapolis MN. I phoned the Center and they confirmed that they act as an Advocate for any sexual abuse victim from anywhere in Minneapolis including those housed at 180 Degrees.

Standard number here 155.222 Policies to ensure referrals for allegations for investigations

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

180 Degrees has in policy and will refer any criminal investigations to the Minneapolis Police Department. The police department's policy 10-115 meets the standards for sexual assault investigations. The facility has the information on their web-site <http://www.180degrees.org/privacy-policy>

Standard number here 115.231 Employee training

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

All 180 degree employees are trained on PREA considerations. The Employee Handbook page 7 and page 36 of the Residential Policies and Procedures Manual refer to this training. Staff interviews confirmed receipt of training.

Standard number here 115.232 Volunteer and contractor training

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

The Employee Handbook page 7 refers to volunteers. An interview with a volunteer confirmed they had received training.

Standard number here 115.233 Resident education

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

The facility gives residents PREA information at the time of intake. The Resident Handbook page 28 has PREA information and the facility has PREEA posting in conspicuous areas of the building.

Interviews with clients confirmed receipt of training.

Standard number here 115.234 Specialized training: Investigations

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

The facility uses Minneapolis Police Department for criminal investigations. Supervisory staff do Administrative investigations and utilize the ACA online training course for Investigative protocols in confinement settings.

Standard number here 115.235 Specialized training: Medical and mental health care

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

180 Degrees has no Medical Staff in their facility. They refer clients with medical issues to Hennepin County Medical Center. 180 Degrees has a Clinical Services department for Mental Health referrals. A phone interview with the Vice President of the Clinical Services dept. confirmed that all staff have received specialized training in Sexual Abuse detection. They also confirmed that they would provide treatment to sexual abuse victims and sexual abuse perpetrators.

Standard number here 115.241 Screening for risk of victimization and abusiveness

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

The facility does a Vulnerability Assessment that meets all components of the standard on every client at intake. The Residential Policy and Procedure Manual page 4 and the Employee Handbook page 4 refer to controls on dissemination of personal information.

Standard number here 115.42 Use of screening information

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

The facility has documentation verifying that the instrument is used in housing assignments. There were no Transgender or Intersex clients housed at the time of the audit. The Facility gives all clients the opportunity to shower separately.

**Standard
number here 115.251 Resident reporting**

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

Residents are informed of different types of reporting at intake and in their Resident Handbook, Staff are informed in the Employee Handbook. Staff reported that they may report privately by e-mail or cell phone. Interviews with staff and clients verified compliance with this standard.

**Standard
number here 115.252 Exhaustion of administrative remedies**

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

The facility has a policy concerning their grievance procedure. Clients use it on a regular basis. A grievance containing information about sexual abuse or sexual harassment would be dealt as an emergency grievance and actions would be taken immediately.

**Standard
number here 115.253 Resident access to outside confidential support services**

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

Clients are given two options for contacting emotional support services. The Minnesota Department of Corrections Sexual Assault Hotline and the Sexual Violence Center in Minneapolis, MN

**Standard
number here 115.254 Third-party reporting**

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

The agency has contact phone numbers on it's web-site for third party reporting of any incidents.

**Standard
number here 115.261 Staff and agency reporting duties**

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

Employee Handbook page 4 and Residential Policy and Procedure manual page 36 all refer to staff's duty to report any suspicion of sexual abuse/harassment or any retaliation. The agency has a Whistle Blower policy on page 38 of the Policy manual and a confidentiality policy. Staff Interviews confirmed their knowledge of the policies.

**Standard
number here 115.62 Agency protection of duties**

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

Staff are trained to separate and protect clients at imminent risk of any abuse. Staff interviews confirm compliance.

**Standard
number here 115.263 Reporting to other confinement facilities**

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

The facility is under a contractual agreement to notify the Minnesota Department of Corrections of any sexual abuse/harassment incidents. Clients charged of a criminal offense would be incarcerated at the Hennepin County Jail. Policy dictates that the facility would notify the next agency of any allegations. The Vulnerability Assessment Tool gives direction to staff to report.

**Standard
number here 115.264 Staff first responder duties**

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

The facility has protocols for staff to adhere to when responding to a sexual assault. Staff interviews confirmed standard compliance. Covered in Residential Policy manual page 40.

**Standard
number here 115.265 Coordinated response**

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

Policy includes response to sexual abuse in the facility.

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

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

Staff members at 180 Degrees are "At Will" employees. They are not under an Collective Bargaining Agreement.

**Standard
number here 115.267 Agency protection against retaliation**

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

Interview statements from the PREA Coordinator indicated that all measures possible would be taken to detect and protect residents from retaliation, including client interviews, video monitoring for as long as necessary. Retaliation is addressed in the Employee Handbook page 9 and 28. There have been no reports of retaliation within the last 12 months.

**Standard
number here 115.271 Criminal and administrative agency investigations**

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

The agency will use Minneapolis Police Department for any criminal investigations. There has been no Administrative or Criminal investigation within the last 12 months.

**Standard
number here 115.272 Evidentiary standard for administrative investigations**

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

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Policy contains statements that adhere to the standard.

**Standard
number here 115.273 Reporting to residents**

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

Agency policy addresses this standard. There were not Criminal or Administrative investigation within the last 12 months.

**Standard
number here 1156.276 Disciplinary sanctions for staff**

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

Employee handbook page 6 supports discipline for employees. Interviews with the CEO confirm zero tolerance for staff misconduct. No staff has ever been disciplined at 180 degrees for violation of sexual abuse/harassment policies.

**Standard
number here 115.277 Corrective action for contractors and volunteers**

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

The agency has zero tolerance towards misconduct by volunteers and would take appropriate action to react to sexual abuse/harassment and cooperate with local Police. There have been no volunteers or contractors that have been in violation of agency policies.

[REDACTED]

**Standard
number here 115.278 Disciplinary sanctions for residents**

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

Disciplinary Sanctions for clients are listed in the Residential Handbook. The facility does not have the means to comply with secure confinement. Sexual abuse would be reported to the clients Probation Officer which would require a revocation. There have been no incidents of sexual abuse committed by residents.

[REDACTED]

**Standard
number here 115.282 Access to emergency medical and mental health services**

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

Sexual abuse victims would be immediately transported to a hospital for treatment. Interviews with supervisors verified no cost to victims for treatment.

[REDACTED]

**Standard
number here 115.283 Ongoing medical and mental health care for sexual abuse victims and abusers**

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

The Vice President of 180 Degrees Clinical Services verified compliance with all components of this standard.

[REDACTED]

**Standard
number here 115.286 Sexual abuse incident reviews**

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

The facility has established an incident review team made up of supervisory staff members. There have been zero incidents to review in the last 12 months.

Standard number here 115.287 Data Collection

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

180 Degrees is in compliance with MN Administrative Rule 2920.4900 which brings them into compliance with this standard. There have been zero incidents to collect data from in the last 12 months.

Standard number here 115.288 Data review for corrective action

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

The agency had zero data to report for 2014.

Standard number here 115.289 Data Storage, publication and destructions

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

180 Degrees follow MN Administrative Rule 2920.490 for maintaining records.

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.

____ Timothy Pippo 01/14/2015_____

Auditor Signature

_____ Date