

The following information is a summary and data report relating to Independence House and the Prison Rape Elimination Act comparative corrective action and quality of compliance.

1. In 2025, no program PREA Audits were conducted.
2. The Independence House as a whole continues to have little to no allegations or PREA incidents, a record the company and programs are proud of.

3. PREA POLICY SUMMARY:

Independence House has a Zero Tolerance Policy for any sexual contact or sexual harassment between clients and between clients and staff members. Any behavior of a sexual nature in any form, including verbal, nonverbal, or physical, is strictly prohibited at all IH facilities and activities.

Sexual assault, sexual misconduct and sexual harassment of any type is PROHIBITED and will be referred to as prohibited sexual behavior. Any participation in sexual activity will be investigated and is subject to disciplinary sanctions. All reports of prohibited sexual behavior may be referred to a law enforcement agency for investigation and may be referred to the district attorney office for criminal prosecution.

All residents admitted into Independence House residential facilities are provided with education and information pertaining to PREA, including, but not limited to definitions and confidential 3rd party reporting procedures, zero tolerance policy, client resources, prevention, treatment and counseling, bad faith allegations, support services, and confidentiality. Residents are screened upon intake to assess the risk of victimization or predation using an objective measurement tool based on specific risk factors. This screening occurs within 72 hours of arrival at the residential facilities, re-assessment is completed within 30 days and upon any new relevant information received.

All staff, contractors, and volunteers/interns are screened for prior criminal records and receive an orientation and training on the Zero Tolerance Policy and reporting procedures.

Types of Sexual Assault, Sexual Misconduct and Sexual Harassment Include:

- Client-on-Client.
- Client-on-employee/contract worker/volunteer.
- Employee/contract worker/volunteer-on-client.

Acts of Sexual Assault, Sexual Misconduct and Sexual Harassment Include:

- The physical act.
- The attempt of the physical act, including inappropriate touching.
- Voyuerism and exhibitionism.

- Threats, intimidation, and actions/communications meant to coerce or pressure another to engage in the inappropriate act.
- Retaliation against individuals reporting prohibited sexual behavior is prohibited and punishable.
- Clients cannot consent to any sexual contact with, or harassment from, employees, contractors or volunteers. All sexual contact and communications of a sexual nature between employees/contractors/volunteers and clients are by definition non-consensual and strictly prohibited.

Any behavior of a sexual nature whether verbal, nonverbal, or physical is strictly prohibited while working or volunteering at Independence. This prohibited sexual behavior includes sexual assault, sexual conduct in a correctional institution, and sexual harassment.

- **Sexual Assault:** Forced or non-consensual sexual intrusion, sexual contact or sexual penetration.
- **Sexual Conduct in a Correctional Institution:** 'An employee, contract employee, or volunteer of a correctional institution, or an individual who performs work or volunteer functions in a correctional institution, who engages in sexual conduct with a person who is in lawful custody in a correctional institution, commits the offense of sexual conduct in a correctional institution, pursuant to C.R.S. 18-7-701.'
 **If charged and convicted, a possible condition could be the requirement to register as a sex offender.
- **Sexual Harassment:** Subjecting another person to verbal or written statements or gestures of a sexual nature.

Where sexual harassment is alleged, IH shall investigate promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports. The results of the investigation will be forwarded to the PREA Coordinator to maintain all sexual abuse data.

Independence House continues to provide PREA prevention education to staff, clients, and visitors.

Independence House continues to make strides to increase accountability around the PREA requirements.

This Annual PREA Report is approved by Rose Rodriguez, Chief of Administration



Signature: _____

Date: March 28, 2026

Independence House PREA Data Reporting

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