

PREA Facility Audit Report: Final

Name of Facility: Silver Oak Academy

Facility Type: Juvenile

Date Interim Report Submitted: 09/30/2020

Date Final Report Submitted: 10/02/2020

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
Auditor Full Name as Signed: Elaine Brideschge	Date of Signature: 10/02/2020

AUDITOR INFORMATION	
Auditor name:	Brideschge, Elaine
Email:	ebridsch@courts.az.gov
Start Date of On-Site Audit:	08/28/2020
End Date of On-Site Audit:	08/29/2020

FACILITY INFORMATION	
Facility name:	Silver Oak Academy
Facility physical address:	999 Crousemill Rd, Keymar, Maryland - 21757
Facility Phone	
Facility mailing address:	

Primary Contact	
Name:	Briann Staub
Email Address:	briann.staub@rop.com
Telephone Number:	4107751745

Superintendent/Director/Administrator	
Name:	Stephen Chop
Email Address:	stephen.chop@rop.com
Telephone Number:	4107751745

Facility PREA Compliance Manager	
Name:	Briann Staub
Email Address:	briann.staub@rop.com
Telephone Number:	

Facility Characteristics	
Designed facility capacity:	42
Current population of facility:	41
Average daily population for the past 12 months:	37
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Males
Age range of population:	14 - 19
Facility security levels/resident custody levels:	Group Home
Number of staff currently employed at the facility who may have contact with residents:	53
Number of individual contractors who have contact with residents, currently authorized to enter the facility:	2
Number of volunteers who have contact with residents, currently authorized to enter the facility:	12

AGENCY INFORMATION	
Name of agency:	Rite of Passage, Inc.
Governing authority or parent agency (if applicable):	
Physical Address:	2560 Business Parkway Suite A, Minden, Nevada - 89423
Mailing Address:	
Telephone number:	775-267-9411

Agency Chief Executive Officer Information:	
Name:	S. James Broman
Email Address:	sbroman@rop.com
Telephone Number:	775-267-9411

Agency-Wide PREA Coordinator Information			
Name:	Karen Murray	Email Address:	karen.murray@rop.com

AUDIT FINDINGS

Narrative:

The auditor's description of the audit methodology should include a detailed description of the following processes during the pre-audit, on-site audit, and post-audit phases: documents and files reviewed, discussions and types of interviews conducted, number of days spent on-site, observations made during the site-review, and a detailed description of any follow-up work conducted during the post-audit phase. The narrative should describe the techniques the auditor used to sample documentation and select interviewees, and the auditor's process for the site review.

The PREA onsite audit of the Rite of Passage Silver Oak Academy (SOA) in Keymar, Maryland was conducted on August 27-28, 2020 by Elaine Brideschge, from Valley Farms, Arizona, a U.S. Department of Justice certified PREA Auditor for juvenile facilities through a contract with PREA Auditors of America.

The purpose of the audit was to determine the degree of compliance with the Federal Rape Elimination Act (PREA) standards.

On June 24, 2020, approximately six weeks in advance of the onsite audit, the facility posted flyers provided by the auditor throughout the facility announcing the upcoming audit. The flyer explained the purpose of the audit and provided students and staff with the auditors contact information. The flyer was written in English and in Spanish. The facility dated the flyer with the date it was posted, and the auditor has photos of the displayed flyers. The flyers were displayed in sixteen areas to include housing areas, main lobby, dining areas, education, and the employee breakroom.

Pre-audit preparation included a thorough evaluation of all documentation and materials submitted by the facility through the PREA online automated system, along with the data specified in the pre-audit questionnaire. The documentation reviewed include agency policies, procedures, forms, education materials, training curriculum and rosters, posters, brochures, and other relevant materials that were provided to determine compliance with the PREA standards. This review prompted questions and requests for additional documentation in a form of an issue log that was submitted to the PREA Coordinator and Compliance Manager for review and clarification. Responses were submitted to the auditor in a timely manner and prior to the onsite audit. Additional documentation was also submitted by the facility for the auditor's review.

The onsite portion of the audit was conducted over a two-day period. The auditor held an entrance meeting on the first day to review the audit agenda and discuss the audit process with facility leadership.

The meeting was attended by facility leadership to include the Regional Director, Clinical Supervisor, Facility Administrator, Regional Compliance Director, School Nurse, Maintenance Supervisor, HR/Compliance, and education staff.

Following the entrance meeting, an extensive tour of the facility was conducted which included observation of facility configuration, staff supervision of students, housing areas, intake, classrooms, visitation areas, recreation areas, dining areas, and administration areas. The auditor was able to view camera locations, showering areas, toilet facilities, and sleeping rooms. The auditor was able to informally talk to the students and staff. While on the tour, the auditor was permitted full access to all areas of the facility. Notices of the PREA audit was observed posted in multiple areas throughout the facility. The auditor was escorted by facility staff.

The auditor conducted interviews with facility leadership, employees, and students. The interviews conducted were consistent with Department of Justice PREA auditing expectations in content and approach utilizing the PREA Compliance Audit Instrument Interview Guides (Program Director, PREA

Coordinator, Agency Head, Compliance Manager, specialized staff, random staff, Medical and Mental Health staff, Human Resource staff, Investigators, and students). The auditor was able to ask additional questions to employees and students to gain more information about certain practices of the facility. In addition, the auditor was able to verify through interviews specific facility protocols and clarify documentation submitted.

On the first day of the audit, there were 8 students shown on the roster. The students were selected randomly to interview by the auditor using a current roster of students. The auditor selected students from all occupied housing units, which included interviews with all 8 random students. There were no students to interviewed for any of the specialized interviews (LGBTI, reported sexual abuse, limited English proficient, held in isolation, or students who disclosed prior sexual victimization).

Students were interviewed using the recommended DOJ PREA Compliance Audit Instrument Interview Guides that question their knowledge of a variety of PREA protections generally and specifically their knowledge of reporting mechanisms available to students to report abuse and harassment. The auditor was able to ask additional questions to students to gain more information about certain practices of the facility. In addition, the auditor was able to gather information through interviews regarding facility practices that occur in the environment. The auditor asked each student if they felt safe in the facility, and 100% responded that they did.

On the first day of audit, there were 39 staff shown on the schedule. The auditor interviewed 12 random staff members representing day and night shifts and 14 staff in specialized areas. The auditor selected staff randomly by using a current staff roster. The auditor randomly selected officers per each shift, position assignment, and gender. Specialized interviews included staff who have acted as first responders, intake staff, lead staff/supervisors, medical staff, mental health staff, human resources staff, staff that monitor retaliation, investigators, staff who perform risk assessments, compliance manager, PREA coordinator, program director, agency head, and sexual abuse response team members.

Selected staff were interviewed using both random and specialty area interview questions. Staff were questioned using the recommended DOJ PREA Compliance Audit Instrument Interview Guides that question their PREA training and overall knowledge of the agency's zero tolerance policy, reporting mechanisms available to students and staff, the response protocols when a student alleges abuse, and first responder duties. The facility's leadership accommodated the auditor's request to interview specific staff and arranged student supervision while staff were participating in the interview process.

The auditor was able to complete telephonic interviews with 2 contractors, 1 volunteer, and the Carroll Hospital SAFE Program (hotline, victim services, forensic examinations) using the recommended DOJ PREA Compliance Audit Instrument Interview Guides.

While at the facility, the auditor reviewed 8 student case records randomly selected by the auditor utilizing a student roster provided to the auditor by the facility to evaluate screening and intake procedures, student education, and other general programmatic areas. The auditor randomly selected and reviewed 15 employee files and employee training logs to determine compliance with training mandates and background check procedures.

On the final day of the onsite audit, a debriefing was held with the facility's leadership staff to include the Regional Director, Facility Administrator, School Nurse, Regional Compliance Director, and HR/Compliance. The purpose of the meeting was to summarize preliminary audit findings, next steps of the audit process, and to provide specific feedback to include strengths and areas of improvement as it relates to PREA standards.

AUDIT FINDINGS

Facility Characteristics:

The auditor's description of the audited facility should include details about the facility type, demographics and size of the inmate or resident population, numbers and type of staff positions, configuration and layout of the facility, numbers of housing units, description of housing units including any special housing units, a description of programs and services, including food service and recreation. The auditor should describe how these details are relevant to PREA implementation and compliance.

Silver Oak Academy, owned and operated by Rite of Passage, is a staff secure, open campus with dorm style living units serving male students ages 14 to 19 years old. The facility has a campus capacity of 96 students. The population at time of audit was 8 students and the average length of stay is 6.8 months.

Silver Oak Academy is dedicated to improving the lives of youth by providing comprehensive and individualized educational, treatment, athletic, and career technical education services through evidences-based programming and state-of-the-art facilities. Silver Oak Academy is a residential high school for up to 96 at-risk young men that is operated by Rite of Passage.

Silver Oak Academy is set on a 75-acre campus including six dormitories, a gymnasium, outdoor field and track, vocational training, and school administration buildings. The dorms are currently configured for use as living units consisting of multiple occupancy bedrooms. In addition to bedrooms, each dorm includes a common bathroom with six individual showers, a shared dayroom, program rooms, and a staff office. Georgetown Hall is currently the only dorm being occupied by students at this time due to low enrollment numbers.

The facility's workforce (vocational training) is exemplary. Programs offered consist of culinary arts, computer technology, certified nursing assistant (CNA), a Barber Shop, a Wood Shop, and automotive technology. The facility also has a music room and offers competitive sports. Staff housing is also available for staff with no student access.

The facility is equipped with a video monitoring system, with cameras located in multiple locations. Meals are prepared onsite in an approved kitchen where students and staff can eat meals together in the dining areas.

AUDIT FINDINGS

Summary of Audit Findings:

The OAS will automatically calculate the number of standards exceeded, number of standards met, and the number of standards not met based on the auditor's compliance determinations. If relevant, the auditor should provide the list of standards exceeded and/or the list of standards not met (e.g. Standards Exceeded: 115.xx, 115.xx..., Standards Not Met: 115.yy, 115.yy). Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.

Number of standards exceeded:	3
Number of standards met:	40
Number of standards not met:	0

Standards Exceeded: 115.313; 115.331; 115.388

Standards Not Met:115.364

Standards

Auditor Overall Determination Definitions

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

Auditor Discussion Instructions

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.311	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The agency has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment in facilities it operates directly. The facility has a policy outlining how it will implement the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment. The policy includes definitions of prohibited behaviors regarding sexual abuse and sexual harassment; sanctions for those found to have participated in prohibited behaviors; and a description of agency strategies and responses to reduce and prevent sexual abuse and sexual harassment of students.</p> <p>The agency employs or designates an upper-level, agency-wide PREA Coordinator. The PREA Coordinator has sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities. The position of the PREA Coordinator is in the agency's organizational structure and is listed as Director of Compliance. The facility has a designated PREA Compliance Manager. The PREA Compliance Manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards. The position of the PREA Compliance Manager is in the agency's organizational structure and is listed as the Human Resource Generalist.</p> <p>Interviews conducted with the PREA Coordinator and Compliance Manager indicate that they have enough time to manage all PREA-related responsibilities. Monthly meetings are held to discuss PREA compliance with quality reviews conducted quarterly. Regular communication between the PREA Coordinator and Compliance Manager occur in person, virtual meeting spaces, mail and phone conversations.</p> <p>Policies reviewed:</p> <p>PREA SES Policy 600.600</p> <p>Documentation/files reviewed:</p> <p>ROP Corp Org chart 2020</p> <p>SOA Organizational Chart 2020</p> <p>Interviews conducted:</p> <p>PREA Coordinator</p> <p>Compliance Manager</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.312	Contracting with other entities for the confinement of residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The agency does not contract for the confinement of students therefore the facility meets this standard.</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.313	Supervision and monitoring
	<p>Auditor Overall Determination: Exceeds Standard</p> <p>Auditor Discussion</p> <p>The agency requires each facility it operates to develop, document, and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect students against abuse. The facility is obligated by law, regulation, or judicial consent decree to maintain staffing ratios of a minimum of 1:8 during student waking hours and 1:12 during student sleeping hours, which far exceeded the requirement of the 1:16 night ratio. Each time the staffing plan is not complied with, the facility documents and justifies all deviations from the staffing plan. The facility has implemented a plan during night shift whereas an emergency night staff is onsite and available to respond to emergency situations and when needed to maintain ratio. This staff member is not counted in the evening ratio unless called upon to do so.</p> <p>The facility has a developed staffing plan that is reviewed annually to see whether adjustments are needed to: (a) the staffing plan; (b) prevailing staffing patterns; (c) the deployment of monitoring technology; or (d) the allocation of agency or facility resources to commit to the staffing plan to ensure compliance with the staffing plan.</p> <p>The facility requires that intermediate-level or higher-level staff conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment. The facility documents unannounced rounds and covers all shifts over time. the facility prohibits staff from alerting other staff of the conduct of such rounds.</p> <p>During a tour of the facility, the auditor was able to check all community bathrooms for potential vulnerabilities.</p> <p>Interviews were conducted. Staff state that a staffing plan has been fully developed and is reviewed at least annually. Interviews were also conducted with staff responsible for conducting unannounced rounds. Rounds occur on every shift at random times. Rounds are documented and maintained in a binder.</p> <p>Policies reviewed:</p> <p>ROP SES PREA Policy</p> <p>Documentation/Files reviewed:</p> <p>FY2020 Staffing Pattern Grid</p> <p>Annual Staffing Review SOA 2019</p> <p>Unannounced Rounds</p> <p>SOA 1st qtr unannounced rounds</p> <p>SOA 2nd qtr unannounced rounds</p> <p>SOA 3rd qtr unannounced rounds</p>

SOA 4th qtr unannounced rounds

SOA Staffing Plan

Supervisor rounds forms

Interviews conducted:

Program Director

Compliance Manager

PREA Coordinator

Intermediate/higher level staff that conduct unannounced rounds

Based on evidence discussed, the facility has exceeded compliance with this standard.

115.315	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility does not conduct cross-gender strip or cross-gender visual body cavity searches of students. The facility is an all-male facility. The facility does not permit cross-gender pat-down searches of students, absent exigent circumstances. Facility policy requires that all cross-gender strip searches, cross-gender visual body cavity searches, and cross-gender pat-down searches be documented and justified.</p> <p>The facility has implemented policies and procedures that enable students to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks (this includes viewing via video camera). Policies and procedures require staff of the opposite gender to announce their presence when entering a student housing unit or areas where students are likely to be showering, performing bodily functions, or changing clothing.</p> <p>The facility has a policy prohibiting staff from searching or physically examining a transgender or intersex student for the sole purpose of determining the student's genital status. All ROP staff, contractors, and volunteers receive training on working with LGBTI students in a professional and respectful manner and on the ROP policy for pat down searches or other searches necessary for security reasons. LGBTI students requiring a search will be conducted by medical professionals.</p> <p>During the facility tour, the auditor did not observe any cross-gender searches. The auditor did observe staff of the opposite gender announcing their presence when entering a student housing unit.</p> <p>At time of audit, the facility did not have any students that were transgender or intersex. Interviews conducted with staff indicate staff have received training in cross gender pat searches. Staff also stated that only in exigent circumstances would a cross gender pat search occur. Staff would not physically examine a transgender for the sole purpose of determining a student's genital status. Female staff stated that they announce their presence when entering a unit and that students are allowed to dress, shower, and use the toilet without being viewed.</p> <p>All students interviewed reported during interview that female staff announce their presence when entering a unit. Students also stated that they have never been pat searched by female staff.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Documentation/files reviewed:</p> <p>ROP SES/PREA training lesson plan</p>

Staff training logs

Interviews conducted:

Random staff

Random Student's

LGBTI Student's

Based on the evidence discussed, the facility has demonstrated compliance with this standard.

115.316	Residents with disabilities and residents who are limited English proficient
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The agency has established procedures to provide disabled students equal opportunity to participate in or benefit from all aspects of the agency’s efforts to prevent, detect, and respond to sexual abuse and sexual harassment. The agency has established procedures to provide students with limited English proficiency equal opportunity to participate in or benefit from all aspects of the agency’s efforts to prevent, detect, and respond to sexual abuse and sexual harassment.</p> <p>Agency has a policy that prohibits use of student interpreters, student readers, or other types of student assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the student’s safety, the performance of first-response duties under §115.364, or the investigation of the student’s allegations.</p> <p>At time of audit there were not any students identified with disabilities or Limited English Proficient.</p> <p>Interviews conducted indicate that signs throughout the facility are in English and Spanish. Bilingual staff are consistently available. Language line services are utilized for other languages for students and their visitors.</p> <p>During a tour of the facility, the auditor observed that units have larger doors for accessibility and handicapped bathrooms for students with a disability are located throughout the campus.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Documentation/files reviewed:</p> <p>ROP SES/PREA training lesson plan</p> <p>PREA Booster sign in sheets</p> <p>Student Brochure – Spanish</p> <p>Pre-Service PREA</p> <p>Language Line Translation information – AdAstra inc.</p> <p>Language Line doc</p> <p>Interviews conducted:</p> <p>Agency Head</p> <p>Random staff</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.317	Hiring and promotion decisions
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1481 663">Agency policy prohibits hiring or promoting anyone who may have contact with students, and prohibits enlisting the services of any contractor who may have contact with students, who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997); has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.</p> <p data-bbox="252 696 1481 1032">Agency policy requires the consideration of any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with students. Agency policy requires that before it hires any new employees who may have contact with students, it (a) conducts criminal background record checks; (b) consults any child abuse registry maintained by the State or locality in which the employee would work; and (c) consistent with Federal, State, and local law, makes its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse.</p> <p data-bbox="252 1066 1481 1357">Agency policy requires that a criminal background records check be completed, and applicable child abuse registries consulted before enlisting the services of any contractor who may have contact with students. Agency policy requires that either criminal background record checks be conducted at least every five years of current employees and contractors who may have contact with students or that a system is in place for otherwise capturing such information for current employees. This was verified by the auditor during a review of employee files.</p> <p data-bbox="252 1391 1481 1603">The agency asks all applicants and employees who may have contact with students directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees. The agency shall also impose upon employees a continuing affirmative duty to disclose any such misconduct.</p> <p data-bbox="252 1637 1481 1715">Agency policy states that material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.</p> <p data-bbox="252 1749 1481 1872">Unless prohibited by law, the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.</p> <p data-bbox="252 1906 1481 2029">During interview, human resource staff stated that they conduct all employee recruitment and background checks. As well, the department maintains all employee files. The auditor was able to review employee background files.</p> <p data-bbox="252 2063 488 2107">Policies reviewed:</p>

ROP SES Policy

FBI Background Policy

Documentation/files reviewed:

CPS Results

Maryland Sex Offender Results

OIG Results

FBI Fingerprints

Maryland Fingerprints

Background Investigation Notification and Authorization Form 100.209

New employee file review

Employee file review for 5 yr intervals

Contractor file review

Interviews conducted:

Human Resources staff

Based on the evidence discussed, the facility has demonstrated compliance with this standard.

115.318	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility has not made any substantial modifications to existing facilities since the previous audit.</p> <p>Interviews conducted reveal that a constant visual of students was essential as well as the placement of the command stations. During a tour of the facility the auditor did not observe any blind spots.</p> <p>Video surveillance cameras and monitors were observed during the tour of the facility. It was also observed that the monitoring of cameras is reviewed on multi-levels, from the command station up to the supervisors. Cameras were not observed in the shower or restroom areas.</p> <p>Documentation/files reviewed:</p> <p>Staffing plan</p> <p>Interviews conducted:</p> <p>Agency Head</p> <p>Program Director</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.321	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The agency/facility is responsible for conducting administrative sexual abuse investigations (including student-on-student sexual abuse or staff sexual misconduct). The agency/facility is not responsible for conducting criminal sexual abuse investigations (including student-on-student sexual abuse or staff sexual misconduct). Such allegations will be referred to the Maryland State Police. When conducting a sexual abuse investigation, the agency investigators follow a uniform evidence protocol. The protocol is developmentally appropriate for youth. The protocol was adapted from or otherwise based on the most recent edition of the DOJ's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011.</p> <p>The facility offers all students who experience sexual abuse access to forensic medical examinations at an outside facility. Forensic medical examinations are offered without financial cost to the victim. Where possible, examinations are conducted by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) through the Rape Crisis Intervention Service of Carroll County. When SANEs or SAFEs are not available, a qualified medical practitioner performs forensic medical examinations.</p> <p>The facility has documented efforts to provide SANEs or SAFEs with the forensic evaluation provider.</p> <p>The facility attempts to make a victim advocate from a rape crisis center available to the victim, in person or by other means. If and when a rape crisis center is not available to provide victim advocate services, the facility provides a qualified staff member from a community-based organization or a qualified agency staff member.</p> <p>If requested by the victim, a victim advocate, or qualified agency staff member, or qualified community-based organization staff member accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provides emotional support, crisis intervention, information, and referrals.</p> <p>The agency is responsible for investigating administrative allegations of sexual abuse and relies on another agency to conduct criminal investigations.</p> <p>The auditor was able to interview three students who reported sexual abuse. The students stated that they were allowed to contact their parent and a call a hotline. Students also stated that they were offered victim advocacy services.</p> <p>Interviews conducted revealed that the local victim advocacy agency is utilized for advocacy. Therapeutic staff are available to provide victim advocacy as needed. Staff are aware of the facility protocol for obtaining usable physical evidence if a student alleges sexual abuse.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p>

Documentation/files reviewed:

A National Protocol for Sexual Assault Medical Forensic Examinations for Adults/Adolescents, 2nd edition

Coordinated Response plan

Documented efforts to Rape Crisis Intervention Service of Carroll County

MOU with Rape Crisis Intervention Service of Carroll County 2020

Maryland Board of Social Work Examiners: License Verification for Stephen Chop

Interviews conducted:

Random Staff

SAFE SANE staff

Compliance Manager

Students who reported sexual abuse

Based on evidence discussed, the facility has demonstrated compliance with this standard.

115.322	<p>Policies to ensure referrals of allegations for investigations</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. The agency has a policy that requires allegations of sexual abuse or sexual harassment be referred for investigation to an agency with the legal authority to conduct criminal investigations, including the agency if it conducts its own investigations, unless the allegation does not involve potentially criminal behavior. The agency's policy regarding the referral of allegations of sexual abuse or sexual harassment for a criminal investigation is published on the agency website at www.riteofpassage.com. The agency documents all referrals of allegations of sexual abuse or sexual harassment for criminal investigation.</p> <p>Interviews conducted reveal that the Maryland State Police conducts all criminal investigations. The Maryland State Police has specialized officers trained to conduct such investigations. The compliance manager remains in contact with this agency and maintains regular communication to receive updates and reports of progress and works closely with the investigative agency when staff are involved in the allegation.</p> <p>Policy reviewed:</p> <p>ROP SES Policy</p> <p>Documentation/files reviewed:</p> <p>Agency website</p> <p>Interviews conducted:</p> <p>Agency Head</p> <p>Investigative staff</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>
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115.331	Employee training
	<p data-bbox="252 168 925 201">Auditor Overall Determination: Exceeds Standard</p> <p data-bbox="252 246 518 280">Auditor Discussion</p> <p data-bbox="252 324 1484 996">The agency trains all employees who may have contact with students on the agency's zero-tolerance policy for sexual abuse and sexual harassment; how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; the right of students to be free from sexual abuse and sexual harassment; the right of students and employees to be free from retaliation for reporting sexual abuse and sexual harassment; the dynamics of sexual abuse and sexual harassment in juvenile facilities; the common reactions of juvenile victims of sexual abuse and sexual harassment; how to detect and respond to signs of threatened and actual sexual abuse and how to distinguish between consensual sexual contact and sexual abuse between students; how to avoid inappropriate relationships with students; how to communicate effectively and professionally with students, including lesbian, gay, bisexual, transgender, intersex, or gender-nonconforming students; how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities; and on relevant laws regarding the applicable age of consent. The training is tailored to the unique needs and attributes and gender of the students at the facility. Employees who are reassigned from facilities housing the opposite gender are given additional training.</p> <p data-bbox="252 1041 1436 1243">Training is provided to all employees upon hire. After that, the agency provides employees who may have contact with students with refresher information about current policies regarding sexual abuse and harassment. Employees who may have contact with students receive refresher training on PREA requirements every six months. As well, refreshers are provided individually as needed.</p> <p data-bbox="252 1288 1452 1355">The agency documents that employees who may have contact with students understand the training they have received through employee signature or electronic verification.</p> <p data-bbox="252 1400 1444 1467">All staff indicated during interview that they received training in the eleven areas identified in this standard.</p> <p data-bbox="252 1512 486 1545">Policies reviewed:</p> <p data-bbox="252 1590 462 1624">ROP SES Policy</p> <p data-bbox="252 1668 646 1702">Documentation/files reviewed:</p> <p data-bbox="252 1747 1013 1780">ROP SES training curriculum and PowerPoint presentation</p> <p data-bbox="252 1825 646 1859">Staff training records reviewed</p> <p data-bbox="252 1904 774 1937">Staff signature/acknowledgement forms</p> <p data-bbox="252 1982 710 2016">ROP SES Knowledge Assessments</p> <p data-bbox="252 2060 630 2094">PREA Booster Sign in Sheets</p> <p data-bbox="252 2139 550 2172">Zero Tolerance - Davis</p>

Interviews conducted:

Random staff

Based on the evidence discussed, the facility has exceeded compliance with this standard.

115.332	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>All volunteers and contractors who have contact with students have been trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response.</p> <p>The level and type of training provided to volunteers and contractors are based on the services they provide and level of contact they have with students. All volunteers and contractors who have contact with students have been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.</p> <p>Interviews conducted with volunteers and contractors state that they received appropriate training on the agency's zero tolerance policy and on their responsibility regarding sexual abuse and sexual harassment prevention, detection, and response. They also stated that they were informed about how to report such incidents.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Documentation/files reviewed:</p> <p>ROP SES/PREA training</p> <p>Independent contractor/volunteer lesson plans</p> <p>Volunteer training file review</p> <p>Contractor training file review</p> <p>Interviews conducted:</p> <p>Volunteers</p> <p>Contractors</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.333	Resident education
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Students receive information at time of intake about the zero-tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment. Agency policy requires that students who are transferred from one facility to another be educated regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents to the extent that the policies and procedures of the new facility differ from those of the previous facility.</p> <p>Student PREA education is available in formats accessible to all students, including those who are limited English proficient. Student PREA education is available in formats accessible to all students, including those who are deaf. Student PREA education is available in formats accessible to all students, including those who are visually impaired. Student PREA education is available in formats accessible to all students, including those who are otherwise disabled. Student PREA education is available in formats accessible to all students, including those who have limited reading skills.</p> <p>The agency maintains documentation of student participation in PREA education sessions. This was verified by the auditor through student file reviews.</p> <p>The agency ensures that key information about the agency's PREA policies is continuously and readily available or visible through posters, student handbooks, or other written formats. During the tour of the facility, the auditor verified that student education and posters were displayed, and handbooks were available. Numerous PREA posters were visible throughout the facility.</p> <p>Intake staff and students were interviewed. Staff stated that students are provided information at time of intake on the agency's zero tolerance policy. Students are given a handbook and shown a PREA video. They also sign a document acknowledging that training was received. Students stated that they received training on PREA at intake and understand the information received. In addition, student's stated that they receive PREA information every month.</p> <p>Policy:</p> <p>ROP SES Policy</p> <p>Documentation/files reviewed:</p> <p>Student PREA SES training video</p> <p>Agency website (video)</p> <p>SES "A Student's Guide to Rights, Protections, and Reporting of Sexual Abuse:</p> <p>Juvenile PREA Intake Orientation</p> <p>ROP SES student acknowledgement of zero tolerance and student education forms</p>

"Know your Rights Zero Tolerance" posters

Student Handbook

Intake records/student file review

PREA materials-handbooks-Spanish and English

Interviews conducted:

Intake staff

Students

Based on the evidence discussed, the facility has demonstrated compliance with this standard.

115.334	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Agency policy requires that investigators are trained in conducting sexual abuse investigations in confinement settings. The facility employs three investigators. The agency maintains documentation showing that investigators have completed the required training.</p> <p>Interview with Investigative staff reveal that specialized training was received. The auditor was able to verify through file review that appropriate training certificates were received.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Documentation/files reviewed:</p> <p>ROP SES/PREA training – specialized training for administrative investigators curriculum</p> <p>Specialized training certificates</p> <p>Investigator file reviews</p> <p>Interviews conducted:</p> <p>Investigative staff</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.335	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The agency has a policy related to the training of medical and mental health practitioners who work regularly in its facilities. Agency medical staff at this facility do not conduct forensic medical exams. The agency maintains documentation showing that medical and mental health practitioners have completed the required training. Training was verified by the auditor through file review.</p> <p>Interviews with medical and mental health staff verified that they do not conduct forensic examinations. They also confirm that specialized training was received through Rite of Passage. As well, medical and mental health receive the same PREA training that all the other staff receive.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Documentation/files reviewed:</p> <p>ROP SES/PREA training - specialized training for medical and mental health personnel curriculum</p> <p>File reviews</p> <p>Training certificates</p> <p>Interviews conducted:</p> <p>Medical staff</p> <p>Mental Health staff</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.341	Obtaining information from residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The agency has a policy that requires screening (upon admission to a facility or transfer to another facility) for risk of sexual abuse victimization or sexual abusiveness toward other students. The policy requires that students be screened for risk of sexual victimization or risk of sexually abusing other students within 72 hours of their intake. The policy requires that the student's risk level be reassessed periodically throughout their confinement. Risk assessments are conducted using an objective screening instrument. The auditor was able to review the risk assessment to determine that the tool meets the criteria 1-11 as specified in this standard.</p> <p>Interviews conducted with staff who administer the risk screening state that students are screened upon admission and no later than 72 hours. The tool considers all factors identified in this standard. Screenings are completed individually and verbally with students. All students interviewed reported that they received a risk screening upon admission to the facility and recall being asked questions like whether they have ever been sexually abused, identify as being gay, bisexual, transgender, have a disability, or think that they may be in danger of sexual abuse at the facility. This was verified through file review.</p> <p>The PREA Coordinator and Compliance Manager stated that the agency has outlined who should have access to a student's risk assessment within the facility to protect sensitive information from exploitation and determined that intake staff and mental health staff have the information. All other staff are on a need to know basis and must seek supervisor approval to receive the information. The need must be demonstrated.</p> <p>Policy reviewed:</p> <p>ROP SES Policy</p> <p>Documentation/files reviewed:</p> <p>Athen Certificate 2020</p> <p>Elliot Certificate 2020</p> <p>Student file review (within 72 hours)</p> <p>Student vulnerability assessment instrument</p> <p>Interviews conducted:</p> <p>Staff responsible for conducting risk screening</p> <p>Student</p> <p>PREA Coordinator</p> <p>Compliance Manager</p>

Based on the evidence discussed, the facility has demonstrated compliance with this standard.

115.342	Placement of residents
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>The agency/facility uses information from the risk screening required by §115.341 to inform housing, bed, work, education, and program assignments with the goal of keeping all students safe and free from sexual abuse. The facility has a policy that students at risk of sexual victimization may only be placed in isolation as a last resort if less restrictive measures are inadequate to keep them and other students safe, and only until an alternative means of keeping all students safe can be arranged. The facility prohibits placing lesbian, gay, bisexual, transgender, or intersex students in particular housing, bed, or other assignments solely on the basis of such identification or status. The facility prohibits considering lesbian, gay, bisexual, transgender, or intersex identification or status as an indicator of likelihood of being sexually abusive.</p> <p>The agency or facility makes housing and program assignments for transgender or intersex students on a case-by-case basis. If a student at risk of sexual victimization the student is never held in isolation. During the tour of the facility the auditor did not observe any isolation areas. The auditor did observe showering and toileting areas that are single use, made private by use of a closed door.</p> <p>Interviews revealed that the facility uses information from risk screenings to keep students safe and free from sexual abuse. All students interviewed stated that they feel safe in the facility. The facility does not house LGBTI students in special housing and can provide a single cell when necessary to keep students safe. A follow up meeting with therapists and medical are provided to students that have experienced prior sexual victimization or has previously perpetrated sexual abuse. Staff stated that isolation is not used in the facility.</p> <p>At time of audit, there were not any transgender students admitted to the facility to interview.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Documentation/files reviewed:</p> <p>Sexual Victimization and Sexual Abusiveness assessments/student file review</p> <p>ROP student vulnerability assessment instrument</p> <p>Interviews:</p> <p>Compliance Manager</p> <p>PREA Coordinator</p> <p>Staff responsible for conducting risk screening</p> <p>Program Director</p> <p>Medical staff</p>

Mental Health staff

Based on the evidence discussed, the facility has demonstrated compliance with this standard.

115.351	Resident reporting
	<p data-bbox="252 168 901 201">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 246 526 280">Auditor Discussion</p> <p data-bbox="252 324 1476 481">The agency has established procedures allowing for multiple internal ways for students to report privately to agency officials about sexual abuse and sexual harassment; retaliation by other students or staff for reporting sexual abuse and sexual harassment; and staff neglect or violation of responsibilities that may have contributed to such incidents.</p> <p data-bbox="252 526 1460 728">The agency provides at least one way for students to report abuse or harassment to a public or private entity or office that is not part of the agency. The agency does not detain students solely for civil immigration purposes. The agency has a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously and from third parties. Staff are required to document verbal reports on an incident report form.</p> <p data-bbox="252 772 1484 929">The facility provides students with access to tools to make written reports of sexual abuse or sexual harassment, retaliation by other students or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. Tools were verified by the auditor during the facility tour.</p> <p data-bbox="252 974 1484 1176">The agency has established procedures for staff to privately report sexual abuse and sexual harassment of students. Staff can speak to a supervisor privately or call the hotline number. Staff are informed of these procedures through the PREA Policy and staff training. Every six months during refresher training staff are taught about reporting, including how to privately report sexual abuse and sexual harassment. Staff training was verified through record review.</p> <p data-bbox="252 1220 1476 1422">The agency has a policy for filing an emergency grievance alleging that a student is subject to a substantial risk of imminent sexual abuse. The agency has a policy for emergency grievances alleging substantial risk of imminent sexual abuse that requires a response within 48 hours. The agency also has a policy for emergency grievances alleging substantial risk of imminent sexual abuse to require that a final agency decision be issued within five days.</p> <p data-bbox="252 1467 1484 1579">The agency has a written policy that limits its ability to discipline a student for filing a grievance alleging sexual abuse to occasions where the agency demonstrates that he student filed the grievance in bad faith.</p> <p data-bbox="252 1624 1476 1736">During the tour of the facility, the auditor observed posters throughout with phone numbers to contact, as well as locked grievance boxes and grievance forms that students can use. Visiting family and attorneys can meet privately with students.</p> <p data-bbox="252 1780 1396 1848">At time of audit, there were no students admitted to the facility who had reported sexual abuse.</p> <p data-bbox="252 1892 1444 2049">Interviews conducted state that students can privately report sexual abuse or sexual harassment, retaliation, or staff neglect. Students can report to a staff member, therapist, parent, attorney, or in writing by submitting a note or a grievance, and by calling the hotline number posted by each phone.</p> <p data-bbox="252 2094 486 2128">Policies reviewed:</p>

ROP SES Policy

ROP Student Problem Solving and Grievance Policy 600.402

Documentation/files reviewed:

Student Handbook – revised

ROP Third Party Reporting form

Behavior Intervention Report

Student Grievance form

ROP incident reporting

SES “A Student’s Guide to Rights, Protections, and Reporting of Sexual Abuse”

ROP SES lesson plan

ROP SES training slides

Student investigation file reviews

Interviews conducted:

Compliance Manager

Random staff

Random students

Based on the evidence discussed, the facility has demonstrated compliance with this standard.

115.352	Exhaustion of administrative remedies
	<p data-bbox="252 170 896 203">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1485 618">The agency has an administrative procedure for dealing with student grievances regarding sexual abuse. Agency policy or procedure allows a student to submit a grievance regarding an allegation of sexual abuse at any time regardless of when the incident is alleged to have occurred. The agency's policy and procedure require that a student grievance alleging sexual abuse not be referred to the staff member who is the subject of the complaint. The agency's policy and procedures that require that a decision on the merits of any grievance or portion of a grievance alleging sexual abuse be made within 90 days of the filing of the grievance.</p> <p data-bbox="252 663 1453 987">Agency policy and procedure permits third parties, including fellow students, staff members, family members, attorneys, and outside advocates, to assist students in filing requests for administrative remedies relating to allegations of sexual abuse, and to file such requests on behalf of students. Agency policy and procedure require that if the student declines to have third-party assistance in filing a grievance alleging sexual abuse, the agency documents the student's decision to decline. Agency policy allows parents or legal guardians of students to file a grievance alleging sexual abuse, including appeals, on behalf of such student, regardless of whether or not the student agrees to having the grievance filed on their behalf.</p> <p data-bbox="252 1032 1477 1323">The agency has a policy or established procedures for filing an emergency grievance alleging that a student is subject to a substantial risk of imminent sexual abuse; emergency grievances alleging substantial risk of imminent sexual abuse require an initial response within 48 hours; and for emergency grievances alleging substantial risk of imminent sexual abuse require that a final agency decision be issued within 5 days. The written policy limits its ability to discipline a student for filing a grievance alleging sexual abuse to occasions where the agency demonstrates that the student filed the grievance in bad faith.</p> <p data-bbox="252 1368 1461 1435">The auditor interviewed three students that reported sexual abuse. Students stated that they were told within 30 days about the decision of the investigation.</p> <p data-bbox="252 1480 464 1514">Policy reviewed:</p> <p data-bbox="252 1559 464 1592">ROP SES Policy</p> <p data-bbox="252 1637 767 1671">ROP Student Grievance Policy 600.402</p> <p data-bbox="252 1715 647 1749">Documentation/files reviewed:</p> <p data-bbox="252 1794 695 1827">Handbooks - Spanish and English</p> <p data-bbox="252 1872 1270 1906">SES "A Students Guide to Rights, Protections, and Reporting of Sexual Abuse"</p> <p data-bbox="252 1951 1430 1984">Based on evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.353	Resident access to outside confidential support services and legal representation
	<p data-bbox="252 219 896 253">Auditor Overall Determination: Meets Standard</p> <p data-bbox="252 297 523 331">Auditor Discussion</p> <p data-bbox="252 376 1455 667">The facility provides students with access to outside victim advocates for emotional support services related to sexual abuse. The facility provides students with access to such services by giving students (by providing, posting, or otherwise making accessible) mailing addresses and telephone numbers (including toll-free hotline numbers where available) for local, State, or national victim advocacy or rape crisis organizations. The facility provides students with access to such services by enabling reasonable communication between students and these organizations in as confidential a manner as possible.</p> <p data-bbox="252 712 1455 958">The facility informs students, prior to giving them access to outside support services, the extent to which such communications will be monitored. The facility informs students, prior to giving them access to outside support services, of the mandatory reporting rules governing privacy, confidentiality, and/or privilege that apply to disclosures of sexual abuse made to outside victim advocates, including any limits to confidentiality under relevant Federal, State, or local law.</p> <p data-bbox="252 1003 1471 1115">The agency or facility maintains memorandum of understanding or other agreements with community service providers that are able to provide students with emotional support services related to sexual abuse. The agency or facility maintains copies of those agreements.</p> <p data-bbox="252 1160 1471 1272">The facility provides students with reasonable and confidential access to their attorneys or other legal representation. The facility provides students with reasonable access to parents or legal guardians.</p> <p data-bbox="252 1317 1375 1384">During the tour of the facility the auditor observed posters in the units containing victim advocacy/crisis hotline information that included a toll-free number.</p> <p data-bbox="252 1429 1471 1720">At time of auditor there were no students enrolled who reported sexual abuse. Interviews conducted revealed that random students are aware of services available outside the facility for dealing with sexual abuse. Students were aware of the crisis services hotline they can call. Students stated that they can make a private call upon request. Staff stated during interview that students have access to their attorney, by request, in person, or by phone, and to parents weekly during family sessions, and during furloughs. They can also write them letters or call them. These visits are private. Video skyping with parents is also available.</p> <p data-bbox="252 1765 481 1798">Policies reviewed:</p> <p data-bbox="252 1843 466 1877">ROP SES Policy</p> <p data-bbox="252 1910 641 1944">Documentation/files reviewed:</p> <p data-bbox="252 1989 689 2022">Handbooks - Spanish and English</p> <p data-bbox="252 2067 970 2101">Zero tolerance/reporting posters – English and Spanish</p> <p data-bbox="252 2134 667 2168">PREA Outside Reporting poster</p>

Student Handbook-revised 2020

MOU – RPISCC

MOU - MSP

Interviews:

Compliance Manager

Program Director

Random students

Based on the evidence discussed, the facility has demonstrated compliance with this standard.

115.354	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The agency or facility provides a method to receive third-party reports of student sexual abuse or sexual harassment. The agency or facility publicly distributes information on how to report student sexual abuse or sexual harassment on behalf of students. Third party reporting forms are available in the lobby/reception/control desk.</p> <p>The facility distributes information on how to report student sexual abuse or sexual harassment on behalf of students through information provided in handbooks, contractor and volunteer pamphlets, and it is also contained in the PREA Policy.</p> <p>During a tour of the facility, the auditor observed that posters explaining third party reporting for sexual abuse and sexual harassment are posted in the lobby/reception/control center area and the visiting area. Information is available on the facility's website regarding third party reporting.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Documentation/files reviewed:</p> <p>Photos of postings</p> <p>Third party reporting forms</p> <p>Website review of zero tolerance policy and reporting</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.361	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The agency requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency. The agency requires all staff to report immediately and according to agency policy any retaliation against students or staff who reported such an incident. The agency requires all staff to report immediately and according to agency policy any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. The agency requires all staff to comply with any applicable mandatory child abuse reporting laws.</p> <p>Apart from reporting to the designated supervisors or officials and designated State or local service agencies, agency policy prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions.</p> <p>Interviews with staff indicate that when the facility receives an allegation of sexual abuse, the allegation is reported to the Compliance Manager, PREA Coordinator, and the Program Director. If the victim is under the guardianship of child welfare system, the social worker is contacted. If the court retains jurisdiction over the victim, the student's attorney is notified. Should staff be included in an allegation of sexual abuse, the human resource staff and the Maryland State Police Department are notified. Attorneys and parents are notified immediately and within 14 days.</p> <p>Through file review the auditor was able to verify that staff have received training on PREA and their duty to report.</p> <p>Medical and Mental Health staff stated that at the initiation of services to a student, limitations of confidentiality and duty to report is disclosed. Staff are mandatory reporters.</p> <p>Policies reviewed:</p> <p>ROP SES policy</p> <p>Child Abuse Reporting Policy 115.361</p> <p>Documentation/files reviewed:</p> <p>Staff training files</p> <p>Staff Acknowledgement forms</p> <p>Interviews conducted:</p> <p>Random staff</p> <p>Medical staff</p> <p>Mental Health staff</p>

Compliance Manager

Program Director

Based on the evidence discussed, the facility has demonstrated compliance with this standard.

115.362	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>When the agency or facility learns that a student is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the student (i.e., it takes some action to assess and implement appropriate protective measures without unreasonable delay).</p> <p>During interviews with staff, staff indicated the appropriate actions to take to protect a student. Staff stated that the expectation for how quickly staff should respond to protect students at substantial risk of imminent sexual abuse is immediate, without delay.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Documentation/files reviewed:</p> <p>“If Sexual Abuse or Sexual Assault is Reported” handout</p> <p>Interviews conducted:</p> <p>Agency Head</p> <p>Program Director</p> <p>Random staff</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.363	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The agency has a policy requiring that, upon receiving an allegation that a student was sexually abused while confined at another facility, the head of the facility must notify the head of the facility or appropriate office of the agency or facility where sexual abuse is alleged to have occurred. The agency's policy also requires that the head of the facility notify the appropriate investigative agency. Agency policy requires that the facility head provides such notification as soon as possible, but no later than 72 hours after receiving the allegation. The agency or facility documents that it has provided such notification within 72 hours of receiving the allegation. As well, the agency or facility policy requires that allegations received from other agencies or facilities are investigated in accordance with the PREA standards.</p> <p>During interviews with the agency head and Program Director they stated that should another facility refer allegations of sexual abuse or sexual harassment that occurred within one of their facilities, the notification would go directly to the compliance manager and program director, up to the Chief level and an investigation would occur. To date, there has not been any such report made.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Interviews conducted:</p> <p>Agency Head</p> <p>Program Director</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.364	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The agency has a first responder policy for allegations of sexual abuse. The policy requires that, upon learning of an allegation that a student was sexually abused, the first security staff member to respond to the report separate the alleged victim and abuser. The policy requires that, upon learning of an allegation that a student was sexually abused, the first security staff member to respond to the report preserve and protect any crime scene until appropriate steps can be taken to collect any evidence. The policy requires that, if the abuse occurred within a time period that still allows for the collection of physical evidence, the first security staff member to respond to the report request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. The policy requires that, if the abuse occurred within a time period that still allows for the collection of physical evidence, the first security staff member to respond to the report ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.</p> <p>Agency policy requires that if the first staff responder is not a security staff member, that responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence. Agency policy requires that if the first staff responder is not a security staff member, that responder shall be required to notify security staff. ROP does not have “security staff”. All staff are trained per policy as first responders.</p> <p>Through interview with first responders and random staff, staff were unable to describe, for the most part, the actions they would take as a first responder to an allegation of sexual abuse. Additionally, staff were unable to communicate with the auditor when they received training in this area. The auditor was able to verify that training was received through a review of training files, however, staff had difficulty remembering the duties of a first responder.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Documentation/files reviewed:</p> <p>Staff training files</p> <p>“If Sexual Abuse or Sexual Assault is Reported” handout</p> <p>Interviews conducted:</p> <p>First responders</p> <p>Random staff</p> <p>Based on the evidence discussed, the facility has not demonstrated compliance with this standard due to staff not able to describe their roles and responsibilities of being a first responder.</p>

The auditor has recommended the following corrective action item to be completed within six months.

CORRECTIVE ACTION NEEDED:

1) All employees to receive training being a first responder per standard 115.364 and provide copies of training rosters and curriculum/handouts to auditor for verification that training was received.

On September 18, 2020, during the corrective action process, the facility completed all corrective action required and submitted appropriate documentation to verify compliance with this standard.

VERIFICATION OF CORRECTIVE ACTION: The auditor was provided appropriate supplemental documentation within the six-month corrective action period to evidence and demonstrate corrective actions taken regarding this standard.

ADDITIONAL DOCUMENTATION REVIEWED: Silver Oak Academy submitted a plan and verification that employees received training on First Responder Duties and Mandated Reporter Duties. SOA also submitted photos of posted visual reminders of the steps that need to be taken when a first responder must respond to an allegation. The trainings are documented on sign in sheets through employee signatures and were sent to the auditor for verification purposes.

Based on the evidence discussed, the facility has demonstrated compliance with this standard.

115.365	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility has developed a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership.</p> <p>The Program Director was able to explain what the facility's plan to coordinate actions among staff first responders, medical and mental health staff, investigators, and facility leadership would be. A coordinated response flowchart would be utilized.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Documentation/files reviewed:</p> <p>PREA Incident Response Flowchart and checklist</p> <p>ROP SES Coordinated Response Plan</p> <p>"IF sexual abuse or assault is reported" handout</p> <p>Interviews conducted:</p> <p>Program Director</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.366	Preservation of ability to protect residents from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>According to the agency head, Rite of Passage does not have collective bargaining agreements, and is an at-will employer. Employees are not unionized.</p> <p>Interviews:</p> <p>Agency Head</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.367	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The agency has a policy to protect all students and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other students or staff. The agency designates the deputy program director with monitoring for possible retaliation.</p> <p>The agency/facility monitors the conduct or treatment of students or staff who reported sexual abuse and of students who were reported to have suffered sexual abuse to see if there are any changes that may suggest possible retaliation by students or staff. The agency/facility acts promptly to remedy any such retaliation. The agency/facility continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need.</p> <p>At time of audit, there were no students held in isolation.</p> <p>During interview, staff stated that retaliation is closely monitored, and appropriate action is taken when needed. Reviews will begin at time of the incident and will continue for no less than 90 days. Reports are prepared and given to the compliance manager and program director.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>ROP Student Problem Solving and Grievance Policy 600.402</p> <p>Staff Protection (Whistleblower) Policy 100.402</p> <p>Interviews conducted:</p> <p>Agency Head</p> <p>Program Director</p> <p>Staff charged with monitoring retaliation</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.368	<p>Post-allegation protective custody</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Rite of Passage has a policy that students who allege to have suffered sexual abuse may only be placed in isolation as a last resort if less restrictive measures are inadequate to keep them and other students safe, and only until an alternative means of keeping all students safe can be arranged. The policy requires that students who are placed in isolation because they allege to have suffered sexual abuse have access to legally required educational programming, special education services, and daily large-muscle exercise. If a student who alleges to have suffered sexual abuse is held in isolation, the facility affords each such student a review every 30 days to determine whether there is a continuing need for separation from the general population.</p> <p>During the tour of the facility, no students were held in isolation.</p> <p>During interview with the Program Director, the facility has not had any circumstances in which isolation was used to protect a student who has alleged to have suffered sexual abuse. Medical and Mental Health staff stated that isolation is not utilized and that students are provided single cells when needed to keep them safe.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Interviews conducted:</p> <p>Program Director</p> <p>Medical and Mental Health staff</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>
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115.371	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The agency/facility has a policy related to criminal and administrative agency investigations. The agency does not terminate an investigation solely because the source of the allegation recants the allegation. Substantiated allegations of conduct that appear to be criminal are referred for prosecution.</p> <p>The agency retains all written reports pertaining to the administrative or criminal investigation of alleged sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.</p> <p>At time of audit there were no students who reported sexual abuse. Investigation files were reviewed. Using a checklist provided by the PREA Resource Center, the file contained all necessary documentation.</p> <p>During interviews, staff stated that the compliance manager and program director remains informed of the progress of sexual abuse investigations that are being conducted by local law enforcement.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Documentation/files reviewed:</p> <p>Interviews conducted:</p> <p>Investigative staff</p> <p>Program Director</p> <p>PREA Coordinator</p> <p>Compliance Manager</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.372	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The agency imposes a standard of a preponderance of the evidence or a lower standard of proof for determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>During interview with investigative staff, staff stated that the local law enforcement agency responsible for investigating criminal allegations of sexual abuse imposes a standard of a preponderance of the evidence.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Interviews conducted:</p> <p>Investigative staff</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.373	Reporting to residents
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>The agency has a policy requiring that any student who makes an allegation that he suffered sexual abuse in an agency facility is informed, verbally or in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation by the agency.</p> <p>An outside entity conducts such investigations. The agency requests the relevant information from the investigative entity in order to inform the student of the outcome of the investigation.</p> <p>Following a student's allegation that a staff member has committed sexual abuse against the student, the agency/facility subsequently informs the student (unless the agency has determined that the allegation is unfounded) whenever the staff member is no longer posted within the student's unit; the staff member is no longer employed at the facility; the agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or the agency learns that the staff member has been convicted on a charge related.</p> <p>There has not been a substantiated or unsubstantiated complaint (i.e., not unfounded) of sexual abuse committed by a staff member against a student in the facility in the past 12 months.</p> <p>Following a student's allegation that he has been sexually abused by another student, the agency subsequently informs the alleged victim whenever the agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or the agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.</p> <p>The agency has a policy that all notifications to students described under this standard are documented.</p> <p>At time of audit, there were no students who reported sexual abuse. Staff stated during interviews that the compliance manager or program director would notify a student who makes an allegation of sexual abuse, that the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Documentation/files reviewed:</p> <p>ROP SES Coordinated Response Plan</p> <p>Outside Agency Incident Report form</p> <p>Interviews conducted:</p> <p>Program Director</p>

Investigative staff

Students who reported sexual abuse

Based on the evidence discussed, the facility has demonstrated compliance with this standard.

115.376	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Policy states that staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. The disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.377	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Agency policy requires that any contractor or volunteer who engages in sexual abuse be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. Agency policy requires that any contractor or volunteer who engages in sexual abuse be prohibited from contact with students. The facility takes appropriate remedial measures and considers whether to prohibit further contact with students in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.</p> <p>During interview with the Program Director, it was stated that in the case of any violation of sexual abuse or sexual harassment policies by a contractor or volunteer, the facility will take remedial measures and prohibit further contact with students.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Interviews conducted:</p> <p>Program Director</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.378	Interventions and disciplinary sanctions for residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>According to Rite of Passage Policy, Students are subject to disciplinary sanctions only pursuant to a formal disciplinary process following an administrative finding that the student engaged in student-on-student sexual abuse. Students are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for student-on-student sexual abuse.</p> <p>In the event a disciplinary sanction for student-on student sexual abuse resulted in the isolation of a student, the facility policy requires that students in isolation have daily access to large muscle exercise, legally required educational programming, and special education services. In the event a disciplinary sanction for student-on-student sexual abuse results in the isolation of a student, students in isolation receive daily visits from a medical or mental health care clinician. In the event a disciplinary sanction for student-on-student sexual abuse results in the isolation of a student, students in isolation have access to other programs and work opportunities to the extent possible.</p> <p>The facility offers therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse. Access to general programming or education is not conditional on participation in such interventions. The agency disciplines students for sexual conduct with staff only upon finding that the staff member did not consent to such contact. The agency prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation. The agency prohibits all sexual activity between students.</p> <p>According to the Program Director, sanctions are proportionate to the nature and circumstances of the abuses committed, the student's disciplinary histories, and the sanctions imposed for similar offenses by other students with similar histories. Mental disability and mental illness are considered when determining sanctions. Isolation is not used within this facility</p> <p>Medical and Mental Health staff indicated that the facility offers therapy, counseling, or other intervention services designed to address and correct the underlying reasons or motivations for sexual abuse. Participation is not a condition of access to any reward-based behavior management system, programming, or education.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Interviews conducted:</p> <p>Program Director</p> <p>Medical/Mental Health staff</p>

Based on the evidence discussed, the facility has demonstrated compliance with this standard.

115.381	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Rite of Passage Policy requires all students who are accepted for residential treatment services at this facility to be assessed for risk the day they arrive. A number of referral documents are reviewed by intake staff. This extensive review includes court and legal documents, psychological evaluations, previous treatment reports, IEP's, medical records, and other critical documents. Within thirty days of a student arriving, therapeutic staff reviews all referral documents and completes several assessments to develop individualized treatment plans for students.</p> <p>As part of the intake process, intake staff conduct a vulnerability assessment for risk to sexual abuse or be sexually abused while in custody.</p> <p>All students who have ever previously perpetrated sexual abuse are offered a meeting with a mental health practitioner within 14 days of the intake screening. The follow-up meeting is offered within 14 days of the intake screening. Mental health staff maintain secondary materials (e.g., form, log) documenting compliance with the above required services.</p> <p>Information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health practitioners.</p> <p>Medical and mental health practitioners obtain informed consent from students before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the student is under the age of 18.</p> <p>Review of student files verified that therapeutic staff followed up and met individually with each student within 14 days. Interviews with staff indicated that informed consent from students is obtained before reporting about prior sexual victimization that did not occur in an institutional setting. Parents or court must give consent. Staff stated that follow up meetings with medical or mental health staff are offered.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Documentation/file review:</p> <p>Medical Intake Screening documents</p> <p>Vulnerability assessments</p> <p>Student files</p> <p>Interviews conducted:</p> <p>Staff who conduct risk screenings</p> <p>Medical and Mental Health staff</p>

Based on the evidence discussed, the facility has demonstrated compliance with this standard.

115.382	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>According to policy, student victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. The nature and scope of such services are determined by medical and mental health practitioners according to their professional judgment. Medical and mental health staff maintain secondary materials (e.g., form, log) documenting the timeliness of emergency medical treatment and crisis intervention services that were provided; the appropriate response by non-health staff in the event health staff are not present at the time the incident is reported; and the provision of appropriate and timely information and services concerning contraception and sexually transmitted infection prophylaxis.</p> <p>Student victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.</p> <p>Treatment services are provided to every victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incidents.</p> <p>Staff interviews indicate that victims of sexual abuse receive timely and unimpeded access to emergency medical treatment and crisis intervention services.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Interviews conducted:</p> <p>Medical and Mental Health staff</p> <p>First Responders</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.383	<p>Ongoing medical and mental health care for sexual abuse victims and abusers</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Silver Oak Academy is an all-male facility. Rite of Passage policy ensures the facility offers medical and mental health evaluation and, as appropriate, treatment to all students who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility. Medical services offered are off campus. All students are taken within first 30 days, as needed, or requested.</p> <p>Student victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate by off campus medical providers. All students receive mental health evaluations regardless of reports.</p> <p>Treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>Staff stated during interview that the facility attempts to conduct a mental health evaluation of all known student-on-student abusers within 30 days of learning of such abuse history and offers treatment when deemed appropriate by mental health practitioners.</p> <p>At time of audit there were no students detained who reported sexual abuse to be interviewed.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Interviews conducted:</p> <p>Medical and Mental Health staff</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>
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115.386	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility conducts a sexual abuse incident review at the conclusion of every criminal or administrative sexual abuse investigation, unless the allegation has been determined to be unfounded. The facility ordinarily conducts a sexual abuse incident review within 30 days of the conclusion of the criminal or administrative sexual abuse investigation.</p> <p>The sexual abuse incident review team includes upper-level management officials and allows for input from line supervisors, investigators, and medical or mental health practitioners. The facility implements the recommendations for improvement or documents its reasons for not doing so.</p> <p>During interviews with staff, staff stated that the facility prepares a report of its findings from sexual abuse incident reviews, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1)-(d)(5) of this section and any recommendations for improvement, and submits such report to the agency head and PREA Coordinator.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Documentation/files reviewed:</p> <p>30-day Review</p> <p>Investigation forms</p> <p>Response form</p> <p>Response Plan</p> <p>Alleged staff abuser outcome</p> <p>Interviews conducted:</p> <p>Program Director</p> <p>Compliance Manager</p> <p>SART Team members</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.387	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>At time of audit, the agency has an approved annual report containing information described in this standard.</p> <p>The agency collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions. The agency aggregates the incident-based sexual abuse data at least annually. The standardized instrument includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice. The agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.</p> <p>The facility does not contract for the confinement of its students.</p> <p>Policy reviewed:</p> <p>ROP SES Policy</p> <p>Documentation/files reviewed:</p> <p>Survey of Sexual Victimization (SSV)</p> <p>Annual reports</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.388	Data review for corrective action
	<p data-bbox="252 170 927 203">Auditor Overall Determination: Exceeds Standard</p> <p data-bbox="252 248 523 282">Auditor Discussion</p> <p data-bbox="252 327 1477 528">The agency reviews data collected and aggregated pursuant to §115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training, including identifying problem areas; taking corrective action on an ongoing basis; and preparing an annual report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole.</p> <p data-bbox="252 573 1477 775">The annual report includes a comparison of the current year’s data and corrective actions with those from prior years. The annual report provides an assessment of the agency’s progress in addressing sexual abuse. The agency makes the annual report readily available to the public at least annually through its website www.silveroakacademy.com/prea. The annual reports are reviewed on multi-levels before being approved by the agency head.</p> <p data-bbox="252 819 1461 931">When the agency redacts material from an annual report for publication, the redaction is limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility. The agency indicates the nature of material redacted.</p> <p data-bbox="252 976 1358 1043">Interviews with staff indicate that the annual data reports are completed annually and reviewed regularly.</p> <p data-bbox="252 1088 488 1122">Policies reviewed:</p> <p data-bbox="252 1167 464 1200">ROP SES Policy</p> <p data-bbox="252 1245 647 1279">Documentation/files reviewed:</p> <p data-bbox="252 1323 695 1357">Annual data reports – 2018, 2019</p> <p data-bbox="252 1402 576 1435">Review of facility website</p> <p data-bbox="252 1480 536 1514">Interviews conducted:</p> <p data-bbox="252 1559 424 1592">Agency Head</p> <p data-bbox="252 1637 488 1671">PREA Coordinator</p> <p data-bbox="252 1715 536 1749">Compliance Manager</p> <p data-bbox="252 1794 1382 1827">Based on evidence discussed, the facility has exceeded compliance with this standard.</p>

115.389	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The agency ensures that incident-based and aggregate data are securely retained. Agency policy requires that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts, be made readily available to the public, at least annually, through its website.</p> <p>Before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers. The agency maintains sexual abuse data collected pursuant to §115.387 for at least 10 years after the date of initial collection.</p> <p>According to the PREA Coordinator, all annual reports are redacted and do not contain any personal identifying information. The annual reports are in the process of being created/edited and will be posted to the website soon.</p> <p>Policies reviewed:</p> <p>ROP SES Policy</p> <p>Documentation/files reviewed:</p> <p>Website review</p> <p>Review of annual data reports</p> <p>Interviews conducted:</p> <p>PREA Coordinator</p> <p>Based on evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>During the prior three-year audit period, the agency ensured that each facility operated by the agency was audited at least once. This is the third audit for this facility. Previous audits were completed in 2015 (cycle one) and 2017 (cycle two).</p> <p>The auditor verified that audits for Silver Oak Academy were completed at appropriate intervals/cycles.</p> <p>The auditor had access to, and the ability to observe, all areas of the audited facility. The auditor was permitted to request and receive copies of any relevant documents (including electronically stored information). The auditor was permitted to conduct private interviews with students and staff. Students were permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel.</p> <p>The auditor observed the audit announcements posted throughout the facility. The auditor did not receive any correspondence from students or staff.</p> <p>Documentation/files reviewed:</p> <p>Previous PREA Audit Reports</p> <p>Facility website</p> <p>Audit announcement postings with date of notice</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The auditor attests that there was no conflict of interest with respect to the auditor’s ability to conduct an audit of the facility under review. This audit report states whether agency-wide policies and procedures comply with the relevant PREA standards. For each PREA standard, the auditor determined whether the audited facility reached compliance, exceeded compliance, or did not meet compliance. The auditor described in this report the methodology, sampling sizes, and basis for the auditor’s conclusions with regard to each standard provision and included recommendations for any required correction action. The auditor redacted any personally identifiable student or staff information from this report. The auditor notified the facility of the requirement of publishing the auditor’s final report on its website.</p> <p>Based on the evidence discussed, the facility has demonstrated compliance with this standard.</p>

Appendix: Provision Findings		
115.311 (a)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
115.311 (b)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
115.311 (c)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	yes
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	yes
115.312 (a)	Contracting with other entities for the confinement of residents	
	If this agency is public and it contracts for the confinement of its residents with private agencies or other entities including other government agencies, has the agency included the entity's obligation to adopt and comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents.)	na
115.312 (b)	Contracting with other entities for the confinement of residents	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents OR the response to 115.312(a)-1 is "NO".)	na
115.313 (a)	Supervision and monitoring	

	Does the agency ensure that each facility has developed a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect residents against sexual abuse?	yes
	Does the agency ensure that each facility has implemented a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect residents against sexual abuse?	yes
	Does the agency ensure that each facility has documented a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect residents against sexual abuse?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Generally accepted juvenile detention and correctional/secure residential practices?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any judicial findings of inadequacy?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any findings of inadequacy from Federal investigative agencies?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any findings of inadequacy from internal or external oversight bodies?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: All components of the facility's physical plant (including "blind-spots" or areas where staff or residents may be isolated)?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The composition of the resident population?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels	yes

	and determining the need for video monitoring: The number and placement of supervisory staff?	
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Institution programs occurring on a particular shift?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any applicable State or local laws, regulations, or standards?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any other relevant factors?	yes
115.313 (b)	Supervision and monitoring	
	Does the agency comply with the staffing plan except during limited and discrete exigent circumstances?	yes
	In circumstances where the staffing plan is not complied with, does the facility fully document all deviations from the plan? (N/A if no deviations from staffing plan.)	yes
115.313 (c)	Supervision and monitoring	
	Does the facility maintain staff ratios of a minimum of 1:8 during resident waking hours, except during limited and discrete exigent circumstances? (N/A only until October 1, 2017.)	yes
	Does the facility maintain staff ratios of a minimum of 1:16 during resident sleeping hours, except during limited and discrete exigent circumstances? (N/A only until October 1, 2017.)	yes
	Does the facility fully document any limited and discrete exigent circumstances during which the facility did not maintain staff ratios? (N/A only until October 1, 2017.)	yes
	Does the facility ensure only security staff are included when calculating these ratios? (N/A only until October 1, 2017.)	yes
	Is the facility obligated by law, regulation, or judicial consent decree to maintain the staffing ratios set forth in this paragraph?	yes

115.313 (d)	Supervision and monitoring	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: Prevailing staffing patterns?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
115.313 (e)	Supervision and monitoring	
	Has the facility implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment? (N/A for non-secure facilities)	yes
	Is this policy and practice implemented for night shifts as well as day shifts? (N/A for non-secure facilities)	yes
	Does the facility have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility? (N/A for non-secure facilities)	yes
115.315 (a)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.315 (b)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting cross-gender pat-down searches in non-exigent circumstances?	yes

115.315 (c)	Limits to cross-gender viewing and searches	
	Does the facility document and justify all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches?	yes
115.315 (d)	Limits to cross-gender viewing and searches	
	Does the facility implement policies and procedures that enable residents to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering a resident housing unit?	yes
	In facilities (such as group homes) that do not contain discrete housing units, does the facility require staff of the opposite gender to announce their presence when entering an area where residents are likely to be showering, performing bodily functions, or changing clothing? (N/A for facilities with discrete housing units)	yes
115.315 (e)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from searching or physically examining transgender or intersex residents for the sole purpose of determining the resident's genital status?	yes
	If a resident's genital status is unknown, does the facility determine genital status during conversations with the resident, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
115.315 (f)	Limits to cross-gender viewing and searches	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex residents in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
115.316 (a)	Residents with disabilities and residents who are limited English proficient	
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all	yes

	aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who are deaf or hard of hearing?	
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who are blind or have low vision?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other? (if "other," please explain in overall determination notes.)	yes
	Do such steps include, when necessary, ensuring effective communication with residents who are deaf or hard of hearing?	yes
	Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Have intellectual disabilities?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or	yes

	through methods that ensure effective communication with residents with disabilities including residents who: Who are blind or have low vision?	
115.316 (b)	Residents with disabilities and residents who are limited English proficient	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to residents who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
115.316 (c)	Residents with disabilities and residents who are limited English proficient	
	Does the agency always refrain from relying on resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-response duties under §115.364, or the investigation of the resident's allegations?	yes

115.317 (a)	Hiring and promotion decisions	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the bullet immediately above?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
115.317 (b)	Hiring and promotion decisions	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with residents?	yes

115.317 (c)	Hiring and promotion decisions	
	Before hiring new employees who may have contact with residents, does the agency: Perform a criminal background records check?	yes
	Before hiring new employees who may have contact with residents, does the agency: Consult any child abuse registry maintained by the State or locality in which the employee would work?	yes
	Before hiring new employees who may have contact with residents, does the agency: Consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
115.317 (d)	Hiring and promotion decisions	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with residents?	yes
	Does the agency consult applicable child abuse registries before enlisting the services of any contractor who may have contact with residents?	yes
115.317 (e)	Hiring and promotion decisions	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with residents or have in place a system for otherwise capturing such information for current employees?	yes
115.317 (f)	Hiring and promotion decisions	
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes

115.317 (g)	Hiring and promotion decisions	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.317 (h)	Hiring and promotion decisions	
	Unless prohibited by law, does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.318 (a)	Upgrades to facilities and technologies	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect residents from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.318 (b)	Upgrades to facilities and technologies	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect residents from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	na
115.321 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes

115.321 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.321 (c)	Evidence protocol and forensic medical examinations	
	Does the agency offer all residents who experience sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.321 (d)	Evidence protocol and forensic medical examinations	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member?	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes

115.321 (e)	Evidence protocol and forensic medical examinations	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.321 (f)	Evidence protocol and forensic medical examinations	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating entity follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency is not responsible for investigating allegations of sexual abuse.)	na
115.321 (h)	Evidence protocol and forensic medical examinations	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (Check N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.321 (d) above.)	yes
115.322 (a)	Policies to ensure referrals of allegations for investigations	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
115.322 (b)	Policies to ensure referrals of allegations for investigations	
	Does the agency have a policy in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes

115.322 (c)	Policies to ensure referrals of allegations for investigations	
	<p>If a separate entity is responsible for conducting criminal investigations, does such publication describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.321(a))</p>	yes

115.331 (a)	Employee training	
	Does the agency train all employees who may have contact with residents on: Its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with residents on: Residents' right to be free from sexual abuse and sexual harassment	yes
	Does the agency train all employees who may have contact with residents on: The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: The dynamics of sexual abuse and sexual harassment in juvenile facilities?	yes
	Does the agency train all employees who may have contact with residents on: The common reactions of juvenile victims of sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: How to detect and respond to signs of threatened and actual sexual abuse and how to distinguish between consensual sexual contact and sexual abuse between residents?	yes
	Does the agency train all employees who may have contact with residents on: How to avoid inappropriate relationships with residents?	yes
	Does the agency train all employees who may have contact with residents on: How to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming residents?	yes
	Does the agency train all employees who may have contact with residents on: How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
	Does the agency train all employees who may have contact with residents on: Relevant laws regarding the applicable age of consent?	yes

115.331 (b)	Employee training	
	Is such training tailored to the unique needs and attributes of residents of juvenile facilities?	yes
	Is such training tailored to the gender of the residents at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male residents to a facility that houses only female residents, or vice versa?	yes
115.331 (c)	Employee training	
	Have all current employees who may have contact with residents received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.331 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.332 (a)	Volunteer and contractor training	
	Has the agency ensured that all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
115.332 (b)	Volunteer and contractor training	
	Have all volunteers and contractors who have contact with residents been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with residents)?	yes
115.332 (c)	Volunteer and contractor training	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes

115.333 (a)	Resident education	
	During intake, do residents receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do residents receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
	Is this information presented in an age-appropriate fashion?	yes
115.333 (b)	Resident education	
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
115.333 (c)	Resident education	
	Have all residents received such education?	yes
	Do residents receive education upon transfer to a different facility to the extent that the policies and procedures of the resident's new facility differ from those of the previous facility?	yes
115.333 (d)	Resident education	
	Does the agency provide resident education in formats accessible to all residents including those who: Are limited English proficient?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are deaf?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are visually impaired?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are otherwise disabled?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Have limited reading skills?	yes

115.333 (e)	Resident education	
	Does the agency maintain documentation of resident participation in these education sessions?	yes
115.333 (f)	Resident education	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to residents through posters, resident handbooks, or other written formats?	yes
115.334 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.331, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
115.334 (b)	Specialized training: Investigations	
	Does this specialized training include: Techniques for interviewing juvenile sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
	Does this specialized training include: Proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
	Does this specialized training include: Sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
	Does this specialized training include: The criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
115.334 (c)	Specialized training: Investigations	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes

115.335 (a)	Specialized training: Medical and mental health care	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to respond effectively and professionally to juvenile victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.335 (b)	Specialized training: Medical and mental health care	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na
115.335 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes

115.335 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.331? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Do medical and mental health care practitioners contracted by and volunteering for the agency also receive training mandated for contractors and volunteers by §115.332? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.341 (a)	Obtaining information from residents	
	Within 72 hours of the resident's arrival at the facility, does the agency obtain and use information about each resident's personal history and behavior to reduce risk of sexual abuse by or upon a resident?	yes
	Does the agency also obtain this information periodically throughout a resident's confinement?	yes
115.341 (b)	Obtaining information from residents	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes

115.341 (c)	Obtaining information from residents	
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Prior sexual victimization or abusiveness?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Any gender nonconforming appearance or manner or identification as lesbian, gay, bisexual, transgender, or intersex, and whether the resident may therefore be vulnerable to sexual abuse?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Current charges and offense history?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Age?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Level of emotional and cognitive development?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Physical size and stature?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Mental illness or mental disabilities?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Intellectual or developmental disabilities?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Physical disabilities?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: The resident's own perception of vulnerability?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Any other specific information about individual residents that may indicate heightened needs for supervision, additional safety precautions, or separation from certain other residents?	yes

115.341 (d)	Obtaining information from residents	
	Is this information ascertained: Through conversations with the resident during the intake process and medical mental health screenings?	yes
	Is this information ascertained: During classification assessments?	yes
	Is this information ascertained: By reviewing court records, case files, facility behavioral records, and other relevant documentation from the resident's files?	yes
115.341 (e)	Obtaining information from residents	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the resident's detriment by staff or other residents?	yes
115.342 (a)	Placement of residents	
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Housing Assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Bed assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Work Assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Education Assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Program Assignments?	yes

115.342 (b)	Placement of residents	
	Are residents isolated from others only as a last resort when less restrictive measures are inadequate to keep them and other residents safe, and then only until an alternative means of keeping all residents safe can be arranged?	yes
	During any period of isolation, does the agency always refrain from denying residents daily large-muscle exercise?	yes
	During any period of isolation, does the agency always refrain from denying residents any legally required educational programming or special education services?	yes
	Do residents in isolation receive daily visits from a medical or mental health care clinician?	yes
	Do residents also have access to other programs and work opportunities to the extent possible?	yes
115.342 (c)	Placement of residents	
	Does the agency always refrain from placing: Lesbian, gay, and bisexual residents in particular housing, bed, or other assignments solely on the basis of such identification or status?	yes
	Does the agency always refrain from placing: Transgender residents in particular housing, bed, or other assignments solely on the basis of such identification or status?	yes
	Does the agency always refrain from placing: Intersex residents in particular housing, bed, or other assignments solely on the basis of such identification or status?	yes
	Does the agency always refrain from considering lesbian, gay, bisexual, transgender, or intersex identification or status as an indicator or likelihood of being sexually abusive?	yes

115.342 (d)	Placement of residents	
	When deciding whether to assign a transgender or intersex resident to a facility for male or female residents, does the agency consider on a case-by-case basis whether a placement would ensure the resident's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns residents to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex residents, does the agency consider on a case-by-case basis whether a placement would ensure the resident's health and safety, and whether a placement would present management or security problems?	yes
115.342 (e)	Placement of residents	
	Are placement and programming assignments for each transgender or intersex resident reassessed at least twice each year to review any threats to safety experienced by the resident?	yes
115.342 (f)	Placement of residents	
	Are each transgender or intersex resident's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes
115.342 (g)	Placement of residents	
	Are transgender and intersex residents given the opportunity to shower separately from other residents?	yes
115.342 (h)	Placement of residents	
	If a resident is isolated pursuant to paragraph (b) of this section, does the facility clearly document: The basis for the facility's concern for the resident's safety? (N/A for h and i if facility doesn't use isolation?)	na
	If a resident is isolated pursuant to paragraph (b) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged? (N/A for h and i if facility doesn't use isolation?)	na
115.342 (i)	Placement of residents	
	In the case of each resident who is isolated as a last resort when less restrictive measures are inadequate to keep them and other residents safe, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes

115.351 (a)	Resident reporting	
	Does the agency provide multiple internal ways for residents to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: 2. Retaliation by other residents or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
115.351 (b)	Resident reporting	
	Does the agency also provide at least one way for residents to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the resident to remain anonymous upon request?	yes
	Are residents detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security to report sexual abuse or harassment?	yes
115.351 (c)	Resident reporting	
	Do staff members accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Do staff members promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.351 (d)	Resident reporting	
	Does the facility provide residents with access to tools necessary to make a written report?	yes
115.351 (e)	Resident reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of residents?	yes

115.352 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address resident grievances regarding sexual abuse. This does not mean the agency is exempt simply because a resident does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
115.352 (b)	Exhaustion of administrative remedies	
	Does the agency permit residents to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an resident to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.352 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: A resident who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes

115.352 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by residents in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency determines that the 90 day timeframe is insufficient to make an appropriate decision and claims an extension of time (the maximum allowable extension of time to respond is 70 days per 115.352(d)(3)) , does the agency notify the resident in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the resident does not receive a response within the time allotted for reply, including any properly noticed extension, may a resident consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes

115.352 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, permitted to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of residents? (If a third party, other than a parent or legal guardian, files such a request on behalf of a resident, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the resident declines to have the request processed on his or her behalf, does the agency document the resident's decision? (N/A if agency is exempt from this standard.)	yes
	Is a parent or legal guardian of a juvenile allowed to file a grievance regarding allegations of sexual abuse, including appeals, on behalf of such juvenile? (N/A if agency is exempt from this standard.)	yes
	If a parent or legal guardian of a juvenile files a grievance (or an appeal) on behalf of a juvenile regarding allegations of sexual abuse, is it the case that those grievances are not conditioned upon the juvenile agreeing to have the request filed on his or her behalf? (N/A if agency is exempt from this standard.)	yes

115.352 (f)	Exhaustion of administrative remedies	
	Has the agency established procedures for the filing of an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging a resident is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the resident is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.352 (g)	Exhaustion of administrative remedies	
	If the agency disciplines a resident for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the resident filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes

115.353 (a)	Resident access to outside confidential support services and legal representation	
	Does the facility provide residents with access to outside victim advocates for emotional support services related to sexual abuse by providing, posting, or otherwise making accessible mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies?	yes
	Does the facility enable reasonable communication between residents and these organizations and agencies, in as confidential a manner as possible?	yes
115.353 (b)	Resident access to outside confidential support services and legal representation	
	Does the facility inform residents, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.353 (c)	Resident access to outside confidential support services and legal representation	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide residents with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.353 (d)	Resident access to outside confidential support services and legal representation	
	Does the facility provide residents with reasonable and confidential access to their attorneys or other legal representation?	yes
	Does the facility provide residents with reasonable access to parents or legal guardians?	yes

115.354 (a)	Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of a resident?	yes
115.361 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding retaliation against residents or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
115.361 (b)	Staff and agency reporting duties	
	Does the agency require all staff to comply with any applicable mandatory child abuse reporting laws?	yes
115.361 (c)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials and designated State or local services agencies, are staff prohibited from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
115.361 (d)	Staff and agency reporting duties	
	Are medical and mental health practitioners required to report sexual abuse to designated supervisors and officials pursuant to paragraph (a) of this section as well as to the designated State or local services agency where required by mandatory reporting laws?	yes
	Are medical and mental health practitioners required to inform residents of their duty to report, and the limitations of confidentiality, at the initiation of services?	yes

115.361 (e)	Staff and agency reporting duties	
	Upon receiving any allegation of sexual abuse, does the facility head or his or her designee promptly report the allegation to the appropriate office?	yes
	Upon receiving any allegation of sexual abuse, does the facility head or his or her designee promptly report the allegation to the alleged victim's parents or legal guardians unless the facility has official documentation showing the parents or legal guardians should not be notified?	yes
	If the alleged victim is under the guardianship of the child welfare system, does the facility head or his or her designee promptly report the allegation to the alleged victim's caseworker instead of the parents or legal guardians? (N/A if the alleged victim is not under the guardianship of the child welfare system.)	yes
	If a juvenile court retains jurisdiction over the alleged victim, does the facility head or designee also report the allegation to the juvenile's attorney or other legal representative of record within 14 days of receiving the allegation?	yes
115.361 (f)	Staff and agency reporting duties	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
115.362 (a)	Agency protection duties	
	When the agency learns that a resident is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the resident?	yes
115.363 (a)	Reporting to other confinement facilities	
	Upon receiving an allegation that a resident was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
	Does the head of the facility that received the allegation also notify the appropriate investigative agency?	yes
115.363 (b)	Reporting to other confinement facilities	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes

115.363 (c)	Reporting to other confinement facilities	
	Does the agency document that it has provided such notification?	yes
115.363 (d)	Reporting to other confinement facilities	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
115.364 (a)	Staff first responder duties	
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
115.364 (b)	Staff first responder duties	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.365 (a)	Coordinated response	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes

115.366 (a)	Preservation of ability to protect residents from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	no
115.367 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.367 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations, such as housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services?	yes

115.367 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Any resident disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Resident housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Resident program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.367 (d)	Agency protection against retaliation	
	In the case of residents, does such monitoring also include periodic status checks?	yes

115.367 (e)	Agency protection against retaliation	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.368 (a)	Post-allegation protective custody	
	Is any and all use of segregated housing to protect a resident who is alleged to have suffered sexual abuse subject to the requirements of § 115.342?	yes
115.371 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency does not conduct any form of administrative or criminal investigations of sexual abuse or harassment. See 115.321(a).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency does not conduct any form of administrative or criminal investigations of sexual abuse or harassment. See 115.321(a).)	yes
115.371 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations involving juvenile victims as required by 115.334?	yes
115.371 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.371 (d)	Criminal and administrative agency investigations	
	Does the agency always refrain from terminating an investigation solely because the source of the allegation recants the allegation?	yes

115.371 (e)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
115.371 (f)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as resident or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring a resident who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.371 (g)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.371 (h)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.371 (i)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.371 (j)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.371(g) and (h) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years unless the abuse was committed by a juvenile resident and applicable law requires a shorter period of retention?	yes
115.371 (k)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the facility or agency does not provide a basis for terminating an investigation?	yes

115.371 (m)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
115.372 (a)	Evidentiary standard for administrative investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.373 (a)	Reporting to residents	
	Following an investigation into a resident's allegation of sexual abuse suffered in the facility, does the agency inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
115.373 (b)	Reporting to residents	
	If the agency did not conduct the investigation into a resident's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the resident? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes

115.373 (c)	Reporting to residents	
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the resident's unit?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.373 (d)	Reporting to residents	
	Following a resident's allegation that he or she has been sexually abused by another resident, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following a resident's allegation that he or she has been sexually abused by another resident, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes
115.373 (e)	Reporting to residents	
	Does the agency document all such notifications or attempted notifications?	yes

115.376 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
115.376 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
115.376 (c)	Disciplinary sanctions for staff	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
115.376 (d)	Disciplinary sanctions for staff	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies, unless the activity was clearly not criminal?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
115.377 (a)	Corrective action for contractors and volunteers	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with residents?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.377 (b)	Corrective action for contractors and volunteers	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with residents?	yes

115.378 (a)	Interventions and disciplinary sanctions for residents	
	Following an administrative finding that a resident engaged in resident-on-resident sexual abuse, or following a criminal finding of guilt for resident-on-resident sexual abuse, may residents be subject to disciplinary sanctions only pursuant to a formal disciplinary process?	yes
115.378 (b)	Interventions and disciplinary sanctions for residents	
	Are disciplinary sanctions commensurate with the nature and circumstances of the abuse committed, the resident's disciplinary history, and the sanctions imposed for comparable offenses by other residents with similar histories?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident is not denied daily large-muscle exercise?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident is not denied access to any legally required educational programming or special education services?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident receives daily visits from a medical or mental health care clinician?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the resident also have access to other programs and work opportunities to the extent possible?	yes
115.378 (c)	Interventions and disciplinary sanctions for residents	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether a resident's mental disabilities or mental illness contributed to his or her behavior?	yes
115.378 (d)	Interventions and disciplinary sanctions for residents	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to offer the offending resident participation in such interventions?	yes
	If the agency requires participation in such interventions as a condition of access to any rewards-based behavior management system or other behavior-based incentives, does it always refrain from requiring such participation as a condition to accessing general programming or education?	yes

115.378 (e)	Interventions and disciplinary sanctions for residents	
	Does the agency discipline a resident for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
115.378 (f)	Interventions and disciplinary sanctions for residents	
	For the purpose of disciplinary action, does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
115.378 (g)	Interventions and disciplinary sanctions for residents	
	Does the agency always refrain from considering non-coercive sexual activity between residents to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between residents.)	yes
115.381 (a)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.341 indicates that a resident has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the resident is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening?	yes
115.381 (b)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.341 indicates that a resident has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the resident is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening?	yes
115.381 (c)	Medical and mental health screenings; history of sexual abuse	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.381 (d)	Medical and mental health screenings; history of sexual abuse	
	Do medical and mental health practitioners obtain informed consent from residents before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the resident is under the age of 18?	yes

115.382 (a)	Access to emergency medical and mental health services	
	Do resident victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
115.382 (b)	Access to emergency medical and mental health services	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do staff first responders take preliminary steps to protect the victim pursuant to § 115.362?	yes
	Do staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
115.382 (c)	Access to emergency medical and mental health services	
	Are resident victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.382 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.383 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.383 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.383 (c)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes

115.383 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are resident victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if all-male facility.)	na
115.383 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph § 115.383(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if all-male facility.)	na
115.383 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are resident victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.383 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.383 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility attempt to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners?	yes
115.386 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
115.386 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes

115.386 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.386 (d)	Sexual abuse incident reviews	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.386(d) (1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.386 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
115.387 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.387 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes

115.387 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.387 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.387 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents? (N/A if agency does not contract for the confinement of its residents.)	na
115.387 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
115.388 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
115.388 (b)	Data review for corrective action	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes

115.388 (c)	Data review for corrective action	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.388 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
115.389 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.387 are securely retained?	yes
115.389 (b)	Data storage, publication, and destruction	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
115.389 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.389 (d)	Data storage, publication, and destruction	
	Does the agency maintain sexual abuse data collected pursuant to § 115.387 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	Frequency and scope of audits	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes

115.401 (b)	Frequency and scope of audits	
	Is this the first year of the current audit cycle? (Note: a “no” response does not impact overall compliance with this standard.)	no
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	no
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	yes
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
115.401 (n)	Frequency and scope of audits	
	Were inmates, residents, and detainees permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
115.403 (f)	Audit contents and findings	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes