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PREA Audit Site Review Instructions

Lockups

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PREA Audit Site Review

Instructions

PREA Standard 115.401(h) states, “The auditor shall have access to, and shall observe, all areas of the audited facilities.” In order to meet the requirements in this Standard, the site review portion of the onsite audit must include a thorough examination of the entire facility. The PREA audit site review is not a casual tour of the facility. It is an active, inquiring process that includes Standards-driven observations, tests of critical functions, and informal conversations with people confined in the facility, staff, volunteers, and contractors. During the site review, auditors **must** observe all areas and test all critical functions as outlined in this document. If something in the site review instructions is not applicable to the facility or it is not possible to observe or test, auditors must discuss barriers to observations/testing in the relevant Standard specific discussions and the Post-Audit Reporting Information section of the Auditor Compliance Tool. Pursuant to the PREA Auditor Handbook (Handbook), auditors are not permitted to conduct the site review portion of the onsite audit remotely.

As required in the Handbook, auditors must take thorough notes and document their observations during the site review, including any issues identified, tests of critical functions, and any other areas or practices that may require additional discussions with or proof documentation from the facility. Auditors are encouraged, but not required, to take notes using the [PREA Audit Site Review Checklist](#).

This document contains three sections:

- The first section outlines general instructions for what an auditor should do during the pre-onsite audit phase to prepare for the site review and general considerations when conducting the site review.
- The second section details what auditors must observe and critically evaluate during the site review, including: signage, supervision practices, cross-gender viewing and searches, and record storage.
- The final section details the critical functions that auditors must test during the site review, including: intake (PREA information and PREA risk screening), internal reporting methods, staff reporting, third party reporting, and interpretation services.

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General

The following section provides general instructions for what an auditor should do during the pre-onsite audit phase to prepare for the site review and general considerations when conducting the site review. Auditors should refer to the Handbook for additional information and guidance on expectations for the onsite portion of the audit.

- Prior to the site review, the auditor should:
 - Review the schematic of the facility, including the layout/design of each housing unit/cells, staff common areas, work areas, etc.
 - Understand the demographics of the population confined in the facility, including targeted populations of persons confined in the facility (e.g., those who identify as transgender; are intersex; have disabilities; are limited English proficient; are under 18).
 - Understand staffing at the facility, including:
 - The number of law enforcement and non-law enforcement staff, as well as volunteers, contractors, and “inmate workers” who may have contact with persons confined in the facility
 - Work and shift assignments
 - Rank structure, if applicable
 - Services provided by staff, volunteers, contractors and/or “inmate workers” on-site (e.g., emergency medical treatment, investigations) and their level of contact with persons confined in the facility.
 - Review the Pre-Audit Questionnaire to ensure a clear understanding of the facility’s policies, procedures, and critical functions (e.g., intake processes, internal reporting method(s), information on who is responsible for providing interpretation services to the facility and the manner in which the services are provided, such as, in person, via video, via phone).
 - Review the facility’s staffing plan.
 - Ask about facility procedures for taking photographs of the facility’s physical plant.
- During the site review, auditors must:
 - Inspect all areas of the facility.¹

¹ As a reminder, “all areas” include the lobby, visitation areas, and other areas where the public may have access in addition to areas where persons confined in the facility, staff, volunteers, and contractors have access.

- Auditors are expected to review all areas of the facility where persons confined in the facility may have access (with or without a staff person). Auditors must also review other areas of the facility where only staff may have access for the purpose of determining how these areas are monitored and secured (see bullet below).
 - In some instances, facility staff may advise the auditor that persons confined in the facility are not allowed in a particular area of the facility or that there are certain areas where only staff have access (e.g., closets, offices, or other storage areas). Because these are spaces where staff sexual abuse can occur, the auditor must observe these areas of the facility (particularly entrance and exit points) during the site review to determine how the facility ensures only staff enter and how those areas are secured and monitored.
- The facility staff who are escorting the auditor during the site review should have the ability to unlock or have access to any and all areas of the facility.
- Auditors may need to re-inspect certain areas of the facility later in the process if information obtained from interviews, documentation review, or other sources raises questions or concerns.
 - If allowed by the facility (see note above), take photographs of facility areas that present problems with compliance and/or where the facility demonstrates promising practices.
 - Document your tests of critical functions, important information gathered through observations, any issues identified with facility practices, and any other areas or practices that may require additional discussions with or proof documentation from the facility. Auditors are encouraged to use the [Site Review Checklist](#) to document findings.
- During the site review, auditors should conduct informal conversations with persons confined in the facility, where feasible, and with staff (references to staff in this document also include volunteers, contractors, and “inmate workers”, where applicable).
 - Note: Informal conversations do not constitute a formal interview for the purpose of complying with Standard 115.401(k) and meeting the interview requirements set forth in the Auditor Handbook.

Observations

During the site review, auditors are expected to observe and critically evaluate signage, supervision practices, cross-gender viewing and searches, record storage, and processes for sending and receiving mail. Note: observation and critical evaluation during the site review requires: (1) a clear understanding of the facility's policies and procedures; (2) observing what actually happens inside the facility, including actively reviewing all areas of the facility for evidence of practice and having informal conversations with staff and persons confined in the facility where confirmation or additional clarification are needed; and (3) analyzing whether what happens in the facility aligns with the expectations in the Standards.

Signage

During the site review, the auditor must actively observe any posted or printed signage throughout the facility (**e.g., posters, pamphlets, brochures, electronic signage**). Signage includes audit notices, how to report sexual abuse and sexual harassment, and other relevant information (see table below). The auditor must review the information provided on signage to determine whether it is readable and accessible, consistent, and placed throughout the facility to convey vital sexual safety information specific to the facility. *Note: The expectations of what an auditor must observe regarding signage are outlined below; however, a thorough review of signage documentation for readability and accessibility, consistency, placement, and accuracy must also be conducted as part of the auditor's analysis of the evidence to make a compliance determination.*

During the site review, the auditor must:

- Observe whether signage throughout the facility can be easily read/accessed by persons in the facility, specifically:
 - Signage language is clear and easy to understand.
 - Signage specific to services, such as external reporting, should include language that clearly details what services are available and for what purposes.
 - Signage is provided in English and translated for the other languages most commonly spoken in the facility.
 - The signage text size, formatting, and physical placement accommodates most readers, including those of average height, low vision/visually impaired, or those physically disabled/in a wheelchair, etc.

- The information provided by the signage is not obscured, unreadable by graffiti, or missing due to damage (e.g., part of the signage is ripped off that included the sexual abuse reporting hotline, a person drew a picture over the words which makes them illegible, etc.).
- Observe whether the information on the signage is accurate and consistent throughout the facility (e.g., audit notices are relevant to the current audit; contact information is consistent for service provider/organization name(s), addresses, phone number(s)).
- Observe where signage is placed in the facility to assess whether the signage is accessible to staff and/or those confined in the facility and other persons who may need the information or services provided. The auditor must observe the placement of the following types of signage:

Signage Type	Placement
PREA Audit Notices	Posted abundantly and visible to staff, persons confined in the facility, and visitors (i.e., posted in every area with cells or other secure enclosures, common spaces, facility entrance and visitation areas to include where attorneys visit, as well as any staff kitchens or other staff break rooms).
How to report sexual abuse and/or sexual harassment (external and internal reporting methods)	<p>Posted in any areas frequented by persons confined in the facility or “inmate workers” who may be working in the facility, including areas with cells or other secure enclosures and common spaces.</p> <p>Recommended: It is often helpful for such signage to be located near the phone(s), so persons confined in the facility can easily access the phone number if needed.</p>
Third-party reporting	Posted in public areas of the facility that can be accessed by advocates, and attorneys (e.g., attorney visiting areas, public-facing websites) as well as any areas frequented by persons confined in the facility.
Other PREA signage	Posted in areas where staff and persons confined in the facility are able to read and retain the information being provided (e.g., staff break room, locker rooms, or any other staff common areas, any areas with cells or other secure enclosures, etc.).

Additionally, the auditor should²:

- Have informal conversations with staff and persons confined in the facility regarding signage throughout the facility (e.g., readability and accessibility of information, including for persons confined in the facility who have disabilities; consistency and accuracy of information; signage posted just for the audit or always posted (with the exception of the PREA Audit Notice)).

Supervision Practices

During the site review the auditor must compare the written staffing plan against the following observations:

- Observe the number of staff, contractors, and volunteers present (including law enforcement and non-law enforcement staff) and staffing patterns during every shift, including:
 - In the areas where people are confined
 - In common spaces
 - In areas where sexual abuse is known to be more likely to occur according to the staffing plan.
- Observe staff line of sight and assess whether there are blind spots (for concerns regarding cross-gender viewing, see section titled “Cross-Gender Viewing”).
- Observe cells where people identified to be vulnerable during risk screening are held to ensure they are either in a single cell, under constant direct sight and sound supervision, or in a cell under constant video surveillance by staff who are close enough to intervene.
- Observe areas where persons confined in the facility are not allowed to determine whether movement in and out of that space is monitored (e.g., by cameras or other forms of surveillance), to ensure that persons confined in the facility never enter those areas.
- Observe the level of supervision and frequency of cell checks in areas where persons confined in the facility are in cells or other secure enclosures with more than one person (if applicable).
- Observe indirect supervision practices, including camera placement.
 - In addition to observation of camera placement, inquire about and observe the monitoring room, including staffing rotation (i.e., how often is camera feed monitored and by whom). (See also the section titled “Cross-Gender Viewing.”)
- Note any staffing concerns, including understaffing, overcrowding, poor line of sight, etc.

² Reminder: Auditors are expected to have informal conversations with staff and persons confined in the facility where feasible.

Additionally, the auditor should:

- Have informal conversations with staff regarding supervision practices (e.g., staffing norms, understaffing, shortages, overcrowding).
- Have informal conversations with persons confined in the facility and “inmate workers” regarding the impact of supervision practices and staffing presence (e.g., safety, overcrowding).

In **lockups that hold persons under the age of 18** (including those facilities that may house but do not have any persons under the age of 18 at the time of the site review), the auditor must:

- Observe where the persons under the age of 18 are or would be held and ensure they are not ever placed in the same cell as any person confined in the facility who is 18 years or older.

Additionally, the auditor should:

- Have informal conversations with staff regarding placement of persons under the age of 18 in the facility.

Cross-gender Viewing & Searches

Note: the Standards use the term “cross-gender,” but for the purposes of clarity in this document we use both “cross-gender” and “opposite-gender” when referring to viewing or searches of persons confined in the facility by staff of the opposite gender.

Cross-gender Viewing

During the site review, the auditor must:

- Observe all areas where persons confined in the facility may be in a state of undress, such as showering, using the toilet, and/or changing their clothes.
 - All areas including:
 - Inside cells, cell blocks, or secure enclosures.
 - Shared bathrooms/shower areas.
 - Outside of the secure enclosures (e.g., intake cells/areas, transport holding areas).
- Observe if any nonmedical staff of the opposite gender are able to view persons confined in the facility in a state of undress, including from different angles and via mirror placement.
 - Observe spaces from multiple perspectives and vantage points, as applicable.

- If mirrors are present, observe the placement and angle of mirrors.
- Observe electronic surveillance monitoring areas such as control rooms or other spaces where staff monitor live or recorded video feeds of persons confined in the facility (e.g., via camera feed) and determine if:
 - Opposite-gender staff are assigned to monitor video surveillance (recorded or live) (e.g., male staff viewing female persons confined in the facility or vice versa).
 - The video monitoring technology allows for point, tilt, zoom (PTZ) capabilities which could allow staff to see persons confined in the facility in a state of undress.
 - The facility uses any type of software (e.g., pixilation or blurring) or other mechanisms (e.g., post-its, tape) to obscure cross-gender viewing of persons confined in the facility in a state of undress.

Additionally, the auditor should:

- Have informal conversations with staff regarding cross-gender viewing, including staff responsible for monitoring camera feed/electronic monitoring (e.g., procedures to prevent cross-gender viewing via electronic monitoring, staff assigned to monitor camera feed, whether live or recorded, frequency of monitoring).
- Have informal conversations with persons confined in the facility regarding changing clothes, using the toilet, and showering without staff of the opposite gender being able to view.

Inside housing units, the auditor must also:

- Observe the method(s) used to alert individuals confined in the facility that an opposite-gender staff person has entered an area where people who are confined in the facility are likely to be changing clothes, showering, or using the toilet (i.e., cross-gender announcement).
 - Alert methods might include a verbal announcement, distinct buzzer, bell, or other noise-making device.
- Assess whether the alert method(s) is sufficient to alert the people confined in the facility that an opposite-gender staff person will be entering the area where they are changing clothes, showering, or using the toilet and allow them to cover-up and determine whether:
 - The alert is loud enough for all of the persons confined in the cells, cell block, or secure enclosure to hear.

- The time between the alert and the staff person's arrival provides enough time for persons confined in that area to cover up before the staff enter.
- The alert is provided in such a manner that persons confined in the facility who have disabilities (e.g., persons who are Deaf or hard of hearing, Blind or have low vision, or those who are cognitively or functionally disabled (including intellectual, psychiatric, or speech disabilities)) are also properly alerted to staff of the opposite-gender in the area where they are changing clothes, showering, or using the toilet.

Additionally, the auditor should:

- Have informal conversations with staff in housing units regarding opposite-gender announcement procedures (e.g., verify opposite-gender announcement procedures, frequency opposite-gender announcements).
- Have informal conversations with persons confined in the facility regarding opposite-gender announcement procedures.
- **Important note:** It may not always be possible to observe a cross-gender announcement if, for example, there are no persons confined in the facility using the shower areas or bathrooms, or otherwise in areas where they'd change clothes, or no staff of the opposite-gender of those confined in the facility at the time of the audit. In these circumstances, the auditor should rely upon other types of evidence (i.e., documentation, interviews of staff and persons confined in the facility).

Searches

During the site review, the auditor must:

- Observe areas used to conduct strip searches and visual body cavity searches and assess whether opposite-gender staff (i.e., non-medical personnel) can watch the conduct of a strip search or visual body cavity search (absent exigent circumstances).
 - **If opposite-gender supervisors are required to supervise or observe strip searches**, observe the area used to conduct searches and note if a privacy screen or other similar device is used to obstruct cross-gender viewing.
 - **If opposite-gender staff or personnel can be in the vicinity of the strip search area**, observe the area used to conduct searches and note if a privacy screen or other similar device is used to obstruct cross-gender viewing or if the staff or personnel are kept at a sufficient distance

where the contours of the breasts, genitalia, or buttocks are not readily distinguishable.

Additionally, the auditor should:

- Have informal conversations with staff and persons confined in the facility regarding search procedures (e.g., limits to cross-gender viewing, supervision of searches).

Record Storage

During the site review, the auditor must:

- Observe the physical storage area of any information/documentation collected and maintained in hard copy pursuant to the PREA Standards (e.g., risk screening information, sexual abuse allegations) to determine if the area is secured (e.g., key card, lock and key).
- Observe electronic safeguards of any information/documentation collected and maintained electronically pursuant to the PREA Standards (e.g., risk screening information) to determine how access to the information is secured (e.g., password protected, accessible only in certain areas, role-based security).
 - Note, the auditor may have to speak with the agency/facility information technology staff person to understand the secure storage of electronic information and who has access to that information.

Additionally, the auditor should:

- Have informal conversations with staff regarding access to secure information, including medical and mental health files, if they exist, sexual abuse and sexual harassment reports, etc. (e.g., where, how, and security of information is stored electronically and in hard copy, specifically who has access and how access is restricted).

Testing of Critical Functions

During the site review, auditors are expected to actively engage in tests of critical functions (including PREA information provided and PREA risk screening conducted during intake, internal and external reporting methods, staff reporting, third party reporting, and interpretation services). Active engagement in testing critical functions during the site review requires: (1) a clear understanding of the facility's critical functions (e.g., how the facility provides access to outside emotional support services); (2) assessing critical functions (e.g., call outside emotional support service provider), including testing critical functions per the site review instructions and having informal conversations with staff and persons confined in the facility where confirmation or additional clarification is needed; and (3) analyzing whether your tests of critical functions aligns with the expectations of the Standards.

Intake

PREA Information

As part of the site review, the auditor must ask to observe, during an actual intake process, if possible, the sexual safety information (PREA information/zero-tolerance information) provided at the point of intake; if no one is being admitted during the onsite audit, the auditor may ask staff to walk through the process and do a mock intake for demonstration purposes.

During the intake or mock demo, the auditor must:

- Confirm who is responsible for conducting the intake process.
 - This information will be important for interviewing the right staff who are responsible for the intake process.
- Test how the facility provides the necessary PREA information to all persons confined in the facility, regardless of ability and language, including whether:
 - Written information, if applicable, is clear and provided at an appropriate reading-level and is accessible for all persons confined in the facility, including those who are limited English proficient (LEP)³ (i.e., the facility provides written information in the languages most commonly spoken in the facility and/or provides translation services on-demand).

³ Note: people who are "limited English proficient" (LEP) refers to those who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. People who are limited English proficient may use spoken or sign language.

- The facility provides interpreters, when needed, to assist Deaf and non-English speaking persons confined in the facility (see section *Interpretation Services*).
- Staff are prepared to read written information out loud, if applicable, to make accommodations for persons confined in the facility when necessary (e.g., Blind or have low vision, limited reading skills, etc.).
- Mental health staff or other skilled educators/staff are involved in providing the required information to persons confined in the facility who have cognitive or functional disabilities.

Additionally, the auditor should:

- Have informal conversations with staff (if mock demo) or persons confined in the facility (if an actual intake) regarding initial PREA education provided during intake (e.g., understanding of information provided, access to additional support to understand information provided, if necessary).

PREA Risk Screening

During the site review, the auditor must ask to observe a person confined in the facility being screened for risk of being sexually abused or sexually abusive, if possible; if no persons are being screened during the onsite portion of the audit, the auditor may ask staff to walk through the process and do a mock intake for demonstration purposes.

Note: If the facility is a lockup where persons confined in the facility are never placed in a holding cell with other persons and are never placed in an area with other persons confined in the facility absent continuous staff supervision, then no screening for risk of sexual abusiveness or victimization is required (see this [FAQ](#) for more information).

During the risk screening or mock demo, the auditor must:

- Confirm who is responsible for risk screening.
 - This information will be important for interviewing the right staff who are responsible for conducting risk screening.
- Observe the method for assessing persons confined in the facility's risk of being sexually abused or being sexually abusive, including whether:
 - Screening staff uses information, outlined in the Standards, to complete the risk screening assessment.
 - Screening staff ask persons confined in the facility about their perception of vulnerability in a manner that fosters comfort and elicits responses.

Additionally, the auditor should:

- Have informal conversations with staff while conducting risk screening (or mock demo) regarding the risk screening process (e.g., how information is collected, how privacy is maintained.)
- Have informal conversations with persons confined in the facility regarding the risk screening process (e.g., their comfort answering questions in the space where the screening is being provided, ability to answer the questions asked).

Testing Internal Reporting Methods for Persons Confined in the Facility

Note: Facilities are required to have multiple internal methods for persons confined in the facility to privately report sexual abuse or sexual harassment, retaliation by other persons confined in the facility or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. Accordingly, during the site review, auditors must test the methods provided for the purpose of assessing whether people confined in the facility have regular and timely access to reporting methods and how the facility receives these reports.

Reporting in Writing

If one of the ways in which persons confined in the facility can report sexual abuse or sexual harassment includes a mechanism or mechanisms for submitting a written report (which might be a note or a form) into a drop box or other receptacle, the auditor must assess access to writing materials (e.g., forms, paper, envelopes, writing implements) and the drop box in the same way as that available to persons confined in the facility. Auditors, however, do not need to complete and submit a written report via hard copy/drop box to test this reporting mechanism.

During the site review the auditor must:

- Test access, or ask a person confined in the facility to test access, to the mechanism(s)/form(s).
 - Determine whether persons confined in the facility can access forms without having to make a request from staff.
- Assess the accessibility of writing instruments for persons confined in the facility (e.g., paper, writing instruments, sexual abuse and sexual harassment reporting form(s), if applicable, envelopes, stamps).

- Observe how mail moves from persons confined in the facility to the mailroom or mailbox.
 - If mail moves via mail drop boxes/receptacles/lock boxes:
 - Assess whether placement of mail drop boxes/receptacles are located in areas accessible to all persons confined in the facility.
 - Ideally, mail drop boxes/receptacles should also be in locations where a person confined in the facility could drop written communication anonymously (e.g., an area where a person confined in the facility could drop a form, letter, or note in passing.)
 - **Note:** Drop boxes or other receptacles used to collect reports of sexual abuse and sexual harassment should not be used exclusively for reporting sexual abuse and sexual harassment. Other staff and persons confined in the facility should not know, from the nature of the receptacle being used, that a person is reporting a sexual abuse or sexual harassment.
 - If mail moves via staff (i.e., other than mailroom staff), see “have informal conversations” below.
- Assess the security of written communication (if mail is available to persons confined in the facility as a mechanism for reporting sexual abuse and sexual harassment)
 - Mail drop boxes/receptacles/lock boxes are kept locked/secured.
 - Mail in the mail drop boxes/receptacles/lock boxes is only accessible by a designated agency official or selected official(s).

Additionally, the auditor should:

- Have informal conversations with staff responsible for sending mail for the purposes of internal reporting of sexual abuse and sexual harassment (e.g., mailroom staff and/or other staff) and persons confined in the facility regarding the process of sending mail to the internal reporting entity, and the perception of privacy/confidentiality/anonymity in sending mail, and accessibility of writing instruments and required forms).

Reporting Electronically

If the facility has a system by which persons confined in the facility can report sexual abuse and/or sexual harassment electronically via kiosk, tablet, or computer (whether by internal email, grievance, or some other method), during the site review the auditor must:

- Complete and submit a test report via the kiosk/tablet/computer during the site review, and in the same manner as that available to persons confined in the facility.
- Assess whether the facility receives the test report.
 - Ask to see evidence of having received the test report that the auditor submitted.
- Test accessibility of kiosks/tablets/computers, including whether:
 - Kiosks/tablets/computers are easily and readily available to all persons confined in the facility and are placed in areas frequented by persons confined in the facility.
 - Kiosks/tablets/computers are accessible to all persons confined in the facility and have reasonable accommodations, where necessary (i.e., for persons confined in the facility who are Deaf or hard-of-hearing, Blind or have low vision, cognitively or functionally disabled, limited English proficient, non-English speaking, and/or have limited reading skills).
 - Kiosks/tablets/computers are placed in areas that afford persons confined in the facility reasonable privacy while submitting a report.
 - Kiosks/tablets/computers are operable (i.e., in working order).
- Assess whether a person confined in the facility can access the kiosks/tablets/computers to complete and submit a sexual abuse or harassment report without providing their name and/or ID. This means that there must be a way for persons confined in the facility to access the reporting mechanism without logging into the kiosk/tablet/computer with a traceable login.

Additionally, the auditor should:

- Have informal conversations with staff and persons confined in the facility regarding internal reporting electronically (e.g., access to kiosks/tablets/computers, including access for persons confined in restricted housing, reasonable accommodations for persons confined in the facility who need it, operability of kiosks/tablets/computers, anonymity in reporting).

Reporting Verbally

For verbal reports of sexual abuse and/or sexual harassment made by persons confined in the facility, during the site review the auditor should:

- Have informal conversations with persons confined in the facility, to determine whether they are aware that they are allowed to report verbally and that they can report not only to an officer working in the cell area, but to other staff in the facility.

- Have informal conversations with staff, to determine whether staff are aware of the process for receiving and documenting verbal reports.
- See section “Record Storage” for instructions on what the auditor must observe during the site review regarding how documented reports are stored and who has access to those documented reports.

Testing Staff Reporting

During the site review, the auditor must:

- Test by asking a staff person to walk through the staff reporting method(s) provided by the facility.
- Observe whether the staff reporting method is available, on demand, to all staff in the facility.
- Assess whether staff are required to report to their direct colleagues or their immediate supervisor.

Testing Third-Party Reporting

Either prior to the onsite, during the site review, or post-onsite, the auditor must:

- Complete and submit a test third-party report using the same method(s) provided to the public (e.g., via the agency/facility website).
 - Confirm the method(s) to submit third-party reports is easily accessible and understandable and can be found in reasonably conspicuous and appropriate locations (e.g., facility/agency website).
 - Confirm that the third-party reporting method is not the general contact information for the facility, but is specific to reporting sexual abuse and sexual harassment in the facility.
- Verify the facility has a process for receiving third-party reports.
 - Ask to see evidence of having received the test report that the auditor submitted.

Interpretation Services

As part of the formal interview process, the auditor must interview persons confined in the facility who are LEP, deaf, or hard of hearing. As such, those interviews are an excellent opportunity to test the facility’s access to interpretation services. The auditor should not notify or set-up interpreting or language line access in advance of the audit. Instead, the auditor must test the facility’s process for securing an interpreter in real-time. Note, the auditor must access the interpretation services in

whatever manner is available to the persons confined in the facility (see *General Guidance* section).

During the site review, the auditor must:

- Test the facility's process for securing interpretation services on-demand.
 - If services are provided via a language line, the auditor must test access to services via the language line to assess whether the phones for accessing the language line work properly (e.g., the auditor should pick up the phone to confirm there is a dial tone).
- Determine if persons confined in the facility must self-identify (e.g., enter pin, provide name/ID number) to access interpretation services. This is important to understand related to anonymous reporting or confidential access to emotional support services.
- Assess the availability of interpretation services (e.g., ability to access immediate interpretation services).
- Assess the accessibility of interpretation services (i.e., available to all persons confined in the facility who need an interpreter, including persons confined in restricted housing).
- Observe the location of interpretation services (e.g., are services provided in a location that provides some privacy for the persons confined in the facility?).

Additionally, the auditor should:

- Have informal conversations with staff and persons confined in the facility regarding accessibility of interpretation services when needed (e.g., experiences with interpretation services in the past).