# PREA AUDIT: AUDITOR COMPLIANCE TOOL Facility: Community Confinement

Completed by:	
Date of Final Submission	

AGENCY INFORMATION				
Name of agency:				
Date of last agency PREA audit(if applicable):				
Telephone:				
Governing authority or parent agency (if applicable):				
Physical Address:				
Mailing Address:				
The Agency is:	Federal: Bureau of Prisons Federal: Military State U.S. Territory County or Multi-County Regional Authority City or Municipal Judicial District Private Other			
Agency Mission (attach additional document if necessary):				
Upload Attachment (o	ptional):			
Agency Chief Executive Officer Information:				
Name:		Title:		
Email address:		Telephone number:		
Agency-Wide PREA Coordinator Information:				
Name:		Email:		
PREA coordinator reports to:				
Number of compliance managers who				

report to PREA coordi	nator:	
Agency website with I	PREA information:	
Is the agency accredited by any other organization?		Yes No
FACILITY INFORMA	TION	
Facility name:		
Facility physical address:		
Facility mailing address:		
Facility website w	vith PREA Information:	□ N/A
Has the facility been accredited within the past 3 years?		Yes No
the past 3 years, organization(s): Selec	peen accredited within select the accrediting at all that apply (N/A if peen accredited within the past 3 years):	ACA NCCHC CALEA Other(please name or describe): N/A
or external audits	ompleted any internal other than those that ation, please describe:	□ N/A
Upload any relevant accreditation, internal, or external audit reports (referenced above):		□ N/A
Primary Contact		
Name:		
Email Address:		
Telephone Number:		

<b>Facility Director</b>		
Name:		
Email Address:		
Telephone Number:		
Facility PREA Comp	oliance Manager	
Name:		
Email Address:		
Telephone Number:		
Facility Health Ser	vice Administrator (	On-Site
Name:		
Email Address:		
Telephone Number:		
Facility Characteris	stics	
Desi	gned facility capacity:	
Current population of facility:		
Average daily population for the past 12 months:		
Has the facility been over capacity at any point in the past 12 months?		Yes No
What is the facility's population designation?		
has the facility held (Nonbinary describe not identify exclusive girl/woman. Some peo	s, which population(s) i? Select all that apply bes a person who does vely as a boy/man or a ople also use this term jender expression. For	Male Female Intersex Transgender Nonbinary

definitions of "intersex" and "transgender," please see https://www.prearesourcecenter.org/standard/115-5)	
Age range of population:	
Average length of stay or time under supervision:	
Facility security levels/resident custody levels:	
Number of residents admitted to facility during the past 12 months:	
Number of residents admitted to facility during the past 12 months whose length of stay in the facility was for 72 hours or more:	
Number of residents admitted to facility during the past 12 months whose length of stay in the facility was for 30 days or more:	
Does the audited facility hold residents for one or more other agencies (e.g. a State correctional agency, U.S. Marshals Service, Bureau of Prisons, U.S. Immigration and Customs Enforcement)?	Yes No
Select all other agencies for which the audited facility holds residents: Select all that apply (N/A if the audited facility does not hold residents for any other agency or agencies)	Federal Bureau of Prisons  US Marshals Service  U.S. Immigration and Customs Enforcement  Bureau of Indian Affairs  U.S. Military branch  State or Territorial correctional agency  County correctional or detention agency  Judicial district correctional or detention facility  City or municipal correctional or detention facility (e.g. police lockup or city jail)  Private corrections or detention provider  Other(please name or describe):  N/A
Number of staff currently employed at the facility who may have contact with residents:	

Number of staff hired by the facility during the past 12 months who may have contact with residents:	
Number of contracts in the past 12 months for services with contractors who may have contact with residents:	
Number of individual contractors who have contact with residents, currently authorized to enter the facility:	
Number of volunteers who have contact with residents, currently authorized to enter the facility:	
Physical Plant	
Number of buildings: Auditors should count all buildings that are part of the facility, whether residents are formally allowed to enter them or not. In situations where temporary structures have been erected (e.g., tents) the auditor should use their discretion to determine whether to include the structure in the overall count of buildings. As a general rule, if a temporary structure is regularly or routinely used to hold or house residents, or if the temporary structure is used to house or support operational functions for more than a short period of time (e.g., an emergency situation), it should be included in the overall count of buildings.	
Number of housing units: DOJ PREA Working Group FAQ on the definition of a housing unit: How is a "housing unit" defined for the purposes of the PREA Standards? The question has been raised in particular as it relates to facilities that have adjacent or interconnected units. The most common concept of a housing unit is architectural. The generally agreed-upon definition is a space that is enclosed by physical barriers accessed through one or more doors of various types, including commercial-grade swing doors, steel sliding doors, interlocking sally port doors,	

etc. In addition to the primary entrance and exit, additional doors are often included to meet life safety codes. The unit contains sleeping space, sanitary facilities (including toilets, lavatories, and showers), and a dayroom or leisure space in differing configurations. Many facilities are designed with modules or pods clustered around a control room. This multiple-pod design provides the facility with certain staff efficiencies and economies of scale. At the same time, the design affords the flexibility to separately house inmates of differing security levels, or who are grouped by some other operational or service scheme. Generally, the control room is enclosed by security glass, and in some cases, this allows residents to see into neighboring pods. However, observation from one unit to another is usually limited by angled site lines. In some cases, the facility has prevented this entirely by installing one-	
way glass. Both the architectural design and functional use of these multiple pods indicate that they are managed as distinct housing units.	
Number of single resident cells, rooms, or other enclosures:	
Number of multiple occupancy cells, rooms, or other enclosures:	
Number of open bay/dorm housing units:	
Does the facility have a video monitoring system, electronic surveillance system, or other monitoring technology (e.g. cameras, etc.)?	Yes No
Has the facility installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology in the past 12 months?	Yes No
Medical and Mental Health Services a	nd Forensic Medical Exams
Are medical services provided on-site?	Yes No

Are mental health services provided on- site?	Yes No
Where are sexual assault forensic medical exams provided? Select all that apply	On-site Local hospital/clinic Rape Crisis Center Other(please name or describe):
Investigations	
Number of investigators employed by the agency and/or facility who are responsible for conducting CRIMINAL investigations into allegations of sexual abuse or sexual harassment:	
When the facility receives allegations of sexual abuse or sexual harassment (whether staff-on-resident or resident-on-resident), CRIMINAL INVESTIGATIONS are conducted by: Select all that apply	Facility investigators Agency investigators An external investigative entity
Select all external entities responsible for CRIMINAL INVESTIGATIONS: Select all that apply (N/A if no external entities are responsible for criminal investigations)	Local police department Local sheriff's department State police A U.S. Department of Justice component Other(please name or describe): N/A
Number of investigators employed by the agency and/or facility who are responsible for conducting ADMINISTRATIVE investigations into allegations of sexual abuse or sexual harassment:	
When the facility receives allegations of sexual abuse or sexual harassment (whether staff-on-resident or resident-on-resident), ADMINISTRATIVE INVESTIGATIONS are conducted by: Select all that apply	Facility investigators Agency investigators An external investigative entity
Select all external entities responsible for ADMINISTRATIVE INVESTIGATIONS: Select all that apply (N/A if no external entities are responsible for administrative investigations)	Local police department Local sheriff's department State police A U.S. Department of Justice component Other(please name or describe):

	□ N/A	
Facility Lists		
Upload staff rosters and lists of contractors and volunteers		
Upload rosters of persons confined in the		
Upload lists of sexual abuse and sexual harassment allegations (including how they were investigated		
Upload other list(s) (e.g., lists or grievances and/or incident reports related to sexual abuse and sexual harassment	elated	
Prevention Planning		
115.211: Zero tolerance of sexual abuse and sexual harassment; PREA coordinator		
<b>115.211 (a):</b> An agency shall have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlining the agency's approach to preventing, detecting, and responding to such conduct.		
Pre-Audit Issue Lo		Issue Log Notes
Section Question Text	Agency/Facility	

Response

115.211 (a)-1	The agency has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment in facilities it operates directly or under contract.  • Upload/select zero tolerance policy	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional
115.211 (a)-2	The facility has a written policy outlining how it will implement the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment.  • Upload/select policy outlining implementation plan	Yes/No Yes No  Enter Comment	documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested
115.211 (a)-3	The policy includes definitions of prohibited behaviors regarding sexual abuse and sexual harassment.	Yes/No Yes No  Enter Comment	Additional documentation requested
115.211 (a)-4	The policy includes sanctions for those found to have participated in prohibited behaviors.	Yes/No Yes No  Enter Comment	
115.211 (a)-5	The policy includes a description of agency strategies and responses to reduce and prevent sexual abuse and sexual harassment of residents.	Yes/No Yes No  Enter Comment	

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?*
Provision Findings  Yes No
Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?*
Provision Findings  Yes

**115.211 (b):** An agency shall employ or designate an upper-level, agency-wide PREA coordinator with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities.

O No

Pre-Audit		Issue Log Notes	
Section	Question Text	Agency/Facility Response	
115.211 (b)-1	The agency employs or designates an upper-level, agency-wide PREA Coordinator.  • Upload/select agency organizational chart	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies
115.211 (b)-2	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 community confinement facilities.	Yes/No Yes No  Enter Comment	clarifications or additional documentation requested by the auditor. Note: this text will not be included in
115.211 (b)-3	The position of the PREA Coordinator in the agency's organizational structure:	Enter Comment	the interim or final reports.  Clarification requested Additional documentation requested

### **Interview Guides**

• PREA Coordinator - Q: 1, 2, 3

### **Auditor Personal Notes**

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# **Provision Findings**

las the agency employed or designated an agency-wide PREA Coordinator?*
Provision Findings
○ Yes
○ No
s the PREA Coordinator position in the upper-level of the agency hierarchy?*
Provision Findings
○ Yes
○ No
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 community confinement facilities?*
Provision Findings
○ Yes
○ No

# **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the

facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

### **Auditor Overall Determination**

Auditor Overall Determination
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
Does Not Meet Standard (requires corrective action)

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# **Prevention Planning**

# 115.212: Contracting with other entities for the confinement of residents

**115.212** (a): A public agency that contracts for the confinement of its residents with private agencies or other entities, including other government agencies, shall include in any new contract or contract renewal the entity's obligation to adopt and comply with the PREA standards.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	

115.212 (a)-1	The agency has entered into or renewed a contract for the confinement of residents on or after August 20, 2012, or since the last PREA audit, whichever is later. If "No", skip to 115.213.  • Upload/select contracts for the confinement of residents entered into (or renewed) after August 20, 2012, or since the last PREA audit	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not
115.212 (a)-2	All of the above contracts require contractors to adopt and comply with PREA standards.	Yes/No Yes No  Enter Comment	be included in the interim or final reports.  Clarification
115.212 (a)-3	The number of contracts for the confinement of residents that the agency entered into or renewed with private entities or other government agencies on or after August 20, 2012, or since the last PREA audit, whichever is later:	(Number only) Enter Comment	requested Additional documentation requested
115.212 (a)-4	The number of above contracts that DID NOT require contractors to adopt and comply with PREA standards:	(Number only) Enter Comment	

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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.)\*

<b>Provision Findings</b>	
Yes	
○ No	
○ N/A	

**115.212 (b):** Any new contract or contract renewal shall provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	
115.212 (b)-1	All of the above contracts require the agency to monitor the contractor's compliance with PREA standards.  • If applicable, select contracts and indicate relevant page/ section.  The number of contracts referenced in 115.212 (a)-3 that DO NOT require the agency to monitor contractor's compliance with PREA standards:	Yes/No Yes No  Enter Comment  (Number only) Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification
			requested Additional documentation requested

# **Audit**

# **Interview Guides**

• Agency Contract Administrator - Q: 1, 2, 3

### **Auditor Personal Notes**

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# **Provision Findings**

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.)\*

Provision Findings		
Yes		
○ No		
○ N/A		

**115.212 (c):** Only in emergency circumstances in which all reasonable attempts to find a private agency or other entity in compliance with the PREA standards have failed, may the agency enter into a contract with an entity that fails to comply with these standards. In such a case, the public agency shall document its unsuccessful attempts to find an entity in compliance with the standards.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	

115.212 (c)-1	Since August 20, 2012, the agency has entered into one or more contracts with a private agency or other entity that failed to comply with the PREA standards. If "No", skip to 115.213(a).	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies
115.212 (c)-2	If YES, these contracts were a result of emergency circumstances. If "Yes", please describe.	Yes/No Yes No  Enter Comment	clarifications or additional documentation requested by the
115.212 (c)-3	The agency documents unsuccessful attempts to find an entity in compliance with the standards.  • Upload/select documentation of unsuccessful attempts to find an entity in compliance with the standards	Yes/No Yes No  Enter Comment	auditor. Note: this text will not be included in the interim or final reports.  Clarification requested  Additional documentation requested

### **Interview Guides**

• Agency Contract Administrator - Q: 4

# **Auditor Personal Notes**

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# **Provision Findings**

If the agency has entered into a contract with an entity that fails to comply with the PREA standards, did the agency do so only in emergency circumstances after making all reasonable attempts to find a PREA compliant private agency or other entity to confine

residents? (N/A if the agency has not entered into a contract with an entity that fails to comply with the PREA standards.)\*

Provision Findings

Yes

No

N/A

In such a case, does the agency document its unsuccessful attempts to find an entity in compliance with the standards? (N/A if the agency has not entered into a contract with an entity that fails to comply with the PREA standards.)\*

Provision Findings

Yes

No

N/A

# **Supporting Documentation**

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Select File(s) (including supplemental files)

### **Auditor Overall Determination**

Auditor Overall Determination
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
<ul> <li>Does Not Meet Standard (requires corrective action)</li> </ul>

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

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# **Prevention Planning**

### 115.213: Supervision and monitoring

**115.213** (a): For each facility, the agency shall develop and document a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect residents against sexual abuse. In calculating adequate staffing levels and determining the need for video monitoring, agencies shall take into consideration: (1) The physical layout of each facility; (2) The composition of the resident population; (3) The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and (4) Any other relevant factors.

Pre-Audit			Issue Log Notes	
Section	Question Text	Agency/Facility Response		
115.213 (a)-1	For each facility, the agency develops and documents a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring to protect residents against sexual abuse.  • Upload/select:  • Documentation of staffing plan development process  • Staffing plan	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not	
115.213 (a)-2	Since August 20, 2012, or last PREA audit, whichever is later, the average daily number of residents:	(Number only) Enter Comment	be included in the interim or final reports.  Clarification	the interim or final reports.
115.213 (a)-3	Since August 20, 2012, or last PREA audit, whichever is later, the average daily number of residents on which the staffing plan was predicated:	(Number only) Enter Comment	requested Additional documentation requested	
Audi	t			
Inter	view Guides			

- Director or Designee Q: 1, 2, 3
- PREA Coordinator Q: 4

#### **PREA Audit Site Review**

#### **SUPERVISION PRACTICES**

During the site review the auditor must compare the written staffing plan against the following observations to determine whether the staffing plan adequately assesses the staffing and/or electronic monitoring needs of the facility with sexual safety in mind, and, whether the facility is staffed according to the plan, as it is written, to later determine whether deviations from the plan have been documented:

- <u>Observe</u> the number of staff, contractors, and volunteers present (including security and non-security staff) and staffing patterns during every shift, including:
  - In housing/living areas
  - In programming, work, education, other areas
  - In areas where sexual abuse is known to be more likely to occur according to the staffing plan.
- Observe staff line of sight in shared spaces.
- <u>Observe</u> 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 confined persons never enter those areas.
- <u>Observe</u> the level of supervision and frequency of room checks in housing areas where confined persons have roommates and in dormitories or other congregate housing settings (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).
- <u>Note</u> any staffing concerns, including understaffing, overcrowding, poor line of sight, etc.

#### Additionally, the auditor should:

- <u>Have informal conversations</u> with staff regarding supervision practices (e.g., staffing norms, understaffing, shortages).
- <u>Have informal conversations</u> with persons confined in the facility regarding the impact of supervision practices and staffing presence (e.g., safety, accessibility or limits to programming, education, work).

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

B			
Prov	ISION	Find	

Does the facility have a documented staffing plan that provides for adequate levels of
staffing and, where applicable, video monitoring to protect residents against sexual abuse?*  Provision Findings  Yes
○ No
In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The physical layout of each facility?*
Provision Findings  Yes No
In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the resident population?*
Provision Findings  Yes No
In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?*
Provision Findings  Yes No
In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?*
Provision Findings  Yes No

**115.213 (b):** In circumstances where the staffing plan is not complied with, the facility documents and justifies all deviations from the plan.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.213 (b)-1	Each time the staffing plan is not complied with, the facility documents and justifies all deviations from the staffing plan. Check N/A if no deviations from plan.  • Upload/select documentation of deviations from staffing plans and written justifications for all such deviations	Yes/No Yes No N/A  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested
115.213 (b)-2	If documented, the six most common reasons for deviating from the staffing plan in the last 12 months:	Enter Comment	

# **Interview Guides**

• Director or Designee - Q: 4

# **PREA Audit Site Review**

• Review site review instructions outlined in provision (a).

# **Auditor Personal Notes**

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# **Provision Findings**

In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (NA if no deviations from staffing plan.)\*

<b>Provision Findings</b>	
○ Yes	
○ No	
○ N/A	

**115.213 (c):** Whenever necessary, but no less frequently than once each year, the facility shall assess, determine, and document whether adjustments are needed to: (1) The staffing plan established pursuant to paragraph (a) of this section; (2) Prevailing staffing patterns; (3) The facility's deployment of video monitoring systems and other monitoring technologies; and (4) The resources the facility has available to commit to ensure adequate staffing levels.

Pre-Audit		Issue Log Notes		
Section	<b>Question Text</b>		Agency/Facility Response	

115.213 (c)-1 At least once every year the facility, reviews the staffing plan to see whether adjustments are needed in (1) the staffing plan, (2) prevailing staffing patterns, (3) the deployment of video monitoring systems and other monitoring technologies, or (4) the allocation of facility/agency resources to commit to the staffing plan to ensure compliance with the staffing plan.

 Upload/select documentation of annual reviews Yes/No
Yes No

Enter Comment

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

### **Audit**

### **Interview Guides**

• PREA Coordinator - Q: 5

## **Documentation Review**

· Additional annual reviews

### **Auditor Personal Notes**

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# **Provision Findings**

In the past 12 months, has the facility assessed, determined, and documented whether
adjustments are needed to the staffing plan established pursuant to paragraph (a) of this
section?*

Section?"
Provision Findings  Yes No
In the past 12 months, has the facility assessed, determined, and documented whether adjustments are needed to prevailing staffing patterns?*
Provision Findings  Yes No
In the past 12 months, has the facility assessed, determined, and documented whether adjustments are needed to the facility's deployment of video monitoring systems and other monitoring technologies?*
Provision Findings  Yes No
In the past 12 months, has the facility assessed, determined, and documented whether adjustments are needed to the resources the facility has available to commit to ensure adequate staffing levels?*
Provision Findings  Yes

# **Supporting Documentation**

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Select File(s) (including supplemental files)

## **Auditor Overall Determination**

#### **Auditor Overall Determination**

O No

<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
Opes Not Meet Standard (requires corrective action)

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# **Prevention Planning**

#### 115.215: Limits to cross-gender viewing and searches

**115.215 (a):** The facility shall not conduct cross-gender strip searches or cross-gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent circumstances or when performed by medical practitioners.

Pre-Audit		Issue Log Notes	
Section	Question Text	Agency/Facility Response	

115.215 (a)-1	The facility conducts cross-gender strip or cross-gender visual body cavity searches of residents.  • Upload/select policy on searches	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies
115.215 (a)-2	In the past 12 months, the number of cross-gender strip or cross-gender visual body cavity searches of residents:	(Number only) Enter Comment	clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested

### **Interview Guides**

• Non-medical staff (involved in cross-gender strip or visual searches) - Q: 1

## **PREA Audit Site Review**

#### **CROSS-GENDER 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.

#### During the site review, the auditor must:

- Observe areas used to conduct strip searches, visual body cavity searches, and patdown 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:

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

#### **Documentation Review**

• Logs of cross-gender strip searches and cross-gender visual body cavity searches in the past 12 months.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Does the facility always refrain from conducting any cross-gender strip searches or crossgender visual body cavity searches, except in exigent circumstances or by medical practitioners?\*

Provision Findings		
○ Yes		
○ No		

**115.215 (b):** As of August 20, 2015, or August 20, 2017 for a facility whose rated capacity does not exceed 50 residents, the facility shall not permit cross-gender pat-down searches of female residents, absent exigent circumstances. Facilities shall not restrict female residents' access to regularly available programming or other outside opportunities in order to comply with this provision.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.215 (b)-1	The facility does not permit cross- gender pat-down searches of female residents, absent exigent circumstances (facilities have until August 20, 2015, to comply; or August 20, 2017, if their rated capacity does not exceed 50 residents).  • If applicable, select policy on searches and indicate relevant page/section.	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested
115.215 (b)-2	The facility does not restrict female residents' access to regularly available programming or other outside opportunities in order to comply with this provision.  • If applicable, select policy on searches and indicate relevant page/section.	Yes/No Yes No  Enter Comment	
115.215 (b)-3	The number of pat-down searches of female residents that were conducted by male staff:	(Number only) Enter Comment	
115.215 (b)-4	The number of pat-down searches of female residents conducted by male staff that did not involve exigent circumstance(s):	(Number only) Enter Comment	

# **Interview Guides**

- Random Sample of Staff Q: 3
- Resident Interview Questionnaire (Female Residents)- Q: 3

### **PREA Audit Site Review**

• Review site review instructions outlined in provision (a).

#### **Documentation Review**

- Logs of cross-gender pat-down searches of female residents to identify documentation of exigent circumstances.
- Video documenting pat-down searches of female residents conducted by male staff, when available (spot—check).

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Does the facility always refrain from conducting cross-gender pat-down searches of female residents, except in exigent circumstances? (N/A if the facility does not have female inmates.)\*

<b>Provision Findings</b>		
○ Yes		
○ No		
O N/A		

Does the facility always refrain from restricting female residents' access to regularly available programming or other outside opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.)\*

<b>Provision Findings</b>		
Yes		
○ No		
O N/A		

115.215 (c): The facility shall document all cross-gender strip searches and cross-gender

visual body cavity searches, and shall document all cross-gender pat-down searches of female residents.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.215 (c)-1	Facility policy requires that all cross- gender strip searches and cross- gender visual body cavity searches be documented.  • If applicable, select policy on searches and indicate relevant page/section.	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested
115.215 (c)-2	Facility policy requires that all cross- gender pat-down searches of female residents be documented. Check N/A if the facility does not house female residents.  • If applicable, select policy on searches and indicate relevant page/section.	Yes/No Yes No N/A  Enter Comment	

# **Audit**

### **Documentation Review**

• Documentation of cross-gender strip and cross-gender visual body cavity searches of all residents, and documentation of all cross-gender pat-down searches of female residents.

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall

Compliance Determination	١.
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# **Provision Findings**

Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?\*

Provision Findings
○ Yes
○ No
Does the facility document all cross-gender pat-down searches of female residents?*

<b>Provision Findings</b>		
Yes		
○ No		

**115.215 (d):** The facility shall 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. Such policies and procedures shall 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.

Pre-Audit			Issue Log Notes	
Section	Question Text		Agency/Facility Response	

115.215 The facility has implemented policies (d)-1and procedures that enable residents to shower, perform bodily functions, **Enter Comment** 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 (this includes viewing via video camera). Upload/select: Policy on cross-gender viewing Logs of exigent circumstances that may require deviance

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

115.215 (d)-2

Policies and procedures 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.

from the standard

Yes/No Yes
No **Enter Comment** 

Yes/No

○ Yes ○ No

### **Audit**

### **Interview Guides**

- Resident Interview Questionnaire Q: 1, 2
- Random Sample of Staff Q: 14, 15

### **PREA Audit Site Review**

#### **CROSS-GENDER VIEWING**

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.

During the site review, the auditor must:

- Observe all areas where confined persons may be in a state of undress, such as showering, using the toilet, and/or changing their clothes.
  - All areas include:
    - Inside housing areas/bedrooms.
    - Outside of the housing areas (e.g., bathrooms/shower areas, recreation areas, other shared spaces).
- <u>Observe</u> if any nonmedical staff of the opposite gender are able to view confined persons 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.
- <u>Observe</u> electronic surveillance monitoring areas such as control rooms or other spaces where staff monitor live or recorded video feeds of confined persons (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 confined persons).
  - The video monitoring technology allows for point, tilt, zoom (PTZ) capabilities which could allow staff to see confined persons in a state of undress.
  - The facility uses any type of software (e.g., pixelation or blurring) or other mechanisms (e.g., post-its, tape) to obscure cross-gender viewing of confined persons in a state of undress.

#### Additionally, the auditor should:

- <u>Have informal conversations</u> 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).
- <u>Have informal conversations</u> with persons confined in the facility regarding changing clothes, using the toilet, and showering without staff of the opposite gender being able to view them in a state of undress.

#### Inside housing areas, 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 confined persons are likely to be in a state of undress (i.e., cross-gender announcement).
  - Alert methods might include a verbal announcement, a knock on the door and verbal warning before entering a bedroom, distinct buzzer, bell, or other noise-making device before entering a dormitory.
- <u>Assess</u> whether the alert method(s) is/are sufficient to alert the persons confined in the facility that an opposite-gender staff person will be entering the housing area, if there is one, a particular bedroom, or a shower or exposed bathroom area and allow them to cover-up and determine whether:
  - The alert is loud enough for all of the confined persons in the housing area to

- hear if the facility has a common living space or the knock on a bedroom or bathroom door is accompanied by an announcement that the confined person can hear.
- The time between the alert and the staff person's arrival provides enough time for confined persons to cover up before the staff enter the room or area.
- The alert is provided in such a manner that confined persons with 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 housing area/bedroom/bathroom/shower area.

#### Additionally, the auditor should:

- <u>Have informal conversations</u> with staff regarding knock and announce procedures (e.g., verify knock and announce procedures, frequency of knock and announce).
- <u>Have informal conversations</u> with persons confined in the facility regarding knock and announce procedures.

#### Important note:

• It may not always be possible to observe a cross-gender announcement if, for example, most or all of the persons confined in the facility are out at work or other programming during the day, or there are no opposite gender staff working in the facility to knock on a bedroom door or the entry to a housing area. In these circumstances, the auditor should rely upon other types of evidence (i.e., documentation, interviews of staff and persons confined in the facility).

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

Does the facility have policies that enable residents 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?\*

### **Provision Findings**

Yes

○ No
Does the facility have procedures that enable residents 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?*
Provision Findings  Yes No
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?*
Provision Findings
○ Yes
○ No

**115.215 (e):** The facility shall not search or physically examine a transgender or intersex resident for the sole purpose of determining the resident's genital status. If the resident's genital status is unknown, it may be determined 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.

Pre-Audit			Issue Log Notes	
Section	Question Text		Agency/Facility Response	

115.215 (e)-1	The facility has a policy prohibiting staff from searching or physically examining a transgender or intersex resident for the sole purpose of determining the resident's genital status.  • Upload/select policy on transgender or intersex residents	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the
115.215 (e)-2	Such searches (described in 115.215(e)-1) occurred in the past 12 months.	Yes/No Yes No  Enter Comment	auditor. Note: this text will not be included in the interim or final reports.  Clarification requested  Additional documentation requested

### **Interview Guides**

- Random Sample of Staff Q: 4
- Transgender/Intersex Residents Q: 2

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

Provision Findings
○ Yes
○ No
If the 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?*
Provision Findings
○ Yes
○ No

**115.215 (f):** The agency shall train security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex residents, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	
115.215 (f)-1	The percent of all security staff who received training on conducting crossgender pat-down searches and searches of transgender and intersex residents in a professional and respectful manner, consistent with security needs:  (The percentage does not necessarily indicate compliance or noncompliance with the Standard.)  • Upload/select:  • Training curricula  • Training logs	(Number only) Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested

#### **Interview Guides**

• Random Sample of Staff - Q: 2

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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?\*

Provision Findings		
○ Yes		
○ No		

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?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

## **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

#### **Auditor Overall Determination**

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

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# **Prevention Planning**

# 115.216: Residents with disabilities and residents who are limited English proficient

115.216 (a): The agency shall take appropriate steps to ensure that residents with disabilities (including, for example, residents who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech 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. Such steps shall include, when necessary to ensure effective communication with residents who are deaf or hard of hearing, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. In addition, the agency shall 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, limited reading skills, or who are blind or have low vision. An agency is not required to take actions that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity, or in undue financial and administrative burdens, as those terms are used in regulations promulgated under title II of the Americans With Disabilities Act, 28 CFR 35.164.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	

115.216 (a)-1 The agency has established procedures to provide disabled residents 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.

- Upload/select:
  - Policy/documentation of procedures
  - Contracts with interpreters or other professionals hired to ensure effective communication with residents with disabilities
  - Written materials used for effective communication about PREA with residents with disabilities
  - Documentation of staff training on PREA compliant practices for residents with disabilities

Yes/No
Yes No

Enter Comment

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

## **Audit**

## **Interview Guides**

- Agency Head Q: 11
- Residents (with disabilities or who are limited English proficient) Q: 1, 2, 3

## **PREA Audit Site Review**

#### INTERPRETATION SERVICES

As part of the formal interview process, the auditor must interview persons confined in the facility who are LEP. 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.

#### **During the site review, the auditor must:**

- <u>Test</u> 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).
- <u>Determine</u> 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.
- <u>Assess</u> the availability of interpretation services (e.g., ability to access immediate interpretation services).
- <u>Assess</u> the accessibility of interpretation services (i.e., available to all persons confined in the facility who need an interpreter).
- <u>Observe</u> 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:

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

#### **Documentation Review**

• If applicable, documentation that taking actions would result in a fundamental alteration in the nature of a service, program, or activity, or in undue financial and administrative burdens.

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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 deaf or hard of hearing?\*

<b>Provision Findings</b>		
Yes		
○ No		

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?\*

Provision Findings		
○ Yes		
○ No		

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?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

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?\*

<b>Provision Findings</b>		
Yes		
○ No		

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?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

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.)\*

Provision Findings  Yes
○ No
Do such steps include, when necessary, ensuring effective communication with residents who are deaf or hard of hearing?*
Provision Findings  Yes No
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?*
Provision Findings  Yes No
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?*
Provision Findings  Yes No
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?*
Provision Findings
○ Yes ○ No
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:  Who are blind or have low vision?*  Provision Findings  Yes
○ No

**115.216 (b):** The agency shall 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, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

	Pre-Audit		Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.216 (b)-1	The agency has established procedures to provide residents 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.  • Upload/select:  • Policy/documentation of procedures • Contracts with interpreters or other professionals hired to ensure effective communication with residents with limited English proficiency • Written materials used for effective communication about PREA with residents with limited English proficiency • Documentation of staff training on PREA - compliant practices for residents with limited English proficiency	Yes No Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested

## **Interview Guides**

• Residents (with disabilities or who are limited English proficient) - Q: 1, 2, 3

#### **PREA Audit Site Review**

• Review site review instructions outlined in provision (a).

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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?\*

Provision Fir	ndings
○ Yes	
O No	
•	nclude providing interpreters who can interpret effectively, accurately, and receptively and expressively, using any necessary specialized vocabulary?*
•	receptively and expressively, using any necessary specialized vocabulary?*
impartially, both	receptively and expressively, using any necessary specialized vocabulary?*

**115.216 (c):** The agency shall not rely 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 § 115.264, or the investigation of the resident's allegations.

	Pre-Audit			Issue Log Notes
Section	Question Text		Agency/Facility Response	

115.216 (c)-1	Agency policy prohibits use of 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 §115.264, or the investigation of the resident's allegations.  • Upload/select policy on resident interpreters, readers, or assistants	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.
115.216 (c)-2	If YES, the agency or facility documents the limited circumstances in individual cases where resident interpreters, readers, or other types of resident assistants are used. (Absence of such documentation does not result in noncompliance with the standard.)	Yes/No Yes No  Enter Comment	Clarification requested Additional documentation requested
115.216 (c)-3	In the past 12 months, the number of instances where resident interpreters, readers, or other types of resident assistants have been used and it was not the case that an extended delay in obtaining another interpreter could compromise the resident's safety, the performance of first-response duties under § 115.264, or the investigation of the resident's allegations:	(Number only) Enter Comment	

## **Interview Guides**

- Random Sample of Staff Q: 9
- Residents (with disabilities or who are limited English proficient) Q: 1, 2, 3

## **Documentation Review**

• Documentation of circumstances when resident interpreters, readers, other resident assistants were used.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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 §115.264, or the investigation of the resident's allegations?\*

Provision Findings		
Yes		
○ No		

## **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

## **Auditor Overall Determination**

Auditor Overall Determination
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
<ul> <li>Does Not Meet Standard (requires corrective action)</li> </ul>

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

## **Prevention Planning**

#### 115.217: Hiring and promotion decisions

**115.217** (a): The agency shall not hire or promote anyone who may have contact with residents, and shall not enlist the services of any contractor who may have contact with residents, who (1) 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); (2) 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 (3) Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.

	Pre-Audit		
Section	<b>Question Text</b>	Agency/Facility Response	

115.217 (a)-1 Agency policy prohibits hiring or promoting anyone who may have contact with residents and prohibits enlisting the services of any contractor who may have contact with residents who:

- (1) 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);
- (2) 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
- (3) Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.
  - Upload/select policy for hiring and promoting

Yes/No
Yes No

Enter Comment

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### **Audit**

### **Documentation Review**

• Files of persons hired or promoted in the past 12 months to determine whether proper criminal record background checks have been conducted and questions regarding past conduct were asked and answered.

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

Provision Findings  Yes  No  No  No  No  No  No  No  No  No  N	Yes	ngs
oes the agency prohibit the hiring or promotion of anyone who may have contact with esidents 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 initial did not consent or was unable to consent or refuse?*  Provision Findings Yes No  No  No  No  No  Provision Findings Yes No  Provision Findings Yes No  Provision Findings Yes No		
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esidents 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 inction did not consent or was unable to consent or refuse?*  Provision Findings  Yes No  No  No  No  No  Provision Findings  Yes No		
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oes the agency prohibit the enlistment of the services of any contractor who may have ontact with residents who: Has been convicted of engaging or attempting to engage in exual activity in the community facilitated by force, overt or implied threats of force, or oercion, or if the victim did not consent or was unable to consent or refuse?*  Provision Findings	confinement facility	y, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?*
ontact with residents who: Has been convicted of engaging or attempting to engage in exual activity in the community facilitated by force, overt or implied threats of force, or oercion, or if the victim did not consent or was unable to consent or refuse?*  Provision Findings	confinement facility  Provision Findir	y, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?*
	Provision Findir  Yes	y, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?*
	Provision Findir Yes No  Does the agency prontact with resider sexual activity in the	ry, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?*  rohibit the enlistment of the services of any contractor who may have not such that the end of engaging or attempting to engage in the community facilitated by force, overt or implied threats of force, or
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oes the agency prohibit the enlistment of the services of any contractor who may have ontact with residents who: Has been civilly or administratively adjudicated to have engage on the activity described in the two questions immediately above ?*	Provision Findir Yes No  Does the agency procontact with resider sexual activity in the coercion, or if the view of the provision Findir	rohibit the enlistment of the services of any contractor who may have nts who: Has been convicted of engaging or attempting to engage in e community facilitated by force, overt or implied threats of force, or ictim did not consent or was unable to consent or refuse?*
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**115.217 (b):** The agency shall 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

	Pre-Audit		
Section	Question Text	Agency/Facility Response	
115.217 (b)-1	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 residents.  • If applicable, select policy on hiring and promotions and indicate relevant page/section.	Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested

## Audit

## **Interview Guides**

• Administrative (Human Resources) Staff - Q: 2

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with residents?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

Does the agency consider any incidents of sexual harassment in determining to enlist the services of any contractor who may have contact with residents?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

**115.217 (c):** Before hiring new employees who may have contact with residents, the agency shall: (1) Perform a criminal background records check; and (2) 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.

Pre-Audit			Issue Log Notes	
Section	Question Text		Agency/Facility Response	

#### 115.217 Agency policy requires that before it (c)-1hires any new employees who may have contact with residents, it (a) conducts criminal background record checks, and (b) 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. • If applicable, select policy on hiring and promotions and indicate relevant page/section.

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### 115.217 (c)-2

In the past 12 months, the number of persons hired who may have contact with residents who have had criminal background record checks:

(Number only) 14 / 14 = 100%

Yes/No

○ Yes ○ No

**Enter Comment** 

Percentages are calculated from information entered into this subsection and information entered into the agency/facility information section(s).

#### **Audit**

#### **Interview Guides**

• Administrative (Human Resources) Staff - Q: 1

## **Documentation Review**

• Files of personnel hired in the past 12 months to determine that the agency has completed checks consistent with 115.217(c).

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

Before hiring new employees who may have contact with residents, does the agency: Perform a criminal background records check?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

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?\*

<b>Provision Findings</b>		
Yes		
○ No		

**115.217 (d):** The agency shall also perform a criminal background records check before enlisting the services of any contractor who may have contact with residents.

Pre-Audit		Issue Log Notes		
Section	Question Text		Agency/Facility Response	

115.217 (d)-1	Agency policy requires that a criminal background record check be completed before enlisting the services of any contractor who may have contact with residents.  • If applicable, select policy on hiring and promotions and indicate relevant page/section.	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation
115.217 (d)-2	In the past 12 months, the number of contracts for services where criminal background record checks were conducted on all staff covered in the contract who might have contact with residents:	(Number only) Enter Comment	requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested

#### **Interview Guides**

• Administrative (Human Resources) Staff - Q: 1

## **Documentation Review**

• Records of background checks of contractors who might have contact with residents.

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with residents?\*

Provision Findings		
○ Yes		
○ No		

**115.217 (e):** The agency shall 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.

#### **Issue Log Pre-Audit Notes** Agency/Facility **Section Question Text** Response The text and 115.217 Agency policy requires that either Yes/No checkboxes (e)-1criminal background record checks be Yes No conducted at least every five years for below can be **Enter Comment** used to populate current employees and contractors who may have contact with residents an audit Issue Log that or that a system is in place for identifies otherwise capturing such information clarifications or for current employees. additional Upload/select policy on documentation background checks of current requested by the employees/contractors auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### **Audit**

## **Interview Guides**

• Administrative (Human Resources) Staff - O: 3

#### **Documentation Review**

• Documentation of background records checks of current employees and contractors at five-year intervals when applicable.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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?\*

Provision Findings		
○ Yes		
○ No		

**115.217 (f):** The agency shall also 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 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.

**Pre-Audit** 

Issue Log Notes

## **Audit**

## **Interview Guides**

• Administrative (Human Resources) Staff - Q: 4, 5

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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?\*

applications or interviews for hiring or promotions?*	
Provision Findings  Yes No	
Does the agency ask all applicants and employees who may have contact with resided 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 employers.	
Provision Findings  Yes No	
Does the agency impose upon employees a continuing affirmative duty to disclose armisconduct?*	ny such
Provision Findings  Yes No	

**115.217 (g):** Material omissions regarding such misconduct, or the provision of materially false information, are grounds for termination.

Pre-Audit			Issue Log Notes	
Section	<b>Question Text</b>		Agency/Facility Response	

115.217 (g)-1 Agency policy states that material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.

 If applicable, select policy on hiring and promotions and/or policy on background checks and indicate relevant page(s)/section(s).

Yes/No	
○ Yes ○ No	
Enter Comment	

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### **Audit**

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?\*

Provision Findings		
○ Yes		
○ No		

**115.217 (h):** 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.

#### **Interview Guides**

• Administrative (Human Resources) Staff - Q: 6

#### **Documentation Review**

• If providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law, review a copy of the law.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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.)\*

# Provision Findings Yes No N/A

## **Supporting Documentation**

Supporting Documentation Instructions: Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) | (including supplemental files)

#### **Auditor Overall Determination**

#### **Auditor Overall Determination**

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

#### Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

## **Prevention Planning**

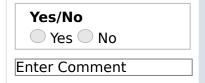
#### 115.218: Upgrades to facilities and technology

115.218 (a): When designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, the agency shall consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect residents from sexual abuse.

Pre-Audit		Issue Log Notes	
Section	Question Text	Agency/Facility Response	

115.218 (a)-1

The agency/facility has acquired a new facility or made a substantial expansion or modification to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.



The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### **Audit**

## **Interview Guides**

- Agency Head Q: 1
- Director or Designee Q: 5

## **Documentation Review**

• Documentation on facility design, renovation, modification, or expansion.

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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.)\*

Provision Findings		
○ Yes		
○ No		
O N/A		

**115.218 (b):** When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the agency shall consider how such technology may enhance the agency's ability to protect residents from sexual abuse.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	
115.218 (b)-1	The agency/facility has 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.	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested

#### **Interview Guides**

- Agency Head Q: 2
- Director or Designee Q: 6

## **Documentation Review**

• Minutes from meetings referencing installing or updating monitoring technology.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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 any video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012 or since the last PREA audit, whichever is later.)\*

Provision Findings	
Yes	
○ No	
○ N/A	

## **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have

collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

#### **Auditor Overall Determination**

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

#### Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# **Responsive Planning**

#### 115.221: Evidence protocol and forensic medical examinations

**115.221 (a):** To the extent the agency is responsible for investigating allegations of sexual abuse, the agency shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.

Pre-Audit		Issue Log Notes	
Section	Question Text	Agency/Facility Response	

115.221 (a)-1	The agency/facility is responsible for conducting administrative sexual abuse investigations (including resident-on-resident sexual abuse or staff sexual misconduct).	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue
115.221 (a)-2	The agency/facility is responsible for conducting criminal sexual abuse investigations (including resident-on-resident sexual abuse or staff sexual misconduct).	Yes/No Yes No  Enter Comment	identifies clarifications or additional documentation requested by the
115.221 (a)-3	If another agency has responsibility for conducting either administrative or criminal sexual abuse investigations, the name of the agency that has responsibility (if another agency has responsibility for conducting both administrative and criminal sexual abuse investigations, skip to 115.221(c)-1):	Enter Comment	auditor. Note: this text will not be included in the interim or final reports.  Clarification requested  Additional documentation requested
115.221 (a)-4	When conducting a sexual abuse investigation, the agency investigators follow a uniform evidence protocol.  • Upload/select uniform evidence protocol	Yes/No Yes No  Enter Comment	

## **Interview Guides**

• Random Sample of Staff - Q: 10, 12

## **Documentation Review**

• Note. Review uniform evidence protocol for evidence that there is sufficient technical detail to aid responders in obtaining usable physical evidence.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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.)\*

Provision Findings	
○ Yes	
○ No	
○ N/A	

**115.221 (b):** The protocol shall be developmentally appropriate for youth where applicable, and, as appropriate, shall be 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.

Pre-Audit		Issue Log Notes		
Section	<b>Question Text</b>		Agency/Facility Response	

115.221 The text and The protocol is developmentally Yes/No checkboxes (b)-1appropriate for youth. ○ Yes ○ No ○ N/A below can be **Enter Comment** · If applicable, select uniform used to populate evidence protocol and indicate an audit Issue relevant page/section. Log that identifies clarifications or 115.221 The protocol was adapted from or Yes/No additional (b)-2otherwise based on the most recent ○ Yes ○ No documentation edition of the DOJ's Office on Violence **Enter Comment** requested by the Against Women publication, "A auditor. Note: National Protocol for Sexual Assault this text will not Medical Forensic Examinations, be included in Adults/Adolescents," or similarly the interim or comprehensive and authoritative final reports. protocols developed after 2011. If Clarification "No", indicate the source used to requested develop the protocol in the comments Additional section. documentation • Upload/select alternative requested source (if applicable)

#### **Audit**

#### **Documentation Review**

• Note. Review uniform evidence protocol for evidence that it is developmentally appropriate for youth, where applicable, and, as appropriate adapted from or otherwise based on the DOJ's publication.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

Is this protocol developmentally appropriate for youth where applicable? (NA if the agency/
facility is not responsible for conducting any form of criminal or administrative sexual abuse
investigations.)*

<b>Provision Findings</b>	
○ Yes	
○ No	
○ N/A	

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? (NA if the agency/facility is not responsible for conducting any form of criminal or administrative sexual abuse investigations.)\*

Provision Findings		
○ Yes		
○ No		
○ N/A		

**115.221 (c):** The agency shall offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. The agency shall document its efforts to provide SAFEs or SANEs.

Pre-Audit		Issue Log Notes		
Section	Question Text		Agency/Facility Response	

115.221 (c)-1	The facility offers all residents who experience sexual abuse access to forensic medical examinations. If no, skip to 115.221 (d)-1.	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue
115.221 (c)-2	Forensic medical examinations are offered without financial cost to the victim.  • Upload/select documentation that forensic medical exams are offered for free	Yes/No Yes No  Enter Comment	Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not
115.221 (c)-3	Where possible, examinations are conducted by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs). If "Sometimes", please describe situations when SAFEs or SANEs are not used in the comments section.	Yes/No Yes No Sometimes  Enter Comment	be included in the interim or final reports.  Clarification requested Additional documentation requested
115.221 (c)-4	When SANEs or SAFEs are not available, a qualified medical practitioner performs forensic medical examinations.	Yes/No Yes No  Enter Comment	104405104
115.221 (c)-5	The facility documents efforts to provide SANEs or SAFEs.  • Upload/select documentation of efforts to provide SANEs/ SAFEs	Yes/No Yes No Sometimes  Enter Comment	
115.221 (c)-6	The number of forensic medical exams conducted during the past 12 months:	(Number only) Enter Comment	
115.221 (c)-7	The number of exams performed by SANEs/SAFEs during the past 12 months:	(Number only) Enter Comment	
115.221 (c)-8	The number of exams performed by a qualified medical practitioner during the past 12 months:	(Number only) Enter Comment	

## **Interview Guides**

• SAFEs/SANEs Staff - Q: 1, 2

#### **Documentation Review**

- Documentation to corroborate that all resident victims of sexual abuse have access to forensic medical examinations.
- Any available documentation that delineates responsibilities of outside medical and mental health practitioners.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?\*

Provision Findings
○ Yes
○ No
Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual

Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?\*

Provision Findings		
○ Yes		
○ No		

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)?\*

#### **Provision Findings**

Yes					
○ No					
Has the agency	documented its eff	orts to provid	e SAFEs or S	ANEs?*	
Has the agency  Provision Fi		orts to provid	e SAFEs or S	ANEs?*	
		orts to provid	e SAFEs or S	ANEs?*	

**115.221 (d):** The agency shall attempt to make available to the victim a victim advocate from a rape crisis center. If a rape crisis center is not available to provide victim advocate services, the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member. Agencies shall document efforts to secure services from rape crisis centers. For the purpose of this standard, a rape crisis center refers to an entity that provides intervention and related assistance, such as the services specified in 42 U.S.C. 14043g(b)(2)(C), to victims of sexual assault of all ages. The agency may utilize a rape crisis center that is part of a governmental unit as long as the center is not part of the criminal justice system (such as a law enforcement agency) and offers a comparable level of confidentiality as a nongovernmental entity that provides similar victim services.

	Pre-Audit				
Section	Question Text		Agency/Facility Response		

115.221 (d)-1	The facility attempts to make available to the victim a victim advocate from a rape crisis center, either in person or by other means.	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate
115.221 (d)-2	<ul> <li>These efforts are documented.</li> <li>Upload/select documentation of agreement(s) with rape crisis center for services or documentation of efforts</li> </ul>	Yes/No Yes No  Enter Comment	an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note:
115.221 (d)-3	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.  • Upload/select documentation of staff member's qualifications if agency staff member used	Yes/No Yes No  Enter Comment	this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested

## **Interview Guides**

- PREA Coordinator Q: 18, 19
- Residents who Reported a Sexual Abuse Q: 9

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Does the agency crisis center?*	y attempt to make available to the victim a victim advocate from a rape
Provision Fir	ndings
If a rape crisis co	enter is not available to provide victim advocate services, does the agency to provide these services a qualified staff member from a community-based a qualified agency staff member?*
Provision Fir	ndings
Has the agency	documented its efforts to secure services from rape crisis centers?*
Provision Fir	ıdings
	requested by the victim, the victim advocate, qualified agency staff member, unity-based organization staff member shall accompany and support the

Pre-Audit		Issue Log Notes	
Section	Question Text	Agency/Facility Response	

victim through the forensic medical examination process and investigatory interviews and shall

provide emotional support, crisis intervention, information, and referrals.

115.221 (e)-1

If requested by the victim, a victim advocate, 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.

Upload/select any relevant documentation

Yes/No
Yes No

Enter Comment

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

### **Audit**

### **Interview Guides**

- PREA Coordinator Q: 17
- Residents who Reported Sexual Abuse Q: 9

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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?\*

Provision Findings
Yes
No

As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?\*

Provision Findings
Yes
No

**115.221 (f):** To the extent the agency itself is not responsible for investigating allegations of sexual abuse, the agency shall request that the investigating agency follow the requirements of paragraphs (a) through (e) of this section.

	Issue Log Notes		
Section	Question Text	Agency/Facility Response	
115.221 (f)-1	If the agency is not responsible for investigating allegations of sexual abuse and relies on another agency to conduct these investigations, the agency has requested that the responsible agency follow the requirements of paragraphs §115.221 (a) through (e) of the standards. Check N/A if the agency/facility is responsible for administrative and criminal investigations.  • Upload/select agreements/ MOUs with responsible agency	Yes/No Yes No N/A  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested

## **Audit**

### **Documentation Review**

• Documentation of the request regarding requirements of 115.221(a) through (e) with outside investigating agency.

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)\*

Provision Findings	
Yes	
○ No	
○ N/A	

**115.221 (g):** The requirements of paragraphs (a) through (f) of this section shall also apply to: (1) Any State entity outside of the agency that is responsible for investigating allegations of sexual abuse in community confinement facilities; and (2) Any Department of Justice component that is responsible for investigating allegations of sexual abuse in community confinement facilities.

**Pre-Audit** 

Issue Log Notes

### **Audit**

### **Other Audit Instructions**

Auditor is not required to audit this provision.

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

**115.221 (h):** For the purposes of this standard, a qualified agency staff member or a qualified community-based staff member shall be an individual who has been screened for appropriateness to serve in this role and has received education concerning sexual assault and forensic examination issues in general.

#### **Pre-Audit**

Issue Log Notes

### **Audit**

### **Documentation Review**

• Documentation of screening; documentation of appropriate training.

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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? (N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.221(d) above).\*

<b>Provision Findings</b>		
○ Yes		
○ No		

○ N/A		
<u> </u>		

## **Supporting Documentation**

Supporting Documentation Instructions: Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

### **Auditor Overall Determination**

<b>Auditor</b>	Overall	Determ	nination
AUUILUI	Overall	Deteili	IIIIalivii

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

### Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# **Responsive Planning**

#### 115.222: Policies to ensure referrals of allegations for investigations

115.222 (a): The agency shall ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	

115.222 (a)-1	The agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment (including resident-on-resident sexual abuse or staff sexual misconduct).  • Upload/select policies and/or procedures governing investigations of allegations of sexual abuse and sexual harassment	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in
115.222 (a)-2	In the past 12 months, the number of allegations of sexual abuse and sexual harassment that were received:	(Number only) Enter Comment	the interim or final reports.  Clarification requested
115.222 (a)-3	In the past 12 months, the number of allegations resulting in an administrative investigation:	(Number only) Enter Comment	Additional documentation requested
115.222 (a)-4	In the past 12 months, the number of allegations referred for criminal investigation:	(Number only) Enter Comment	
115.222 (a)-5	Referring to allegations received during the past 12 months, all administrative and/or criminal investigations were completed. If "NO", please explain in the comments section.	Yes/No Yes No  Enter Comment	

## **Interview Guides**

• Agency Head - Q: 3, 4

# **Documentation Review**

 Documentation of reports of sexual abuse and sexual harassment and documentation of investigations, including full investigative reports with findings.

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?\*

	aduse:*
Provision Finding	js
○ Yes	
○ No	
Does the agency ens allegations of sexual	ure an administrative or criminal investigation is completed for all
allegations of sexual	
Provision Finding	

**115.222 (b):** The agency shall have in place a policy 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. The agency shall publish such policy on its Web site or, if it does not have one, make the policy available through other means. The agency shall document all such referrals.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	

115.222 The text and The agency has a policy that requires Yes/No checkboxes (b)-1that allegations of sexual abuse or ○ Yes ○ No sexual harassment be referred for below can be **Enter Comment** investigation to an agency with the used to populate legal authority to conduct criminal an audit Issue Log that investigations, including the agency if it conducts its own investigations, identifies clarifications or unless the allegation does not involve potentially criminal behavior. additional documentation · Upload/select investigative requested by the policy auditor. Note: this text will not be included in 115.222 The agency's policy regarding the Yes/No the interim or (b)-2referral of allegations of sexual abuse ○ Yes ○ No final reports. or sexual harassment for criminal **Enter Comment** Clarification investigation is published on the requested agency website or made publicly Additional available via other means. documentation requested 115.222 The agency documents all referrals of Yes/No (b)-3allegations of sexual abuse or sexual Yes harassment for criminal investigation. **Enter Comment** 

### **Audit**

#### **Interview Guides**

• Investigative Staff - Q: 4

### **Documentation Review**

- Verify that policy is on website or other means made publicly available.
- Documentation of referrals of allegations of sexual abuse and/or sexual harassment.

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall

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Comp	liance	Determ	าเทล	ation.

## **Provision Findings**

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?\*

Provision Findings  Yes No
Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?*
Provision Findings  Yes No
Does the agency document all such referrals?*
Provision Findings  Yes No

**115.222 (c):** If a separate entity is responsible for conducting criminal investigations, such publication shall describe the responsibilities of both the agency and the investigating entity.

**Pre-Audit** 

Issue Log Notes

### **Audit**

### **Documentation Review**

• Publication (website or paper) that describes investigative responsibilities of both the agency and the separate entity that conducts criminal investigations for the agency, if applicable.

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for conducting criminal investigations. See 115.221(a).)\*

Provision Findings		
○ Yes		
○ No		
○ N/A		

**115.222 (d):** Any State entity responsible for conducting administrative or criminal investigations of sexual abuse or sexual harassment in community confinement facilities shall have in place a policy governing the conduct of such investigations.

**Pre-Audit** 

Issue Log Notes

### **Audit**

### **Other Audit Instructions**

Auditor is not required to audit this provision.

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

**115.222 (e):** Any Department of Justice component responsible for conducting administrative or criminal investigations of sexual abuse or sexual harassment in community confinement facilities shall have in place a policy governing the conduct of such investigations.

### **Other Audit Instructions**

Auditor is not required to audit this provision.

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

### **Supporting Documentation**

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Select File(s) (including supplemental files)

### **Auditor Overall Determination**

#### **Auditor Overall Determination**

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

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

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# **Training and Education**

### 115.231: Employee training

115.231 (a): The agency shall train all employees who may have contact with residents on: (1) Its zero-tolerance policy for sexual abuse and sexual harassment; (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; (3) Residents' rights to be free from sexual abuse and sexual harassment; (4) The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment; (5) The dynamics of sexual abuse and sexual harassment in confinement; (6) The common reactions of sexual abuse and sexual harassment victims; (7) How to detect and respond to signs of threatened and actual sexual abuse; (8) How to avoid inappropriate relationships with residents; (9) How to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming residents; and (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

	Pre-	Audit	Issue Log Notes
Section	Question Text	Agency/Facility Response	

115.231 (a)-1	The agency trains all employees who may have contact with residents on the agency's zero-tolerance policy for sexual abuse and sexual harassment.  • Upload/select:  • Training policy and/or procedures  • Training curriculum	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation
115.231 (a)-2	The agency trains 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.  • If applicable, select training curriculum and indicate relevant page/section.	Yes/No Yes No  Enter Comment	requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested
115.231 (a)-3	The agency trains all employees who may have contact with residents on the right of residents to be free from sexual abuse and sexual harassment.  • If applicable, select training curriculum and indicate relevant page/section.	Yes/No Yes No  Enter Comment	
115.231 (a)-4	The agency trains 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.  • If applicable, select training curriculum and indicate relevant page/section.	Yes/No Yes No  Enter Comment	
115.231 (a)-5	The agency trains all employees who may have contact with residents on the dynamics of sexual abuse and sexual harassment in confinement.	Yes/No Yes No  Enter Comment	

	<ul> <li>If applicable, select training curriculum and indicate relevant page/section.</li> </ul>	
115.231 (a)-6	The agency trains all employees who may have contact with residents on the common reactions of sexual abuse and sexual harassment victims.  • If applicable, select training curriculum and indicate relevant page/section.	Yes/No Yes No  Enter Comment
115.231 (a)-7	The agency trains all employees who may have contact with residents on how to detect and respond to signs of threatened and actual sexual abuse.  • If applicable, select training curriculum and indicate relevant page/section.	Yes/No Yes No  Enter Comment
115.231 (a)-8	The agency trains all employees who may have contact with residents on how to avoid inappropriate relationships with residents.  • If applicable, select training curriculum and indicate relevant page/section.	Yes/No Yes No  Enter Comment
115.231 (a)-9	The agency trains all employees who may have contact with residents on how to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gendernonconforming residents.  • If applicable, select training curriculum and indicate relevant page/section.	Yes/No Yes No  Enter Comment
115.231 (a)-10	The agency trains 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.

> If applicable, select training curriculum and indicate relevant page/section.

Yes/No Yes No	
Enter Comment	

## **Audit**

### **Interview Guides**

• Random Sample of Staff - Q: 1

## **Documentation Review**

• Sample of training records.

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

h residents on: Its zero-
h residents on: How to fulfill assment prevention,
h residents on: Residents'
h residents on: The right of g sexual abuse and sexual
h residents on: The dynamics
h residents on: The common

and respond to signs of threatened and actual sexual abuse?\*

Provision Findings	
○ Yes	
○ No	
Does the agency train all employees who may have contact with re inappropriate relationships with residents?*	esidents on: How to avoid
Provision Findings  Yes	
○ No	
Does the agency train all employees who may have contact with recommunicate effectively and professionally with residents, including transgender, intersex, or gender nonconforming residents?*	
Provision Findings  Yes	
○ No	
Does the agency train all employees who may have contact with recomply with relevant laws related to mandatory reporting of sexua authorities?*	
Provision Findings  Yes	
○ No	
<b>15.231 (b):</b> Such training shall be tailored to the gender of the res	sidents at the employee's

**115.231 (b):** Such training shall be tailored to the gender of the residents at the employee's facility. The employee shall receive additional training if the employee is reassigned from a facility that houses only male residents to a facility that houses only female residents, or vice versa.

		Pre-Audit		Issue Log Notes
Section	Question Text		Agency/Facility Response	

115.231 (b)-1	Training is tailored to the gender of the residents at the facility.  • If applicable, select training policy, procedures, or training curriculum and indicate relevant page/section.	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or
115.231 (b)-2	Employees who are reassigned from facilities housing the opposite gender are given additional training.  • If applicable, select training policy, procedures, or training curriculum and indicate relevant page/section.	Yes/No Yes No  Enter Comment	additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested

### **Documentation Review**

• Sample of training records.

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Is such training tailored to the gender of the residents at the employee's facility?\*

#### **Provision Findings**

○ Yes ○ No	
	eceived additional training if reassigned from a facility that houses only facility that houses only female residents, or vice versa?*
maic residents to a	, , , ,
Provision Findi	

**115.231 (c):** All current employees who have not received such training shall be trained within one year of the effective date of the PREA standards, and the agency shall 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. In years in which an employee does not receive refresher training, the agency shall provide refresher information on current sexual abuse and sexual harassment policies.

	Issue Log Notes		
Section	Question Text	Agency/Facility Response	
115.231 (c)-2	Between trainings the agency provides employees who may have contact with residents with refresher information about current policies regarding sexual abuse and harassment. If "YES", please describe in the comments section.  • If applicable, select training curriculum and indicate relevant page/section.	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested
115.231 (c)-3	The frequency with which employees who may have contact with residents receive refresher training on PREA requirements:	Enter Comment	

### **Documentation Review**

· Sample of training records.

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Have all current employees who may have contact with residents received such training?\*

<b>Provision Findings</b>		
Yes		
○ No		

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?\*

<b>Provision Findings</b>		
Yes		
○ No		

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?\*

Provision Findings		
○ Yes		
○ No		

**115.231 (d):** The agency shall document, through employee signature or electronic verification, that employees understand the training they have received.

	Pre-Audit			
Section	Question Text	Agency/Facility Response		
115.231 (d)-1	The agency documents that employees who may have contact with residents understand the training they have received through employee signature or electronic verification.	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested	

## **Documentation Review**

• Documentation of employee signatures or electronic verification signifying comprehension of the training.

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?\*

Provision Findings	
○ Yes	
○ No	

## **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

### **Auditor Overall Determination**

Auditor Overall Determination
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
Opes Not Meet Standard (requires corrective action)

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# **Training and Education**

115.232: Volunteer and contractor training

115.232 (a): The agency shall ensure 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.

	Pre-Audit				
Section	Question Text	Agency/Facility Response			
115.232 (a)-1	All volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response.  • Upload/select training curriculum for volunteers and contractors	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested		
115.232 (a)-2	The number of volunteers and individual contractors who have contact with residents who have been trained in agency policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response:	(Number only) Enter Comment			

## Audit

## **Interview Guides**

• Volunteer(s) or Contractor(s) who may have Contact with Residents - Q: 1

## **Documentation Review**

• Sample of training records of volunteers and contractors who may have contact with residents.

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

**115.232 (b):** 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, but all volunteers and contractors who have contact with residents shall be notified of the agency 's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

Pre-Audit			Issue Log Notes	
Section	Question Text		Agency/Facility Response	

115.232 The text and The level and type of training Yes/No checkboxes (b)-1provided to volunteers and ○ Yes ○ No contractors is based on the services below can be **Enter Comment** they provide and level of contact they used to populate have with residents. an audit Issue Log that If applicable, select volunteer/ identifies contractor training curriculum clarifications or and indicate relevant page/ additional section. documentation requested by the auditor. Note: 115.232 All volunteers and contractors who Yes/No this text will not (b)-2have contact with residents have ○ Yes ○ No be included in been notified of the agency's zero-**Enter Comment** the interim or tolerance policy regarding sexual final reports. abuse and sexual harassment and Clarification informed how to report such incidents. requested Additional documentation requested

### **Audit**

### **Interview Guides**

• Volunteer(s) or Contractor(s) who may have Contact with Residents - Q: 2, 3

## **Documentation Review**

• Sample of training records of volunteers and contractors who may have contact with residents.

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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)?\*

Provision Findings		
○ Yes		
○ No		

**115.232 (c):** The agency shall maintain documentation confirming that volunteers and contractors understand the training they have received.

	Pre-Audit				
Section	Question Text	Agency/Facility Response			
115.232 (c)-1	The agency maintains documentation confirming that volunteers and contractors who have contact with residents understand the training they have received.	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested		

## **Audit**

### **Documentation Review**

• Relevant documentation (e.g., signed acknowledgement of understanding by volunteers/contractors).

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?\*

Provision Findings		
○ Yes		
○ No		

## **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

### **Auditor Overall Determination**

Auditor Overall Determination
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
Does Not Meet Standard (requires corrective action)

Instructions for Overall Compliance Determination Narrative (this text will appear in

#### your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# **Training and Education**

### 115.233: Resident education

**115.233 (a):** During the intake process, residents shall receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment, how to report incidents or suspicions of sexual abuse or sexual harassment, 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.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.233 (a)-1	Residents receive information at time of intake about the zero-tolerance policy, how to report incidents or suspicions of sexual abuse or harassment, 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.  • Upload/select agency/facility policy governing PREA education of residents	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.
115.233 (a)-2	The number of residents admitted during past 12 months who were given this information at intake:	(Number only) Enter Comment	Clarification requested Additional documentation requested

### **Interview Guides**

- Intake Staff Q: 1, 3
- Resident Interview Questionnaire Q: 4, 5

### **PREA Audit Site Review**

#### **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 or transfer; 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.
- <u>Test</u> how the facility provides the necessary PREA information to all confined persons, 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) (i.e., the facility provides written information in the languages most commonly spoken in the facility and/or provides translation services on-demand).
  - The facility provides interpreters, when needed, to assist Deaf and non-English speaking persons confined in the facility (see section Interpretation Services below).
  - 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 confined persons with cognitive or functional disabilities.

#### Additionally, the auditor should:

• <u>Have informal conversations</u> 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).

**Note:** individuals 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. These individuals may use spoken or sign language.

#### **INTERPRETATION SERVICES**

As part of the formal interview process, the auditor must interview persons confined in the facility who are LEP. 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.

#### **During the site review, the auditor must**:

- <u>Test</u> 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).
- <u>Determine</u> 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.
- <u>Assess</u> the availability of interpretation services (e.g., ability to access immediate interpretation services).
- <u>Assess</u> the accessibility of interpretation services (i.e., available to all persons confined in the facility who need an interpreter).
- <u>Observe</u> 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:

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

### **Documentation Review**

- Intake records of residents entering the facility in the last 12 months (spot check).
- Log or other record corroborating that residents received information at intake (e.g., resident signatures).
- Any relevant education materials (e.g., resident handbook) to ensure that relevant information is covered.

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

During intake, do residents receive information explaining: The agency's zero-tolerance
policy regarding sexual abuse and sexual harassment?*
Provision Findings  Yes  No
During intake, do residents receive information explaining: How to report incidents or
suspicions of sexual abuse or sexual harassment?*
Provision Findings  Yes  No
During intake, do residents receive information explaining: Their rights to be free from sexual abuse and sexual harassment?*
Provision Findings  Yes
○ No
During intake, do residents receive information explaining: Their rights to be free from retaliation for reporting such incidents?*
Provision Findings
○ Yes
○ No
During intake, do residents receive information regarding agency policies and procedures for responding to such incidents?*
Provision Findings
○ Yes
○ No

**115.233 (b):** The agency shall provide refresher information whenever a resident is transferred to a different facility.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.233 (b)-1	The facility provides residents who are transferred from a different community confinement facility with refresher information referenced in 115.233(a)-1.  • Indicate page/section in applicable uploaded documentation	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation
115.233 (b)-2	The number of residents transferred from a different community confinement facility during the past 12 months:	(Number only) Enter Comment	requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested
115.233 (b)-3	The number of residents transferred from a different community confinement facility, during the past 12 months, who received refresher information:	(Number only) Enter Comment	

## **Interview Guides**

- Intake Staff Q: 3, 4
- Resident Interview Questionnaire Q: 6

## **Documentation Review**

- Intake records of residents transferred from another facility in the last 12 months (spot check).
- Log or other record corroborating that transferred residents received refresher information.

• Any relevant education materials (e.g., resident handbook) to ensure that relevant information is covered.

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

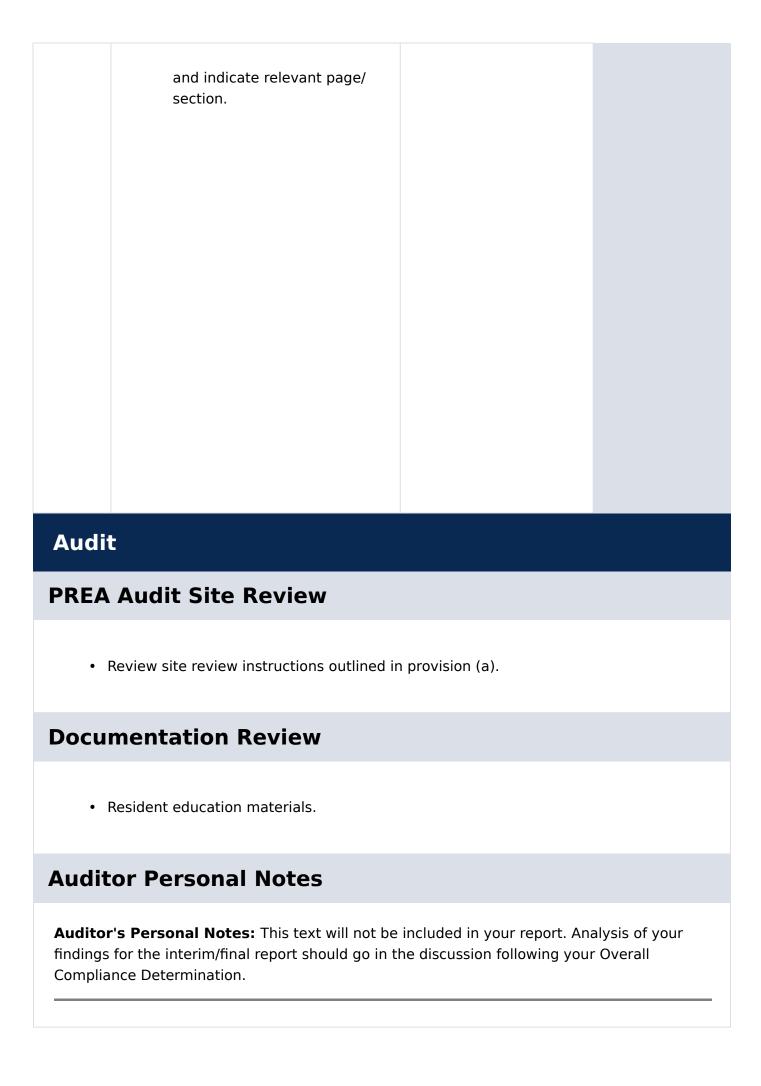
Does the agency provide refresher information whenever a resident is transferred to a different facility?\*

amerene idemey.		
Provision Findings		
○ Yes		
○ No		

**115.233 (c):** The agency shall provide resident education in formats accessible to all residents, including those who are limited English proficient, deaf, visually impaired, otherwise disabled, as well as to residents who have limited reading skills.

Pre-Audit		Issue Log Notes	
Section	<b>Question Text</b>	Agency/Facility Response	

115.233 (c)-1	Resident PREA education is available in formats accessible to all residents, including those who are limited English proficient.  • If applicable, select policy on PREA education of residents and indicate relevant page/ section.	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation	
115.233 (c)-2	Resident PREA education is available in formats accessible to all residents, including those who are deaf.  • If applicable, select policy on PREA education of residents and indicate relevant page/ section.	Yes/No Yes No  Enter Comment	requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional	requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested
115.233 (c)-3	Resident PREA education is available in formats accessible to all residents, including those who are visually impaired.  • If applicable, select policy on PREA education of residents and indicate relevant page/ section.	Yes/No Yes No  Enter Comment	documentation requested	
115.233 (c)-4	Resident PREA education is available in formats accessible to all residents, including those who are otherwise disabled.  • If applicable, select policy on PREA education of residents and indicate relevant page/ section.	Yes/No Yes No  Enter Comment		
115.233 (c)-5	Resident PREA education is available in formats accessible to all residents, including those who are limited in their reading skills.  • If applicable, select policy on PREA education of residents	Yes/No Yes No  Enter Comment		



# **Provision Findings**

Does the agency provide resident education in formats accessible to all residents, including those who: Are limited English proficient?*
Provision Findings  Yes No
Does the agency provide resident education in formats accessible to all residents, including those who: Are deaf?*
Provision Findings  Yes No
Does the agency provide resident education in formats accessible to all residents, including those who: Are visually impaired?*
Provision Findings  Yes No
Does the agency provide resident education in formats accessible to all residents, including those who: Are otherwise disabled?*
Provision Findings  Yes No
Does the agency provide resident education in formats accessible to all residents, including those who: Have limited reading skills?*
Provision Findings  Yes No
<b>15.233 (d):</b> The agency shall maintain documentation of resident participation in these

education sessions.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	

115.233 (d)-1 The agency maintains documentation of resident participation in PREA education sessions.

Yes/No Yes No	
Enter Comment	

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### **Audit**

### **Documentation Review**

• Sample of documentation of resident participation in education sessions.

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Does the agency maintain documentation of resident participation in these education sessions?\*

Provision Findings		
○ Yes		
○ No		

**115.233 (e):** In addition to providing such education, the agency shall ensure that key information is continuously and readily available or visible to residents through posters, resident handbooks, or other written formats.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	
115.233 (e)-1	The agency ensures that key information about the agency's PREA policies is continuously and readily available or visible through posters, resident handbooks, or other written formats.	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested

### **Audit**

### **PREA Audit Site Review**

#### 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, access to outside victim emotional support services, and other relevant PREA 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:**

- <u>Observe</u> 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 emotional support services and 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).
- 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:
  - 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 dining area, staff break room, locker rooms, housing areas, etc.).
    - For example, is key PREA information continuously and readily available and observed throughout the facility (e.g., posters, handbooks, brochures, or other written formats, etc.)?

#### Additionally, the auditor should:

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 confined persons with disabilities; consistency and accuracy of information; signage posted just for the audit or always posted (with the exception of the PREA Audit Notice).

### **Documentation Review**

• Education and informational materials (posters, resident handbook, etc.) in compliance with the standard.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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?\*

Provision Findings		
○ Yes		
○ No		

## **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

### **Auditor Overall Determination**

Auditor Overall Determination
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
<ul> <li>Does Not Meet Standard (requires corrective action)</li> </ul>

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# **Training and Education**

#### 115.234: Specialized training: Investigations

**115.234 (a):** In addition to the general training provided to all employees pursuant to § 115.231, the agency shall ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings.

	Pre-Audit			Issue Log Notes
Section	Question Text		Agency/Facility Response	

115.234 (a)-1

Agency policy requires that investigators are trained in conducting sexual abuse investigations in confinement settings. Check N/A if the agency does not conduct administrative or criminal sexual abuse investigations and skip to 115.235(a)-1.

- Upload/select:
  - Training policy
  - Training curriculum for investigators

Yes/No
Yes No N/A

Enter Comment

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### **Audit**

### **Interview Guides**

• Investigative Staff - Q: 1, 2

### **Documentation Review**

• Sample of training records/logs of investigative staff.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

In addition to the general training provided to all employees pursuant to §115.231, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).\*

Provision Findings		
○ Yes		
○ No		
O N/A		

**115.234 (b):** Specialized training shall include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.

**Pre-Audit** 

Issue Log Notes

#### **Audit**

#### **Interview Guides**

• Investigative Staff - Q: 3

### **Documentation Review**

• Sample of training records/logs of investigative staff.

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

O N/A

Does this specialized training include: Techniques for interviewing sexual abuse victims?(N/A
if the agency does not conduct any form of criminal or administrative sexual abuse
investigations. See 115.221(a)).*

Provision Findings  Yes  No N/A
Does this specialized training include: Proper use of Miranda and Garrity warnings?(N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).*
Provision Findings  Yes  No N/A
Does this specialized training include: Sexual abuse evidence collection in confinement settings?(N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).*
Provision Findings  Yes  No

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 criminal or administrative sexual abuse investigations. See 115.221(a)).\*

<b>Provision Findings</b>		
○ Yes		
○ No		
O N/A		

**115.234 (c):** The agency shall maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations.

Pre-Audit		Issue Log Notes		
Section	Question Text		Agency/Facility Response	

115.234 (c)-1	The agency maintains documentation showing that investigators have completed the required training.  • Upload/select documentation that investigators have completed training	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or
115.234 (c)-2	The number of investigators currently employed who have completed the required training:	(Number only) Enter Comment	additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested

### **Audit**

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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 criminal or administrative sexual abuse investigations. See 115.221(a).)\*

Provision Findings	
Yes	
○ No	
○ N/A	

115.234 (d): Any State entity or Department of Justice component that investigates sexual abuse in confinement settings shall provide such training to its agents and investigators who conduct such investigations.

#### **Pre-Audit**

**Issue Log** Notes

### **Audit**

#### Other Audit Instructions

- Note to auditors: Agents and investigators must be trained in conducting investigations in confinement settings as per 115.234(b) above.
- Auditor is not required to audit this provision.

#### **Auditor Personal Notes**

Auditor's Personal Notes: This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

### **Supporting Documentation**

Supporting Documentation Instructions: Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

### **Auditor Overall Determination**

#### **Auditor Overall Determination**

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

Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# **Training and Education**

#### 115.235: Specialized training: Medical and mental health care

**115.235 (a):** The agency ensures that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: (1) How to detect and assess signs of sexual abuse and sexual harassment; (2) How to preserve physical evidence of sexual abuse; (3) How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and (4) How and to whom to report allegations or suspicions of sexual abuse and sexual harassment.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	
115.235 (a)-1	The agency has a policy related to the training of medical and mental health practitioners who work regularly in its facilities. Check N/A if the agency does not have medical and mental health practitioners who work regularly in its facilities.  • Upload/select agency policy related to training of medical and mental health care practitioners	Yes/No Yes No N/A  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not
115.235 (a)-2	The number of all medical and mental health care practitioners who work regularly at this facility and have received the training required by agency policy:	(Number only) Enter Comment	be included in the interim or final reports.  Clarification requested Additional
115.235 (a)-3	The percent of all medical and mental health care practitioners who work regularly at this facility and have	(Number only) Enter Comment	documentation requested

	received the training required by agency policy:		
Audi	it		
Interview Guides			

• Medical and Mental Health Staff - Q: 2

### **Documentation Review**

- Training records and personnel records to verify that regular practitioners have been trained ("regular" does not include practitioners who are engaged infrequently).
- Examine policy and verify that all required elements are addressed. Indicate reasons for variance from policy, if any.

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

O No O N/A

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.)*
Provision Findings
○ Yes
○ No
○ N/A
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.)*
Provision Findings
Yes
O No
○ N/A
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 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.)*
Provision Findings
Yes
O No
○ N/A
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.)*
Provision Findings  Yes

**115.235 (b):** If medical staff employed by the agency conduct forensic examinations, such medical staff shall receive the appropriate training to conduct such examinations.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	
115.235 (b)-1	Agency medical staff at this facility conduct forensic medical exams.	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested

## **Audit**

### **Interview Guides**

• Medical and Mental Health Staff - Q: 1

### **Documentation Review**

- Exam logs (spot-check).
- List of all medical staff at facility and a sample of training logs and forensic exam

- training curriculum.
- If contract medical staff are used, determine if trained.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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 does not employ medical staff or the medical staff employed by the agency do not conduct forensic exams.)\*

Provision Findings	
○ Yes	
○ No	
○ N/A	

**115.235 (c):** The agency shall maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere.

Pre-Audit			Issue Log Notes	
Section	Question Text		Agency/Facility Response	

115.235 (c)-1 The agency maintains documentation showing that medical and mental health practitioners have completed the required training. Check N/A if the agency does not have medical and mental health practitioners who work regularly in its facilities.

 Upload/select documentation of training Yes/No
Yes No N/A

Enter Comment

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### **Audit**

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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.)\*

<b>Provision Findings</b>		
○ Yes		
○ No		
O N/A		

**115.235 (d):** Medical and mental health care practitioners shall also receive the training mandated for employees under § 115.231 or for contractors and volunteers under § 115.232, depending upon the practitioner's status at the agency.

#### **Pre-Audit**

Issue Log Notes

#### **Audit**

#### **Documentation Review**

• Training logs of medical and mental health care practitioners to ensure they received the training for employees AND contractors/volunteers (depending on their status) in the referenced standards.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

### **Provision Findings**

Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.231? (N/A for circumstances in which a particular status (employee or contractor/volunteer) does not apply.)\*

Provision Findings			
○ Yes			
○ No			
○ N/A			

Do medical and mental health care practitioners contracted by and volunteering for the agency also receive training mandated for contractors and volunteers by §115.232? (N/A for circumstances in which a particular status (employee or contractor/volunteer) does not apply.)\*

<b>Provision Findings</b>		
Yes		
○ No		



### **Supporting Documentation**

Supporting Documentation Instructions: Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

#### **Auditor Overall Determination**

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

#### Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# Screening for Risk of Sexual Victimization and Abusiveness

#### 115.241: Screening for risk of victimization and abusiveness

115.241 (a): All residents shall be assessed during an intake screening and upon transfer to another facility for their risk of being sexually abused by other residents or sexually abusive toward other residents.

	Issue Log Notes		
Section	Question Text	Agency/Facility Response	
115.241 (a)-1	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 residents.  • Upload/select screening policy	Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested

### **Audit**

### **Interview Guides**

- Staff Responsible for Risk Screening Q: 1
- Resident Interview Questionnaire Q: 7

### **PREA Audit Site Review**

#### **INTAKE: PREA RISK SCREENING**

During the site review, the auditor must ask to observe a confined person being screened for risk of being sexually abused or sexually abusive, if possible; if no confined 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.

#### During the PREA 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.
- <u>Assess</u> whether the screening process occurs in a setting that ensures as much privacy as possible given the potentially sensitive information that could be discussed (e.g., screening takes place out of earshot of other staff and confined persons who would not otherwise participate in the screening process).
- <u>Assess</u> whether screening staff ask screening questions in a manner that fosters comfort and elicits responses.
- <u>Test</u> the method for assessing confined persons for risk of being sexually abused by other persons confined in the facility or sexually abusive toward other persons confined in the facility, including whether:
  - Screening staff use an instrument to collect information during the risk screening process.
  - Screening staff affirmatively ask persons confined in the facility about their sexual orientation and gender identity by directly inquiring if they identify as LGBTI (in addition to making a subjective determination about perceived status).
  - Screening staff use additional sources of information, outlined in the Standards, to complete the initial risk screening assessment.
  - Completion of the risk screening instrument returns a subsequent "score" or determination of risk of being sexually abused or being sexually abusive.

#### Additionally, the auditor should:

- <u>Have informal conversations</u> with staff while conducting risk screening (or mock demo) regarding the risk screening process (e.g., how information is collected/ specifics of the screening tool, how privacy is maintained).
- <u>Have informal conversations</u> 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 conducted, ability to answer the questions asked).

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

### **Provision Findings**

Are all residents assessed during an intake screening for their risk of being sexually abused by other residents or sexually abusive toward other residents?\*

Provision Findings

Yes
No

Are all residents assessed upon transfer to another facility for their risk of being sexually abused by other residents or sexually abusive toward other residents?\*

Provision Findings
Yes

**115.241 (b):** Intake screening shall ordinarily take place within 72 hours of arrival at the facility.

O No

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.241 (b)-1	The policy requires that residents be screened for risk of sexual victimization or risk of sexually abusing other residents within 72 hours of their intake.  • If applicable, select screening policy and indicate relevant page/section.	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation
115.241 (b)-2	The number of residents entering the facility (either through intake or transfer) within the past 12 months (whose length of stay in the facility was for 72 hours or more) who were screened for risk of sexual victimization or risk of sexually abusing other residents within 72 hours of their entry into the facility:	(Number only) 162 / 162 = 100%  Percentages are calculated from information entered into this subsection and information entered into the agency/facility information section(s).  Enter Comment	requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested

### **Audit**

#### **Interview Guides**

- Staff Responsible for Risk Screening Q: 2
- Resident Interview Questionnaire Q: 7

#### **Documentation Review**

• Sample of records for residents admitted to the facility within the past 12 months for evidence of appropriate screening within 72 hours.

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Do intake screenings ordinarily take place within 72 hours of arrival at the facility?\*

<b>Provision Findings</b>	
○ Yes	
ONo	

**115.241** (c): Such assessments shall be conducted using an objective screening instrument.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	

115.241 The text and Risk assessment is conducted using Yes/No checkboxes (c)-1an objective screening instrument. ○ Yes ○ No below can be **Enter Comment**  Upload/select screening used to populate instrument an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested **Audit Auditor Personal Notes** findings for the interim/final report should go in the discussion following your Overall

Auditor's Personal Notes: This text will not be included in your report. Analysis of your Compliance Determination.

### **Provision Findings**

Are all PREA screening assessments conducted using an objective screening instrument?\*

Provision Findings	
○ Yes	
○ No	

115.241 (d): The intake screening shall consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: (1) Whether the resident has a mental, physical, or developmental disability; (2) The age of the resident; (3) The physical build of the resident; (4) Whether the resident has previously been incarcerated; (5) Whether the resident's criminal

history is exclusively nonviolent; (6) Whether the resident has prior convictions for sex offenses against an adult or child; (7) Whether the resident is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming; (8) Whether the resident has previously experienced sexual victimization; and (9) The resident's own perception of vulnerability.

#### **Pre-Audit**

Issue Log Notes

#### **Audit**

#### **Interview Guides**

Staff Responsible for Risk Screening - Q: 3, 4

#### **PREA Audit Site Review**

• Review site review instructions outlined in provision (a).

#### **Other Audit Instructions**

• Note each item prescribed by the PREA standard that is missing from the facility's risk screening instrument; note each item not prescribed in the PREA standards that is included in the facility's instrument. (In order to meet the requirements of the standard, the screening should use all criteria (1–9), at a minimum, to assess risk.)

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

### **Provision Findings**

Does the intake screening consider, at a minimum, the following criteria to assess residents

Provision Findings	
Yes	
○ No	
Does the intake screening consider, at a minimum, the followin	g criteria to assess resident
for risk of sexual victimization: The age of the resident?*	
Provision Findings	
○ Yes ○ No	
○ NO	
Does the intake screening consider, at a minimum, the followin for risk of sexual victimization: The physical build of the resider	•
Provision Findings  Yes	
○ No	
Does the intake screening consider, at a minimum, the followin for risk of sexual victimization: Whether the resident has previo	
Provision Findings  Yes  No	
Does the intake screening consider, at a minimum, the followin for risk of sexual victimization: Whether the resident's criminal nonviolent?*	
Provision Findings  Yes	
○ No	
Does the intake screening consider, at a minimum, the followin	a criteria to assess resident
for risk of sexual victimization: Whether the resident has prior o	<del>-</del>
against an adult or child?*	
Provision Findings	
Yes	
○ No	

bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the

resident about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the resident is gender non-

conforming or otherwise may be perceived to be LGBTI)?*	
Provision Findings  Yes No	
Does the intake screening consider, at a minimum, the following criteria to a for risk of sexual victimization: Whether the resident has previously experier victimization?*	
Provision Findings  Yes No	
Does the intake screening consider, at a minimum, the following criteria to a for risk of sexual victimization: The resident's own perception of vulnerability	
Provision Findings  Yes  No	
.15.241 (e): The intake screening shall consider prior acts of sexual abuse, or violent offenses, and history of prior institutional violence or sexual abuse,	
gency, in assessing residents for risk of being sexually abusive.	as known to the
	Issue Log Notes
gency, in assessing residents for risk of being sexually abusive.	Issue Log
gency, in assessing residents for risk of being sexually abusive.  Pre-Audit	Issue Log
Pre-Audit  Audit	Issue Log
Pre-Audit  Audit  Interview Guides	Issue Log
Pre-Audit  Audit Interview Guides  • Staff Responsible for Risk Screening - Q: 3, 4	Issue Log
Pre-Audit  Audit  Interview Guides  • Staff Responsible for Risk Screening - Q: 3, 4  PREA Audit Site Review	Issue Log

• Note each item prescribed by the PREA standards that is missing from the facility's risk screening instrument; note each item not prescribed in the PREA standards that is included in the facility's instrument. (In order to meet the requirements of the standard, the screening should use all criteria (1–3) to assess risk.)

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

In assessing residents for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior acts of sexual abuse?\*

Provision Findings
○ Yes
○ No
assessing residents for risk of being sexually abusive, does the initial PREA risk screening nsider, when known to the agency: prior convictions for violent offenses?*
Provision Findings
○ Yes
○ No
assessing residents for risk of being sexually abusive, does the initial PREA risk screening nsider, when known to the agency: history of prior institutional violence or sexual abuse?
Provision Findings
Yes
○ No

**115.241 (f):** Within a set time period, not to exceed 30 days from the resident's arrival at the facility, the facility will reassess the resident's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening.

		Pre-Audit		Issue Log Notes
Section	<b>Question Text</b>		Agency/Facility	

		Response	
115.241 (f)-1	The policy requires that the facility reassess each resident's risk of victimization or abusiveness within a set time period, not to exceed 30 days after the resident's arrival at the facility, based upon any additional, relevant information received by the facility since the intake screening.  • If applicable, select screening policy and indicate relevant page/section.	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not
115.241 (f)-2	The number of residents entering the facility (either through intake or transfer) within the past 12 months whose length of stay in the facility was for 30 days or more who were reassessed for their risk of sexual victimization or of being sexually abusive within 30 days after their arrival at the facility based upon any additional, relevant information received since intake:	(Number only) 128 / 128 = 100%  Percentages are calculated from information entered into this subsection and information entered into the agency/facility information section(s).  Enter Comment	be included in the interim or final reports.  Clarification requested Additional documentation requested
Audi			

### Audit

### **Interview Guides**

- Staff Responsible for Risk Screening Q: 6
- Resident Interview Questionnaire Q: 8

## **Documentation Review**

• Sample of records of initial assessment and reassessment for risk of sexual victimization or abusiveness.

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Within a set time period not more than 30 days from the resident's arrival at the facility, does the facility reassess the resident's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?\*

Provision Findings		
○ Yes		
○ No		

**115.241 (g):** A resident's risk level shall be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the resident's risk of sexual victimization or abusiveness.

Pre-Audit			Issue Log Notes	
Section	Question Text		Agency/Facility Response	

115.241 (g)-1 The policy requires that a resident's risk level be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the resident's risk of sexual victimization or abusiveness.

 If applicable, select screening policy and indicate relevant page/section. Yes/No
Yes No

Enter Comment

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### **Audit**

### **Interview Guides**

- Staff Responsible for Risk Screening Q: 5
- Resident Interview Questionnaire Q: 8

### **Documentation Review**

- Sample of records of residents who were reassessed for risk of sexual victimization or abusiveness.
- Sample of records of residents who have been victims or perpetrators of sexual abuse for confirmation of reassessment.

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall

Comi	pliance	Deter	mina	tion.
O	Dilailee	D C C C		

# **Provision Findings**

Does the facility reassess a resident's risk level when warranted due to a: Referral?*
Provision Findings
Yes
○ No
Does the facility reassess a resident's risk level when warranted due to a: Request?*
Provision Findings
Yes
○ No
Does the facility reassess a resident's risk level when warranted due to a: Incident of sexual
abuse?*
Provision Findings
Yes
○ No
Does the facility reassess a resident's risk level when warranted due to a: Receipt of additional information that bears on the resident's risk of sexual victimization or abusiveness?*
Provision Findings
○ Yes
○ No
15.241 (h): Residents may not be disciplined for refusing to answer, or for not disclosing

**115.241 (h):** Residents may not be disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section.

Pre-Audit		Issue Log Notes	
Section	Question Text	Agency/Facility Response	

115.241 (h)-1 The policy prohibits disciplining residents for refusing to answer (or for not disclosing complete information related to) the questions regarding:
(a) whether or not the resident has a mental, physical, or developmental disability; (b) whether or not the resident is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender non-conforming; (c) Whether or not the resident has previously experienced sexual victimization; and (d) the resident's own perception of vulnerability.

 If applicable, select screening policy and indicate relevant page/section. Yes/No
Yes No

Enter Comment

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### **Audit**

### **Interview Guides**

• Staff Responsible for Risk Screening - Q: 7

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

### **Provision Findings**

Is it the case that residents are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?\*

Provision Findings		
○ Yes		
○ No		

**115.241 (i):** The agency shall implement 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.

**Pre-Audit** 

Issue Log Notes

#### **Audit**

#### **Interview Guides**

- PREA Coordinator Q: 7
- Staff Responsible for Risk Screening Q: 8

#### **PREA Audit Site Review**

#### RECORD STORAGE

During the site review, the auditor must:

- <u>Observe</u> the physical storage area of any information/documentation collected and maintained in hard copy pursuant to the PREA Standards (e.g., risk screening information, medical records, sexual abuse allegations) to determine if the area is secured (e.g., key card, lock and key).
- <u>Observe</u> 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:

• <u>Have informal conversations</u> with staff regarding access to secure information, including medical and mental health files, 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).

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

### **Provision Findings**

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?\*

Provision Findings		
○ Yes		
○ No		

# **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

### **Auditor Overall Determination**

Auditor Overall Determination
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
Does Not Meet Standard (requires corrective action)

Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# Screening for Risk of Sexual Victimization and Abusiveness

#### 115.242: Use of screening information

**115.242 (a):** The agency shall use information from the risk screening required by § 115.241 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	
115.242 (a)-1	The agency/facility uses information from the risk screening required by §115.241 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive.  • Upload/select  • documentation of use of screening information for these purposes  • documentation of how decisions are made pursuant to the standard	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested

### **Audit**

#### **Interview Guides**

- PREA Coordinator Q: 6
- Staff Responsible for Risk Screening Q: 9

### **Documentation Review**

• Documentation of risk-based housing decisions.

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?\*

Provision Findings
Yes
○ No
oes the agency use information from the risk screening required by § 115.241, with the oal of keeping separate those residents at high risk of being sexually victimized from those thigh risk of being sexually abusive, to inform: Education Assignments?*
Provision Findings  Yes
○ No
oes the agency use information from the risk screening required by § 115.241, with the oal of keeping separate those residents at high risk of being sexually victimized from those thigh risk of being sexually abusive, to inform: Program Assignments?*
Provision Findings  Yes
○ No
<b>5.242 (b):</b> The agency shall make individualized determinations about how to ensure the ety of each resident.

Agency/Facility

Response

**Pre-Audit** 

**Section Question Text** 

**Issue Log** 

Notes

115.242 (b)-1 The agency/facility makes individualized determinations about how to ensure the safety of each resident. If "No", please explain in the comments section.

Upload/select any relevant policies

Yes/No
Yes No

Enter Comment

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

### **Audit**

# **Interview Guides**

• Staff Responsible for Risk Screening - Q: 9

# **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Does the agency make individualized determinations about how to ensure the safety of each resident?\*

Provision Findings		
○ Yes		
○ No		

**115.242 (c):** In deciding whether to assign a transgender or intersex resident to a facility for male or female residents, and in making other housing and programming assignments, the agency shall consider on a case-by-case basis whether a placement would ensure the resident's health and safety, and whether the placement would present management or security problems.

	Pre-Audit		Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.242 (c)-1	In deciding whether to assign a transgender or intersex resident to a facility for male or female residents, the agency shall consider on a case-by-case basis whether a placement would ensure the resident's health and safety.  Check N/A if this is a facility level audit tied to an agency audit.  • Upload/select any relevant policies	Yes/No Yes No N/A  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in
115.242 (c)-2	In making housing and programming assignments, the facility shall consider on a case-by-case basis whether a placement of a transgender or intersex resident would present management or security problems. Check N/A if this is an agency level audit.  • Upload/select any relevant policies	Yes/No Yes No N/A  Enter Comment	be included in the interim or final reports.  Clarification requested Additional documentation requested

# **Audit**

# **Interview Guides**

- PREA Coordinator Q: 8, 9, 10
- Transgender/Intersex Residents Q: 1, 2

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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)?\*

Provision Findings	
○ Yes	
○ No	
When making housing or other program assignments for transgender or intersex redoes the agency consider on a case-by-case basis whether a placement would ensident's health and safety, and whether a placement would present management security problems?*	ure the
Provision Findings	
Yes	
│ ○ No	

**115.242 (d):** A transgender or intersex resident's own views with respect to his or her own safety shall be given serious consideration.

**Pre-Audit** 

Issue Log Notes

### **Audit**

# **Interview Guides**

- PREA Coordinator Q: 11
- Staff Responsible for Risk Screening Q: 10
- Transgender and Intersex Residents Q: 1

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

Provision Findings		
○ Yes		
○ No		

**115.242 (e):** Transgender and intersex residents shall be given the opportunity to shower separately from other residents.

**Pre-Audit** 

Issue Log Notes

# **Audit**

# **Interview Guides**

- PREA Coordinator Q: 12
- Staff Responsible for Risk Screening Q: 11
- Transgender/Intersex Residents Q: 3

# **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Are transgender and intersex residents given the opportunity to shower separately from other residents?\*

Provision Findings		
○ Yes		
○ No		

**115.242 (f):** The agency shall not place lesbian, gay, bisexual, transgender, or intersex residents in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such residents.

#### **Pre-Audit**

Issue Log Notes

### **Audit**

# **Interview Guides**

- PREA Coordinator Q: 13 14
- Transgender/Intersex/Gay/Lesbian Residents Q: 2, 4

# **Documentation Review**

- The title, status, and findings of any consent decree, legal settlement, or legal judgment requiring a facility to establish a dedicated facility, unit, or wing for lesbian, gay, bisexual, transgender, or intersex residents.
- Documentation of housing assignments of residents identified to be lesbian, gay, bisexual, transgender, or intersex for compliance with the standard.

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing: lesbian, gay, and bisexual residents in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I residents pursuant to a consent decree, legal settlement, or legal judgement.)\*

<b>Provision Findings</b>	
○ Yes	
○ No	
○ N/A	

Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing: transgender residents in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I residents pursuant to a consent decree, legal settlement, or legal judgement.)\*

<b>Provision Findings</b>		
Yes		
○ No		
○ N/A		

Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing: intersex residents in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I residents pursuant to a consent decree, legal settlement, or legal judgement.)\*

<b>Provision Findings</b>		
○ Yes		



# **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

Auditor Overall Determination
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# Reporting

#### 115.251: Resident reporting

**115.251 (a):** The agency shall provide multiple internal ways for residents to privately report sexual abuse and sexual harassment, retaliation by other residents or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.

	Pre-Audit			
Section	Question Text	Agency/Facility Response		
115.251 (a)-1	The agency has established procedures allowing for multiple internal ways for residents to report privately to agency officials about: (a) sexual abuse or sexual harassment; (b) retaliation by other residents or staff for reporting sexual abuse and sexual harassment; and (c) staff neglect or violation of responsibilities that may have contributed to such incidents.  • Upload/select  • resident reporting policy(ies)  • other relevant documentation on resident reporting (e.g. resident handbooks)	Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested	

# **Audit**

# **Interview Guides**

- Random Sample of Staff Q: 7
- Resident Interview Questionnaire Q: 9

# **PREA Audit Site Review**

#### **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, access to outside victim emotional support services, and other relevant PREA 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:**

- <u>Observe</u> 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 emotional support services and 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).
- <u>Observe</u> 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)).
- <u>Observe</u> 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:
  - How to report sexual abuse and/or sexual harassment (external and internal reporting methods)
    - Posted in any areas frequented by persons confined in the facility, including housing/living areas, programming areas, work areas, education areas, etc.
    - 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.

#### Additionally, the auditor should:

• <u>Have informal conversations</u> with staff and persons confined in the facility regarding signage throughout the facility (e.g., readability and accessibility of information, including for confined persons with disabilities; consistency and accuracy of

information; signage posted just for the audit or always posted (with the exception of the PREA Audit Notice).

#### TESTING INTERNAL REPORTING METHODS FOR CONFINED PERSONS

Note: Facilities are required to have multiple internal methods for confined persons 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 persons confined in the facility have regular and timely access to reporting methods and how the facility receives these reports.

#### **Reporting in Writing**

If internal reporting includes a mechanism or mechanisms for submitting a written report (which might be a note or a form, and usually includes grievance forms) into a drop box or other receptacle, auditors are not expected to complete and submit a written report via hard copy/drop box. However, 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.

#### **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 do not have to request forms from staff.
  - See section "Processes for Sending and Receiving Mail (Mail drop boxes/ Mailroom)" below for instructions on what the auditor must observe during the site review regarding access to writing materials (e.g., writing implements, forms, paper, envelopes), drop boxes, etc. and security of written communications.

#### **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:

- <u>Complete and submit</u> 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 confined persons
  - Kiosks/tablets/computers are accessible to all persons confined in the facility and have reasonable accommodations, where necessary (i.e., for confined

- persons 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 kiosks/tablets/computers require persons confined in the facility to
  provide their name and/or ID in order to complete and submit a sexual abuse or
  sexual harassment report (i.e., allows the report to be submitted anonymously). This
  means that there must be a way for confined persons to access the reporting
  mechanism without logging into the kiosk/tablet/computer with a traceable login.

#### Additionally, the auditor should:

• <u>Have informal conversations</u> with staff and persons confined in the facility regarding internal reporting electronically (e.g., access to kiosks/tablets/computers, 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:

- <u>Have informal conversations</u> with persons confined in the facility, to determine whether they are aware that they are allowed to report verbally and that they can report to any staff in the facility.
- <u>Have informal conversations</u> with staff, to determine whether staff are aware of the process for receiving and documenting verbal reports.
- See section "Record Storage" below 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.

# PROCESSES FOR SENDING AND RECEIVING MAIL (MAIL DROP BOXES/MAILROOM) During the site review, the auditor must:

- <u>Assess</u> 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 confined persons to the mailroom.
  - 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 confined person 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 confined persons should not know, from the nature of the receptacle being used, that a confined 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
  - 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 or facility official(s).

#### Additionally, the auditor should:

Have informal conversations with staff responsible for sending and receiving mail
 (e.g., mailroom staff and/or other staff) and persons confined in the facility regarding
 the process of sending and receiving mail to/from the external reporting entity,
 outside emotional support services, legal mail (e.g., the extent to which mail
 correspondence is kept private, confidential, and/or privileged as allowed by Federal,
 State, and local laws, perception of privacy/confidentiality/anonymity in sending and
 receiving mail, and accessibility of writing instruments and required forms).

#### **RECORD STORAGE**

#### **During the site review, the auditor must:**

- <u>Observe</u> the physical storage area of any information/documentation collected and maintained in hard copy pursuant to the PREA Standards (e.g., risk screening information, medical records, sexual abuse allegations) to determine if the area is secured (e.g., key card, lock and key).
- <u>Observe</u> 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:

• <u>Have informal conversations</u> with staff regarding access to secure information, including medical and mental health files, 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).

# **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

Prov	ision	Find	inas
			9-

Does the agency provide multiple internal ways for residents to privately report: Sexual abuse and sexual harassment?*
Provision Findings  Yes No
Does the agency provide multiple internal ways for residents to privately report: Retaliation by other residents or staff for reporting sexual abuse and sexual harassment?*
Provision Findings  Yes No
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?*
Provision Findings  Yes No

**115.251 (b):** The agency shall also inform residents of at least one way to report abuse or harassment to a public or private entity or office that is not part of the agency, and that is able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials, allowing the resident to remain anonymous upon request.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	

115.251 (b)-1

The agency provides at least one way for residents to report abuse or harassment to a public or private entity or office that is not part of the agency.

- Upload/select documentation of agreement with outside public or private entity responsible for taking reports
- If applicable, also select resident reporting policy and indicate relevant page/section

Yes/No
Yes No

Enter Comment

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

### **Audit**

# **Interview Guides**

- PREA Coordinator Q: 15, 16
- Resident Interview Questionnaire Q: 9, 10

# **PREA Audit Site Review**

#### **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, access to outside victim emotional support services, and other relevant PREA 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 emotional support services and 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).
- <u>Observe</u> 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:
  - How to report sexual abuse and/or sexual harassment (external and internal reporting methods)
    - Posted in any areas frequented by persons confined in the facility, including housing/living areas, programming areas, work areas, education areas, etc.
    - 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.

#### Additionally, the auditor should:

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

TESTING EXTERNAL REPORTING METHOD(S) FOR CONFINED PERSONS

During the site review, the auditor must test access to the external reporting
entity or ask a person confined in the facility to test access to the external
reporting entity. Note: Facilities may not contract with an answering service to perform

this function because an answering service is not a "public or private entity or office that is not part of the agency." An answering service in this context is, essentially, no more than an agent of or a contractor to the agency. See this FAQ for formal guidance:

https://www.prearesourcecenter.org/frequently-asked-questions/can-answering-service-be-used-satisfy-requirement-standard-11551-b.

#### Reporting via Phone

If access to the external reporting entity is provided by phone, during the site review the auditor must:

- <u>Test</u> reporting via phones by calling the external reporting entity in the same manner that a person confined in the facility would be expected to call the external reporting entity (or have a confined person call the service provider), to assess whether:
  - The phones work (e.g., have a dial tone, can call outside the facility, etc.).
  - The phone number listed on the signage actually connects with the outside reporting entity.
  - Access to the outside reporting entity does not require a confined person to provide their pin or name (allowing the person to remain anonymous).
  - The phone number is local/toll-free.
  - The phone is answered by a live person or information about how and when to reach a live person is provided (versus a recording with no access to a live person).
  - The reporting entity is prepared to receive reports of sexual abuse and sexual harassment from persons confined in the facility and immediately forward reports to agency officials.
    - This requires a brief conversation with the person who answers the phone on behalf of the external reporting entity regarding responsibilities in regard to reporting. The auditor must ask the person to forward a test report to the agency under the auditor's name.
  - The reporting entity allows persons confined in the facility to report anonymously upon request.
    - As above, this requires a brief conversation with the person who answers the phone on behalf of the external reporting entity regarding anonymity, if requested.
- <u>Assess</u> whether all persons confined in the facility have regular access to phones to report sexual abuse and sexual harassment to the external reporting entity and have reasonable accommodations, where necessary (i.e., for confined persons 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).
- Assess how the facility allows confined persons to report sexual abuse or sexual harassment anonymously, if requested:
  - Facilities should allow persons confined in the facility access to telephones that are unmonitored or that may provide more privacy.
  - The configuration of the telephone should not make obvious that any confined person using the telephone system is making an allegation of sexual abuse or sexual harassment. For example, if the hotline is a dedicated phone,

- then the phone should also be used for other purposes besides reporting sexual abuse or sexual harassment.
- Facilities should have reporting mechanisms in place that allow the identity of the confined person making the report to remain anonymous to facility staff and administrators.

#### Additionally, the auditor should:

 Have informal conversations with staff and persons confined in the facility regarding external reporting via the phone (e.g., access to phones, reasonable accommodations for persons confined in the facility who need it, anonymity in reporting).

#### **Reporting in Writing**

Note: Auditors are not expected to test access to external reporting entities via mail. See section "Processes for Sending and Receiving Mail (Mail Drop boxes/Mailroom)" for instructions on what the auditor must observe during the site review regarding sending and receiving mail, including to external reporting entities.

# PROCESSES FOR SENDING AND RECEIVING MAIL (MAIL DOP BOXES/MAILROOM) During the site review, the auditor must:

- <u>Assess</u> 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 confined persons to the mailroom.
  - 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 confined person 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 confined persons should not know, from the nature of the receptacle being used, that a confined 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
  - 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 or facility official(s).

#### Additionally, the auditor should:

Have informal conversations with staff responsible for sending and receiving mail
 (e.g., mailroom staff and/or other staff) and persons confined in the facility regarding
 the process of sending and receiving mail to/from the external reporting entity,
 outside emotional support services, legal mail (e.g., the extent to which mail
 correspondence is kept private, confidential, and/or privileged as allowed by Federal,
 State, and local laws, perception of privacy/confidentiality/anonymity in sending and
 receiving mail, and accessibility of writing instruments and required forms).

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

Provision Findings
○ Yes
○ No
that private entity or office able to receive and immediately forward resident reports of exual abuse and sexual harassment to agency officials?*
Provision Findings
Yes
○ No
oes that private entity or office allow the resident to remain anonymous upon request?*
Provision Findings
Yes
○ No

**115.251 (c):** Staff shall accept reports made verbally, in writing, anonymously, and from third parties and shall promptly document any verbal reports.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	
115.251 (c)-1	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.  • If applicable, select resident reporting policy and other relevant documentation on resident reporting (e.g. resident handbooks) and indicate relevant page(s)/section(s)	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in
115.251 (c)-2	Staff are required to document verbal reports. If "Yes", please provide the timeframe required to document the reports in the comments section. If "No", please explain in the comments section.  • Upload/select documentation made of verbal reports	Yes/No Yes No  Enter Comment	the interim or final reports.  Clarification requested Additional documentation requested

# Audit

# **Interview Guides**

- Random Sample of Staff Q: 8
- Resident Interview Questionnaire Q: 11

# **PREA Audit Site Review**

• Review the site review instructions outlined in provisions (a) and (b).

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Do staff members accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?\*

<b>Provision Findings</b>		
Yes		
○ No		

Do staff members promptly document any verbal reports of sexual abuse and sexual harassment?\*

<b>Provision Findings</b>		
Yes		
○ No		

**115.251 (d):** The agency shall provide a method for staff to privately report sexual abuse and sexual harassment of residents.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	

115.251 (d)-1	The agency has established procedures for staff to privately report sexual abuse and sexual harassment of residents. If "Yes", please describe the procedures in the comments. If "No", please explain in the comments section.  • Upload/select staff reporting policies or procedures	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the
115.251 (d)-2	Staff are informed of these procedures in the following ways:  • Upload/select any relevant documentation, such as staff handbooks	Enter Comment	auditor. Note: this text will not be included in the interim or final reports.  Clarification requested  Additional documentation requested

# **Audit**

# **Interview Guides**

• Random Sample of Staff - Q: 6

# **PREA Audit Site Review**

#### **TESTING STAFF REPORTING**

During the site review, the auditor must:

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

# **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of residents?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

# **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

### **Auditor Overall Determination**

Auditor Overall Determination	
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>	
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>	
with the standard for the relevant review period)	
O Does Not Meet Standard (requires corrective action)	
	_

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# Reporting

#### 115.252: Exhaustion of administrative remedies

**115.252 (a):** An agency shall be exempt from this standard if it does not have administrative procedures to address resident grievances regarding sexual abuse.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	
115.252 (a)-1	The agency has an administrative procedure for dealing with resident grievances regarding sexual abuse. If "No", skip to 115.253(a)-1.  • Upload/select policy/procedure regarding resident grievances of sexual abuse	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested

# **Audit**

# **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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.\*

<b>Provision Findings</b>	
Yes	
○ No	

**115.252 (b):** (1) The agency shall not impose a time limit on when a resident may submit a grievance regarding an allegation of sexual abuse. (2) The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse. (3) The agency shall not require a resident to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse. (4) Nothing in this section shall restrict the agency's ability to defend against a lawsuit filed by a resident on the ground that the applicable statute of limitations has expired.

	Pre-Audit		Issue Log Notes	
Section	Question Text		Agency/Facility Response	

115.252 The text and Agency policy or procedure allows a Yes/No checkboxes (b)-1resident to submit a grievance ○ Yes ○ No regarding an allegation of sexual below can be **Enter Comment** abuse at any time, regardless of when used to populate the incident is alleged to have an audit Issue occurred. If "No", please provide time Log that limit for a resident to submit a identifies clarifications or grievance regarding an allegation of sexual abuse in the comments. additional documentation If applicable, select policy/ requested by the procedure regarding resident auditor. Note: grievances of sexual abuse this text will not and indicate relevant page/ be included in section the interim or final reports. Clarification 115.252 Agency policy requires a resident to Yes/No requested (b)-2use an informal grievance process, or ○ Yes ○ No Additional otherwise to attempt to resolve with **Enter Comment** documentation staff, an alleged incident of sexual requested abuse. If applicable, select policy/ procedure regarding resident grievances of sexual abuse and indicate relevant page/ section

### **Audit**

### **Documentation Review**

• Documentation to determine that relevant information is provided.

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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.)\*

Provision Findings		
○ Yes		
○ No		
O N/A		

Does the agency always refrain from requiring a 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.)\*

Provision Findings		
○ Yes		
○ No		
○ N/A		

**115.252 (c):** The agency shall ensure that: (1) A resident who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and (2) Such grievance is not referred to a staff member who is the subject of the complaint.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	

115.252 The text and The agency's policy and procedure Yes/No checkboxes (c)-1allows a resident to submit a ○ Yes ○ No grievance alleging sexual abuse below can be **Enter Comment** without submitting it to the staff used to populate member who is the subject of the an audit Issue Log that complaint. identifies Upload/select policy/procedure clarifications or regarding resident grievances additional of sexual abuse documentation requested by the auditor. Note: 115.252 The agency's policy and procedure Yes/No this text will not (c)-2requires that a resident grievance Yes No be included in alleging sexual abuse not be referred **Enter Comment** the interim or to the staff member who is the subject final reports. of the complaint. Clarification requested • Upload/select policy/procedure Additional regarding resident grievances documentation of sexual abuse requested

### **Audit**

### **Documentation Review**

Documentation to determine that relevant information is provided

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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.)\*

Provision Finding  Yes	IS Control of the con
○ No	
○ N/A	
• •	ure that: such grievance is not referred to a staff member who is the
• •	int? (N/A if agency is exempt from this standard.)*
subject of the compla	int? (N/A if agency is exempt from this standard.)*
subject of the compla  Provision Finding	int? (N/A if agency is exempt from this standard.)*

**115.252 (d):** (1) The agency shall 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. (2) Computation of the 90-day time period does not include time consumed by residents in preparing any administrative appeal. (3) The agency may claim an extension of time to respond, of up to 70 days, if the normal time period for response is insufficient to make an appropriate decision. The agency shall notify the resident in writing of any such extension and provide a date by which a decision will be made. (4) 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, the resident may consider the absence of a response to be a denial at that level.

	ı	Pre-Audit		Issue Log Notes
Section	Question Text		Agency/Facility Response	

115.252 (d)-1	Agency policy and procedure requires 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.  • Upload/select policy/procedure regarding resident grievances of sexual abuse	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation
115.252 (d)-2	In the past 12 months, the number of grievances filed that alleged sexual abuse:	(Number only) Enter Comment	requested by the auditor. Note: this text will not be included in
115.252 (d)-3	In the past 12 months, the number of grievances alleging sexual abuse that reached final decision within 90 days after being filed:	(Number only) Enter Comment	the interim or final reports.  Clarification requested Additional
115.252 (d)-4	In the past 12 months, the number of grievances alleging sexual abuse that involved extensions because final decision was not reached within 90 days:  • Upload/select supporting logs/records that involved an extension	(Number only) Enter Comment	documentation requested
115.252 (d)-5	In cases where the agency requested an extension of the 90-day period to respond to a grievance and had reached final decisions by the time of the PREA audit, some grievances took longer than a 70-day extension period to resolve. If "No", skip to 115.252(d)-7.	Yes/No Yes No  Enter Comment	
115.252 (d)-6	If YES, the number of grievances that took longer than a 70-day extension period to resolve:	(Number only) Enter Comment	
115.252 (d)-7	The agency always notifies a resident in writing when the agency files for an extension, including notice of the date by which a decision will be made.	Yes/No Yes No  Enter Comment	

 Upload/select documentation of written notifications of extensions

# **Audit**

# **Interview Guides**

• Residents who Reported a Sexual Abuse - Q: 15, 16, 17, 18

# **Documentation Review**

• Sample of grievances that alleged sexual abuse and their final decision.

# **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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.)\*

Provision Findings
○ Yes
○ No
○ N/A
If the agency determines that the OO day timeframe is insufficient to make an appropriate
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 is 70 days per
115.252(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.)*
Provision Findings
○ Yes
○ No
○ N/A
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.)*

Provision Findings

Yes

No
N/A

**115.252** (e): (1) Third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, shall be permitted to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of residents. (2) If a third party files such a request on behalf of an 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. (3) If the resident declines to have the request processed on his or her behalf, the agency shall document the resident's decision.

		Pre-Audit		Issue Log Notes
Section	<b>Question Text</b>		Agency/Facility	

		Response	
115.252 (e)-1	Agency policy and procedure permits third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse and to file such requests on behalf of residents.  • If applicable, select policy/ procedure regarding resident grievances of sexual abuse and indicate relevant page/ section	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested
115.252 (e)-2	Agency policy and procedure requires that if a resident declines to have third-party assistance in filing a grievance alleging sexual abuse, the agency documents the resident's decision to decline.  • If applicable, select policy/ procedure regarding resident grievances of sexual abuse and indicate relevant page/ section	Yes/No Yes No  Enter Comment	
115.252 (e)-3	The number of grievances alleging sexual abuse filed by residents in the past 12 months in which the resident declined third-party assistance, containing documentation of the resident's decision to decline:	(Number only) Enter Comment	

# **Audit**

# **PREA Audit Site Review**

#### **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, access to outside victim emotional support services, and other relevant PREA 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:**

- <u>Observe</u> 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 emotional support services and 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).
- 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)).
- <u>Observe</u> 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:

#### Third-party reporting

Posted in public areas of the facility that can be accessed by family members, friends, advocates, and attorneys (e.g., family visitation areas, attorney visiting areas, public-facing websites) as well as any areas frequented by persons confined in the facility.

#### Additionally, the auditor should:

 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 confined persons with disabilities; consistency and accuracy of information; signage posted just for the audit or always posted (with the exception of the PREA Audit Notice).

#### **TESTING THIRD-PARTY REPORTING**

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

- <u>Complete and submit</u> 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.
- <u>Verify</u> the facility has a process for receiving third-party reports.
  - Ask to see evidence of having received the test report that the auditor submitted.

#### **Documentation Review**

- · Documentation of third-party reports.
- Documentation of declination of third-party assistance.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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.)\*

<b>Provision Findings</b>		
Yes		
○ No		

○ N/A
Are those third parties also permitted to file such requests on behalf of residents? (If a third party 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.)*
Provision Findings
Yes
○ No
○ N/A
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.)*
Provision Findings
○ Yes
○ No
○ N/A

**115.252 (f):** (1) The agency shall establish procedures for the filing of an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse. (2) After receiving an emergency grievance alleging a resident is subject to a substantial risk of imminent sexual abuse, the agency shall 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, shall provide an initial response within 48 hours, and shall issue a final agency decision within 5 calendar days. The initial response and final agency decision documents the agency's determination whether the resident is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

	Pre-Audit		Issue Log Notes
Section	Question Text	Agency/Facility Response	

115.252 (f)-1	The agency has a policy and established procedures for filing an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse.  • Upload/select policy/procedure for emergency grievances	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional
115.252 (f)-2	Agency policy and procedure for emergency grievances alleging substantial risk of imminent sexual abuse requires an initial response within 48 hours.  • If applicable, select policy/ procedure for emergency grievances and indicate relevant page/section	Yes/No Yes No  Enter Comment	documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation
115.252 (f)-3	The number of emergency grievances alleging substantial risk of imminent sexual abuse that were filed in the past 12 months:	(Number only) Enter Comment	requested
115.252 (f)-4	The number of those grievances in 115.252 (e)-3 that had an initial response within 48 hours:	(Number only) Enter Comment	
115.252 (f)-5	The agency's policy and procedure for emergency grievances alleging substantial risk of imminent sexual abuse requires that a final agency decision be issued within 5 days.  • If applicable, select policy/ procedure for emergency grievances and indicate relevant page/section	Yes/No Yes No  Enter Comment	
115.252 (f)-6	The number of grievances alleging substantial risk of imminent sexual abuse filed in the past 12 months that reached final decisions within 5 days:	(Number only) Enter Comment	

#### **Documentation Review**

• Documentation of emergency grievances filed pursuant to this standard.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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.)\*

Provision Findings	
○ Yes	
○ No	
○ N/A	

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.)\*

<b>Provision Findings</b>		
○ Yes		
○ No		
○ N/A		

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.)\*

Provision Findings		
Yes		
○ No		
○ N/A		

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.)\*

Provision Findings	
Yes	
○ No	
○ N/A	
	decision document the agency's determination of imminent sexual abuse? (N/A if agency is
exempt from this standard.)*	
Provision Findings	
Yes	
O No	
○ N/A	
emergency grievance? (N/A if agency is ex Provision Findings  Yes  No	gency's action(s) taken in response to the xempt from this standard.)*
○ N/A	
Does the agency's final decision document emergency grievance? (N/A if agency is ex	at the agency's action(s) taken in response to the xempt from this standard.)*
Provision Findings	
Yes	
No	
○ N/A	
<b>5.252 (g):</b> The agency may discipline a	resident for filing a grievance related to alleged
ial abuse only where the agency demon	estrates that the resident filed the grievance in ha

faith.

	Pre-Audit		Issue Log Notes	
Section	Question Text		Agency/Facility Response	

115.252 (g)-1	The agency has a written policy that limits its ability to discipline a resident for filing a grievance alleging sexual abuse to occasions where the agency demonstrates that the resident filed the grievance in bad faith.  • Upload/select policy on resident disciplinary sanctions (specific to filing a grievance in bad faith)	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note:
115.252 (g)-2	In the past 12 months, the number of resident grievances alleging sexual abuse that resulted in disciplinary action by the agency against the resident for having filed the grievance in bad faith:	(Number only) Enter Comment	this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested

#### **Audit**

# **Documentation Review**

· Documentation of any such disciplinary actions

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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.)\*

<b>Provision Findings</b>	
○ Yes	
○ No	
○ N/A	

# **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

Auditor Overall Determination
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
<ul> <li>Does Not Meet Standard (requires corrective action)</li> </ul>

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# Reporting

#### 115.253: Resident access to outside confidential support services

**115.253 (a):** The facility shall provide residents with access to outside victim advocates for emotional support services related to sexual abuse by giving residents mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations, and by enabling reasonable communication between residents and these organizations in as confidential a manner as

indicate relevant page/section

#### **Audit**

#### **Interview Guides**

- Resident Interview Questionnaire Q: 13, 14, 15, 16
- Residents who Reported a Sexual Abuse Q: 10, 11

#### **PREA Audit Site Review**

#### **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, access to outside victim emotional support services, and other relevant PREA 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:**

- <u>Observe</u> 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 emotional support services and 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).
- <u>Observe</u> 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:

- Access to outside confidential (emotional) support services
  - Posted in all areas frequented by persons confined in the facility, including housing areas and any shared spaces in the facility.
  - 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.

#### Additionally, the auditor should:

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

#### **TESTING ACCESS TO OUTSIDE EMOTIONAL SUPPORT SERVICES**

During the site review, the auditor must test access to outside emotional support services or ask a person confined in the facility to test access to outside emotional support services.

#### **Outside Emotional Support via Phone**

If access to support services is provided by phone, during the site review the auditor must:

- <u>Test</u> access via phones by calling the outside emotional support service provider(s) in the same manner that a person confined in the facility would be expected to call (or have a confined person call the service provider(s)), to assess whether:
  - The phones work (e.g., have a dial tone, can call outside the facility, etc.).
  - The phone number listed on the signage actually connects with the organization providing outside emotional support services.
  - The phone number is local/toll-free.
  - The phone is answered by a service provider (i.e., a live person or information about how and when to reach a live person is provided versus a recording with no access to a live person).
  - The service provider is prepared to offer services to callers from the facility.
    - This requires a brief conversation with the person who answers the phone at the service provider regarding the services offered to persons confined in the facility.
- <u>Assess</u> whether all persons confined in the facility have regular access to phones to contact the outside emotional support service provider(s) and have reasonable accommodations, where necessary (i.e., for confined persons 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).
- <u>Assess</u> how the facility provides access to phones that are unmonitored or allow for privacy or otherwise provides a way for persons confined in the facility to correspond with outside emotional support services confidentially.

#### Additionally, the auditor should:

Have informal conversations with staff and persons confined in the facility regarding
access to outside emotional support services via the phone (e.g., access to phones,
reasonable accommodations for persons confined in the facility who need it, limits to
confidentiality).

#### **Outside Emotional Support via Mail**

Note: Auditors are not expected to test access to external reporting entities via mail. See section "Processes for Sending and Receiving Mail (Mail drop boxes/Mailroom)" below for instructions on what the auditor must observe during the site review regarding sending and receiving mail, including to outside emotional support services.

# PROCESSES FOR SENDING AND RECEIVING MAIL (MAIL DROP BOXES/MAILROOM) During the site review, the auditor must:

- <u>Assess</u> 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 confined persons to the mailroom.
  - 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 confined person 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 confined persons should not know, from the nature of the receptacle being used, that a confined 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
  - 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 or facility official(s).

#### Additionally, the auditor should:

Have informal conversations with staff responsible for sending and receiving mail
 (e.g., mailroom staff and/or other staff) and persons confined in the facility regarding
 the process of sending and receiving mail to/from the external reporting entity,
 outside emotional support services, legal mail (e.g., the extent to which mail
 correspondence is kept private, confidential, and/or privileged as allowed by Federal,
 State, and local laws, perception of privacy/confidentiality/anonymity in sending and
 receiving mail, and accessibility of writing instruments and required forms).

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Does the facility provide residents with access to outside victim advocates for emotional support services related to sexual abuse by giving residents mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?\*

Provision Findings  Yes	
○ No	
Does the facility enable reasonable communication between residents and these organizations, in as confidential a manner as possible?*	
Provision Findings  Yes	
○ No	

**115.253 (b):** The facility shall 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.

	Pre-Audit		Issue Log Notes
Section	Question Text	Agency/Facility Response	

115.253 The text and The facility informs residents, prior to Yes/No checkboxes (b)-1giving them access to outside support ○ Yes ○ No services, of the extent to which such below can be **Enter Comment** communications will be monitored. used to populate an audit Issue If applicable, select policy/ Log that procedure regarding residents' identifies access to outside victim clarifications or advocates and indicate additional relevant page/section documentation requested by the auditor. Note: 115.253 The facility informs residents, prior to Yes/No this text will not (b)-2giving them access to outside support ○ Yes ○ No be included in services, of the mandatory reporting **Enter Comment** the interim or rules governing privacy, final reports. confidentiality, and/or privilege that Clarification apply to disclosures of sexual abuse requested made to outside victim advocates, Additional including any limits to confidentiality documentation under relevant federal, state, or local requested law. If applicable, select policy/ procedure regarding residents' access to outside victim advocates and indicate relevant page/section

#### **Audit**

#### **Interview Guides**

- Resident Interview Questionnaire Q: 17
- Residents who Reported a Sexual Abuse Q: 12

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

Provision Findings		
○ Yes		
○ No		

**115.253 (c):** The agency shall 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. The agency shall maintain copies of agreements or documentation showing attempts to enter into such agreements.

Pre-Audit			Issue Log Notes	
Section	Question Text	Agency/Facility Response		
115.253 (c)-1	The agency or facility maintains memorandum of understanding (MOUs) or other agreements with community service providers that are able to provide residents with emotional support services related to sexual abuse. If "No", skip to 115.253 (c)-3.	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or	
115.253 (c)-2	If YES to 115.253 (c)-1, the agency or facility maintains copies of those agreements. Skip to 115.254.  • Upload/select agreements/ MOUs	Yes/No Yes No  Enter Comment	additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested	documentation requested by the auditor. Note: this text will not be included in the interim or
115.253 (c)-3	If NO to 115.253 (c)-1, the agency or facility has attempted to enter into MOUs or other agreements with community service providers that are able to provide such services. If "Yes", please explain why these attempts have not been successful in the comments section. If "No", skip to 115.254.	Yes/No Yes No  Enter Comment		

115.253 If YES to 115.253 (c)-3, the agency maintains documentation of attempts to enter into such agreements.
 Upload/select documentation of attempts to enter into agreements

Yes/No
Yes No

Enter Comment

#### **Audit**

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

Provision Findings

Yes
No

Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?\*

Provision Findings		
Yes		
○ No		

### **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

Auditor Overall Determination
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
Opes Not Meet Standard (requires corrective action)

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# Reporting

#### 115.254: Third party reporting

**115.254 (a):** The agency shall establish a method to receive third-party reports of sexual abuse and sexual harassment and shall distribute publicly information on how to report sexual abuse and sexual harassment on behalf of a resident.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.254 (a)-1	The agency or facility provides a method to receive third-party reports of resident sexual abuse or sexual harassment. If "Yes", please describe the method in the comments section.	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue
115.254 (a)-2	The agency or facility publicly distributes information on how to report resident sexual abuse or sexual harassment on behalf of residents. If "Yes", please describe in the comments section.  • Upload/select publicly distributed information	Yes/No Yes No  Enter Comment	

## **Audit**

#### **PREA Audit Site Review**

#### **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, access to outside victim emotional support services, and other relevant PREA 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:

- <u>Observe</u> 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 emotional support services and 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).
- <u>Observe</u> 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)).
- <u>Observe</u> 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:
  - Third-party reporting
    - Posted in public areas of the facility that can be accessed by family members, friends, advocates, and attorneys (e.g., family visitation areas, attorney visiting areas, public-facing websites) as well as any areas frequented by persons confined in the facility.

#### Additionally, the auditor should:

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

#### **TESTING THIRD-PARTY REPORTING**

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

- <u>Complete and submit</u> 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.

- <u>Verify</u> the facility has a process for receiving third-party reports.
  - Ask to see evidence of having received the test report that the auditor submitted.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

#### **Provision Findings**

Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?\*

exact narassment.
Provision Findings
○ Yes
○ No
las the agency distributed publicly information on how to report sexual abuse and sexual arassment on behalf of a resident?*
Provision Findings
○ Yes
○ No

# **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

Auditor Overall Determination
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
<ul> <li>Does Not Meet Standard (requires corrective action)</li> </ul>

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

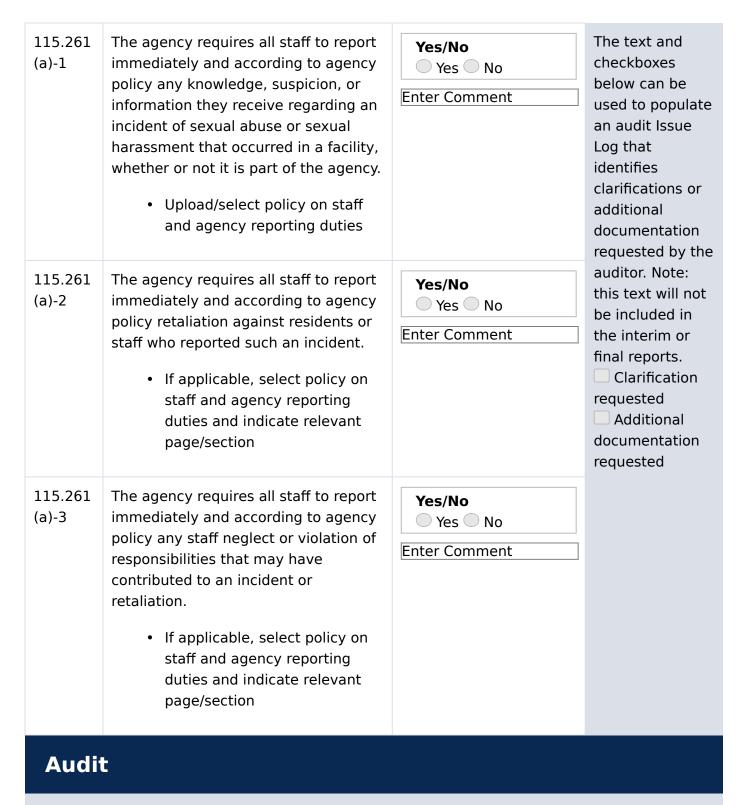
The narrative below must include a comprehensive discussion of all the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility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

# Official Response Following a Resident Report

#### 115.261: Staff and agency reporting duties

**115.261 (a):** The agency shall require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency; retaliation against residents or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

Pre-Audit		Issue Log Notes		
Section	Question Text		Agency/Facility Response	



#### **Interview Guides**

Random Sample of Staff - Q: 5

#### **PREA Audit Site Review**

#### **TESTING STAFF REPORTING**

During the site review, the auditor must:

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

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

YesNo

Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?\*

narassment that occurred in a facility, whether or not it is part of the agency?*
Provision Findings  Yes No
Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against residents or staff who reported an incident of sexual abuse or sexual harassment?*
Provision Findings  Yes No
Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?*
Provision Findings

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.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.261 (b)-1	Apart from reporting to designated supervisors or officials and designated state or local services 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.  • If applicable, select policy on staff and agency reporting duties and indicate relevant page/section	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested

# **Audit**

# **Interview Guides**

• Random Sample of Staff - Q: 5

#### **PREA Audit Site Review**

#### **RECORD STORAGE**

During the site review, the auditor must:

- <u>Observe</u> the physical storage area of any information/documentation collected and maintained in hard copy pursuant to the PREA Standards (e.g., risk screening information, medical records, sexual abuse allegations) to determine if the area is secured (e.g., key card, lock and key).
- <u>Observe</u> 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:

• <u>Have informal conversations</u> with staff regarding access to secure information, including medical and mental health files, 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).

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

Apart from reporting to designated supervisors or officials, do staff always refrain 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?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

**115.261 (c):** Unless otherwise precluded by Federal, State, or local law, medical and mental health practitioners shall be required to report sexual abuse pursuant to paragraph (a) of this section and to inform residents of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services.

#### **Audit**

#### **Interview Guides**

• Medical and Mental Health Staff - Q: 3, 4, 5

#### **Documentation Review**

• Documentation of any sexual abuse reports made by medical or mental health practitioners.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?\*

Provision Findings		
Yes		
○ No		

Are medical and mental health practitioners required to inform residents of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?\*

Provision Findings	
○ Yes	
○ No	

**115.261 (d):** If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, the agency shall report the allegation to the

designated State or local services agency under applicable mandatory reporting laws.

#### **Pre-Audit**

Issue Log Notes

#### **Audit**

#### **Interview Guides**

- Director or Designee Q: 11
- PREA Coordinator Q: 27

#### **Documentation Review**

 Documentation of any reports to designated State or local services agency per mandatory reporting laws regarding victims under the age of 18 or considered vulnerable persons.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?\*

Provision Findings		
○ Yes		
○ No		

**115.261 (e):** The facility shall report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators.

#### **Audit**

#### **Interview Guides**

• Director or Designee Q: 8

#### **Documentation Review**

• Sample of sexual abuse and sexual harassment reports to investigators.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?\*

<b>Provision Findings</b>		
Yes		
○ No		

# **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

#### **Auditor Overall Determination**

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

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

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# Official Response Following a Resident Report

#### 115.262: Agency protection duties

**115.262 (a):** When an agency learns that a resident is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the resident.

Pre-Audit		Issue Log Notes	
Section	Question Text	Agency/Facility Response	

115.262 (a)-1	When the agency or facility learns that a resident is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the resident (i.e., it takes some action to assess and implement appropriate protective measures without unreasonable delay).  • Upload/select policy on agency/facility protection duties	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not
115.262 (a)-2 115.262 (a)-3	In the past 12 months, the number of times the agency or facility determined that a resident was subject to a substantial risk of imminent sexual abuse:  If the agency or facility made such determinations in the past 12 months, the average amount of time (in hours) that passed before taking action:  • Upload/select any relevant documentation	(Number only) Enter Comment  (Number only) Enter Comment	be included in the interim or final reports.  Clarification requested Additional documentation requested
115.262 (a)-4	The longest amount of time (in hours or days) elapsed before taking actionif not "immediate" (i.e., without unreasonable delay). If not immediate, please explain in the comments section.  • Upload/select any relevant documentation	Enter Comment	

# Audit

# **Interview Guides**

- Agency Head Q: 12
- Director or Designee Q: 7

• Random Sample of Staff - Q: 13

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

### **Provision Findings**

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?\*

Provision Findings		
○ Yes		
○ No		

# **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

Auditor Overall Determination
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
Does Not Meet Standard (requires corrective action)

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

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and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# Official Response Following a Resident Report

#### 115.263: Reporting to other confinement facilities

**115.263 (a):** Upon receiving an allegation that a resident was sexually abused while confined at another facility, the head of the facility that received the allegation shall notify the head of the facility or appropriate office of the agency where the alleged abuse occurred.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	
115.263 (a)-1	The agency has a policy requiring that, upon receiving an allegation that a resident 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.  • Upload/select policy on agency reporting to other confinement facilities	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not
115.263 (a)-2	During the past 12 months, the number of allegations the facility received that a resident was abused while confined at another facility:	(Number only) Enter Comment	be included in the interim or final reports.  Clarification requested
115.263 (a)-3	Please describe your facility's response to these allegations:	Enter Comment	Additional documentation requested

#### **Audit**

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

Provision Findings	
○ Yes	
○ No	

**115.263 (b):** Such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation.

Pre-Audit		Issue Log Notes		
Section	Question Text		Agency/Facility Response	

115.263 (b)-1

Agency policy requires the facility head to provide such notification as soon as possible, but no later than 72 hours after receiving the allegation.

> If applicable, select policy on agency reporting to other confinement facilities and indicate relevant page/section

Yes/No		
○ Yes ○ No		
Enter Comment	_	

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### **Audit**

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?\*

Provision Findings		
○ Yes		
○ No		

**115.263 (c):** The agency shall document that it has provided such notification.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.263 (c)-1	The agency or facility documents that it has provided such notification within 72 hours of receiving the allegation.  • Upload/select documentation of notifications	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested

# Audit

### **Documentation Review**

• Documentation of notifications to verify that they occurred within 72 hours of receiving allegation.

# **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Does the agency document that it has provided such notification?*
---

3 ,	•
Provision Findings	
○ Yes	
○ No	

**115.263 (d):** The facility head or agency office that receives such notification shall ensure that the allegation is investigated in accordance with these standards.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.263 (d)-1	The agency or facility policy requires that allegations received from other facilities and agencies are investigated in accordance with the PREA standards.  • Upload/select policy	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or
115.263 (d)-2	In the past 12 months, the number of allegations of sexual abuse the facility received from other facilities:	(Number only) Enter Comment	additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested

# **Audit**

# **Interview Guides**

- Agency head Q: 5
- Director or designee Q: 12, 13

#### **Documentation Review**

• Documentation of allegations from other facilities and documentation of responses (i.e., evidence that allegation has been investigated in accordance with the standard).

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

#### **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

#### **Auditor Overall Determination**

<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
<ul> <li>Does Not Meet Standard (requires corrective action)</li> </ul>

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

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# Official Response Following a Resident Report

#### 115.264: Staff first responder duties

**115.264 (a):** Upon learning of an allegation that a resident was sexually abused, the first security staff member to respond to the report shall be required to: (1) Separate the alleged victim and abuser; (2) Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence; (3) If the abuse occurred within a time period that still allows for the collection of physical evidence, 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; and (4) If the abuse occurred within a time period that still allows for the collection of physical evidence, 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.

Pre-Audit		Issue Log Notes		
Section	<b>Question Text</b>		Agency/Facility Response	

115.264 (a)-1	The agency has a first responder policy for allegations of sexual abuse. If "No", skip to 115.264(a)-6.  • Upload/select policy on first responder duties	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies
115.264 (a)-2	The policy requires that, upon learning of an allegation that a resident was sexually abused, the first security staff member to respond to the report shall be required to separate the alleged victim and abuser.  • If applicable, select policy on first responder duties and indicate relevant page/section	Yes/No Yes No  Enter Comment	clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested
115.264 (a)-3	The policy requires that, upon learning of an allegation that a resident was sexually abused, the first security staff member to respond to the report shall be required to preserve and protect any crime scene until appropriate steps can be taken to collect any evidence.  • If applicable, select policy on first responder duties and indicate relevant page/section	Yes/No Yes No  Enter Comment	Additional documentation requested
115.264 (a)-4	The policy requires that, upon learning of an allegation that a resident was sexually abused and 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 shall be 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.	Yes/No Yes No  Enter Comment	

	<ul> <li>If applicable, select policy on first responder duties and indicate relevant page/section</li> </ul>	
115.264 (a)-5	The policy requires that, upon learning of an allegation that a resident was sexually abused and 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 shall be required to ensure that the alleged abuser not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.  • If applicable, select policy on first responder duties and indicate relevant page/section	Yes/No Yes No  Enter Comment
115.264 (a)-6	In the past 12 months, the number of allegations that a resident was sexually abused:	(Number only) Enter Comment
115.264 (a)-7	Of these allegations, the number of times the first security staff member to respond to the report separated the alleged victim and abuser:	(Number only) Enter Comment
115.264 (a)-8	In the past 12 months, the number of allegations where staff were notified within a time period that still allowed for the collection of physical evidence:	(Number only) Enter Comment
115.264 (a)-9	Of these allegations in the past 12 months where staff were notified within a time period that still allowed for the collection of physical evidence, the number of times the first security staff member to respond to the report preserved and protected any crime scene until appropriate steps could be taken to collect any evidence:	(Number only) Enter Comment

#### 115.264 Of these allegations in the past 12 (a)-10 months where staff were notified (Number only) within a time period that still allowed **Enter Comment** for the collection of physical evidence, the number of times the first security staff member to respond to the report requested 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: 115.264 Of these allegations in the past 12 (a)-11 months where staff were notified (Number only) within a time period that still allowed **Enter Comment** for the collection of physical evidence, the number of times the first security staff member to respond to the report ensured that the alleged abuser not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or

#### **Audit**

#### **Interview Guides**

eating:

- Security Staff and Non-Security Staff First Responders Q: 1
- Residents who Reported a Sexual Abuse Q: 1,2,3

## **Documentation Review**

Documentation of facility response to sexual abuse allegations.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

member to respond to the report required to separate the direged victim and abaser.
Provision Findings
○ Yes
○ No
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?*

<b>Provision Findings</b>		
○ Yes		
○ No		

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?\*

Provision Findings		
○ Yes		
○ No		

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?\*

<b>Provision Findings</b>		
Yes		
○ No		

**115.264 (b):** If the first staff responder is not a security staff member, the responder shall be required to request that the alleged victim not to take any actions that could destroy physical evidence and then notify security staff.

	Pre-Audit		Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.264 (b)-1	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.  • If applicable, select policy on first responder duties and indicate relevant page/section	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the
115.264 (b)-2	Agency policy requires that if the first staff responder is not a security staff member, that responder shall be required to notify security staff.  • If applicable, select policy on first responder duties and indicate relevant page/section	Yes/No Yes No  Enter Comment	auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation
115.264 (b)-3	Of the allegations that a resident was sexually abused made in the past 12 months, the number of times a non-security staff member was the first responder:	(Number only) Enter Comment	requested
115.264 (b)-4	Of those allegations responded to first by a non-security staff member, the number of times that staff member requested that the alleged victim not take any actions that could destroy physical evidence:	(Number only) Enter Comment	
115.264 (b)-5	Of those allegations responded to first by a non-security staff member, the number of times that staff member notified security staff:	(Number only) Enter Comment	
Audi	t		

#### **Interview Guides**

- Security Staff and Non-Security Staff First Responders Q: 1
- Random Sample of Staff Q: 11

#### **Documentation Review**

Documentation of facility response to sexual abuse allegations.

#### **Auditor Personal Notes**

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# **Provision Findings**

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?\*

# Provision Findings Yes No

## **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

### **Auditor Overall Determination**

Auditor Overall Determination
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
<ul> <li>Does Not Meet Standard (requires corrective action)</li> </ul>

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# Official Response Following a Resident Report

#### 115.265: Coordinated response

**115.265 (a):** The facility shall develop 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.

Pre-Audit		Issue Log Notes	
Section	Question Text	Agency/Facility Response	

115.265 (a)-1 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.

 Upload/select facility's institutional plan Yes/No
Yes No

Enter Comment

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### **Audit**

#### **Interview Guides**

• Director or Designee - Q: 14

### **Documentation Review**

 Written institutional plan to coordinate actions taken in response to an incident of sexual abuse.

### **Other Audit Instructions**

• Note to auditors: In order to be compliant, there must be an institutional plan for each facility (not merely agency-wide plan).

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

<b>Provision Findings</b>		
Yes		
○ No		

#### **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

Auditor Overall Determination
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
<ul> <li>Does Not Meet Standard (requires corrective action)</li> </ul>

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# Official Response Following a Resident Report

115.266: Preservation of ability to protect residents from contact with abusers

**115.266 (a):** Neither the agency nor any other governmental entity responsible for collective bargaining on the agency's behalf shall enter into or renew 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.

	Issue Log Notes		
Section	Question Text	Agency/Facility Response	
115.266 (a)-1	The agency, facility, or any other governmental entity responsible for collective bargaining on the agency's behalf has entered into or renewed any collective bargaining agreement or other agreement since August 20, 2012, or since the last PREA audit, whichever is later.  • Upload/select all agreements entered into since August 20, 2012 or since the last PREA audit	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested

**Audit** 

#### **Interview Guides**

• Agency Head - Q: 6

#### **Other Audit Instructions**

 Verify that all agreements permit the agency to remove alleged staff sexual abusers from contact with any residents pending an investigation or a determination of whether and to what extent discipline is warranted.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

#### **Provision Findings**

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?\*

Provision Findings		
○ Yes		
○ No		

**115.266 (b):** Nothing in this standard shall restrict the entering into or renewal of agreements that govern: (1) The conduct of the disciplinary process, as long as such agreements are not inconsistent with the provisions of §115.272 and 115.276; or (2) Whether a no-contact assignment that is imposed pending the outcome of an investigation shall be expunged from or retained in the staff member's personnel file following a determination that the allegation of sexual abuse is not substantiated.

#### **Other Audit Instructions**

Auditor is not required to audit this provision.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

#### **Supporting Documentation**

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Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

#### **Auditor Overall Determination**

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

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

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# Official Response Following a Resident Report

#### 115.267: Agency protection against retaliation

**115.267 (a):** The agency shall establish 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, and shall designate which staff members or departments are charged with monitoring retaliation.

	Pre-Audit			
Section	Question Text	Agency/Facility Response		
115.267 (a)-1	The agency has 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.  • Upload/select policy protecting residents against retaliation	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation	
115.267 (a)-2	The agency designates staff member(s) or charges department(s) with monitoring for possible retaliation. If "YES", provide staff name(s), title(s), and department(s) in the comments section.	Yes/No Yes No  Enter Comment	requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested	

# **Audit**

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

Provision Findings	
Yes	
○ No	
Has the agency designated which staff memonitoring retaliation?*	embers or departments are charged with
Provision Findings	

**115.267 (b):** The agency shall employ multiple protection measures, 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 for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.

**Pre-Audit** 

Issue Log Notes

#### **Audit**

#### **Interview Guides**

- Agency Head Q: 7
- Director or Designee Q: 15
- Designated Staff Member Charged with Monitoring Retaliation (or Director if none available) Q: 1, 2, 3
- Residents who Reported a Sexual Abuse Q: 25

### **Documentation Review**

• Documentation of any protective measures taken.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Does the agency employ multiple protection measures, 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 for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?\*

Provision Findings	
○ Yes	
○ No	

**115.267 (c):** For at least 90 days following a report of sexual abuse, the agency shall monitor the conduct and treatment of residents or staff who reported the sexual abuse and 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, and shall act promptly to remedy any such retaliation. Items the agency should monitor include any resident disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. The agency shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	

115.267 (c)-1	The agency/facility monitors the conduct or treatment of residents or staff who reported sexual abuse and of residents who were reported to have suffered sexual abuse to see if there are any changes that may suggest possible retaliation by residents or staff.  • If applicable, select policy on protecting residents against retaliation and indicate relevant page/section	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in
115.267 (c)-2	If YES, the length of time that the agency/facility monitors the conduct or treatment:	Enter Comment	the interim or final reports.  Clarification requested
115.267 (c)-3	The agency/facility acts promptly to remedy any such retaliation.  • If applicable, select policy on protecting residents against retaliation and indicate relevant page/section	Yes/No Yes No  Enter Comment	Additional documentation requested
115.267 (c)-4	The agency/facility continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need.  • If applicable, select policy on protecting residents against retaliation and indicate relevant page/section	Yes/No Yes No  Enter Comment	
115.267 (c)-5	The number of times an incident of retaliation occurred in the past 12 months:	(Number only) Enter Comment	
Δudi	<b>+</b>		

# **Interview Guides**

- Director or Designee Q: 16
- Designated Staff Member Charged with Monitoring Retaliation (or Director if none available) Q: 4, 5, 6

#### **Documentation Review**

- Documentation of retaliation monitoring efforts.
- Documentation of reports of retaliation and agency response.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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?\*

<b>Provision Findings</b>		
Yes		
○ No		

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?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

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?\*

Provision Findings
Yes
○ No
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?*
Provision Findings
○ Yes
○ No
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:4.
Monitor resident housing changes?*
Provision Findings
○ Yes
○ No
<b>0 110</b>
Except in instances where the exercise determines that a report of cavual abuse is
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?*
Provision Findings
○ Yes
○ No
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?*
Provision Findings
○ Yes
○ No
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
reassignment of staff?*
Provision Findings
○ Yes
○ No
Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates
a continuing need?*
Provision Findings
○ Yes

○ No	
<b>115.267 (d):</b> In the case of residents, such monitoring shall also include checks.	de periodic status
Pre-Audit	Issue Log Notes
Audit	
Interview Guides	
<ul> <li>Designated Staff Member Charged with Monitoring Retaliation available) - Q: 4</li> </ul>	(or Director if none
Documentation Review	
Documentation of retaliation monitoring of residents.	
Auditor Personal Notes	
<b>Auditor's Personal Notes:</b> This text will not be included in your report findings for the interim/final report should go in the discussion following Compliance Determination.	•
Provision Findings	
In the case of residents, does such monitoring also include periodic state.  Provision Findings  Yes No	atus checks?*

115.267 (e): If any other individual who cooperates with an investigation expresses a fear of

retaliation, the agency shall take appropriate measures to protect that individual against

Pre-Audit

Issue Log
Notes

Audit

#### **Interview Guides**

- Agency Head Q: 8
- Director or Designee Q: 15, 16

#### **Documentation Review**

• Documentation of any such protective measures taken.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

**115.267 (f):** An agency's obligation to monitor shall terminate if the agency determines that the allegation is unfounded.

#### **Other Audit Instructions**

Auditor is not required to audit this provision.

#### **Auditor Personal Notes**

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#### **Supporting Documentation**

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Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

#### **Auditor Overall Determination**

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

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

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# **Investigations**

#### 115.271: Criminal and administrative agency investigations

**115.271 (a):** When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, it shall do so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports.

	Pre-Audit			
Section	Question Text	Agency/Facility Response		
115.271 (a)-1	The agency/facility has a policy related to criminal and administrative agency investigations.  • Upload/select policy related to criminal and administrative agency investigations	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested	

# **Audit**

#### **Interview Guides**

• Investigative Staff - Q: 5, 8

#### **Documentation Review**

• Sample of investigative records/reports for allegations of sexual abuse or sexual harassment.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.221(a). )\*

<b>Provision Findings</b>	
○ Yes	
○ No	
○ N/A	

Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.221(a). )\*

<b>Provision Findings</b>		
Yes		
○ No		
O N/A		

**115.271 (b):** Where sexual abuse is alleged, the agency shall use investigators who have received special training in sexual abuse investigations pursuant to § 115.234.

#### **Interview Guides**

• Investigative Staff - Q: 1, 2

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

### **Provision Findings**

Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.234?\*

# Provision Findings Yes No

**115.271 (c):** Investigators shall gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator.

**Pre-Audit** 

Issue Log Notes

#### **Audit**

#### **Interview Guides**

• Investigative Staff - Q: 6, 7, 9

#### **Documentation Review**

• Investigative reports, record retention schedule, and copies of case records detailing allegations of abuse.

# **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?\*

available physical and DNA evidence and any available electronic monitoring data?*
Provision Findings  Yes No
Do investigators interview alleged victims, suspected perpetrators, and witnesses?*
Provision Findings  Yes No
Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?*
Provision Findings  Yes No

**115.271 (d):** When the quality of evidence appears to support criminal prosecution, the agency shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.

#### **Interview Guides**

• Investigative Staff - Q: 10

#### **Documentation Review**

• Sample of criminal and administrative investigation reports.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

Provision Findings		
○ Yes		
○ No		

**115.271 (e):** The credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person's status as resident or staff. No agency shall require a resident who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation.

#### **Interview Guides**

- Investigative Staff Q: 11, 12
- Residents who Reported a Sexual Abuse Q: 13

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

Provision Findings		
○ Yes		
○ No		

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?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

**115.271 (f):** Administrative investigations: (1) Shall include an effort to determine whether staff actions or failures to act contributed to the abuse; and (2) Shall be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.

#### **Interview Guides**

• Investigative Staff - Q: 16, 17

#### **PREA Audit Site Review**

#### **RECORD STORAGE**

During the site review, the auditor must:

- <u>Observe</u> the physical storage area of any information/documentation collected and maintained in hard copy pursuant to the PREA Standards (e.g., risk screening information, medical records, sexual abuse allegations) to determine if the area is secured (e.g., key card, lock and key).
- <u>Observe</u> 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:

• <u>Have informal conversations</u> with staff regarding access to secure information, including medical and mental health files, 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).

#### **Documentation Review**

- Sample of administrative investigation reports.
- Sample of cases involving substantiated allegations to ensure that they were referred for prosecution.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?\*

Provision Findings		
○ Yes		
○ No		

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?\*

Provision Findings		
○ Yes		
○ No		

**115.271 (g):** Criminal investigations shall be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible.

**Pre-Audit** 

Issue Log Notes

#### **Audit**

#### **Interview Guides**

• Investigative Staff - Q: 18

### **PREA Audit Site Review**

• Review the site review instructions outlined in provision (f).

#### **Documentation Review**

• Sample of criminal investigation reports.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

**115.271 (h):** Substantiated allegations of conduct that appears to be criminal shall be referred for prosecution.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	

115.271 (h)-1	Substantiated allegations of conduct that appear to be criminal are referred for prosecution.	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate
115.271 (h)-2	The number of substantiated allegations of conduct that appear to be criminal that were referred for prosecution since August 20, 2012, or since the last PREA audit, whichever is later:	(Number only) Enter Comment	an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested

# **Interview Guides**

• Investigative Staff - Q: 13

# **Documentation Review**

• Sample of cases referred for prosecution.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?\*

Provision Findings		
○ Yes		
○ No		

**115.271 (i):** The agency shall retain all written reports referenced in paragraphs (f) and (g) of this section for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

#### **Issue Log Pre-Audit** Notes Agency/Facility **Section Question Text** Response The text and 115.271 The agency retains all written reports Yes/No checkboxes (i)-1pertaining to the administrative or Yes No criminal investigation of alleged below can be **Enter Comment** sexual abuse or sexual harassment for used to populate as long as the alleged abuser is an audit Issue Log that incarcerated or employed by the identifies agency, plus five years. clarifications or · If applicable, select policy on additional criminal and administrative documentation agency investigations and requested by the indicate relevant page/section auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### **Audit**

#### **PREA Audit Site Review**

• Review the site review instructions outlined in provision (f).

#### **Documentation Review**

• Sample of investigation reports (including older reports, if applicable).

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

#### **Provision Findings**

Does the agency retain all written reports referenced in 115.271(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?\*

# Provision Findings Yes No

**115.271** (j): The departure of the alleged abuser or victim from the employment or control of the facility or agency shall not provide a basis for terminating an investigation.

**Pre-Audit** 

Issue Log Notes

#### **Audit**

#### **Interview Guides**

• Investigative Staff - Q: 14

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

Provision Findings		
○ Yes		
○ No		

**115.271 (k):** Any State entity or Department of Justice component that conducts such investigations shall do so pursuant to the above requirements.

**Pre-Audit** 

Issue Log Notes

#### **Audit**

#### **Other Audit Instructions**

Auditor is not required to audit this provision.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

**115.271 (I):** When outside agencies investigate sexual abuse, the facility shall cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation.

#### **Pre-Audit**

#### **Audit**

#### **Interview Guides**

- Director or Designee Q: 9
- PREA Coordinator Q: 20
- Investigative Staff Q: 15

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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 any form of administrative or criminal sexual abuse investigations. See 115.221(a).)\*

Provision Findings				
○ Yes				
○ No				
○ N/A				

# **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

#### **Auditor Overall Determination**

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

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# **Investigations**

#### 115.272: Evidentiary standard for administrative investigations

**115.272 (a):** The agency shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	

115.272 (a)-1 The agency imposes a standard of a preponderance of evidence or a lower standard of proof when determining whether allegations of sexual abuse or sexual harassment can be substantiated.

 Upload/select policy on standards for administrative investigations Yes/No
Yes No

Enter Comment

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### **Audit**

#### **Interview Guides**

• Investigative Staff - Q: 19

### **Documentation Review**

• Documentation of administrative findings for proper standard of proof.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

Provision Findings		
○ Yes		
○ No		

### **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

Auditor Overall Determination
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
<ul> <li>Does Not Meet Standard (requires corrective action)</li> </ul>

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# **Investigations**

115.273: Reporting to residents

**115.273 (a):** Following an investigation into an resident's allegation of sexual abuse suffered in an agency facility, the agency shall inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.273 (a)-1	The agency has a policy requiring that any resident who makes an allegation that he or she 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.  • Upload/select:  • policy on resident notification requirements  • sample of alleged sexual abuse investigations completed by the agency	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation
115.273 (a)-2	The number of criminal and/or administrative investigations of alleged resident sexual abuse that were completed by the agency/facility in the past 12 months:	(Number only) Enter Comment	requested
115.273 (a)-3	Of the alleged sexual abuse investigations that were completed in the past 12 months, the number of residents who were notified, verbally or in writing, of the results of the investigation:	(Number only) Enter Comment	

# **Audit**

# **Interview Guides**

- Director or Designee Q: 10
- Investigative Staff Q: 20
- Residents who Reported a Sexual Abuse Q: 14

#### **Documentation Review**

· Additional sample of alleged sexual abuse investigations completed by agency.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Following an investigation into a resident's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?\*

<b>Provision Findings</b>	
○ Yes	
○ No	

**115.273 (b):** If the agency did not conduct the investigation, it shall request the relevant information from the investigative agency in order to inform the resident.

Pre-Audit			Issue Log Notes
Section	<b>Question Text</b>	Agency/Facility Response	

115.273 (b)-1	If an outside entity conducts such investigations, the agency requests the relevant information from the investigative entity in order to inform the resident of the outcome of the investigation. Check N/A if the agency/facility is responsible for conducting administrative and criminal investigations and skip to 115.273(c)-1.  • Upload/select sample of alleged sexual abuse investigations completed by outside agency	Yes/No Yes No N/A  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.
115.273 (b)-2	The number of investigations of alleged resident sexual abuse in the facility that were completed by an outside agency in the past 12 months:	(Number only) Enter Comment	Clarification requested Additional documentation requested
115.273 (b)-3	Of the outside agency investigations of alleged sexual abuse that were completed in the past 12 months, the number of residents alleging sexual abuse in the facility who were notified verbally or in writing of the results of the investigation:	(Number only) Enter Comment	

# Audit

#### **Documentation Review**

• Additional sample of alleged sexual abuse investigations completed by outside agency.

# **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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.)\*

Provision Findings			
Yes			
○ No			
○ N/A			

**115.273** (c): Following a resident's allegation that a staff member has committed sexual abuse against the resident, the agency shall subsequently inform the resident (unless the agency has determined that the allegation is unfounded) whenever: (1) The staff member is no longer posted within the resident ⟨⟨o⟩'s unit; (2) The staff member is no longer employed at the facility; (3) The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or (4) The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	

# 115.273 (c)-1staff member has committed sexual abuse against the resident, the agency/facility subsequently informs the resident (unless the agency has determined that the allegation is unfounded) whenever: (a) the staff the agency learns that the staff member has been indicted on a the facility; or (d) the agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility. • If applicable, select policy on resident notification requirements and indicate relevant page/section

Following a resident's allegation that a member is no longer posted within the resident's unit; (b) the staff member is no longer employed at the facility; (c) charge related to sexual abuse within

Yes/No ○ Yes ○ No **Enter Comment**  The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### 115.273 (c)-2

There has been a substantiated or unsubstantiated complaint (i.e., not unfounded) of sexual abuse committed by a staff member against a resident in an agency facility in the past 12 months.

> • Upload/select sample documentation of substantiated or unsubstantiated complaints

Yes/No

Yes No

**Enter Comment** 

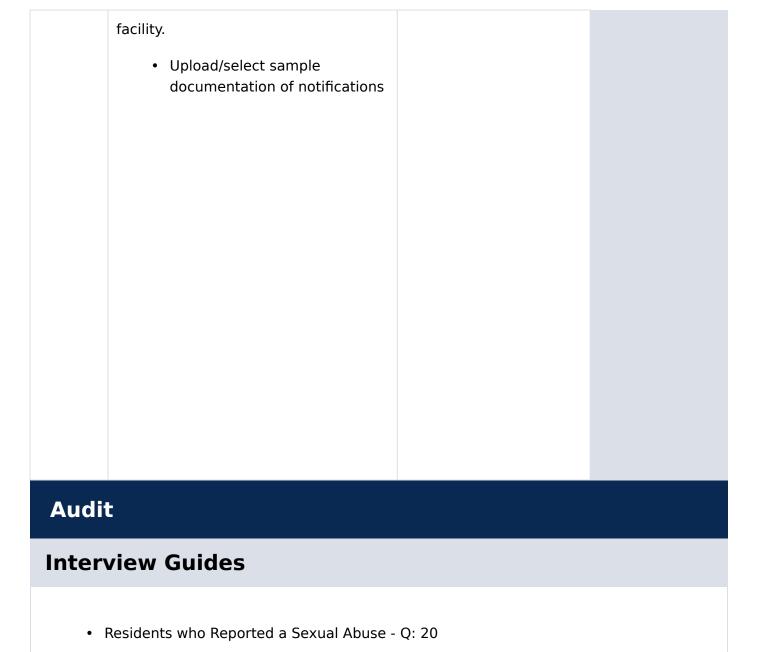
#### 115.273 (c)-3

If YES, in each case the agency subsequently informed the resident whenever: (a) the staff member was no longer posted within the resident's unit; (b) the staff member was no longer employed at the facility; (c) the agency learned that the staff member was indicted on a charge related to sexual abuse within the facility; or (d) the agency learned that the staff member was convicted on a charge related to sexual abuse within the

Yes/No

○ Yes ○ No

**Enter Comment** 



## **Documentation Review**

- Additional sample documentation of founded complaints.
- Additional sample documentation of notifications.

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

<b>Provision Findings</b>	
Yes	
○ No	

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?\*

Provision Findings	
○ Yes	
○ No	

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?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

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?\*

Provision Findings		
○ Yes		
○ No		

**115.273 (d):** Following a resident's allegation that he or she has been sexually abused by another resident, the agency shall subsequently inform the alleged victim whenever: 1) The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or 2) The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. All such notifications or attempted notifications shall be documented.

	Pre-Audit		Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.273 (d)-1	Following a resident's allegation that he or she has been sexually abused by another resident in an agency facility, the agency subsequently informs the alleged victim whenever:  (a) the agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or (b) the agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.  • Upload/select sample documentation of notifications  • If applicable, also select policy on resident notification requirements and indicate relevant page/section	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested

# **Audit**

# **Interview Guides**

• Residents who Reported a Sexual Abuse - Q: 21

# **Documentation Review**

• Additional sample documentation of notifications.

# **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

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?\*

<b>Provision Findings</b>		
Yes		
○ No		

115.273 (e): All such notifications or attempted notifications shall be documented.

	Pre-A	udit	Issue Log Notes
Section	Question Text	Agency/Facility Response	

115.273 (e)-1	The agency has a policy that all notifications to residents described under this standard are documented.  • Upload/select:  • policy on documentation of notifications  • sample documentation of notifications	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the
115.273 (e)-2	In the past 12 months, the number of notifications to residents that were provided pursuant to this standard:	(Number only) Enter Comment	auditor. Note: this text will not be included in the interim or
115.273 (e)-3	Of those notifications made in the past 12 months, the number that were documented:	(Number only) Enter Comment	final reports.  Clarification requested Additional documentation requested

#### **Audit**

#### **Documentation Review**

• Logs or other documentation of notifications to confirm number provided.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Does the agency document all such notifications or attempted notifications?\*

#### **Provision Findings**

○ Yes			
○ No			

**115.273 (f):** An agency's obligation to report under this standard shall terminate if the resident is released from the agency's custody.

#### **Pre-Audit**

Issue Log Notes

#### Audit

#### Other Audit Instructions

Auditor is not required to audit this provision.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

#### **Auditor Overall Determination**

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

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# **Discipline**

#### 115.276: Disciplinary sanctions for staff

**115.276 (a):** Staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	
115.276 (a)-1	Staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.  • Upload/select policy on staff disciplinary sanctions	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested

# **Audit**

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?\*

Provision Findings		
Yes		
○ No		

**115.276 (b):** Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.

		Pre-Audit		Issue Log Notes
Section	Question Text		Agency/Facility Response	

115.276 (b)-1	In the past 12 months, the number of staff from the facility who have violated agency sexual abuse or sexual harassment policies:  • Upload/select sample records of terminations, resignations, or other sanctions for violation of sexual abuse or harassment policy • If applicable, also select policy on staff disciplinary sanctions and indicate relevant page/ section	(Number only) Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or
115.276 (b)-2	In the past 12 months, the number of staff from the facility who have been terminated (or resigned prior to termination) for violating agency sexual abuse or sexual harassment policies:	(Number only) Enter Comment	final reports.  Clarification requested  Additional documentation requested

#### **Audit**

#### **Documentation Review**

• Additional sample records of terminations, resignations, or other sanctions for violation of sexual abuse or sexual harassment policies.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?\*

Provision Findings		
Yes		
○ No		

115.276 (c): Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be 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.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	
115.276 (c)-1	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.  • If applicable, select policy on staff disciplinary sanctions and indicate relevant page/section	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or
115.276 (c)-2	In the past 12 months, the number of staff from the facility who have been disciplined, short of termination, for violation of agency sexual abuse or sexual harassment policies (other than actually engaging in sexual abuse):	(Number only) Enter Comment	final reports.  Clarification requested Additional documentation requested
Audi	t		

# **Documentation Review**

• Records of disciplinary sanctions taken against staff for violations of the agency sexual abuse or sexual harassment policies in the past 12 months.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

### **Provision Findings**

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?\*

<b>Provision Findings</b>	
○ Yes	
○ No	

**115.276 (d):** 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, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.

Pre-Audit		Issue Log Notes		
Section	Question Text		Agency/Facility Response	

115.276 All terminations for violations of The text and Yes/No checkboxes (d)-1agency sexual abuse or sexual ○ Yes ○ No harassment policies, or resignations below can be **Enter Comment** by staff who would have been used to populate terminated if not for their resignation, an audit Issue Log that are reported to law enforcement agencies (unless the activity was identifies clarifications or clearly not criminal) and to any additional relevant licensing bodies. documentation · If applicable, select policy on requested by the staff disciplinary sanctions and auditor. Note: indicate relevant page/section this text will not be included in the interim or 115.276 In the past 12 months, the number of final reports. (d)-2staff from the facility that have been (Number only) Clarification reported to law enforcement or Enter Comment requested licensing boards following their Additional termination (or resignation prior to documentation termination) for violating agency requested sexual abuse or sexual harassment policies:

#### **Audit**

#### **Documentation Review**

 Reports to law enforcement for violations of agency sexual abuse or sexual harassment policies.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

### **Provision Findings**

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?\*

Provision Findings
Yes
No

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?\*

Provision Findings

# **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

Auditor Overall Determination
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
<ul> <li>Does Not Meet Standard (requires corrective action)</li> </ul>

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

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# **Discipline**

Yes No

#### 115.277: Corrective action for contractors and volunteers

**115.277 (a):** Any contractor or volunteer who engages in sexual abuse is prohibited from contact with residents and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.277 (a)-1	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.  • Upload/select policy on corrective actions for contractors and volunteers	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the
115.277 (a)-2	Agency policy requires that any contractor or volunteer who engages in sexual abuse be prohibited from contact with residents.  • If applicable, select policy on corrective actions for contractors and volunteers and indicate relevant page/ section	Yes/No Yes No  Enter Comment	auditor. Note: this text will not be included in the interim or final reports.  Clarification requested  Additional documentation requested
115.277 (a)-3	In the past 12 months, contractors or volunteers have been reported to law enforcement agencies and relevant licensing bodies for engaging in sexual abuse of residents.  • Upload/select reports of sexual abuse of residents by contractors or volunteers	Yes/No Yes No  Enter Comment	
115.277 (a)-4	In the past 12 months, the number of contractors or volunteers reported to	(Number only)	

	law enforcement for engaging in sexual abuse of residents:	Enter Comment	
Audit			

#### **Documentation Review**

- Documentation of referrals to law enforcement and/or relevant licensing bodies.
- Investigative reports if relevant.

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Is any contractor or volunteer who engages in sexual abuse prohibited from contact with residents?\*

PIOVISION	Findings
Yes	
O No	
-	tor or volunteer who engages in sexual abuse reported to: Law enforcement ess the activity was clearly not criminal)?*
Provision	Findings
Yes	
○ No	
ls any contrad bodies?*	tor or volunteer who engages in sexual abuse reported to: Relevant licensing
Provision	Findings
1 104131011	
Yes	

abuse or sexual harassment policies by a contractor or volunteer.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	

115.277 (b)-1

The facility takes appropriate remedial measures and considers whether to prohibit further contact with residents in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.

 Upload/select documentation of remedial measures that have been enforced Yes/No
Yes No

Enter Comment

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### **Audit**

#### **Interview Guides**

• Director or Designee - Q: 17

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

Provision Findings		
○ Yes		
○ No		

#### **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

Auditor Overall Determination
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
Opes Not Meet Standard (requires corrective action)

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# **Discipline**

#### 115.278: Disciplinary sanctions for residents

**115.278 (a):** Residents shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the resident engaged in resident-on-resident sexual abuse or following a criminal finding of guilt for resident-on-resident sexual abuse.

	re subject to disciplinary nly pursuant to a formal	Agency/Facility Response Yes/No	
	nly pursuant to a formal	Yes/No	
administrat engaged in sexual abus	process following an ive finding that a resident resident-on-resident se.  Dad/select policy on dent disciplinary sanctions	Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation
(a)-2 sanctions of disciplinary criminal find on-resident	re subject to disciplinary nly pursuant to a formal process following a ding of guilt for resident- sexual abuse.  pplicable, select policy on dent disciplinary sanctions indicate relevant page/ cion	Yes/No Yes No  Enter Comment	requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested
(a)-3 administrat	12 months, the number of ive findings of resident-on-kual abuse that have the facility:	(Number only) Enter Comment	
(a)-4 criminal find	12 months, the number of dings of guilt for residentsexual abuse that have the facility:	(Number only) Enter Comment	

# **Audit**

# **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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, are residents subject to disciplinary sanctions pursuant to a formal disciplinary process?\*

Provision Findings		
○ Yes		
○ No		

**115.278 (b):** Sanctions shall be 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.

#### **Pre-Audit**

Issue Log Notes

#### **Audit**

#### **Interview Guides**

• Director or Designee - Q: 18

# **Documentation Review**

Investigative reports and documentation of sanctions imposed.

### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Are 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?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

**115.278 (c):** The disciplinary process shall consider whether a resident's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.

**Pre-Audit** 

Issue Log Notes

# Audit

#### **Interview Guides**

• Director or Designee - Q: 18

# **Documentation Review**

Investigative reports and documentation of sanctions imposed.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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?\*

Provision Findings		
○ Yes		
○ No		

**115.278 (d):** If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, the facility shall consider whether to require the offending resident to participate in such interventions as a condition of access to programming or other benefits.

	Pre-Audit			
Section	Question Text	Agency/Facility Response		
115.278 (d)-1	The facility offers therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse. If "NO," skip to 115.278 (e)-1.	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue	
115.278 (d)-2	If the facility offers therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse, the facility considers whether to require the offending resident to participate in such interventions as a condition of access to programming or other benefits.	Yes/No Yes No  Enter Comment	Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested	

# **Audit**

### **Interview Guides**

• Medical and Mental Health Staff - Q: 6, 7

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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 require the offending resident to participate in such interventions as a condition of access to programming and other benefits?\*

Provision Findings	
○ Yes	
○ No	

**115.278 (e):** The agency may discipline a resident for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

	Pre-Audit		Issue Log Notes
Section	<b>Question Text</b>	Agency/Facility Response	

115.278 (e)-1

The agency disciplines residents for sexual conduct with staff only upon finding that the staff member did not consent to such contact.

- Upload/select sample of records of disciplinary actions against residents for sexual conduct with staff
- If applicable, also select policy on resident disciplinary sanctions and indicate relevant page/section

Yes/No
Yes No

Enter Comment

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### **Audit**

#### **Documentation Review**

 Additional records of disciplinary actions against residents for sexual conduct with staff.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

Provision Findings		
Yes		
○ No		

**115.278 (f):** For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	
115.278 (f)-1	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.  • If applicable, select policy on resident disciplinary sanctions and indicate relevant page/ section	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested

# **Audit**

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall

Compliance Det	termination.
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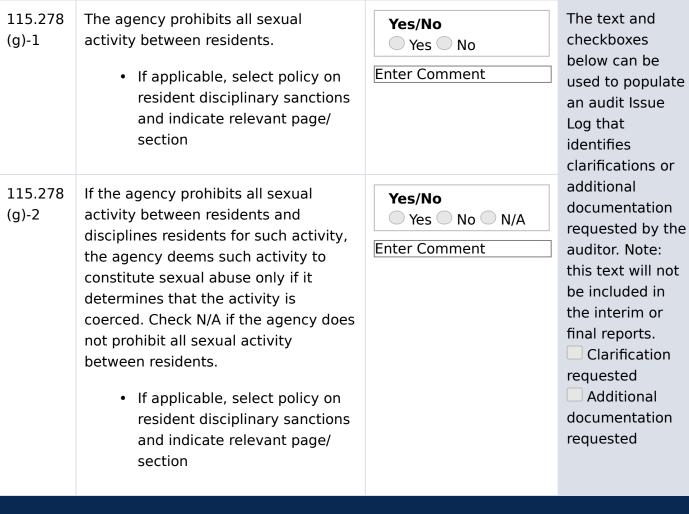
# **Provision Findings**

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?\*

Provision Findings		
○ Yes		
○ No		

**115.278 (g):** An agency may, in its discretion, prohibit all sexual activity between residents and may discipline residents for such activity. An agency may not, however, deem such activity to constitute sexual abuse if it determines that the activity is not coerced.

	Pre-Audit		Issue Log Notes	
Section	Question Text		Agency/Facility Response	



#### **Audit**

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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.)\*

<b>Provision Findings</b>		
Yes		
○ No		
O N/A		

# **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

Auditor	Overall	<b>Determination</b>

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

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

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# **Medical and Mental Care**

#### 115.282: Access to emergency medical and mental health services

**115.282 (a):** Resident victims of sexual abuse shall 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.

Pre-Audit				Issue Log Notes
Section	Question Text		Agency/Facility Response	

115.282 (a)-1 115.282 (a)-2	Resident 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.	Yes/No Yes No  Enter Comment  Yes/No Yes No Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional
115.282 (a)-3	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. (Such documentation is not required by the Standard, but may be helpful to review during the audit.)  • Upload/select sample medical/ mental health secondary forms/logs regarding residents' access to services	Yes No  Enter Comment	documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested

## **Audit**

## **Interview Guides**

- Medical and Mental Health Staff Q: 8, 9, 10
- Residents who Reported a Sexual Abuse Q: 4

## **Documentation Review**

• Additional medical/mental health secondary materials describing access to services.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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?\*

<b>Provision Findings</b>		
Yes		
○ No		

**115.282 (b):** If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders shall take preliminary steps to protect the victim pursuant to § 115.262 and shall immediately notify the appropriate medical and mental health practitioners.

**Pre-Audit** 

Issue Log Notes

#### **Audit**

#### **Interview Guides**

Security Staff and Non-Security Staff First Responders - Q: 1

## **Documentation Review**

• Documentation demonstrating immediate notification of the appropriate medical and mental health practitioners.

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.262?\*

Yes	
No	
Do socurity staff first ros	ponders immediately notify the appropriate medical and mental
health practitioners?*	policers inimediately notify the appropriate medical and mental

**115.282 (c):** Resident victims of sexual abuse while incarcerated shall be 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.

Pre-Audit			Issue Log Notes	
Section	Question Text		Agency/Facility Response	

115.282 (c)-1

Resident 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.

Yes/No
Yes No

Enter Comment

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### **Audit**

## **Interview Guides**

- Medical and Mental Health Staff Q: 11
- Residents who Reported a Sexual Abuse Q: 6

#### **Documentation Review**

• Sample of additional medical/mental health secondary materials describing access to services.

#### **Auditor Personal Notes**

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?\*

Provision Findings	
○ Yes	
○ No	

**115.282 (d):** Treatment services shall be 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.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.282 (d)-1	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 incident.  • Upload/select policy on medical/mental health treatment for sexual abuse	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested

## **Audit**

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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?\*

Provision Findings		
○ Yes		
○ No		

## **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

Auditor Overall Determination
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
<ul> <li>Does Not Meet Standard (requires corrective action)</li> </ul>

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## **Medical and Mental Care**

115.283: Ongoing medical and mental health care for sexual abuse victims and abusers

**115.283 (a):** The facility shall 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.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	
115.283 (a)-1	The facility offers 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.  • Upload/select policy on ongoing medical/mental health treatment for sexual abuse victims and abusers	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested

## **Audit**

#### **Auditor Personal Notes**

Auditor's Personal Notes: This text will not be included in your report. Analysis of your

findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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?\*

Provision Findings		
○ Yes		
○ No		

**115.283 (b):** The evaluation and treatment of such victims shall 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.

#### **Pre-Audit**

Issue Log Notes

#### **Audit**

#### **Interview Guides**

- Medical and Mental Health Staff Q: 12
- Residents who Reported a Sexual Abuse Q: 5

#### **Documentation Review**

 Medical records or secondary documentation that demonstrate victims receive follow-up services and appropriate treatment plans and, when necessary, referrals for continued care following their transfer to or placement in other facilities, or their release from custody.

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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?\*

Provision Findings		
○ Yes		
○ No		

**115.283 (c):** The facility shall provide such victims with medical and mental health services consistent with the community level of care.

#### **Pre-Audit**

Issue Log Notes

#### **Audit**

#### **Interview Guides**

Medical and Mental Health Staff - 0:13

#### **Documentation Review**

• Medical records or secondary documentation that demonstrate victims receive medical and mental health services consistent with community level of care.

#### **Auditor Personal Notes**

Does the facility provide such victims with medical and mental health services consistent with the community level of care?\*

Provision Findings		
○ Yes		
○ No		

**115.283 (d):** Resident victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests.

	Pre-Audit				
Section	Question Text	Agency/Facility Response			
115.283 (d)-1	Female victims of sexually abusive vaginal penetration while incarcerated are offered pregnancy tests. Check N/A if an all-male facility.  • If applicable, select policy on ongoing medical/mental health treatment for sexual abuse victims and abusers and indicate relevant page/section	Yes/No Yes No N/A  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested		

## **Audit**

#### **Interview Guides**

• Residents who Reported a Sexual Abuse - Q: 22

#### **Documentation Review**

 Medical records or secondary documentation that demonstrates that female victims were offered pregnancy tests.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

Are resident victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all-male" facility. Note: in "all-male" facilities, there may be residents who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)\*

Provision Findings		
Yes		
○ No		
O N/A		

**115.283 (e):** If pregnancy results from the conduct described in paragraph (d) of this section, such victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services.

Pre-Audit			Issue Log Notes	
Section	Question Text		Agency/Facility Response	

115.283 (e)-1 If pregnancy results from sexual abuse while incarcerated, victims receive timely and comprehensive information about, and timely access to, all lawful pregnancy-related medical services. Check N/A if an allmale facility.

 If applicable, select policy on ongoing medical/mental health treatment for sexual abuse victims and abusers and indicate relevant page/section Yes/No
Yes No N/A

Enter Comment

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### **Audit**

#### **Interview Guides**

- Medical and Mental Health Staff Q: 14, 15
- Residents who Reported a Sexual Abuse Q: 23

#### **Documentation Review**

• Documentation that victims received timely and comprehensive information about and timely access to all lawful pregnancy-related medical services commensurate with the community level of care.

## **Auditor Personal Notes**

If pregnancy results from the conduct described in paragraph § 115.283(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. Note: in "all-male" facilities, there may be residents who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)\*

<b>Provision Findings</b>	
○ Yes	
○ No	
○ N/A	

**115.283 (f):** Resident victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections as medically appropriate.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	

115.283 (f)-1 Resident victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate.

 If applicable, select policy on ongoing medical/mental health treatment for sexual abuse victims and abusers and indicate relevant page/section Yes/No
Yes No

Enter Comment

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### **Audit**

## **Interview Guides**

• Residents who Reported a Sexual Abuse - Q: 7

## **Documentation Review**

• Medical records or secondary documentation that demonstrate victims were offered tests for sexually transmitted infections as medically appropriate.

## **Auditor Personal Notes**

Are resident victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?\*

<b>Provision Findings</b>		
Yes		
○ No		

**115.283 (g):** Treatment services shall be 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.

**Pre-Audit** 

Issue Log Notes

#### **Audit**

#### **Interview Guides**

• Residents who Reported a Sexual Abuse - Q: 8

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

**115.283 (h):** The facility shall 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.

	Pre-Audit				
Section	Question Text	Agency/Facility Response			
115.283 (h)-1	The facility attempts to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offers treatment when deemed appropriate by mental health practitioners.  • If applicable, select policy on ongoing medical/mental health treatment for sexual abuse victims and abusers and indicate relevant page/section	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested		

## Audit

## **Interview Guides**

• Medical and Mental Health Staff - Q: 16

## **Documentation Review**

• Mental health records or secondary documentation that demonstrate evaluations of

resident-on-resident abusers.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

Does the facility attempt to conduct a mental health evaluation of all known resident-onresident abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners?\*

Provision Findings		
○ Yes		
○ No		

## **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

Auditor Overall Determination
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
Does Not Meet Standard (requires corrective action)

Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

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## **Data Collection and Review**

#### 115.286: Sexual abuse incident reviews

**115.286 (a):** The facility shall 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.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	
115.286 (a)-1	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.  • Upload/select:  • policy on conducting sexual abuse incident reviews  • documentation of sexual abuse incident reviews  • sample documentation of completed criminal or administrative investigations of sexual abuse (if incident review documents contained therein)	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested
115.286 (a)-2	In the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse	(Number only)	

	completed at the facility, excluding only "unfounded" incidents:	Enter Comment	
Audit			
Documentation Review			

 Additional documentation of completed criminal or administrative investigations of sexual abuse.

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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

	on has been determined to be unfounded	?*	
<b>115.286</b> (investigat	<b>b):</b> Such review shall ordinarily occur wion.	ithin 30 days of the conclus	ion of the
	Pre-Audit		Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.286 (b)-1	The facility ordinarily conducts a sexual abuse incident review within 30 days of the conclusion of the criminal or administrative sexual abuse investigation.  • If applicable, select documentation of sexual abuse incident reviews and sample documentation of completed criminal or administrative (if incident review documents contained therein) and indicate relevant page/section	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or
115.286 (b)-2	In the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility that were followed by a sexual abuse incident review within 30 days, excluding only "unfounded" incidents:	(Number only) Enter Comment	final reports.  Clarification requested Additional documentation requested
Audit			
Docui	mentation Review		

• Additional documentation of completed criminal or administrative investigations of sexual abuse.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

Does such review ordinarily occur within 30 days of the conclusion of the investigation?\*

	3
Provision Findings	
Yes	
○ No	

**115.286 (c):** The review team shall include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners.

	Pre-Audit		
Section	Question Text	Agency/Facility Response	

115.286 (c)-1 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.

 If applicable, select policy on sexual abuse incident reviews and indicate relevant page/ section Yes/No
Yes No

Enter Comment

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### **Audit**

## **Interview Guides**

• Director or Designee - Q: 19

## **Documentation Review**

Documentation of sexual abuse incident review team minutes or reports.

#### **Auditor Personal Notes**

Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

**115.286 (d):** The review team shall: (1) Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; (2) Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility; (3) Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; (4) Assess the adequacy of staffing levels in that area during different shifts; (5) Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and (6) Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1)-(d)(5) of this section, and any recommendations for improvement and submit such report to the facility head and PREA Coordinator.

	Pre-Audit		Issue Log Notes
Section	Question Text	Agency/Facility Response	

115.286 (d)-1 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 facility head and PREA Coordinator.

- Upload/select reports of findings from sexual abuse incident reviews
- If applicable, select documentation of sexual abuse incident reviews and indicate relevant page/section

Yes/No
Yes No

Enter Comment

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### **Audit**

## **Interview Guides**

- Director or Designee Q: 20, 21
- PREA Coordinator Q: 25, 26, 27
- Incident Review Team Q: 1, 2, 3, 4

#### **Documentation Review**

• Additional reports of findings from sexual abuse incident reviews.

#### **Auditor Personal Notes**

<b>Provision Findi</b>	ngs
○ Yes	
O No	
ethnicity; gender id	am: Consider whether the incident or allegation was motivated by race; dentity; lesbian, gay, bisexual, transgender, or intersex identification, d status; gang affiliation; or other group dynamics at the facility?*
Provision Findi Yes No	ngs
	am: Examine the area in the facility where the incident allegedly occurred physical barriers in the area may enable abuse?*
Provision Findi Yes No	ngs
Does the review te shifts?*	am: Assess the adequacy of staffing levels in that area during different
shifts?*  Provision Findi	
shifts?*  Provision Findi Yes	
shifts?*  Provision Findi	
shifts?*  Provision Findi Yes No  Does the review te	
shifts?*  Provision Findi Yes No  Does the review te	ngs  am: Assess whether monitoring technology should be deployed or blement supervision by staff?*
Provision Findi Yes No  Does the review te augmented to supp Provision Findi Yes No  Does the review te to determinations reserved.	ngs  am: Assess whether monitoring technology should be deployed or blement supervision by staff?*

**115.286 (e):** The facility shall implement the recommendations for improvement, or shall document its reasons for not doing so.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.286 (e)-1	The facility implements the recommendations for improvement or documents its reasons for not doing so.  • Upload/select:  • documentation supporting implementation of recommendations  • documentation of reasons for not implementing recommendations	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested

## **Audit**

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

Does the facility implement the recommendations for improvement, or document its reasons for not doing so?\*

#### **Provision Findings**



## **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

Auditor Overall Determination
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
<ul> <li>Does Not Meet Standard (requires corrective action)</li> </ul>

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

## **Data Collection and Review**

# 115.287: Data collection 115.287 (a): The agency shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions. Pre-Audit Section Question Text Agency/Facility

		Response	
115.287 (a)-1	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.  • Upload/select:  • policy on sexual abuse data collection; upload/ select set of definitions  • data collection instrument	Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested documentation requested

## **Audit**

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

115.287 (b): The agency shall aggregate the incident-based sexual abuse data at least

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.287 (b)-1	The agency aggregates the incident-based sexual abuse data at least annually.	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested

## **Audit**

## **Documentation Review**

• Sample of aggregated sexual abuse data.

## **Auditor Personal Notes**

Does the agency aggregate the incident-based sexual abuse data at least annually?\*

3 , 33 3	•
Provision Findings	
○ Yes	
○ No	

**115.287 (c):** The incident-based data collected shall 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.

#### **Issue Log Pre-Audit Notes** Agency/Facility **Section Question Text** Response The text and The standardized instrument includes. 115.287 Yes/No (c)-1at a minimum, the data necessary to checkboxes Yes No below can be answer all questions from the most **Enter Comment** recent version of the Survey of Sexual used to populate an audit Issue Violence (SSV) conducted by the Department of Justice. Log that identifies · If applicable, select policy on clarifications or sexual abuse data collection additional and data collection instrument documentation and indicate relevant requested by the page(s)/section(s) auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### **Audit**

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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?\*

•		
<b>Provision Findings</b>		
○ Yes		
○ No		

**115.287 (d):** The agency shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.

Pre-Audit		Issue Log Notes		
Section	Question Text		Agency/Facility Response	

115.287 (d)-1 The agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.

 If applicable, select policy on sexual abuse data collection and indicate relevant page/ section Yes/No
Yes No

Enter Comment

The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports. Clarification requested Additional documentation requested

#### **Audit**

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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?\*

<b>Provision Findings</b>		
Yes		
○ No		

**115.287 (e):** The agency also shall obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents.

Pre-Audit			Issue Log Notes	
Section	Question Text	Agency/Facility Response		
115.287 (e)-1	The agency obtains incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents. Check N/A if agency does not contract for the confinement of its residents and skip to 115.287 (f).  • If applicable, select policy on sexual abuse data collection and indicate relevant page/ section	Yes/No Yes No N/A  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not	
115.287 (e)-2	The data from private facilities complies with SSV reporting regarding content.	Yes/No Yes No  Enter Comment	be included in the interim or final reports.  Clarification requested Additional documentation requested	be included in the interim or final reports.  Clarification requested Additional documentation

## Audit

## **Documentation Review**

• Sample of incident-based and aggregated data from private facility, if applicable.

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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.)\*

Provision Findings			
Yes			
○ No			
○ N/A			

**115.287 (f):** Upon request, the agency shall provide all such data from the previous calendar year to the Department of Justice no later than June 30.

Pre-Audit			Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.287 (f)-1	The agency provided the Department of Justice (DOJ) with data from the previous calendar year upon request. Check N/A if DOJ has not requested agency data.	Yes/No Yes No N/A  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested

## **Audit**

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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.)\*

<b>Provision Findings</b>	
○ Yes	
○ No	
○ N/A	

## **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

## **Auditor Overall Determination**

Auditor Overall Determination
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
Opes Not Meet Standard (requires corrective action)

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

## **Data Collection and Review**

#### 115.288: Data review for corrective action

**115.288 (a):** The agency shall review data collected and aggregated pursuant to § 115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including: (1) Identifying problem areas; (2) Taking corrective action on an ongoing basis; and (3) Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole.

	Issue Log Notes		
Section	Question Text	Agency/Facility Response	
115.288 (a)-1	The agency reviews data collected and aggregated pursuant to §115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training, including: (a) identifying problem areas; (b) taking corrective action on an ongoing basis; and (c) 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.  • Upload/select:  • documentation of corrective action plans • annual report of findings from data reviews/corrective actions	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested

## **Audit**

## **Interview Guides**

• Agency Head - Q: 9

• PREA Coordinator - Q: 21, 22

#### **Documentation Review**

· Additional documentation of corrective action plans.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Does the agency review data collected and aggregated pursuant to § 115.287 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?\*

Provision Findings		
○ Yes		
○ No		

Does the agency review data collected and aggregated pursuant to § 115.287 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?\*

<b>Provision Findings</b>		
Yes		
○ No		

Does the agency review data collected and aggregated pursuant to § 115.287 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?\*

<b>Provision Findings</b>		
○ Yes		
○ No		

**115.288 (b):** Such report shall include a comparison of the current year's data and corrective actions with those from prior years and shall provide an assessment of the agency's progress in addressing sexual abuse.

	Pre-Audit		Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.288 (b)-1	The annual report includes a comparison of the current year's data and corrective actions with those from prior years.  • If applicable, select annual report of findings from data reviews/corrective actions and indicate relevant page/section	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation
115.288 (b)-2	The annual report provides an assessment of the agency's progress in addressing sexual abuse.  • If applicable, select annual report of findings from data reviews/corrective actions and indicate relevant page/section	Yes/No Yes No  Enter Comment	requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested

## **Audit**

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

Provision Findings		
Yes		
○ No		

**115.288 (c):** The agency's report shall be approved by the agency head and made readily available to the public through its Web site or, if it does not have one, through other means.

	Pre-Audit		Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.288 (c)-1	The agency makes its annual report readily available to the public at least annually through its website.  • Provide link to website where annual report is available.	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies
115.288 (c)-2	If NO, the agency makes it available through other means.	Yes/No Yes No  Enter Comment	clarifications or additional documentation requested by the
115.288 (c)-3	The annual reports are approved by the agency head.	Yes/No Yes No  Enter Comment	auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested

# **Audit**

#### **Interview Guides**

Agency Head - Q: 10

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

Provision Findings		
Yes		
○ No		

**115.288 (d):** The agency may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility, but must indicate the nature of the material redacted.

	Pre-Audit	:	Issue Log Notes
Section	Question Text	Agency/Facility Response	

115.288 The text and When the agency redacts material Yes/No checkboxes (d)-1from an annual report for publication, ○ Yes ○ No the redactions are limited to specific below can be **Enter Comment** materials where publication would used to populate present a clear and specific threat to an audit Issue Log that the safety and security of the facility. identifies • If applicable, select annual clarifications or report of findings from data additional reviews/corrective actions and documentation indicate relevant page/section requested by the auditor. Note: this text will not 115.288 The agency indicates the nature of Yes/No be included in (d)-2material redacted. ○ Yes ○ No the interim or **Enter Comment** final reports. • If applicable, select annual Clarification report of findings from data requested reviews/corrective actions and Additional indicate relevant page/section documentation requested

#### **Audit**

#### **Interview Guides**

• PREA Coordinator - Q: 23

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

<b>Provision Findings</b>		
Yes		
○ No		

## **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

Auditor Overall Determination
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>
with the standard for the relevant review period)
Opes Not Meet Standard (requires corrective action)

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# **Data Collection and Review**

115.289: Data storage, publication, and destruction

**115.289 (a):** The agency shall ensure that data collected pursuant to § 115.287 are securely retained.

	Pre-Audit		Issue Log Notes
Section	Question Text	Agency/Facility Response	
115.289 (a)-1	The agency ensures that incident-based and aggregate data are securely retained.  • Upload/select policy on data storage	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested

# **Audit**

## **Interview Guides**

• PREA Coordinator - Q: 21

## **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

<b>Provision Fin</b>	dings	
Yes		
○ No		

**115.289 (b):** The agency shall 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 Web site or, if it does not have one, through other means.

	Pre-Audit				
Section	Question Text	Agency/Facility Response			
115.289 (b)-1	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.  • Upload/select policy on data availability	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested Additional documentation requested Additional documentation requested		
115.289 (b)-2	If NO, the agency makes it available through other means.	Yes/No Yes No  Enter Comment			

# **Audit**

# **Documentation Review**

• Website or other means for publicly available aggregated sexual abuse data.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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?\*

,	9	•	, 3	
Provision	n Findings	3		
○ Yes				
○ No				

**115.289 (c):** Before making aggregated sexual abuse data publicly available, the agency shall remove all personal identifiers.

Pre-Audit			Issue Log Notes	
Section	Question Text		Agency/Facility Response	

115.289 (c)-1	Before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers.	Yes/No Yes No  Enter Comment	The text and checkboxes below can be used to populate an audit Issue
115.289 (c)-2	The agency maintains sexual abuse data collected pursuant to §115.287 for at least 10 years after the date of initial collection, unless federal, state, or local law requires otherwise.  • If Federal, State, or local law requires otherwise, upload/ select copy of the applicable law	Yes/No Yes No  Enter Comment	Log that identifies clarifications or additional documentation requested by the auditor. Note: this text will not be included in the interim or final reports.  Clarification requested  Additional documentation requested

## **Audit**

#### **Documentation Review**

• Sample of publicly available sexual abuse data to check that personal identifiers have been removed.

# **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?\*

Provision Findings  Yes	
○ No	
<b>115.289 (d):</b> The agency shall maintain sexual abuse data collected pursuar at least 10 years after the date of the initial collection unless Federal, State, or otherwise.	
Pre-Audit	Issue Log Notes
Audit	
Documentation Review	
Sample of historical sexual abuse data since August 20, 2012.	
Auditor Personal Notes	
<b>Auditor's Personal Notes:</b> This text will not be included in your report. An findings for the interim/final report should go in the discussion following you Compliance Determination.	•
Provision Findings	
Does the agency maintain sexual abuse data collected pursuant to § 115.28 years after the date of the initial collection, unless Federal, State, or local law otherwise?*	

# **Supporting Documentation**

**Provision Findings** 

Yes No

Supporting Documentation Instructions: Use this button to upload interview notes, your

Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

#### **Auditor Overall Determination**

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

#### Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# **Auditing and Corrective Action**

#### 115.401: Frequency and scope of audits

115.401 (a): During the three-year period starting on August 20, 2013, and during each threeyear period thereafter, the agency shall ensure that each facility operated by the agency, or by a private organization on behalf of the agency, is audited at least once.

**Pre-Audit** 

**Issue Log** Notes

## **Audit**

#### **Documentation Review**

• Review agency records, website, etc. to ensure that each facility has been audited.

#### Other Audit Instructions

• Note. The auditor comments (below) should indicate whether the agency met this standard during the prior three-year audit cycle. If the standard was not met for the prior cycle, the narrative should discuss the agency's plans for future audits during the current audit cycle. See also FAQ: Audit and Compliance, issued April 23, 2014.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

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.)\*

Provision Findings	
Yes	
○ No	

**115.401 (b):** During each one-year period starting on August 20, 2013, the agency shall ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, is audited.

**Pre-Audit** 

Issue Log Notes

#### **Audit**

#### **Documentation Review**

• Review agency records, website, etc. to ensure that one-third of each facility type has been audited.

#### **Other Audit Instructions**

• Note. The auditor comments (below) should indicate whether the agency met this standard during the prior year. If the standard was not met for the prior year, the narrative should discuss the agency's plans for future audits during the upcoming years. See also FAQ: Audit and Compliance, issued April 23, 2014.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)\*

<b>Provision Findings</b>		
Yes		
○ No		

If this is the second year of the current audit cycle, did the agency ensure that at least onethird 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.)\*

<b>Provision Findings</b>		
○ Yes		
○ No		
○ N/A		

If this is the third year of the current audit cycle, did the agency ensure that at least twothirds 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.)\*

<b>Provision Finding</b>	gs		
○ Yes			
○ No			
O N/A			

115.401 (h): The auditor shall have access to, and shall observe, all areas of the audited facilities. **Issue Log** Pre-Audit **Notes Audit Other Audit Instructions** • Note. The agency/facility must have provided the auditor with full access to all areas of the audited agency/facility. If full access was not provided to any areas of the agency/facility, answer "No". **Auditor Personal Notes** Auditor's Personal Notes: This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination. **Provision Findings** Did the auditor have access to, and the ability to observe, all areas of the audited facility?\* **Provision Findings** Yes O No 115.401 (i): The auditor shall be permitted to request and receive copies of any relevant documents (including electronically stored information). **Issue Log Pre-Audit Notes Audit Other Audit Instructions** 

 Note. The agency/facility must have provided the auditor with copies of any requested documents and information (including, among other things, electronically stored information). If copies of any requested documents were not provided, answer "No".

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?\*

<b>Provision Findings</b>		
Yes		
○ No		

**115.401 (m):** The auditor shall be permitted to conduct private interviews with residents.

**Pre-Audit** 

Issue Log Notes

#### **Audit**

#### **Other Audit Instructions**

 Note. The agency/facility must have permitted the auditor to conduct interviews with any residents that were requested by the auditor. The agency/facility must have allowed the auditor to conduct these interviews in a private setting. If the agency/ facility did not allow interviews of certain residents and/or did not allow interviews to be conducted in private, answer "No".

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision Findings**

Was the auditor permitted to conduct private interviews with residents?\*

# Provision Findings Yes No

**115.401 (n):** Residents shall be permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel.

**Pre-Audit** 

Issue Log Notes

#### **Audit**

#### **PREA Audit Site Review**

• Ensure that information about the PREA audit (e.g., Notice of Audit) is posted in all housing units. Ask residents about the notice and how long it has been posted.

#### **Documentation Review**

- Review information provided to residents regarding the confidential nature of any correspondence and communication with the auditor. Ensure that the information is accurate.
- Review methods provided by agency/facility for sending confidential information or correspondence to the auditor, and detail methods in the notes section or upload documentation, if applicable.

# **Other Audit Instructions**

• Note. The agency/facility must have provided residents with information about the PREA audit at least six weeks prior to the site visit. The information or "Notice of Audit" is generally provided to the agency/facility by the auditor, and the agency is required to post such information in all housing units. The information provided to the residents must have included accurate information regarding the confidential nature of any correspondence and communication with the auditor. The agency/facility must have provided residents with a method of sending confidential information or correspondence to the auditor. Such method provided the same level of confidentiality as if the residents were communicating with legal counsel. If any of these elements were not met, answer "No".

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

## **Provision Findings**

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?\*

<b>Provision Findings</b>		
Yes		
○ No		

# **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

## **Auditor Overall Determination**

# Auditor Overall Determination Exceeds Standard (Substantially exceeds requirement of standard) Meets Standard (Substantial compliance; complies in all material ways with the standard for the relevant review period) Does Not Meet Standard (requires corrective action)

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

# **Auditing and Corrective Action**

#### 115.403: Audit contents and findings

**115.403 (f):** The agency shall ensure that the auditor's final report is published on the agency's website if it has one, or is otherwise made readily available to the public.

**Pre-Audit** 

Issue Log
Notes

#### **Audit**

#### **Documentation Review**

• A list of all of the agency's facility and agency audit reports completed 90 days prior to the audit within the appropriate review period, and web links to each of these reports or any other evidence that these reports have been provided publicly if the agency does not have a website.

#### **Auditor Personal Notes**

**Auditor's Personal Notes:** This text will not be included in your report. Analysis of your findings for the interim/final report should go in the discussion following your Overall Compliance Determination.

# **Provision 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.)\*

Provision Findings		
○ Yes		
○ No		
O N/A		

# **Supporting Documentation**

**Supporting Documentation Instructions:** Use this button to upload interview notes, your Site Review Checklist or other site review notes, supporting documentation you have collected during the course of the audit, and/or tag any supplemental files provided by the facility after the Pre-Audit Questionnaire was submitted.

Select File(s) (including supplemental files)

#### **Auditor Overall Determination**

Auditor Overall Determination	
<ul> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> </ul>	
<ul> <li>Meets Standard (Substantial compliance; complies in all material ways</li> </ul>	
with the standard for the relevant review period)	
<ul> <li>Does Not Meet Standard (requires corrective action)</li> </ul>	

# Instructions for Overall Compliance Determination Narrative (this text will appear in your report)

The narrative below must include a comprehensive discussion of all 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 the standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

POST-AUDIT REPORTING INFORMATION	
GENERAL AUDIT INFORMATION	
On-site Audit Dates	
1. Start date of the onsite portion of the audit:	
2. End date of the onsite portion of the audit:	
Audit Notice	
Remember that pursuant to Standard 115.401(j), auditors are required to preserve and retain, and release to DOJ upon request, all audit documentation relied upon in making audit determinations. This includes the notice of the onsite audit and documentation gathered by the auditor to verify that the notice was properly posted (e.g., interview notes, time- stamped photos).	
3. Did you request that the facility post the audit notice at least 6 weeks in advance of the onsite portion of the audit?	○ Yes ○ No
4. Did the facility post the audit notice?	Yes
	○ No

5. What steps did you take to verify whether the notice was posted in required areas by the agreed upon deadline? Check all that apply	■ I requested time-stamped photos of all posted notices from the PREA Coordinator or other authorized point of contact in the facility
	☐ I requested a written assurance (e.g., in an email) from the PREA Coordinator or other authorized point of contact in the facility that the notice was posted as required
	☐ I visited the facility at least 6 weeks before the onsite portion of the audit and personally confirmed that the audit notice was posted as required
	During the onsite portion of the audit I asked all inmate/resident/detainee interviewees about the timing and placement of the audit notice
	Other
Confidential Correspondence	
6. Did you receive any confidential correspondence from INMATES/	○ Yes
RESIDENTS/DETAINEES that was relevant to sexual safety in the facility?	○ No
7. Did you receive any confidential correspondence from STAFF that was	○ Yes
relevant to sexual safety in the facility?	○ No
8. Did you receive any confidential	
	○ Yes
correspondence from VOLUNTEERS OR CONTRACTORS that was relevant to sexual safety in the facility?	○ Yes ○ No
correspondence from VOLUNTEERS OR CONTRACTORS that was relevant to sexual safety in the facility?  9. Did you receive any confidential	
correspondence from VOLUNTEERS OR CONTRACTORS that was relevant to sexual safety in the facility?	○ No

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Outreach	
10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	Yes No
Research	
11. Did you review mandatory reporting	○ Yes
laws for the state where the facility is located?	○ No
12. Did you review the agency and/or facility website(s) for PREA information	Yes
(e.g., how to make a third-party report, PREA investigation policies, other	○ No
policies, etc.)?	○ NA
13. Did you conduct internet research regarding the audited facility (e.g.,	Yes
litigation related to sexual abuse or sexual harassment, federal consent	○ No
decrees, etc.)?	
AUDITED FACILITY INFORMATION	
14. Designated facility capacity:	
15. Average daily population for the past 12 months:	
16. Number of inmate/resident/detainee housing units:	

DOJ PREA Working Group FAQ on the definition of a housing unit: How is a "housing unit" defined for the purposes of the PREA Standards? The question has been raised in particular as it relates to facilities that have adjacent or interconnected units. The most common concept of a housing unit is architectural. The generally agreed-upon definition is a space that is enclosed by physical barriers accessed through one or more doors of various types, including commercial-grade swing doors, steel sliding doors, interlocking sally port doors, etc. In addition to the primary entrance and exit, additional doors are often included to meet life safety codes. The unit contains sleeping space, sanitary facilities (including toilets, lavatories, and showers), and a dayroom or leisure space in differing configurations. Many facilities are designed with modules or pods clustered around a control room. This multiple-pod design provides the facility with certain staff efficiencies and economies of scale. At the same time, the design affords the flexibility to separately house inmates of differing security levels, or who are grouped by some other operational or service scheme. Generally, the control room is enclosed by security glass, and in some cases, this allows residents to see into neighboring pods. However, observation from one unit to another is usually limited by angled site lines. In some cases, the facility has prevented this entirely by installing one-way glass. Both the architectural design and functional use of these multiple pods indicate that they are managed as distinct housing units. Yes 17. Does the facility ever hold youthful inmates or youthful/juvenile detainees? O No Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility) Audited Facility Population Characteristics for the 12 Months Preceding the Audit (for documentation sampling) Inmates/Residents/Detainees Population Characteristics for the 12 Months Preceding the Audit 18. Enter the total number of inmates/ residents/detainees who were admitted to the facility over the past 12 months: 19. Enter the total number of inmates/

19. Enter the total number of inmates/
residents/detainees with a physical
disability who were in the facility over
the past 12 months:

20. Enter the total number of inmates/
residents/detainees with a cognitive or
functional disability (including
intellectual disability, psychiatric
disability, or speech disability) who were
in the facility over the past 12 months:

21. Enter the total number of inmates/ residents/detainees who are Blind or have low vision (visually impaired) who were in the facility over the past 12 months:	
22. Enter the total number of inmates/ residents/detainees who are Deaf or hard-of-hearing who were in the facility over the past 12 months:	
23. Enter the total number of inmates/ residents/detainees who are Limited English Proficient (LEP) who were in the facility over the past 12 months:	
24. Enter the total number of inmates/ residents/detainees who identify as lesbian, gay, or bisexual who were in the facility over the past 12 months:	
25. Enter the total number of inmates/ residents/detainees who identify as transgender or intersex who were in the facility over the past 12 months:	
26. Enter the total number of inmates/ residents/detainees who reported sexual abuse in this facility over the past 12 months:	
27. Enter the total number of inmates/ residents/detainees who disclosed prior sexual victimization during risk screening who were in the facility over the past 12 months:	
28. Enter the total number of inmates/ residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization who were in the facility over the past 12 months:	

29. Provide any additional comments regarding the population characteristics of inmates/residents/detainees who were in the facility over the past 12 months (e.g., groups not tracked, issues with identifying certain populations).	
Staff, Volunteers, and Contractors Population the Audit	Characteristics for the 12 Months Preceding
30. Enter the total number of STAFF employed by the facility over the past 12 months:	
31. Enter the total number of STAFF employed by the facility who may have had contact with inmates/residents/ detainees over the past 12 months:	
32. Enter the total number of VOLUNTEERS who may have had contact with inmates/residents/detainees over the past 12 months:	
33. Enter the total number of CONTRACTORS who may have had contact with inmates/residents/ detainees over the past 12 months:	
34. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility over the past 12 months:	
Audited Facility Population Characteristics on Day One of the Onsite Portion of the Audit	
Inmates/Residents/Detainees Population Characteristics on Day One of the Onsite Portion of the Audit	
35. Enter the total number of inmates/ residents/detainees in the facility as of the first day of onsite portion of the audit:	

36. Enter the total number of inmates/ residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	
37. Enter the total number of inmates/ residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	
38. Enter the total number of inmates/ residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	
39. Enter the total number of inmates/ residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	
40. Enter the total number of inmates/ residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	
41. Enter the total number of inmates/ residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	
42. Enter the total number of inmates/ residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	
43. Enter the total number of inmates/ residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	

44. Enter the total number of inmates/ residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	
45. Enter the total number of inmates/ residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	
46. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	
Staff, Volunteers, and Contractors Population Portion of the Audit	Characteristics on Day One of the Onsite
47. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	
48. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	
49. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	
50. Provide any additional comments regarding the population characteristics	

INTERVIEWS	
Inmate/Resident/Detainee Interviews	
Random Inmate/Resident/Detainee Interviews	
51. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	
52. Select which characteristics you	Age
considered when you selected RANDOM INMATE/RESIDENT/DETAINEE	Race
interviewees: (select all that apply)	Ethnicity (e.g., Hispanic, Non-Hispanic)
	Length of time in the facility
	Housing assignment
	Gender
	Other
	None
53. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	
54. Were you able to conduct the minimum number of random inmate/ resident/detainee interviews?	Yes
	○ No
55. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	

Targeted Inmate/Resident/Detainee Interviews	
56. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	
As stated in the PREA Auditor Handbook, the bread guide auditors in interviewing the appropriate creare the most vulnerable to sexual abuse and sex regarding targeted inmate/resident/detainee interviewing targeted inmate/resident/detainee interviewing about the number of interviewing about the number of interviewing dustions are asking about the number of interviewing dustions. For example, if an additional detail in segregated housing dustions are asking about the number of interview would be prior sexual victimization, that interview would be questions. Therefore, in most cases, the sum of a inmate/resident/detainee interview categories with residents/detainees who were interviewed. If a patched audited facility, enter "0".	oss-section of inmates/residents/detainees who ual harassment. When completing questions erviews below, remember that an interview with le targeted interview requirements. These ews conducted using the targeted inmate/uditor interviews an inmate who has a physical e to risk of sexual victimization, and disclosed e included in the totals for each of those all the following responses to the targeted II exceed the total number of targeted inmates/
57. Enter the total number of interviews conducted with inmates/residents/ detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	
58. Enter the total number of interviews conducted with inmates/residents/ detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:	
59. Enter the total number of interviews conducted with inmates/residents/ detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	
60. Enter the total number of interviews conducted with inmates/residents/ detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	

61. Enter the total number of interviews conducted with inmates/residents/ detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:	
62. Enter the total number of interviews conducted with inmates/residents/ detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	
63. Enter the total number of interviews conducted with inmates/residents/ detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	
64. Enter the total number of interviews conducted with inmates/residents/ detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:	
65. Enter the total number of interviews conducted with inmates/residents/ detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:	
66. Enter the total number of interviews conducted with inmates/residents/ detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:	

67. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	
Staff, Volunteer, and Contractor Interv	riews
Random Staff Interviews	
68. Enter the total number of RANDOM STAFF who were interviewed:	
69. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	Length of tenure in the facility  Shift assignment  Work assignment  Rank (or equivalent)  Other (e.g., gender, race, ethnicity, languages spoken)  None
70. Were you able to conduct the minimum number of RANDOM STAFF interviews?	○ Yes ○ No
71. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	
Specialized Staff, Volunteers, and Contractor	Interviews
Staff in some facilities may be responsible for more than one of the specialized staff duties.  Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.	
72. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	

73. Were you able to interview the Agency Head?	○ Yes ○ No
74. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	○ Yes ○ No
75. Were you able to interview the PREA Coordinator?	○ Yes ○ No
76. Were you able to interview the PREA Compliance Manager?	<ul> <li>Yes</li> <li>No</li> <li>NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)</li> </ul>

77. Select which SPECIALIZED STAFF roles were interviewed as part of this	Agency contract administrator
audit from the list below: (select all that apply)	☐ Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment
	Line staff who supervise youthful inmates (if applicable)
	Education and program staff who work with youthful inmates (if applicable)
	☐ Medical staff
	Mental health staff
	Non-medical staff involved in cross-gender strip or visual searches
	Administrative (human resources) staff
	Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff
	Investigative staff responsible for conducting administrative investigations
	Investigative staff responsible for conducting criminal investigations
	Staff who perform screening for risk of victimization and abusiveness
	Staff who supervise inmates in segregated housing/residents in isolation
	Staff on the sexual abuse incident review team
	Designated staff member charged with monitoring retaliation
	First responders, both security and non- security staff
	☐ Intake staff

	Other			
78. Did you interview VOLUNTEERS who	Yes			
may have contact with inmates/ residents/detainees in this facility?	○ No			
79. Did you interview CONTRACTORS	○ Yes			
who may have contact with inmates/ residents/detainees in this facility?	○ No			
80. Provide any additional comments regarding selecting or interviewing specialized staff.				
SITE REVIEW AND DOCUMENTATI	ON SAMPLING			
Site Review				
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 site review is not a casual tour of the facility. It is an active, inquiring process that includes talking with staff and inmates to determine whether, and the extent to which, the audited facility's practices demonstrate compliance with the Standards. Note: As you are conducting the site review, you must document your tests of critical functions, important information gathered through observations, and any issues identified with facility practices. The information you collect through the site review is a crucial part of the evidence you will analyze as part of your compliance determinations and will be needed to complete your audit report, including the Post-Audit Reporting Information.				
81. Did you have access to all areas of	Yes			
the facility?	○ No			
Was the site review an active, inquiring proce	ess that included the following:			
82. Observations of all facility practices in accordance with the site review	○ Yes			
component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?	○ No			

83. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?	Yes No
84. Informal conversations with inmates/ residents/detainees during the site review (encouraged, not required)?	○ Yes ○ No
85. Informal conversations with staff during the site review (encouraged, not required)?	○ Yes ○ No
86. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).	
Documentation Sampling	
Where there is a collection of records to review-s records; background check records; supervisory processing records; inmate education records; m self-select for review a representative sample of	rounds logs; risk screening and intake ledical files; and investigative files-auditors must
87. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?	○ Yes ○ No
88. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).	

# SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

#### Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

Remember the number of allegations should be based on a review of all sources of allegations (e.g., hotline, third-party, grievances) and should not be based solely on the number of investigations conducted. Note: For question brevity, we use the term "inmate" in the following questions. Auditors should provide information on inmate, resident, or detainee sexual abuse allegations and investigations, as applicable to the facility type being audited.

# 89. Total number of SEXUAL ABUSE allegations and investigations overview during the 12 months preceding the audit, by incident type:

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate- on- inmate sexual abuse				
Staff- on- inmate sexual abuse				

# 90. Total number of SEXUAL HARASSMENT allegations and investigations overview during the 12 months preceding the audit, by incident type:

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on- inmate sexual harassment				
Staff-on- inmate sexual harassment				
Total				

#### Sexual Abuse and Sexual Harassment Investigation Outcomes

#### **Sexual Abuse Investigation Outcomes**

Note: these counts should reflect where the investigation is currently (i.e., if a criminal investigation was referred for prosecution and resulted in a conviction, that investigation outcome should only appear in the count for "convicted.") Do not double count. Additionally, for question brevity, we use the term "inmate" in the following questions. Auditors should provide information on inmate, resident, and detainee sexual abuse investigation files, as applicable to the facility type being audited.

91.	<b>Criminal SEXUA</b>	L ABUSE investigation	outcomes duri	ng the 12	months	preceding
the	audit:					

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
Inmate-on- inmate sexual abuse					
Staff-on- inmate sexual abuse					
Total					

# 92. Administrative SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse				
Staff-on-inmate sexual abuse				
Total				

#### **Sexual Harassment Investigation Outcomes**

Note: these counts should reflect where the investigation is currently. Do not double count. Additionally, for question brevity, we use the term "inmate" in the following questions. Auditors should provide information on inmate, resident, and detained sexual harassment investigation files, as applicable to the facility type being audited.

preceding the audi	t:								
	On	going	for	ferred osecution	C	dicted/ ourt ase led	Convicte Adjudica	-	Acquitted
Inmate-on- inmate sexual harassment									
Staff-on- inmate sexual harassment									
Total									
94. Administrative months preceding	SEXUAL HARASSMENT investigation outcomes during the 12 the audit:  Ongoing Unfounded Unsubstantiated Substantiated								
Inmate-on-inma sexual harassment	te								
Staff-on-inmate sexual harassment									
Total									
Sexual Abuse and Sexual Harassment Investigation Files Selected for Review									
Sexual Abuse Investigation Files Selected for Review									
95. Enter the total ABUSE investigation sampled:									

93. Criminal SEXUAL HARASSMENT investigation outcomes during the 12 months

96. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<ul><li>Yes</li><li>No</li><li>NA (NA if you were unable to review any sexual abuse investigation files)</li></ul>
Inmate-on-inmate sexual abuse investigation	files
97. Enter the total number of INMATE- ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	
98. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<ul><li>Yes</li><li>No</li><li>NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</li></ul>
99. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<ul><li>Yes</li><li>No</li><li>NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</li></ul>
Staff-on-inmate sexual abuse investigation fil	es
100. Enter the total number of STAFF- ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	
101. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	No NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)

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102. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	No NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
Sexual Harassment Investigation Files Select	ed for Review
103. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	
104. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<ul><li>Yes</li><li>No</li><li>NA (NA if you were unable to review any sexual harassment investigation files)</li></ul>
Inmate-on-inmate sexual harassment investig	pation files
105. Enter the total number of INMATE- ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	
106. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	<ul> <li>Yes</li> <li>No</li> <li>NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</li> </ul>
107. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<ul> <li>Yes</li> <li>No</li> <li>NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</li> </ul>

Staff-on-inmate sexual harassment investigation files	
108. Enter the total number of STAFF- ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	
109. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	<ul> <li>Yes</li> <li>No</li> <li>NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</li> </ul>
110. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<ul> <li>Yes</li> <li>No</li> <li>NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</li> </ul>
111. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	
SUPPORT STAFF INFORMATION	
IMPORTANT REMINDER: Lead auditors are required to include in their audit contracts and in their audit reports information on all other DOJ-certified PREA auditors and non-certified support staff who assisted the lead auditor during any phase of the PREA audit. For details on what information to include, refer to p. 6 and p. 66 of the PREA Auditor Handbook. The following questions are about support staff. Please provide complete information about any assistance you received from any other DOJ-certified PREA auditors and/or non-certified support staff during each phase of this audit.	
DOJ-certified PREA Auditors Support Staff	
112. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the preonsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	○ Yes ○ No

Non-certified Support Staff	
113. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the preonsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	Yes No
LEAD AUDITOR TIME SPENT AUDITING THIS FACILITY	
114. How many HOURS did you (the lead auditor) spend on the PRE-ONSITE	10 hours or less
portion of this audit?	11-20 hours
	21-30 hours
	31-40 hours
	○ 41-50 hours
	○ 51 or more hours
For the following question, please account for all days spent at the audited facility, regardless of	

For the following question, please account for all days spent at the audited facility, regardless of the amount of time you were onsite on a particular day. For example, if you were onsite for only 2 hours on the last day of the onsite portion of the audit, count this as one day. Remember, the number of days you indicate here should match the number of days indicated in your Audit Start Date and Audit End Date entries above.

115. How many DAYS did you (the lead auditor) spend conducting the ONSITE	1 day
portion of this audit?	2 days
	3 days
	○ 4 days
	○ 5 days
	○ 6 days
	7 days
	○ 8 days
	○ 9 days
	◯ 10 days
	○ 11 days
	12 days
116. In the questions below, select the number of HOURS you spent onsite at the facility conducting the audit (e.g., conducting interviews, site review, and documentation review) for EACH DAY of the ONSITE portion of the audit.	
117. How many HOURS did you (the lead	10 hours or less
auditor) spend on the POST-ONSITE portion of this audit - including evidence	11-20 hours
review, interim audit report (if applicable), corrective action planning	21-30 hours
and verification (if applicable), and final audit report?	○ 31-40 hours
	26-30 hours
	○ 41-50 hours
	○ 51 hours or more

For the following questions, the PREA Management Office is collecting information on auditing arrangements and compensation for trend analysis so that better information and guidance can be provided to the field in the future.	
118. Who paid you to conduct this audit?	The audited facility or its parent agency
	<ul> <li>My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)</li> </ul>
	A third-party auditing entity (e.g., accreditation body, consulting firm)
	Other
119. How much were you paid to conduct	○ \$5,001 or more
this audit? Please indicate the dollar amount for the compensation received	<pre>\$4,001-\$5,000</pre>
for your time to complete audit-related tasks (e.g., documentation review,	\$3,001-\$4,000
report writing, interviews, onsite observations). Do not include	\$2,001-\$3,000
reimbursements for airfare, per diem rates, or non-personnel costs.	\$1,001-\$2,000
	S1- \$1,000
	\$0 - I conducted this audit as part of a consortium or circular auditing arrangement
	\$0 - I was unpaid for a reason other than a consortium or circular auditing arrangement
120. Does the amount indicated above	○ Yes
reflect the amount you were paid to conduct the audit of the single facility named above (i.e., not the amount you were paid to conduct multiple audits under a single contract)?	○ No

**AUDITING ARRANGEMENTS AND COMPENSATION** 

121. What was the total cost of this audit? Total cost refers to the TOTAL	\$7,001 or more
AMOUNT THAT THE AUDITED AGENCY PAID for this audit, including the auditor's compensation, travel costs, per diem costs, and so on.	\$6,001-\$7,000
	\$5,001-\$6,000
	<pre>\$4,001-\$5,000</pre>
	<pre>\$3,001-\$4,000</pre>
	\$2,001-\$3,000
	\$1,001-\$2,000
	\$1-\$1,000
	\$0 - This audit was conducted as part of a consortium or circular auditing arrangement
	\$0 - There was no cost for this audit for a reason other than a consortium or circular auditing arrangement
	<ul> <li>Unknown - I was not responsible for procuring this audit, and do not know the total amount paid by the audited agency</li> </ul>
122. Is there any other information you would like to provide about this audit? The PREA Management Office is interested in hearing from auditors about particular challenges associated with this audit, as well as examples of	
with this audit, as well as examples of important achievements by the audited agency or facility. Please provide a brief description here.	