

PREA Facility Audit Report: Final

Name of Facility: State Training School for Boys

Facility Type: Juvenile

Date Interim Report Submitted: NA

Date Final Report Submitted: 04/27/2023

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
Auditor Full Name as Signed: Karen d. Murray	Date of Signature: 04/27/2023

AUDITOR INFORMATION	
Auditor name:	Murray, Karen
Email:	kdmconsults1@gmail.com
Start Date of On-Site Audit:	04/04/2023
End Date of On-Site Audit:	04/05/2023

FACILITY INFORMATION	
Facility name:	State Training School for Boys
Facility physical address:	3211 West Edgington, Eldora, Iowa - 50627
Facility mailing address:	

Primary Contact	
Name:	Ben Huntington
Email Address:	bhuntin@dhs.state.ia.us
Telephone Number:	563-349-8158

Superintendent/Director/Administrator	
Name:	Jason Sodders
Email Address:	jsodder@dhs.state.ia.us
Telephone Number:	641-858-6756

Facility PREA Compliance Manager	
Name:	Benjamin Huntington
Email Address:	bhuntin@dhs.state.ia.us
Telephone Number:	O: 563.349.8158

Facility Characteristics	
Designed facility capacity:	80
Current population of facility:	57
Average daily population for the past 12 months:	52
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Males
Age range of population:	12 -18 years
Facility security levels/resident custody levels:	30
Number of staff currently employed at the facility who may have contact with residents:	139
Number of individual contractors who have contact with residents, currently authorized to enter the facility:	14
Number of volunteers who have contact with residents, currently authorized to enter the facility:	21

AGENCY INFORMATION	
Name of agency:	Iowa Department of Human Services
Governing authority or parent agency (if applicable):	
Physical Address:	1305 Walnut Street, Des Moines, Iowa - 50319
Mailing Address:	
Telephone number:	

Agency Chief Executive Officer Information:	
Name:	Kelly Garcia, HHS Director
Email Address:	kgarcia@dhs.state.ia.us
Telephone Number:	

Agency-Wide PREA Coordinator Information			
Name:	Mark Swore	Email Address:	mswore@dhs.state.ia.us

SUMMARY OF AUDIT FINDINGS

The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.

Auditor Note: In general, no standards should be found to be "Not Applicable" or "NA." A compliance determination must be made for each standard. In rare instances where an auditor determines that a standard is not applicable, the auditor should select "Meets Standard" and include a comprehensive discussion as to why the standard is not applicable to the facility being audited.

Number of standards exceeded:

3	<ul style="list-style-type: none"> • 115.311 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator • 115.316 - Residents with disabilities and residents who are limited English proficient • 115.351 - Resident reporting
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Number of standards met:

40

Number of standards not met:

0

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2023-04-04
2. End date of the onsite portion of the audit:	2023-04-05

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?	<input checked="" type="radio"/> Yes <input type="radio"/> No
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a. Identify the community-based organization(s) or victim advocates with whom you communicated:

During the onsite review the Auditor tested the youth pay phones in an attempt to contact the PREA Hotline. When dialing #211 the Crisis Intervention Operator answered the phone on the third ring. After proper introductions and the reason for the call, the Operator stated upon request she would connect the student with a sexual abuse advocate, if one wasn't available she would collect contact information and they would call the student back. The Operator stated the service would report to allegation to law enforcement upon request and would not report to the Agency.

On 3.7.2023 at 9:32 am, this Auditor contacted Crisis Intervention Services at 206 3rd Street NE in Mason City, IA at 641.424.9133. After proper introductions and the reason for the call, the operator stated this is the same service for outside reporting. The Auditor was connected with a Supervisor who stated the agency is aware of the memorandum of understanding provide services advocacy services to the students at the State Training School. The supervisor stated, after normal business hours' calls are rolled to the National Help Line Victim Call Service Center, and whoever is on call would meet students at a hospital and begin working with the facility to establish services. Ongoing services at the facility would depend on what students prefer, if a student chooses to be private they advocate would not be able to follow up with them. When students choose to disclose who they are the agency will work with facility staff to arrange services. The supervisor did state she has met with facility staff, has toured the facility and met with new PREA Director.

AUDITED FACILITY INFORMATION

14. Designated facility capacity:

80

15. Average daily population for the past 12 months:	52
16. Number of inmate/resident/detainee housing units:	5
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	56
38. 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:	0
39. 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:	5
40. 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:	0

41. 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:	0
42. 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:	1
43. 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:	2
44. 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:	0
45. 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:	1
46. 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:	7
47. 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:	0

<p>48. 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):</p>	<p>No text provided.</p>
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Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit

<p>49. 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:</p>	<p>139</p>
<p>50. 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:</p>	<p>19</p>
<p>51. 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:</p>	<p>14</p>
<p>52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</p>	<p>No text provided.</p>

INTERVIEWS

Inmate/Resident/Detainee Interviews

Random Inmate/Resident/Detainee Interviews

<p>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>8</p>
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<p>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</p>	<p><input type="checkbox"/> Age</p> <p><input checked="" type="checkbox"/> Race</p> <p><input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic)</p> <p><input type="checkbox"/> Length of time in the facility</p> <p><input checked="" type="checkbox"/> Housing assignment</p> <p><input type="checkbox"/> Gender</p> <p><input type="checkbox"/> Other</p> <p><input type="checkbox"/> None</p>
<p>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p>	<p>The facility provided a roster with the student's name, date of birth, date of admission, race, placement, ethnicity, cognitive functioning, English language learner, sexual abuse victim (screened), sexual abuse reported at facility, gay or bi-sexual. The Auditor chose targeted students to be interviewed then chose random students from each cottage, race and ethnicity.</p>
<p>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>57. 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):</p>	<p>No text provided.</p>
<p>Targeted Inmate/Resident/Detainee Interviews</p>	
<p>58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>8</p>

As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".

<p>60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
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<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
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<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Through a facility tour, formal and informal interviews with students and staff and student file review, this category of student did not appear to be at the facility during the onsite review.</p>
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<p>61. 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:</p>	<p>1</p>
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<p>62. 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:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Through a facility tour, formal and informal interviews with students and staff and student file review, this category of student did not appear to be at the facility during the onsite review.</p>
<p>63. 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:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Through a facility tour, formal and informal interviews with students and staff and student file review, this category of student did not appear to be at the facility during the onsite review.</p>

<p>64. 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:</p>	<p>1</p>
<p>65. 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:</p>	<p>2</p>
<p>66. 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:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Through a facility tour, formal and informal interviews with students and staff and student file review, this category of student did not appear to be at the facility during the onsite review.</p>
<p>67. 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:</p>	<p>1</p>

<p>68. 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:</p>	<p>3</p>
<p>69. 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:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Through a facility tour, formal and informal interviews with students and staff and student file review, this category of student did not appear to be at the facility during the onsite review.</p>
<p>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>No text provided.</p>
<p>Staff, Volunteer, and Contractor Interviews</p>	
<p>Random Staff Interviews</p>	
<p>71. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>12</p>

<p>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p><input type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input checked="" type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>A staff schedule was provided upon the onset of the onsite review. Facility security staff were randomly selected by the Auditor. Each of the random staff were interviewed to include staff assigned to each shift and from each of the open cottages at the facility.</p>
<p>Specialized Staff, Volunteers, and Contractor Interviews</p>	
<p>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.</p>	
<p>75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</p>	<p>15</p>
<p>76. Were you able to interview the Agency Head?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

78. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No
79. Were you able to interview the PREA Compliance Manager?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

80. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)

- Agency contract administrator
- 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

	<input checked="" type="checkbox"/> Intake staff <input type="checkbox"/> Other
81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of VOLUNTEERS who were interviewed:	1
b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Mental health/counseling <input type="checkbox"/> Religious <input checked="" type="checkbox"/> Other
82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of CONTRACTORS who were interviewed:	1
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Security/detention <input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input checked="" type="checkbox"/> Other

83. Provide any additional comments regarding selecting or interviewing specialized staff.	No text provided.
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SITE REVIEW AND DOCUMENTATION 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.

84. Did you have access to all areas of the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
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Was the site review an active, inquiring process that included the following:

85. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
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86. 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)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
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<p>87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>88. Informal conversations with staff during the site review (encouraged, not required)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</p>	<p>No text provided.</p>
<h2 style="text-align: center;">Documentation Sampling</h2>	
<p>Where there is a collection of records to review-such as staff, contractor, and volunteer training records; background check records; supervisory rounds logs; risk screening and intake processing records; inmate education records; medical files; and investigative files-auditors must self-select for review a representative sample of each type of record.</p>	
<p>90. 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?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</p>	<p>No text provided.</p>

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.

92. 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	3	0	3	0
Staff-on-inmate sexual abuse	4	0	4	0
Total	7	0	7	0

93. 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	4	0	4	0
Staff-on-inmate sexual harassment	3	0	3	0
Total	7	0	7	0

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.

94. Criminal SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
Inmate-on-inmate sexual abuse	0	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0	0
Total	0	0	0	0	0

95. Administrative SEXUAL ABUSE investigation outcomes during the 12 months preceding the audit:

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	0	2	1	0
Staff-on-inmate sexual abuse	0	3	1	0
Total	0	5	2	0

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 detainee sexual harassment investigation files, as applicable to the facility type being audited.

96. Criminal SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
Inmate-on-inmate sexual harassment	0	0	0	0	0
Staff-on-inmate sexual harassment	0	0	0	0	0
Total	0	0	0	0	0

97. Administrative SEXUAL HARASSMENT investigation outcomes during the 12 months preceding the audit:

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	0	3	1
Staff-on-inmate sexual harassment	0	1	2	0
Total	0	1	5	1

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

98. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:

6

<p>99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
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Inmate-on-inmate sexual abuse investigation files

<p>100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>2</p>
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<p>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
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<p>102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
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Staff-on-inmate sexual abuse investigation files

<p>103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>4</p>
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<p>104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
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<p>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
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Sexual Harassment Investigation Files Selected for Review

<p>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>4</p>
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<p>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
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Inmate-on-inmate sexual harassment investigation files

<p>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>2</p>
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<p>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
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<p>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
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Staff-on-inmate sexual harassment investigation files

111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	2
112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	No text provided.

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.	<input type="radio"/> Yes <input checked="" type="radio"/> No
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Non-certified Support Staff

116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.

Yes

No

AUDITING ARRANGEMENTS AND COMPENSATION

121. Who paid you to conduct this audit?

The audited facility or its parent agency

My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)

A third-party auditing entity (e.g., accreditation body, consulting firm)

Other

Standards

Auditor Overall Determination Definitions

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

Auditor Discussion Instructions

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

115.311	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. State Training School for Boys PAQ 2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 3. Iowa HHS Division of Table of Organization - State-Operated Facilities, dated 3.2023 4. State Training School Organizational Chart, dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random Students 2. Targeted Students 3. Youth Service Workers 4. Treatment Program Administrator / PREA Compliance Manager 5. Superintendent 6. Executive Officer / PREA Coordinator 7. Division Director of State Facilities / Agency Head <p>Interviews with students and staff and review of student and staff files demonstrates it is evident that this facility interweaves requirements for this standard in their daily protocols. Both students and staff could speak to facility PREA practices and protocols being used as is described in the agency's PREA policy. Every formal and informal interview with students and staff demonstrated a sound knowledge of PREA, PREA protocols and reporting options for all.</p> <p>The interview with the Treatment Program Administrator / PREA Compliance Manager demonstrated he is well versed on PREA system implementation and has ample time to complete his PREA duties. The PREA Compliance Manager is well known and appreciated by students and staff as was evident during discussions observed during the tour of the facility and throughout the onsite review.</p>

The interview with the Superintendent demonstrated student safety comes first over all other programmatic daily needs and protocols. The Superintendent stated each shift has Youth Service Technicians whose primary responsibilities are to verbally de-escalate students, provide those students with an extra staff who they have sound relationships and who they trust. Youth Service Technicians are readily available at all times to assist Youth Service Workers in response to all crisis situations.

The Interview with the Executive Officer / PREA Coordinator demonstrated he is well versed on PREA system implementation at the facility where he serves as the State School liaison, has a passionate understanding of the PREA Standards and has ample time to complete his PREA duties.

The interview with the Division Director of State Facilities / Agency Head demonstrated his expectation of facility staff is first and foremost students are safe, feel safe and reside in a safe environment. The Division Director of State Facilities stated he is very involved with the facility and conducts onsite visits at least twice monthly.

Interviews overall with facility personnel mirrored and echoed the expectations of the Superintendent and the Division Director of State Facilities. Interviews demonstrated departments communicate well with one another and safety of their students is paramount. Interviews overall with students demonstrated each are respected by the facility staff and they feel sexually safe in the program.

Site Review Observation:

During the tour of the facility, the Auditor witnessed multiple versions of student designed PREA posters with #211 calling instructions throughout the campus. No Means No flyers were posted in cottages and highly trafficked areas which include multiple internal and external reporting options. Audit notices were laminated on neon green paper and posted at the facility entrance, canteen where visitation takes place, day rooms and the school.

Youth are housed in cottages, most with single wet cells, providing privacy while dressing and toileting. Those cottages without single rooms are being remodeled to provide each student an individual space of privacy, safety and security. Each shower and toileting area was observed to have either full doors, shower curtains or

half walls, providing students with privacy and staff with safe observation areas without impeding on student privacy. Cameras were present in areas of the school and cottages; however, interactive staff supervision is primarily used for supervision. During the tour and formal interviews being conducted in the school, demonstrated Youth Service Workers, Youth Supervisors, Youth Service Technicians, School Principal and Administrative staff provide a rich student to staff ratio exceeding the standard requirement of one staff to eight youth.

(a) State Training School for Boys PAQ states the agency policy mandates zero-tolerance toward all forms of sexual abuse and sexual harassment in the facility it operates and those directly under contract. The facility has a policy outlining how it will implement the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 1, section policy, states, "The State Training School has zero tolerance for sexual abuse or sexual harassment of students both by staff or other students, and for any form of retaliation for reporting. This policy establishes this zero tolerance standard for the incidence of sexual abuse/assault in accordance with the Prison Rape Elimination Act of 2003 (PREA) and the National Standards to Prevent, Detect and Respond to Prison Rape.

The State Training School has established this policy to help prevent, detect, respond and report any incident of sexual abuse, sexual harassment or retaliation for reporting within the facility. This policy establishes guidelines for action including, but not limited to: staff training and education; reporting and investigative standards; student victim services and support; and data collection measures related to sexual abuse at the State Training School.

All reported incidents of sexual abuse by staff or others or sexual harassment by staff or others will be documented and investigated. Employees, contractors, or volunteers who perpetrate, or fail to report, any sexual abuse or sexual harassment as outlined in this policy, will be subject to disciplinary action up to and including termination of employment or services. All substantiated criminal cases will be referred to local law enforcement as well as the appropriate County Attorney's Office for review for prosecution."

(b) State Training School for Boys PAQ states the agency employs or designates an upper-level, agency-wide PREA Coordinator. The PREA Coordinator has sufficient time and authority to develop, implement, and oversee agency efforts to comply

with the PREA standards in all of its facilities. The position of the PREA Coordinator in the agency's organizational structure. The Executive Officer 2 functions as the PREA Coordinator and reports directly to the Deputy Director.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 5-6, section 1. A.1., states, "The Division Administrator shall designate an upper-level central office, facility PREA Coordinator with sufficient time and authority to develop, implement, and ensure consistent compliance with PREA standards. In addition, at the facility level a PREA manager shall be designated and assigned to the State Training School to ensure on-sight oversight of PREA compliance."

The facility provided an Iowa HHS Division of Table of Organization - State-Operated Facilities. The organization chart demonstrates the Executive Officer also function as the PREA Coordinator and reports directly to the Division Director of State Facilities.

(c) State Training School for Boys PAQ states the PREA Compliance Manager has sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards. The Institutional Superintendent functions as the PREA Compliance Manager and reports directly to the facility Superintendent. Policy compliance can be found in provision (b) of this standard.

Through interview outcomes, exceeding staff to student ratios, ongoing departmental communication, the use of Youth Service Technician to accommodate students in crisis, relationship report between students and facility staff, the facility exceeds the standard requirements.

115.312	Contracting with other entities for the confinement of residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. State Training School for Boys PAQ <p>Interviews:</p> <ol style="list-style-type: none"> 1. Executive Officer / PREA Coordinator <p>During the pre-audit phase, the Executive Officer / PREA Coordinator conveyed the agency does not have privatized contracts for juvenile programs in the State of Wisconsin.</p> <p>(a) State Training School for Boys PAQ states the agency has not 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.</p> <p>(b) State Training School for Boys PAQ states all of the above contracts require the agency to monitor the contractor's compliance with PREA standards. On or after August 20, 2012, or since the last PREA audit, whichever is later, the number of the contracts referenced in 115.312 (a) that DO NOT require the agency to monitor contractor's compliance with PREA Standards is zero.</p> <p>Through such reviews, the facility meets the standard requirements.</p>

115.313	Supervision and monitoring
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 580 297">Auditor Discussion</p> <p data-bbox="280 340 544 374">Document Review:</p> <ol data-bbox="280 412 1410 815" style="list-style-type: none"> 1. State Training School for Boys PAQ 2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 3. State Training School Staffing Plan and Review - 12.22.2022 4. Iowa Department of Human Services STS Investigation (Staffing Deviation Documentation) 5. Unannounced Rounds Form, not dated <p data-bbox="280 927 437 960">Interviews:</p> <ol data-bbox="280 999 1227 1532" style="list-style-type: none"> 1. Random Students 2. Targeted Students 3. Youth Service Workers 4. Youth Counselor Supervisor 5. Treatment Program Administrator / PREA Compliance Manager 6. Superintendent 7. Executive Officer / PREA Coordinator 8. Division Director of State Facilities <p data-bbox="280 1570 1461 1731">The interview with the Treatment Program Administrator / PREA Compliance Manager, Superintendent and the Executive Officer / PREA Coordinator demonstrated the administrators meet often to discuss and revise the staffing plan and annual reviews in conjunction with the Division Director of State Facilities.</p> <p data-bbox="280 1839 1477 2085">Staff and students interviewed could attest to supervisory staff being in the cottages often and available multiple times per day. The Youth Counselor Supervisor attested to completing unannounced rounds in all areas of the facility where students program. Round are completed at a minimum of once per day; however, often occurring more often. The Youth Counselor stated rounds are completed on weekends in the kitchen and in unoccupied buildings.</p>

Site review observation:

Unannounced rounds documentation previewed during the pre-audit phase demonstrated rounds were being documented for each cottage. The Auditor requested the facility complete and document rounds for all areas of the campus. During the onsite review round documentation was observed in the cottages as well as a separate binder kept in the Administrative Building demonstrating the facility had begun documenting rounds in buildings occupied by students during the programmatic day.

Recommendation: The Auditor recommended the facility complete and document rounds for all areas of the campus. The facility stated State Training School staff will primarily conduct unannounced rounds of areas occupied by students. However, all-campus rounds will be conducted minimally on a quarterly cadence and will be documented on the non-cottage unannounced rounds log.

(a) State Training School for Boys PAQ states the agency requires each facility it operates to develop, document, and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect residents against abuse. Since August 20, 2012, or last PREA audit, whichever is later, the average daily number of residents is 48. Since August 20, 2012, or last PREA audit, whichever is later, the average daily number of residents on which the staffing plan was predicated is 64.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 6, section B. 2., states, "The State Training School shall ensure that its facility develops, implements, and documents a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to help protect students against sexual abuse. In calculating adequate staffing levels and determining the need for video monitoring, the State Training School shall take into consideration:

- a. Generally accepted juvenile detention and correctional/secure policies;
- b. Any judicial findings of inadequacy;
- c. Any findings of inadequacy from Federal investigative agencies;
- d. Any findings of inadequacy from internal or external oversight bodies;
- e. All components of the facility's physical plant (including "blind spots" or areas where staff or students may be isolated)
- f. The composition of the student population

- g. The number and placement of supervisory staff
- h. Facility programs occurring on a particular shift
- i. Any applicable State or local laws, regulations, or standards
- j. The prevalence of substantiated “

The facility provided a State Training School Staffing Plan and Review. The staffing plan and review includes the following components.

- Describe how generally accepted juvenile justice residential treatment facility practices are being utilized.
- Describe how any findings of inadequacy, by judicial, federal investigative agencies or internal or external oversight bodies, in program policies and procedures are addressed.
- Describe how any physical plan inadequacies or video monitoring systems are addressed (if applicable).
- Describe how the following have impacted staffing decisions:
 - o Sexual abuse reporting
 - o Location or other factors
 - o Programs offered
 - o Composition of the youth population
 - o Number and placement of supervising staff
- Staffing ratio
- After reviewing these areas, it determined the current staffing plan is inadequate - new video surveillance system needs to be addressed
- Facilities use of video monitoring systems is adequate
- Resources available to ensure adherence to the staffing plan are adequate
- Summary Comments / review

(b) State Training School for Boys PAQ states each time the staffing plan is not complied with, the facility documents and justifies all deviations from the staffing plan.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 6, section B. 3., states, "The State Training School shall comply with the staffing plan except during limited and discrete exigent circumstances, and shall fully document deviations from the plan during such circumstances."

The facility provided an Iowa Department of Human Services STS Investigation, documenting staffing deviations on 10.11.2022, 10.12.2022, 10.15.2022 and 10.17.2022.

(c) State Training School for Boys PAQ states the facility is not obligated by law, regulation, or judicial consent decree to maintain staffing ratios of a minimum of 1:8 during resident waking hours and 1:16 during resident sleeping hours. In the past 12 months, the number of times the facility deviated from the staffing ratios of 1:8 security staff during resident waking hours was one.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 6, section B. 1., states, "The State Training School will maintain direct care and supervision staff ratios of a minimum of 1:8 during student waking hours and 1:16 during student sleeping hours, except during limited and discrete exigent circumstances, which shall be fully documented."

(d) State Training School for Boys PAQ states at least once every year the agency or facility, in collaboration with the agency's PREA Coordinator, reviews the staffing plan to see whether adjustments are needed to: (a) the staffing plan; (b) prevailing staffing patterns; (c) the deployment of monitoring technology; or (d) the allocation of agency or facility resources to commit to the staffing plan to ensure compliance with the staffing plan.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 6, section B. 4., states, "

Whenever necessary, but no less frequently than once each year the State Training School, in consultation with the assigned/appointed PREA Coordinator, shall assess, determine, and document whether adjustments are needed to:

- a. The staffing plan established pursuant to paragraph (1) of this section;
- b. Prevailing staffing patterns;

c. The State Training School deployment of video monitoring systems and other monitoring technologies; and

d. The resources the facility has available to commit to ensure adherence to the staffing plan.”

(e) State Training School for Boys PAQ states the facility requires that intermediate-level or higher-level staff conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 7, section B. 5., states, “The State Training School shall implement a practice of having intermediate-level or higher level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment. This practice shall be implemented for night shifts as well as day shifts. The State Training School prohibits staff from alerting other staff members that these supervisory rounds are occurring, unless such an announcement is related to the legitimate operational functions of the facility.”

The facility provided an Unannounced Rounds form demonstrating staff document the following during rounds.

- Building
- Date / Time / # of Students / # of Staff
- Area Checked
- Laundry / De-escalation Room Secure
- Structured Activity Planned
- Structured Activity Executed
- Staff Aware of Safety Plans
- Safety Plans Enforced by Staff
- Cottage Atmosphere
- Staff Initials
- PREA Manager Date and Initials

During the pre-audit phase the Auditor inquired as to rounds being completed outside of the living units. The PREA Compliance Manager responded with the

following. "The template we provided is what we use in the cottages. We conduct unannounced rounds in other areas (Rec Hall, De-escalation Room, School, Kitchen, Canteen, etc.), but we document those rounds in the building/area's log book.

We will work on developing a standard form for non-cottage areas that speaks to the rounds that are being kept in greater detail.

STS currently working on developing and implementing a document template to document unannounced rounds in non-cottage areas."

Through such reviews, the facility meets the standard requirements.

115.315	Limits to cross-gender viewing and searches
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 297">Auditor Discussion</p> <p data-bbox="280 340 544 374">Document Review:</p> <ol data-bbox="280 412 1409 703" style="list-style-type: none"> <li data-bbox="280 412 831 445">1. State Training School for Boys PAQ <li data-bbox="280 483 1409 557">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <li data-bbox="280 595 1326 629">3. STS Staff Training PREA Prevention & Response PowerPoint, not dated <li data-bbox="280 667 1321 701">4. 2023 Training: Security Practices Exam / Acknowledgment of Training <p data-bbox="280 813 437 846">Interviews:</p> <ol data-bbox="280 884 1225 1131" style="list-style-type: none"> <li data-bbox="280 884 596 918">1. Random Students <li data-bbox="280 956 603 990">2. Targeted Students <li data-bbox="280 1028 660 1061">3. Youth Service Workers <li data-bbox="280 1099 1225 1133">4. Treatment Program Administrator / PREA Compliance Manager <p data-bbox="280 1171 1441 1285">Interviews with students demonstrated searches to their bodies are conducted respectfully and in a private location. Students stated there is never a time where they are seen without being fully clothed, outside of searches.</p> <p data-bbox="280 1400 1449 1473">Interviews with staff demonstrated cross gender searches are trained; however, exigent circumstances had not presented a need with any of the staff interviewed.</p> <p data-bbox="280 1588 1458 1747">Staff interviewed attested to searches being conducted in Corbett Miller Hall, in designated rooms, out of line of sight of others. Staff stated one staff is in the doorway, facing the youth, and a second staff is always right next to the open door in the hallway.</p> <p data-bbox="280 1856 635 1890">Site Review Observation:</p> <ol data-bbox="280 1928 512 2031" style="list-style-type: none"> <li data-bbox="280 1928 504 1962">1. Intake area <li data-bbox="280 2000 512 2033">2. Search area

During the tour of the facility the Auditor observed Intake Department. Each student is brought into the Corbett Miller Hall cottage and searched in designated search cells where signage stating such was posted on the cell doors. Staff were able to describe students are told each step of the way how the search would be conducted and each transition step is communicated as students hand the staff articles of clothing. Staff were able to demonstrate how one staff is in the doorway while another is positioned right outside of the cell, out of line of sight of the student, during the entire search.

(a) State Training School for Boys PAQ states the facility does not conduct cross-gender strip or cross-gender visual body cavity searches of their Residents. In the past 12 months the facility has not conducted cross-gender strip or cross-gender visual body cavity searches.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 7, section C. 1., states, "The State Training School shall not conduct cross-gender strip searches or cross-gender visual body except when performed for health related reasons by medical personnel such as; Medical Doctor (MD), Physician Assistant (PA), Advanced Registered Nurse Practitioner (ARNP), Registered Nurse (RN) and Licensed Practical Nurse (LPN) levels of licensure."

(b) State Training School for Boys PAQ states the facility does not permit cross-gender pat-down searches of female residents, absent exigent circumstances. The number of pat-down searches of female residents that were conducted by male staff has been zero. The number of pat-down searches of female residents conducted by male staff that did not involve exigent circumstance(s) has been zero.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 7, section C. 2., states, "The State Training School shall not conduct cross-gender pat-down searches except in exigent circumstances. Any cross-gender pat-down searches shall be documented and justified."

(c) State Training School for Boys PAQ states the facility policy requires that all cross-gender strip searches, cross-gender visual body cavity searches, and cross-gender pat-down searches be documented and justified. Policy compliance can be found in provision (b) of this standard.

(d) State Training School for Boys PAQ states the facility has implemented

policies and 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 (this includes viewing via video camera). Policies and procedures require staff of the opposite gender to announce their presence when entering a resident housing unit/areas where residents are likely to be showering, performing bodily functions, or changing clothing.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 7, section C. 3-4., states,

3. "Students shall be permitted to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cottage checks.

4. Staff of the opposite gender of the student(s) shall announce their presence when entering a student cottage/housing unit or any area where students are likely to be showering, performing bodily functions, or changing clothing."

(e) State Training School for Boys PAQ states 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. Such searches did not occur in the past 12 months.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 7, section C. 5., states, "The State Training School shall not search or physically examine a transgender or intersex student for the sole purpose of determining the student's genital status. If the student's genital status is unknown, it may be determined during conversations with the student, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by medical personnel."

(f) State Training School for Boys PAQ states the percent of all security staff who received training on conducting cross-gender pat-down searches and searches of transgender and intersex residents in a professional and respectful manner, consistent with security needs is 100%.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 7, section C. 6., states, "The State Training School shall train direct care and

supervision staff on how to conduct cross-gender pat-down searches and searches of transgender and intersex students, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.”

The facility provided a STS Staff Training PREA Prevention & Response PowerPoint. Slides 58-60 provide instruction on strip searches and staff placement during those searches.

The facility provided a 2023 Training: Security Practices Exam / Acknowledgment of Training. The exam is signed by employees attesting to their signature verifying they have received and understood the Security Practices training.

Through such reviews, the facility met the standards requirements.

115.316	Residents with disabilities and residents who are limited English proficient
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. State Training School for Boys PAQ 2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 3. On-Demand Remote Interpreting and Document Translation Contract, dated 2.26.2020 4. Iowa Department of Human Services Boys State Training School PREA Refresher: Helping Students with a Learning Disability, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Targeted Students 2. Youth Service Workers 3. Youth Counselor Supervisor / Cottage Director - Intake <p>The facility had one cognitive and one LEP targeted student. Both students had a sound understanding of PREA, their rights and reporting options made available to them. The LEP student has been provided with Rosetta Stone software on a tablet and has subsequently taught himself English while in the program. The LEP student was provided all PREA education in Spanish documentation.</p> <p>Interviews with Youth Service Workers demonstrated a tablet is used for interpretation and or the facility will bring in an interpreter whenever the needs arises.</p> <p>The interview with the Youth Counselor Supervisor / Cottage Director demonstrated he delivers youth education in a format understandable by youth through a video and documentation within the first hour describing their rights, how to report through speaking with a staff member they trust, dialing #211, writing a letter to administration or telling a parent or their Juvenile Court Officer.</p>

Site Observation:

Two targeted youth were residing at the program during the onsite review. Two youth records were reviewed by utilizing the PREA Audit – Juvenile Facilities Documentation Review – Resident Files / Review template and each youth had signed and attested to their knowledge and understanding of PREA education through a quiz and a subsequent information sheet provided within 10 days of intake. (Subsequent documentation was not documented until December of 2022; however, since, documentation was observed to be in place.)

(a) State Training School for Boys PAQ states the agency has established procedures to provide disabled Residents equal opportunities to be provided with and learn about the agency’s efforts to prevent, detect and respond to sexual abuse and sexual harassment.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 7, section D.1., states, “The State Training School shall take appropriate steps to ensure students with disabilities and students with limited English language skills are aware of its zero tolerance for any form of sexual abuse by staff or other students or sexual harassment by staff or other students. Reasonable steps will also be taken to ensure meaningful access to all aspects of efforts to prevent, detect, and respond, including steps to provide professional interpreters who can interpret effectively, accurately, and impartially [refer to State of Iowa Master Agreement with Language Link].”

The facility provided a one-page document titled: Boys State Training School PREA Refresher: Helping Students with a Learning Disability. This guide instructs staff on the following:

- Providing reading assistance with PREA educational information as well as an audio version of the State Training School Safety Plan for Sexual Abuse and Sexual Harassment to or with any student, but especially to students with a learning and/or reading disability.
- Strategies for assisting a student with a learning or reading disability.

The facility provided an On-Demand Remote Interpreting and Document Translation Contract. The contract is in place for on demand interpreting and document translation services.

(b) State Training School for Boys PAQ states the agency has established

procedures to provide residents with limited English 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. Policy compliance can be found in provision (a) of this standard.

(c) State Training School for Boys PAQ states the 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 §115.364, or the investigation of the resident's allegations. 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. 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 §115.364, or the investigation of the resident's allegations was one.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 7, section D.2., states, "The State Training School shall not rely on student interpreters, student readers, or other types of student assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the student's safety, the performance of first-response duties or the investigation of the student's allegation."

Through such reviews of the LEP student having been provided a tablet that enabled him to learn English and the staff having access to translation tools to assist the one LEP student, the facility exceeds the standard requirements.

115.317	Hiring and promotion decisions
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 297">Auditor Discussion</p> <p data-bbox="280 340 544 374">Document Review:</p> <ol data-bbox="280 412 1469 815" style="list-style-type: none"> <li data-bbox="280 412 831 445">1. State Training School for Boys PAQ <li data-bbox="280 483 1409 562">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <li data-bbox="280 600 1177 633">3. Administrative Adjudication Document Template, not dated <li data-bbox="280 672 1465 750">4. Post Audit: Memorandum, Subject: PREA Administrative Adjudication Questions for Contractors, dated 4.19.2023 <li data-bbox="280 788 1469 822">5. Post Audit: 13 Completed Administrative Adjudication Questions by Contractors <p data-bbox="280 927 437 960">Interviews:</p> <ol data-bbox="280 999 863 1032" style="list-style-type: none"> <li data-bbox="280 999 863 1032">1. Human Resource Technical Assistant <p data-bbox="280 1070 1465 1352">Interviews with the Human Resource Technical Assistant demonstrated the initial criminal history check was completed before hire, and upon promotion. The Human Resource Technical Assistant was aware criminal history checks were subsequently completed every five years after the employee hire date. The Human Resource Technical Assistant was aware and could demonstrate Administrative Adjudication questions were asked during the hiring and promotion processes and institutional reference questions were asked and documented for applicable employees.</p> <p data-bbox="280 1464 635 1498">Site Review Observation:</p> <p data-bbox="280 1536 1469 1738">20 personnel files were reviewed by utilizing the PREA Audit Documentation Review – Employee Files / Records review template. Record review demonstrated each employee had been asked administrative adjudication questions during the completion of the interview and or at promotion and an institutional reference request had been completed on the one applicable employee.</p> <p data-bbox="280 1850 448 1883">Action Plan:</p> <p data-bbox="280 1921 1390 2000">Administrative adjudication questions were not present in contractor files. The facility was requested to complete the following:</p> <p data-bbox="280 2033 1214 2067">Contractor to complete the administrative adjudication questions.</p>

Upload completed administrative questions to the supplemental file.

Provide a Superintendent memorandum stating administrative questions will be answered before contracting for services with students.

Post audit the facility provided a memorandum in regard to PREA Administrative Adjudication Questions for Contractors, stating, "Please note that effective immediately, all contractors who have direct contact with STS students must complete the attached Administrative Adjudication questions prior to working directly with students.

Should a contractor answer "Yes" to any of the questions on the attached form, Superintendent Soddors, PREA Compliance Manager Ben Huntington, and the contractor's contract manager must review the background details surrounding the contractor's answers and assess the feasibility of the contractor providing services at the State Training School.

Additionally, the below contractors who have direct contact with students, must complete the attached adjudication questionnaire no later than April 24, 2023."

Post audit, the facility provided 13 completed administrative adjudication questions by contract personnel.

(a) State Training School for Boys PAQ states the 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: • Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997); • Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or • Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 8, section E. 3., states, "The State Training School shall ask all applicants and employees who may have contact with students directly about previous misconduct related to sexual abuse or sexual harassment in written applications or interviews for hiring or promotion and in any interviews or written self-evaluations conducted

as part of reviews of current employees. The State Training School shall also impose upon employees a continuing affirmative duty to disclose any such misconduct. Material omissions regarding such misconduct or the provision of materially false information shall be grounds for termination.”

The facility provided an Administrative Adjudication Document Template asking applicants and staff to answer the following questions.

- “Have you ever engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility or other institution?
- Have you even 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?
- Have you ever been civilly or administratively adjudicated to have engaged in the activity described in the last two questions?”

(b) State Training School for Boys PAQ states agency policy requires the consideration of any incidents of sexual harassment when determining to hire and or promote anyone, or to enlist services of any contractor, who may have contact with youth.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 8, section E. 1., states, “A person, who STS is aware, has been convicted or charged with sexual abuse or sexual harassment, as defined by this policy, shall not be hired. Employees, who have engaged in sexual abuse or sexual harassment, as defined by this policy will be subject to progressive discipline and potential termination.”

(c) State Training School for Boys PAQ states agency policy requires that before it hires any new employees who may have contact with residents, it (a) conducts criminal background record checks; (b) consults any child abuse registry maintained by the State or locality in which the employee would work; and (c) consistent with Federal, State, and local law, makes its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. In the past 12 months, the number of persons hired who may have contact with residents who have had criminal background record checks was 40.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 8,

section E. 2., states, "Before hiring new employees who may have contact with students, the State Training School shall perform a criminal background check, consult any child abuse registry maintained by the State of Iowa Department of Criminal Investigations (DCI), and make its best effort to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of sexual abuse."

(d) State Training School for Boys PAQ states the agency policy requires that a criminal background records check be completed and applicable child abuse registries consulted before enlisting the services of any contractor who may have contact with residents. 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 is seven.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 8, section E. 4., states, "The State Training School shall perform a criminal background check before enlisting the services of any contractor who may have contact with students. The State Training School shall consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with students."

(e) State Training School for Boys PAQ states the agency policy requires that either criminal background records checks be conducted at least every five years of current employees and contractors who may have contact with residents or that a system is in place for otherwise capturing such information for current employees.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 8, section E. 5., states, "The State Training School shall conduct criminal background checks at least every five years on current employees and contractors who may have contact with students."

(g) State Training School for Boys PAQ states that agency policy states that material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination. Policy compliance can be found in provision (a) of this standard.

(h) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 9, section E. 6., states, "In accordance with current state and federal laws, the

State Training School 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.”

Through such reviews, the facility meets the standard requirements.

115.318	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. State Training School for Boys PAQ 2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Superintendent 2. Division Director of State Facilities / Agency Head <p>Interviews with the Administration demonstrated the facility is in process of renovating three cottages from group sleeping dorms to single room dorms and expanding video surveillance. One of three cottages have been renovated. The Division Director of State Facilities spoke to construction planning phases including optimal security through design and additional camera placement throughout the new dorms and the facility as a whole.</p> <p>(a) State Training School for Boys PAQ states the facility has acquired a new facility or made substantial expansions or modifications to existing facilities since the last PREA audit.</p> <p>(b) State Training School for Boys PAQ states the agency or 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.</p> <p>Through such reviews, the facility meets the standard requirements.</p>

115.321	Evidence protocol and forensic medical examinations
	<p data-bbox="280 188 1007 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 300">Auditor Discussion</p> <p data-bbox="280 340 544 376">Document Review:</p> <ol data-bbox="280 412 1433 819" style="list-style-type: none"> <li data-bbox="280 412 839 448">1. State Training School for Boys PAQ <li data-bbox="280 483 1417 560">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <li data-bbox="280 595 1433 631">3. Memorandum of Understanding Crisis Intervention Service, dated 1.31.2023 <li data-bbox="280 667 1401 743">4. Memorandum of Understanding, Johnson County Sexual Assault Response Team, dated 2.7.2023 <li data-bbox="280 779 1050 815">5. Law Enforcement MOU Attempt, dated 3.14.2023 <p data-bbox="280 927 437 963">Interviews:</p> <ol data-bbox="280 999 555 1106" style="list-style-type: none"> <li data-bbox="280 999 408 1034">1. LPN <li data-bbox="280 1070 555 1106">2. Chief of Police <p data-bbox="280 1142 1465 1218">The interview with the LPN demonstrated students would be transported to nearest hospital where SANE can be available.</p> <p data-bbox="280 1330 1449 1527">The interview with the Chief of Police, Criminal Investigator, demonstrated a Memorandum of Understanding is not in place with the facility as they are in the local jurisdiction and will respond and investigate all sexual abuse allegations. The Chief of Police stated he will consider the PREA standards during his investigation and provide an outcome of his investigations to the Facility Superintendent.</p> <p data-bbox="280 1639 635 1675">Site Review Observation:</p> <p data-bbox="280 1711 1442 1787">There was zero sexual abuse allegation reported in the last 12 months requiring a forensic medical exam.</p> <p data-bbox="280 1899 1471 2056">(a) State Training School for Boys PAQ states the agency/facility is responsible for conducting administrative sexual abuse investigations (including resident-on-resident sexual abuse or staff sexual misconduct). The agency/facility is not responsible for conducting criminal sexual abuse investigations (including resident-</p>

on-resident sexual abuse or staff sexual misconduct). Criminal Investigations are conducted by Department of Inspections & Appeals. When conducting a sexual abuse investigation, the agency investigators follow a uniform evidence protocol.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 9, section II. A. 1., states, "The State Training School shall follow a uniform evidence protocol that is developmentally appropriate for youth, which will be based on: preserving the scene to maximize the potential for investigating agencies such as the Department of Inspections and Appeals (DIA) and law enforcement to obtain physical evidence for administrative proceedings and possible criminal prosecution."

(b) State Training School for Boys PAQ states the protocol being developmentally is appropriate for youth. The protocol was adapted from or otherwise based on the most recent edition of the DOJ's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011.

(c) State Training School for Boys PAQ states the facility offers all residents who experience sexual abuse access to forensic medical examinations. Forensic examinations are offered at no cost to the victim. Where possible, all examinations are conducted by SAFE or SANE examiners. There has been zero medical exam, SAFE/SANE exam performed in the last 12 months.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 9., section, II. A. 2., states, "In cases requiring medical examination and when resources allow examinations shall be performed by a Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE). The examinations will be conducted, without cost to the student victim, for evidentiary and medical purposes related to the allegation of sexual abuse. If these resources are not available, the circumstances will be documented and an examination will be conducted by a qualified medical personnel."

The facility provided a Memorandum of Understanding (MOU) between the Johnson County Sexual Assault Response Team and State Training School. The purpose of the MOU is to establish coordination with conducting Sexual Assault Nurse Examiner (SANE) exams at UIHC for alleged victims of sexual assault incident involving STA students. The MOU appears to be current and does not have an expiration date. The MOU is signed by the facility superintendent and the JCSART/SANE Coordinator.

(d) State Training School for Boys PAQ states the facility attempts to make a victim advocate from a rape crisis center available to the victim, in person or by other means. All efforts are documented. If a rape crisis center is not available to provide victim advocate services. The facility does employ qualified staff member to accompany victims.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page, 9., section, II. A. 3., states, "The State Training School shall offer advocacy services from a sexual assault service provider to the student victim. If requested by the student victim, the victim advocate shall be asked to accompany and support the student victim through the forensic medical exam and investigatory interview to provide emotional support; crisis intervention, information, and referrals (Refer to Memorandum of Understanding with Crisis Intervention Services)."

The facility provided a Memorandum of Understanding (MOU) Crisis Intervention Service. Page 1, section Purpose, states, "To establish written procedures that are in compliance with the Prison Rape Elimination Act (PREA) standards, concerning the exchange of information and the coordination of efforts and assets between the State Training School (STS) and Crisis Intervention Services with sexual assault or abuse concerns/incidents involving STS students." This MOU appears to expire and must be renewed annually. The MOU is signed by the State Training School Superintendent on 1.27.2023 and the Crisis Intervention Service Executive Director on 1.31.2023.

(e) State Training School for Boys PAQ states if requested by the victim, a victim advocate, or qualified agency staff member, or qualified community-based organization staff member accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provides emotional support, crisis intervention, information, and referrals. Policy compliance can be found in provision (d) of this standard.

(f, g) State Training School for Boys PAQ states if the agency is responsible for investigating administrative or criminal 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 §115.321 (a) through (e) of the standards. The investigative policy is posted on the facility website at <https://hhs.iowa.gov/mhds/mental-health/in-patient/juvenile-facility/eldora/prea>

The facility provided an attempt for a memorandum of understanding with the Eldora Police Department. The police chief provided the following response to the facility superintendent. "As you stated in the past, we have declined to enter a MOU. The Iowa State Training School lays within the jurisdiction of the Eldora Police Department. Thus, we will continue to provide all police services including:

- Conducting criminal investigations following incidents of sexual abuse and/or harassment
- Collecting physical evidence
- Following response planning protocols in a manner that is developmentally appropriate for youth."

Through such reviews the facility meets the standard requirements.

115.322	Policies to ensure referrals of allegations for investigations
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. State Training School for Boys PAQ 2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 3. Title 3: Chapter C: State Juvenile Facility – Policy on Incident Management for Sexual Abuse, dated 5.27.2016 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Youth Service Workers 2. Youth Counselor Supervisor 3. Treatment Program Administrator / PREA Compliance Manager <p>Staff interviews demonstrated each would immediately report all allegations to their direct supervisor, a Youth Service Technician or the Duty Superintendent, contact the medical department, and make sure the students are safe until the proper authorities arrive.</p> <p>Site Review Observation:</p> <p>There were seven allegations of sexual harassment referred for investigation in the past 12 months. Review of the investigation with the Youth Counselor Supervisor and the PREA Compliance Manager demonstrated the allegations were responded to on the same day of receipt of the allegation, thorough, and objectively by facility personnel throughout the investigative process.</p> <p>(a) State Training School for Boys PAQ states the agency insures that an administrative or criminal investigations are completed for all allegations of sexual abuse and sexual harassment. In the past 12 months the facility has had 14 allegations of sexual abuse and sexual harassment that were received. In the past 12 months, the number of allegations resulting in an administrative investigation was 14.</p>

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 9, section II. B. 1., states, “The State Training School shall ensure that an administrative, Department of Inspections and Appeals (DIA) or criminal investigation is completed for all allegations of sexual abuse and sexual harassment as appropriate based on the particulars of the allegation.”

(b-d) State Training School for Boys PAQ states the agency has a policy that requires allegations of sexual abuse or sexual harassment be referred for investigation to an agency with the legal authority to conduct criminal investigations, including the agency if it conducts its own investigations, unless the allegation does not involve potentially criminal behavior. The agency’s policy regarding the referral of allegations of sexual abuse or sexual harassment for a criminal investigation is published on the agency website or made publicly available via other means. The facility has published their investigation policy on their website at <https://hhs.iowa.gov/mhds/mental-health/in-patient/juvenile-facility/eldora/prea>

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 9-10, section II. B. 2-3., state,

2. “The State Training School shall ensure allegations of sexual abuse and/or sexual harassment are referred to the appropriate agency with the legal authority to conduct criminal and/or abuse investigations. If the allegation does not involve potentially criminal behavior the State Training School will conduct its own investigation per facility guidelines/protocols. These guidelines/protocols will be published on the State Training School website for the public’s information. All such referrals shall be documented.

3. Local law enforcement and DIA are responsible for conducting criminal and/or abuse investigations, such publication shall describe the responsibilities of the State Training School, local law enforcement and DIA.”

Title 3: Chapter C: State Juvenile Facility – Policy on Incident Management for Sexual Abuse, page 20, section Reporting, Retaliation, and Investigatory Duties, states, “Allegations of sexual abuse and harassment will be forwarded to local law enforcement and other regulatory agencies such as the Department of Inspections and Appeals immediately, as appropriate. The facility will fully cooperate with subsequent investigations. Regardless of whether local law enforcement or regulatory agencies are investigating alleged sexual abuse or harassment at the facility the facility will also immediately initiate its own investigation which shall be completed in a timely manner. “

	Through such reviews, the facility meets the standard requirements.
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115.331	Employee training
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 266 580 300">Auditor Discussion</p> <p data-bbox="280 344 544 378">Document Review:</p> <ol data-bbox="280 412 1410 848" style="list-style-type: none"> 1. State Training School for Boys PAQ 2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 3. PREA Basics Student Education, not dated 4. Post-Intake PREA Follow Up, not dated 5. Crisis Intervention Service Poster, not dated 6. State Training School Student Handbook, dated 3.2023 <p data-bbox="280 960 437 994">Interviews:</p> <ol data-bbox="280 1028 735 1207" style="list-style-type: none"> 1. Random Students 2. Targeted Students 3. Youth Counselor Supervisor <p data-bbox="280 1240 1461 1408">Informal and formal interviews with youth demonstrated their knowledge on PREA through quizzes and subsequent 'PREA papers' given to them at the time of intake. Each were aware they could dial #211, tell a trusted staff, writing a note or a letter and placing it in a 'box', or telling a parent or Juvenile Correction Officer.</p> <p data-bbox="280 1509 1461 1722">The interview with the Youth Counselor Supervisor / Cottage Director demonstrated he delivers youth education in a format understandable by youth through a video and documentation within the first hour describing their rights, how to report through speaking with a staff member they trust, dialing #211, writing a letter to administration or telling a parent or their Juvenile Court Officer.</p> <p data-bbox="280 1823 528 1856">Site Observation:</p> <p data-bbox="280 1890 1474 2058">During the onsite review 14 resident files were reviewed by utilizing the PREA Audit – Juvenile Facilities Documentation Review – Resident Files / Reviews template. Each resident had received initial and comprehensive PREA education within 72 hours of intake, typically on the same day of admission and again within 10 days of intake.</p>

(a) State Training School for Boys PAQ states residents receive information at time of intake about the zero-tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment. In the past 12 months 69 residents were given information at intake.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 11, section C. 1., states, "During the intake process, students shall receive information explaining, in an age appropriate fashion, the agency's zero tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment."

The facility provided a PREA Basics Student Education. The education components include the following.

- What is PREA
- Student Rights
- Prevention of sexual abuse or harassment
- What do I do if I've been sexually abused or harassed - Reporting
- I reported my concerns, now what?
- Investigation
- Victim Rights
- o Access to medical care services
- o Access to mental health care services
- o Freedom from retaliation
- Zero Tolerance Policy
- Things to keep in mind
- Question about PREA?
- Review

(b) State Training School for Boys PAQ states the number of those residents admitted in the past 12 months who received comprehensive age-appropriate education on their rights to be free from sexual abuse and sexual harassment, from

retaliation for reporting such incidents, and on agency policies and procedures for responding to such incidents within 10 days of intake was 69.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 11, section C. 2., states, "Within 10 days of intake, the State Training School shall provide comprehensive age-appropriate education to students either in person or through video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents."

(c) State Training School for Boys PAQ states of those who were not educated during 10 days of intake, all residents have been educated subsequently. All juveniles have been trained. Agency policy requires that residents who are transferred from one facility to another be educated regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents to the extent that the policies and procedures of the new facility differ from those of the previous facility.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 11, section C. 3., states, "Current students who have not received such education shall be educated within two weeks of the effective date of this policy, and shall receive education upon transfer to a different facility to the extent that the policies and procedures of the student's new facility differ from those of the previous facility."

(d) State Training School for Boys PAQ states Resident PREA education is available in accessible formats for all residents including those who are limited English proficient, deaf, visually impaired, otherwise disabled or have limited reading skills.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 11, section C. 4., states, "The State Training School shall provide student education in formats accessible to all students, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to students who have limited reading skills."

(e) State Training School for Boys PAQ states the facility maintains documentation of resident participation in PREA education sessions.

The facility provided a Post-Intake PREA Follow Up having student attest to the following. "I have completed supplemental training on the Prison Rape Elimination Act (PREA) within my first ten days of admission and understand the following standards and expectations that the State Training School must meet to remain in PREA compliance."

The facility provided a PREA Basics - Student Education Quiz, ensuring each understands the following elements.

1. What does the PREA law protect?
2. True or false: The State Training School has a zero-tolerance policy toward all forms of sexual abuse and sexual harassment?
3. Is consensual sexual contact okay?
4. What do you do if you think sexual abuse or sexual harassment has occurred?
5. Name three different ways you can report sexual abuse, sexual harassment or suspicion of sexual abuse or sexual harassment:
6. What happens once you report alleged sexual abuse or harassment?
7. All Students at STS have the right to be free from sexual abuse, sexual harassment and retaliation for reporting sexual abuse and sexual harassment?

(f) State Training School for Boys PAQ states 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.

The facility provided a State Training School Student Handbook. Page 8-9 provides students information on the following.

- Prison Rape Elimination Act
- STS Safety Policy - Sexual Abuse and Assault
- Reporting
- Examinations
- Free services
- Confidentiality
- Medical and mental health help

· How to protect yourself

The facility provided a Crisis Intervention Service Poster providing #211 as an option to dial for services.

Through such reviews the facility meets the standard requirements.

115.332	Volunteer and contractor training
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 297">Auditor Discussion</p> <p data-bbox="280 340 544 374">Document Review:</p> <ol data-bbox="280 412 1418 629" style="list-style-type: none"> <li data-bbox="280 412 839 445">1. State Training School for Boys PAQ <li data-bbox="280 483 1418 562">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <li data-bbox="280 600 1337 633">3. STS Staff Training PREA Prevention & Response PowerPoint, not dated <p data-bbox="280 741 437 775">Interviews:</p> <ol data-bbox="280 813 730 918" style="list-style-type: none"> <li data-bbox="280 813 596 846">1. Mentor Volunteer <li data-bbox="280 884 730 918">2. Youth for Christ Contractor <p data-bbox="280 956 1458 1115">The interview with the volunteer and contractor demonstrated both had completed in person PREA training with facility staff. Each were able to articulate their knowledge of the agency zero tolerance policy and how and who to report PREA allegations of sexual harassment and sexual abuse allegations.</p> <p data-bbox="280 1223 526 1256">Site Observation:</p> <p data-bbox="280 1294 1458 1413">During the onsite file review, each file demonstrated the contractor had completed training on the agency zero tolerance policy and their volunteer and contractor responsibilities.</p> <p data-bbox="280 1525 1437 1809">(a) State Training School for Boys PAQ states 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 harassment prevention, detection, and response. The number of volunteers and contractors, who have contact with residents, who have been trained in agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response is 35.</p> <p data-bbox="280 1917 1481 2076">State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 11, section B.1., states, "The State Training School shall ensure that all volunteers and contractors who have contact with students have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention,</p>

detection, and response policies and procedures.”

The facility provided a STS Staff Training PREA Prevention & Response PowerPoint Presentation. Slides of the presentation provide direction on the following topics.

- Prison Rape Elimination Act
- PREA Misconduct
- Zero Tolerance Policy
- Staff Sexual Misconduct
- Common Reactions
- Healthy Sexual Development
- Iowa Code - Age of Consent
- Dynamics of Sexual Abuse / Harassment in Facilities
- Student Reporting
- Staff Response-Intervention & Reporting
- Mandatory Reporting
- Staff and Facility Reporting Duties
- Investigations
- Consensual or Abuse
- Preventative Measures at Intake
- Prevention-Skill Building & Cultural Competency
- Avoiding Inappropriate Relationships with Students
- Preventative Staff Behavior
- Preventative-Practicing Cultural Competency
- LGBTQIA Students
- Communicating with LGBTQIA
- Search Policy 2A-15 Strip Searches
- Other Preventative Measures
- Protection from Retaliation

(b) State Training School for Boys PAQ states the level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with residents. All volunteers and contractors who have contact with residents have been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 11, section B.2., states, "The level and type of training provided to volunteers and contractors shall be based on the services they provide and the level of contact they have with students, but all volunteers and contractors who have contact with students shall be notified of the agency's zero tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents."

(c) State Training School for Boys PAQ states the agency maintains documentation confirming that the volunteers and contractors understand the training they have received.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 11, section B.3., states, "The State Training School shall maintain documentation confirming that volunteers and contractors understand the training they have received."

Through such reviews, the facility meets the standard requirements.

115.333	Resident education
	<p data-bbox="280 188 1007 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 580 300">Auditor Discussion</p> <p data-bbox="280 340 544 376">Document Review:</p> <ol data-bbox="280 412 1422 846" style="list-style-type: none"> 1. State Training School for Boys PAQ 2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 3. PREA Basics Student Education, not dated 4. Post-Intake PREA Follow Up, not dated 5. Crisis Intervention Service Poster, not dated 6. State Training School Student Handbook, dated 3.2023 <p data-bbox="280 958 437 994">Interviews:</p> <ol data-bbox="280 1030 743 1205" style="list-style-type: none"> 1. Random Students 2. Targeted Students 3. Youth Counselor Supervisor <p data-bbox="280 1240 1461 1402">Informal and formal interviews with youth demonstrated their knowledge on PREA through quizzes and subsequent 'PREA papers' given to them at the time of intake. Each were aware they could dial #211, tell a trusted staff, writing a note or a letter and placing it in a 'box', or telling a parent or Juvenile Correction Officer.</p> <p data-bbox="280 1514 1461 1715">The interview with the Youth Counselor Supervisor / Cottage Director demonstrated he delivers youth education in a format unstainable by youth through a video and documentation within the first hour describing their rights, how to report through speaking with a staff member they trust, dialing #211, writing a letter to administration or telling a parent or their Juvenile Court Officer.</p> <p data-bbox="280 1827 528 1863">Site Observation:</p> <p data-bbox="280 1899 1469 2056">During the onsite review 14 resident files were reviewed by utilizing the PREA Audit – Juvenile Facilities Documentation Review – Resident Files / Reviews template. Each resident had received initial and comprehensive PREA education within 72 hours of intake, typically on the same day of admission and again within 10 days of intake.</p>

(a) State Training School for Boys PAQ states residents receive information at time of intake about the zero-tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment. In the past 12 months 69 residents were given information at intake.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 11, section C. 1., states, "During the intake process, students shall receive information explaining, in an age appropriate fashion, the agency's zero tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment."

The facility provided a PREA Basics Student Education. The education components include the following.

- What is PREA
- Student Rights
- Prevention of sexual abuse or harassment
- What do I do if I've been sexually abused or harassed - Reporting
- I reported my concerns, now what?
- Investigation
- Victim Rights
- o Access to medical care services
- o Access to mental health care services
- o Freedom from retaliation
- Zero Tolerance Policy
- Things to keep in mind
- Question about PREA?
- Review

(b) State Training School for Boys PAQ states the number of those residents admitted in the past 12 months who received comprehensive age-appropriate education on their rights to be free from sexual abuse and sexual harassment, from

retaliation for reporting such incidents, and on agency policies and procedures for responding to such incidents within 10 days of intake was 69.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 11, section C. 2., states, "Within 10 days of intake, the State Training School shall provide comprehensive age-appropriate education to students either in person or through video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents."

(c) State Training School for Boys PAQ states of those who were not educated during 10 days of intake, all residents have been educated subsequently. All juveniles have been trained. Agency policy requires that residents who are transferred from one facility to another be educated regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents to the extent that the policies and procedures of the new facility differ from those of the previous facility.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 11, section C. 3., states, "Current students who have not received such education shall be educated within two weeks of the effective date of this policy and shall receive education upon transfer to a different facility to the extent that the policies and procedures of the student's new facility differ from those of the previous facility."

(d) State Training School for Boys PAQ states Resident PREA education is available in accessible formats for all residents including those who are limited English proficient, deaf, visually impaired, otherwise disabled or have limited reading skills.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 11, section C. 4., states, "The State Training School shall provide student education in formats accessible to all students, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to students who have limited reading skills."

(e) State Training School for Boys PAQ states the facility maintains documentation of resident participation in PREA education sessions.

The facility provided a Post-Intake PREA Follow Up having student attest to the following. "I have completed supplemental training on the Prison Rape Elimination Act (PREA) within my first ten days of admission and understand the following standards and expectations that the State Training School must meet to remain in PREA compliance."

The facility provided a PREA Basics - Student Education Quiz, ensuring each understands the following elements.

1. What does the PREA law protect?
2. True or false: The State Training School has a zero-tolerance policy toward all forms of sexual abuse and sexual harassment?
3. Is consensual sexual contact okay?
4. What do you do if you think sexual abuse or sexual harassment has occurred?
5. Name three different ways you can report sexual abuse, sexual harassment or suspicion of sexual abuse or sexual harassment:
6. What happens once you report alleged sexual abuse or harassment?
7. All Students at STS have the right to be free from sexual abuse, sexual harassment and retaliation for reporting sexual abuse and sexual harassment?

(f) State Training School for Boys PAQ states 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.

The facility provided a State Training School Student Handbook. Page 8-9, provides students information on the following.

- Prison Rape Elimination Act
- STS Safety Policy - Sexual Abuse and Assault
- Reporting
- Examinations
- Free services
- Confidentiality
- Medical and mental health help

· How to protect yourself

The facility provided a Crisis Intervention Service Poster providing #211 as an option to dial for services.

Through such reviews the facility meets the standard requirements.

115.334	Specialized training: Investigations
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 580 297">Auditor Discussion</p> <p data-bbox="280 340 544 374">Document Review:</p> <ol data-bbox="280 414 1410 775" style="list-style-type: none"> 1. State Training School for Boys PAQ 2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 3. Investigating Sexual Harassment and Abuse Training 2021 PowerPoint 4. PREA Investigator Training, not dated 5. Investigator Certificates of Completion <p data-bbox="280 887 756 920">Interviews and on site file review:</p> <ol data-bbox="280 960 927 994" style="list-style-type: none"> 1. Youth Counselor Supervisor / Investigator <p data-bbox="280 1034 1469 1189">Interviews with Youth Counselor Supervisor / Investigator and personnel file review demonstrated that the investigator interviewed had completed investigator training to include supplemental training noted during the pre-audit phase and annual training provided to and required by all staff, thereafter.</p> <p data-bbox="280 1301 1453 1413">(a-b) State Training School for Boys PAQ states the agency policy requires that investigators are trained in conducting sexual abuse investigations in confinement settings.</p> <p data-bbox="280 1525 1477 1603">State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 12, section D. 1-2., state, “</p> <ol data-bbox="280 1644 1461 2069" style="list-style-type: none"> 1. “In addition to the general training provided to all employees, the State Training School shall ensure that, to the extent the agency itself conducts sexual abuse investigations as appropriate its upper level management have received training in conducting such investigations. 2. Specialized training shall include techniques for interviewing juvenile sexual abuse victims, sexual abuse evidence collection in similar settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.”

The facility provided Investigating Sexual Harassment and Abuse Training 2021 PowerPoint. The training includes the following objectives.

- Provide Safety and Protection
- Determine the Facts
- Properly and effectively acquire evidence to meet criteria for administrative action or referral for prosecution
- Determine appropriate sanctions for rule violations or criminal actions
- Types of Investigations
- Leading up to Investigative Interviews
- Investigation Interview Warnings/Rights
- Credibility Assessment
- What is reportable
- Who can report
- Investigations - General Information
- Continuum of Student-on-Student Sexual Abuse
- Responding to Reports
- What is Evidence
- Sexual Assault (Crime Scene)
- Physical Evidence
- Chain of Custody

(c) State Training School for Boys PAQ states the agency maintains documentation showing that investigators have completed the required training. The number of investigators currently employed who have completed the required training is six.

The facility provided six Investigator Certificates of Completion.

Through such reviews the facility meets the standard requirements.

115.335	Specialized training: Medical and mental health care
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 297">Auditor Discussion</p> <p data-bbox="280 340 544 374">Document Review:</p> <ol data-bbox="280 412 1409 741" style="list-style-type: none"> <li data-bbox="280 412 831 445">1. State Training School for Boys PAQ <li data-bbox="280 483 1409 562">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <li data-bbox="280 600 1393 678">3. PREA: Specialized Training Mental Health and Medical Providers, 2023 STS Training <li data-bbox="280 716 1262 750">4. Medical and Mental Health Specialized PREA Training Certificates <p data-bbox="280 855 437 889">Interviews:</p> <ol data-bbox="280 927 555 1032" style="list-style-type: none"> <li data-bbox="280 927 395 960">1. LPN <li data-bbox="280 999 555 1032">2. Psychologist III <p data-bbox="280 1070 1469 1357">The interview with the LPN and Psychologist III demonstrated each had completed the specialized Medical and Mental Health specialized training through an agency recorded training, initially and again before each PREA Audit. Each could articulate the training including components speaking to detection, collection of evidence, responding to victims of abuse and reporting. Each stated they would report to the Youth Service Technician or Duty Superintendent on shift and each would document their receipt of allegations on an incident report.</p> <p data-bbox="280 1462 528 1496">Site Observation:</p> <p data-bbox="280 1534 1430 1612">Training documentation was uploaded to the on line audit system during the pre-audit phase.</p> <p data-bbox="280 1718 539 1751">Recommendation:</p> <p data-bbox="280 1792 1469 2078">The Auditor requested the facility add specialized PREA training for medical and mental health staff to orientation training to ensure specialized training is completed to ensure such staff are aware of their responsibilities should an allegation be reported to them through a student disclosure. The facility implemented the following: First test case will be the Nurse Supervisor, who started employment 4.10.2023. He will complete the training within his first 120 hours of employment. Quality assurance will be sustained improvement will include PREA</p>

Coordinator Mark Swore and PREA Compliance Manager Ben Huntington verifying specialized medical/mental health training is completed no later than 5.1.2023.

(a) State Training School for Boys PAQ states the agency has a policy related to the training of medical and mental health practitioners who work regularly in its facilities. The number of all medical and mental health care practitioners who work regularly at this facility who received the training required by agency policy is nine. The percent of all medical and mental health care practitioners who work regularly at this facility who received the training required by agency policy is 100.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 12, section E. 1., states, "The State Training School shall ensure that all medical and mental health care personnel who work regularly in its facilities have been trained:

- a. How to detect and assess signs of sexual abuse and sexual harassment;
- b. How to preserve physical evidence of sexual abuse;
- c. How to respond effectively and professionally to juvenile victims of sexual abuse and sexual harassment; and
- d. How and to whom to report allegations or suspicions of sexual abuse and sexual harassment."

The facility provided a PREA: Specialized Training Mental Health and Medical Providers, 2023 STS Training. The training includes the following components.

- Identify the dynamics and profile of sexual abuse in facilities and how it is defined in the Prison Rape Elimination Act (PREA)
- Detect signs and symptoms of both acute and prior sexual abuse
- Summarize the short and long term effects of trauma on the brain
- Describe considerations for the development of intake screening tool requirement in PREA
- Recognize the health care provider's role in the screening process

(b) State Training School for Boys PAQ states their medical staff do not conduct forensic medical exams.

(c) State Training School for Boys PAQ states the agency maintains documentation showing that medical and mental health practitioners have completed the required training.

The facility provided 16 specialized training certificates for medical and mental health staff. (Nine for mental health and seven for medical personnel.)

Through such reviews the facility meets the standard requirements.

115.341	Obtaining information from residents
	<p data-bbox="280 188 1007 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 300">Auditor Discussion</p> <p data-bbox="280 340 544 376">Document Review:</p> <ol data-bbox="280 412 1422 672" style="list-style-type: none"> <li data-bbox="280 412 839 448">1. State Training School for Boys PAQ <li data-bbox="280 483 1422 564">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <li data-bbox="280 600 1394 672">3. State Training School Risk of Sexual Victimization / Perpetration Screener, dated 1.12.2020 <p data-bbox="280 784 437 819">Interviews:</p> <ol data-bbox="280 855 743 1034" style="list-style-type: none"> <li data-bbox="280 855 604 891">1. Random Students <li data-bbox="280 927 611 963">2. Targeted Students <li data-bbox="280 999 743 1034">3. Youth Counselor Supervisor <p data-bbox="280 1070 1437 1232">Interviews with students demonstrated most recalled being asked risk screening questions to include if they had been sexually assaulted in the past, their gender identity, if they had disabilities and if they thought they would be sexually safe in the program.</p> <p data-bbox="280 1339 1485 1500">The interview with the Youth Counselor Supervisor demonstrated that risk assessments are completed with each youth on the day of intake. The Youth Counselor Supervisor stated risk assessments are completed in his office in a one on one environment by him reading each question to the student.</p> <p data-bbox="280 1608 528 1644">Site Observation:</p> <p data-bbox="280 1680 1477 1841">During the onsite review 14 resident files were reviewed by utilizing the PREA Audit – Juvenile Facilities Documentation Review – Resident Files / Reviews template. Each resident had a completed risk assessment on the day of intake and again annually for two applicable youth.</p> <p data-bbox="280 1948 1453 2069">(a) State Training School for Boys PAQ states the facility has a policy that requires screening, upon admission or transfer, for risk of sexual abuse victimization or sexual abusiveness toward other residents. The policy requires that residents be</p>

screened for risk of sexual victimization or risk of sexually abusing other residents within 72 hours of their intake. 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 and who were screened for risk of sexual victimization or risk of sexually abusing other residents within 72 hours of their entry into the facility was 69.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page14, section IV. A. 1., states, "Within 72 hours of the student's arrival at the facility and periodically throughout a student's confinement, the State Training School shall obtain and use information about each student's personal history and behavior to reduce the risk of sexual abuse by or upon a student."

(b-c) State Training School for Boys PAQ states the Risk assessment is conducted using an objective screening instrument.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page14, section IV. A. 2-3., state,

1. "Such assessments shall be conducted using the "Risk of Sexual Victimization/Perpetration Screener" tool.
2. At a minimum, the State Training School shall attempt to ascertain information about:
 - a. Prior sexual victimization or abusiveness;
 - b. Any gender nonconforming appearance or manner or identification as lesbian, gay, bisexual, transgender, or intersex, and whether the student may therefore, be vulnerable to sexual abuse;
 - c. Current charges and offense history;
 - d. Age;
 - e. Level of emotional and cognitive development;
 - f. Physical size and stature;
 - g. Mental illness or mental disabilities;
 - h. Intellectual or developmental disabilities;
 - i. Physical disabilities;
 - j. The student's own perception of vulnerability; and

k. Any other specific information about individual students that may indicate heightened needs for supervision, additional safety precautions, or separation from certain other students”

The facility provided a State Training School Risk of Sexual Victimization / Perpetration Screener. The screener includes the following information.

- a. Age of student
- b. Have you been in a locked juvenile facility?
- c. Do you think you get along with other people well?
- d. Do you find it easy to make friends?
- e. How do you feel about being in groups of people you don't know well?
- f. Do you feel at risk from attack from other people?
- g. Have you ever been attacked, bullied, or abused by your peers?
- h. Have you ever been the victim of sexual abuse? If yes, was this report? If not, a report must be filed.
- i. Vulnerabilities in a confinement setting, check: build, looks younger than stated age, non-English speaking, pronounced disfigurement, physical disability, deaf, appears frail, weak
- j. Inappropriate behavior
- k. Gender nonconforming appearance/behavior
- l. Identifies as Lesbian, Gay, Bi-sexual or Transgender
- m. Hunched fearful posture
- n. Speech impediment
- o. Suspected cognitive/developmental delays
- p. Behaviors that are likely to irritate and annoy others
- q. Behavior that appears related to mental illness
- r. Naïve to criminal culture
- s. Ethnic minority
- t. Member of gang
- u. Other

- v. Is there evidence this student is or has been reported as having an intellectual impairment
- w. Have you ever been arrested on a sexual offense?
- x. Have you ever engaged in behavior that you would consider sexually aggressive/violent?
- y. Does the file indicate student has been charged with a sex offense?
- z. Does the file information suggest sexual aggression/violence of victimization of others?

The screening has an overall score for vulnerability to sexual victimization or propensity towards sexual perpetration.

(d) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page14, section IV. A. 4., states, "This information shall be ascertained through conversations with the student during the intake process and medical and mental health screenings, during classification assessments, and by reviewing court records, case files, facility behavioral records, and other relevant documentation from the student's files."

(e) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page14, section IV. A. 5-6., state,

5. "The State Training School 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 student's detriment by staff or other students.

6. Assigned counselors shall use the information from the "Risk of Sexual Victimization/Perpetration Screener" in subsequent documentation. Students with scores of 9 or higher on the vulnerability scale, 6 or higher on the propensity scale or self-identifying as gay, bi-sexual, transgender or intersex shall be reassessed on a monthly basis."

During the pre-audit phase the PREA Compliance Manager stated, "Policy states that authorized personnel (Cottage Counselor/Director, MH treatment team) may access main student case record files ONLY as needed to carry out their job responsibilities. Volunteers, consultants, contract workers, others not assigned to the student's treatment team must receive written consent from the superintendent/designee prior to accessing the student's main file."

	<p>Through such reviews the facility meets the standard requirements.</p>
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115.342	Placement of residents
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <p data-bbox="280 264 580 297">Auditor Discussion</p> <p data-bbox="280 340 544 374">Document Review:</p> <ol data-bbox="280 416 1410 562" style="list-style-type: none"><li data-bbox="280 416 831 450">1. State Training School for Boys PAQ<li data-bbox="280 483 1410 562">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <p data-bbox="280 672 437 705">Interviews:</p> <ol data-bbox="280 748 1214 1133" style="list-style-type: none"><li data-bbox="280 748 596 781">1. Random Students<li data-bbox="280 815 603 848">2. Targeted Students<li data-bbox="280 882 572 916">3. Youth Counselor<li data-bbox="280 949 1214 983">4. Correctional Program Supervisor / PREA Compliance Manager<li data-bbox="280 1016 732 1050">5. Youth Counselor Supervisor<li data-bbox="280 1084 860 1117">6. Executive Officer / PREA Coordinator <p data-bbox="280 1173 1474 1252">Interviews with youth demonstrated youth had a past history of sexual victimization stated they were offered mental health services.</p> <p data-bbox="280 1352 1426 1565">Interviews with administrative staff demonstrated Corbin Cottage is an Intensive Treatment Program for sex offenders; Cottage 3 is used for lower functioning students and students not housed in either of those programs who present as a security risk are placed in Cottage 5 in beds in front of staff desks for optimum supervision.</p> <p data-bbox="280 1666 1474 1879">The Youth Counselor who supervises youth in isolation stated a student has never been placed in isolation for reasons related to PREA, in her employ. Furthermore, the Youth Counselor stated students are rarely in isolation for more than 15 minutes and the longest she has observed was three hours where staff were in constant contact with the youth until he was de-escalated and could resume programming.</p> <p data-bbox="280 1980 1458 2058">Administrative staff reported staff who had access to risk assessments was limited to those completing the Risk Assessment, Director of State Facilities,</p>

Superintendent, PREA Coordinator, PREA Compliance Manager and mental health personnel.

Observation:

Resident file review demonstrated residents risk screening for all each of the 14 students reviewed were completed on the day of intake to determine housing, bed, work, education and program assignments with the goal of keeping separate those residents as is described in provisions (a) of this standard. The

(a) State Training School for Boys PAQ states the facility uses information from the risk screening required by §115.341 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 14, section B. 1., states, "The State Training School shall use all information obtained through the intake screening to make housing, bed, program, education, and work assignments for students with the goal of keeping all students safe and free from sexual abuse and sexual harassment."

(a) State Training School for Boys PAQ states the facility has a policy that residents at risk of sexual victimization may only be placed in isolation as a last resort if less restrictive measures are inadequate to keep them and other residents safe, and only until an alternative means of keeping all residents safe can be arranged. The facility policy requires that residents at risk of sexual victimization who are placed in isolation have access to legally required educational programming, special education services, and daily large-muscle exercise. The number of residents at risk of sexual victimization who were placed in isolation in the past 12 months was zero.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 14, section B. 2., states, "Students may be isolated from others only as a last resort when less restrictive measures are inadequate to keep them and other students safe, and then only until an alternative means of keeping all students safe can be arranged. During any period of seclusion, the State Training School shall not deny students daily large-muscle exercise and any legally required educational programming or special education services. Students in seclusion shall receive daily visits from medical or mental health care personnel. Students shall also have access to other programs and work opportunities to the extent possible."

(c) State Training School for Boys PAQ states the facility prohibits placing lesbian, gay, bisexual, transgender, or intersex residents in particular housing, bed, or other assignments solely on the basis of such identification or status. The facility prohibits considering lesbian, gay, bisexual, transgender, or intersex identification or status as an indicator of likelihood of being sexually abusive.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 14, section B. 3., states, "Lesbian, gay, bisexual, transgender, or intersex students shall not be placed in particular housing, bed, or other assignments solely on the basis of such identification or status, nor shall agencies consider lesbian, gay, transgender, or intersex identification or status as an indicator of likelihood of being sexually abusive."

(d-e) State Training School for Boys PAQ states the agency or facility makes housing and program assignments for transgender or intersex residents in a facility on a case-by-case basis.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 14, section B. 4-5., states, "In deciding whether to assign a transgender or intersex student to a housing unit, and in making other housing and programming assignments, the State Training School shall consider on a case-by-case basis whether a placement would ensure the student's health and safety, and whether the placement would present management or security problems. Placement and programming assignments for each transgender or intersex student shall be reassessed at least twice each year to review any threats to safety experienced by the student."

(e) Policy compliance regarding safety considerations for all youth and youth own views with respect to his or her own safety are given serious consideration is demonstrated on the Risk Screener.

(f) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 14, section B. 7., states, "Transgender and intersex students shall be given the opportunity to shower separately from other students."

(h) State Training School for Boys PAQ states from a review of case files of residents at risk of sexual victimization who were held in isolation in the past 12

months, the number of case files that include BOTH:

- A statement of the basis for facility's concern for the residents safety, and
- The reason or reasons why alternative means of separation cannot be arranged.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 14-15, section B. 8., states, "If a student is isolated pursuant to paragraph 2 of this section, the State Training School shall clearly document:

- a. The basis for the facility's concern for the student's safety; and
- b. The reason why no alternative means of separation can be arranged."

(i) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 15, section B. 9., states, "Every 30 days, the State Training School shall afford each isolated student a review to determine whether there is a continuing need for separation from the general population."

Through such reviews the facility meets the standard requirements.

115.351	Resident reporting
	<p data-bbox="280 188 1038 224">Auditor Overall Determination: Exceeds Standard</p> <hr/> <p data-bbox="280 264 580 300">Auditor Discussion</p> <p data-bbox="280 340 544 376">Document Review:</p> <ol data-bbox="280 412 1453 819" style="list-style-type: none"> <li data-bbox="280 412 839 448">1. State Training School for Boys PAQ <li data-bbox="280 483 1418 560">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <li data-bbox="280 595 1453 672">3. State Training School Policy 4D-02 PREA Reporting Abuse, Neglect and Sexual Abuse, dated 11.28.2022 <li data-bbox="280 707 1350 743">4. Student Handbook & Rights Manual, State Training School, dated 2022 <li data-bbox="280 779 772 815">5. No Means No Flyer, not dated <p data-bbox="280 927 437 963">Interviews:</p> <ol data-bbox="280 999 743 1249" style="list-style-type: none"> <li data-bbox="280 999 608 1034">1. Random Students <li data-bbox="280 1070 612 1106">2. Targeted Students <li data-bbox="280 1142 668 1178">3. Youth Service Workers <li data-bbox="280 1214 743 1249">4. Youth Counselor Supervisor <p data-bbox="280 1285 1461 1447">Informal and formal interviews with youth demonstrated their knowledge on PREA through quizzes and subsequent 'PREA papers' given to them at the time of intake. Each were aware they could dial #211, tell a trusted staff, writing a note or a letter and placing it in a 'box', or telling a parent or Juvenile Correction Officer.</p> <p data-bbox="280 1554 1453 1671">Interviews with staff demonstrated they would accept allegations regardless of if a student approached them in person, handed them a note with or without a name, through a third party or a grievance.</p> <p data-bbox="280 1778 544 1814">Site Observations:</p> <p data-bbox="280 1850 1477 2056">The facility has had a practice in place for several years where students design the PREA posters throughout the facility, raising not only awareness with students but staff who help with designs and the production of the posters. In addition, No Means No postings with multiple internal and external reporting options and contact information are available in the Cottages, Canteen, School and the Administrative</p>

building.

(a) State Training School for Boys PAQ states the agency has established procedures allowing for multiple internal ways for residents to report privately to agency officials about sexual harassment, abuse, retaliation and or any type of neglect.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 15, section V. A. 1., states, "The State Training School shall provide multiple internal ways for students to privately report sexual abuse and sexual harassment, retaliation by other students or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents."

The facility provided a Student Handbook & Rights Manual. Page 8, section Prison Rape Elimination Act, first paragraph states, "The State Training School has zero tolerance for sexual abuse or sexual harassment of students either by staff or other students. All reported incidents of sexual abuse by staff, students, or others or sexual harassment by staff, students or others will be documented and investigated. If you would like to make a report related to sexual abuse or harassment, please let a staff member know or dial the toll free number: #211 on the student phone system. You will receive more specific PREA related training during your intake. If you or someone else is abused or assaulted, you should immediately inform a staff member that you trust, preferably and at least your assigned counselor. You may also fill out a grievance form and turn it in to your counselor or to the STS administration."

State Training School Student Handbook. Page 8-9, provides students information on the following.

- Prison Rape Elimination Act
- STS Safety Policy - Sexual Abuse and Assault
- Reporting
- Examinations
- Free services
- Confidentiality
- Medical and mental health help

· How to protect yourself

The facility provided a Crisis Intervention Service Poster providing #211 as an option to dial for services.

(b) State Training School for Boys PAQ states facility 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. The agency does not have a policy requiring residents detained solely for civil immigration purposes be provided detention facility locator information.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 15, section V. A. 2., states, "The State Training School shall provide a toll free phone line dedicated for students to use for reporting abuse or harassment to an outside agency. The outside agency is not part of the State Training School or the Department of Human Services and will be able to receive and immediately forward student reports of sexual abuse and sexual harassment to State Training School officials, as well as other investigatory bodies while allowing the student to remain anonymous upon request. The following agency contact number will be posted: Crisis Intervention Services Sexual Assault Hotline (800-479-9071) #211"

On 3.7.2023 at 8:25 am, this Auditor phoned 800.479.9071. The hotline operator stated this agency was a state dual domestic abuse agency, covering Hardin County. The operator stated she is typically who receives these calls and would collect student information, name, cottage, and the person in charge in their cottage. The operator then stated she would pass on the information to the advocate in area and the school. The operator stated they are not mandatory reporters and they would not report the phone call to an outside agency unless requested by the student.

The facility provided a No Means No flyer providing the following reporting options to students.

The State Training School offers multiple ways to report sexual abuse and sexual harassment. Reports can be made confidentially.

- Call Crisis Intervention Service at #211 (available 24 hours a day, 7 days a week)
- Call the Child Abuse Hotline at 1-800-362-2178 (available 24 hours a day, 7 days a week)

- Report to any staff, volunteer, contractor, or medical or mental health staff.
- Submit a grievance.
- Report to the PREA coordinator or PREA compliance manager.
- Tell a family member, friend, legal counsel, or anyone else outside the facility. They can report on your behalf by calling the Child Abuse Hotline at 1-800-362-2178 or emailing prea.report@dhs.state.ia.us.
- You also can submit a report on someone's behalf, or someone at the facility can report for you using the ways listed here.

(c) State Training School for Boys PAQ states 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. 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.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 15, section V. A. 3., states, "Staff shall accept reports made verbally, in writing, anonymously, and from third parties and shall promptly document any verbal reports."

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 5, section XVIII., states, "Any employee, contractor, or volunteer shall report within 24 hours or on the next scheduled working day any allegation or founding of abuse or being arrested for, charged with, or convicted of any felony or misdemeanor against the person arising from the person's actions outside the work place."

(d) State Training School for Boys PAQ states the facility provides residents with access to tools to make written reports of sexual abuse or 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.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 15, section V. A. 4., states, "The State Training School shall provide students with access to tools necessary to make a written report."

(e) State Training School for Boys PAQ states the agency has established procedures for staff to privately report sexual abuse and sexual harassment of residents.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 15, section V. A. 5., states, "The State Training School shall provide a method for staff to privately report sexual abuse and sexual harassment of students. Staff can report in the following ways:

- a. To any supervisor by phone
- b. To any supervisor in person
- c. To any supervisor in writing (through email, interdepartmental mail, mailbox)"

Through such reviews of the student produced PREA posting throughout the facility, enhancing awareness for students and staff, the facility exceeds the standard requirements.

115.352	Exhaustion of administrative remedies
	<p data-bbox="280 188 1007 224">Auditor Overall Determination: Meets Standard</p> <p data-bbox="280 264 580 300">Auditor Discussion</p> <p data-bbox="280 340 544 376">Document Review:</p> <ol data-bbox="280 412 1422 560" style="list-style-type: none"><li data-bbox="280 412 842 448">1. State Training School for Boys PAQ<li data-bbox="280 483 1422 560">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <p data-bbox="280 667 437 703">Interviews:</p> <ol data-bbox="280 739 1235 990" style="list-style-type: none"><li data-bbox="280 739 608 775">1. Random Students<li data-bbox="280 810 612 846">2. Targeted Students<li data-bbox="280 882 743 918">3. Youth Counselor Supervisor<li data-bbox="280 954 1235 990">4. Treatment Program Administrator / PREA Compliance Manager <p data-bbox="280 1025 1485 1272">Youth interviewed were aware of the grievance procedures and understood they could complete a grievance, if necessary and place it in the grievance box located in their Cottage, near the entry to the bathrooms. Students stated grievances are either available in the paper rack or they could ask a staff and have never had an issue getting the grievance and a pen or pencil to complete the form. Students stated staff will also help them complete the grievance.</p> <p data-bbox="280 1379 1449 1496">The interview with the Youth Counselor Supervisor demonstrated between himself and the Director of Treatment Services check the grievance boxes are check six days' week and only four staff have grievance box keys assigned to them.</p> <p data-bbox="280 1603 528 1639">Site Observation:</p> <p data-bbox="280 1680 1469 1796">During the tour the Auditor witnessed the grievance box in the Cottages and student forms, to include grievances available in magazine rack near the entrances of bathrooms or sleeping areas.</p> <p data-bbox="280 1904 1414 1984">(a) State Training School for Boys PAQ states the agency has an administrative procedure for dealing with resident grievances regarding sexual abuse.</p>

(b) State Training School for Boys PAQ states the agency policy or procedure allows a resident to submit a grievance regarding an allegation of sexual abuse at any time regardless of when the incident is alleged to have occurred.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 15, section B. 1., states, "The State Training School shall not impose a time limit on when a student may submit a grievance regarding an allegation of sexual abuse; however, may apply otherwise-applicable time limits on any portion of the grievance that does not allege an incident of sexual abuse."

(c) State Training School for Boys PAQ states the agency's policy and procedure allows a resident to submit a grievance alleging sexual abuse without submitting it to the staff member who is the subject of the complaint. The agency's policy and procedure requires that a resident grievance alleging sexual abuse not be referred to the staff member who is the subject of the complaint.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 16, section B. 4., states, "The State Training School shall ensure that:

a. A student who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and

b. Such grievance is not referred to the staff member who is the subject of the complaint"

(d) State Training School for Boys PAQ states the agency's policy and procedures that require 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. In the past 12 months:

- there have been seven grievances filed alleging sexual abuse;

- In the past 12 months, the number of grievances alleging sexual abuse that reached final decision within 90 days after being filed was seven;

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 16, section B. 5., states, "The State Training School 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 whenever possible.

a. The 90-day time period shall not include time used by students in preparing an

administrative appeal.

b. STS may claim an extension of the time to respond of up to 70 days if needed. The student shall be notified in writing of the extension.

c. The student may consider an absence of response within the time periods as a denial at that level.”

(e) State Training School for Boys PAQ states 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. Agency policy and procedure requires that the resident declines to have third-party assistance in filing a grievance alleging sexual abuse, the agency documents the resident’s decision to decline.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 16, section B. 6., states, “Third parties shall be permitted to assist students in filing requests for administrative remedies relating to allegations of sexual abuse and shall also be permitted to file such requests on behalf of students.

a. Third parties include other students, staff, family members, attorneys and outside advocates.

b. When requests are filed by third parties, STS may require that the alleged victim agrees with and will personally pursue any subsequent steps in the administrative remedy process. STS shall document a student’s decision to decline to process a request.

c. A student’s parent or legal guardian shall be allowed to file a grievance or an appeal regarding allegations of sexual abuse on behalf of the student. The grievance or appeal shall not be conditioned upon the student agreeing to have the request filed on his behalf.”

(f) State Training School for Boys PAQ states the facility 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. The facilities policy and procedures for emergency grievances alleging substantial risk of imminent sexual abuse require an initial response within 48 hours. The facilities policy and procedure for emergency grievances alleging substantial risk of imminent sexual abuse require that a final agency decision be issued within 5 days. The number of emergency grievances alleging substantial risk of imminent sexual abuse that were filed in the past 12 months was zero.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 17, section B. 7., states, “STS administrative staff shall be notified immediately when there is an allegation that a student is at substantial risk of imminent sexual abuse.

a. Immediate corrective action shall be taken with an initial response within 48 hours and final decision in five (5) calendar days, documenting whether the student is in substantial risk of imminent sexual abuse and the action taken in response.”

(g) State Training School for Boys PAQ states the facility 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. In the past 12 months, there have been five grievances alleging sexual abuse to occasions where the agency demonstrated that the resident filed the grievance in bad faith.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 17, section B. 8., states, “A student may be disciplined for filing a grievance alleging sexual abuse only when STS demonstrates that the grievance was filed in bad faith.”

Through such reviews, the facility meets the standard requirements.

115.353	Resident access to outside confidential support services and legal representation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. State Training School for Boys PAQ 2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 3. Memorandum of Understanding Crisis Intervention Service, dated 1.31.2023 4. No Means No Flyer, not dated <p>Interviews</p> <ol style="list-style-type: none"> 1. Random Students 2. Targeted Students 3. Youth Service Workers 4. Treatment Program Administrator / PREA Compliance Manager 5. Executive Officer / PREA Coordinator <p>Staff and students interviewed were aware of outside reporting agencies and spoke to the information being posted on the youth bulletin board. Youth were aware of pressing #211 to contact the PREA Hotline.</p> <p>The interview with the Treatment Program Administrator / PREA Compliance Manager and the Executive Officer / PREA Coordinator demonstrated legal mail is not opened when mailed out to or received from legal professionals and mail is delivered to students by the Cottage Director.</p> <p>Site Observation:</p> <p>During the onsite review the Auditor tested the youth pay phones in an attempt to contact the PREA Hotline. When dialing #211 the Crisis Intervention Operator answered the phone on the third ring. After proper introductions and the reason for the call, the Operator stated upon request she would connect the student with a sexual abuse advocate, if one wasn't available she would collect contact information</p>

and they would call the student back. The Operator stated the service would report to allegation to law enforcement upon request and would not report to the Agency.

During the onsite review the mailroom was observed behind a locked door behind the data collection clerk desk. Each Cottage has their own mail slot and access to the area is limited to Administrative personnel.

(a) State Training School for Boys PAQ states the facility provides residents with access to outside victim advocates for emotional support services related to sexual abuse.

The facility provides residents with access to such services by giving residents (by providing, posting, or otherwise making accessible) mailing addresses and telephone numbers (including toll-free hotline numbers where available) for local, State, or national victim advocacy or rape crisis organizations.

- The facility provides residents (by providing, posting, or otherwise making accessible) with access to such services by giving residents mailing addresses and telephone numbers (including toll-free hotline numbers where available) for immigrant services agencies for persons detained solely for civil immigration purposes.
- The facility provides residents with access to such services by enabling reasonable communication between residents and these organizations in as confidential a manner as possible.
- The facility does not detain solely for civil immigration purposes.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 17, section C. 1., states, "The State Training School shall provide students with access to outside victim advocates for emotional support services related to sexual abuse, by providing, posting, or otherwise making accessible mailing addresses and telephone numbers, including toll-free hotlines where available, of local, State, or national victim advocacy or rape crisis organizations. The facility shall enable reasonable communication between students and these organizations and agencies, in as confidential a manner as possible."

(b) State Training School for Boys PAQ states the facility informs residents, prior to giving them access to outside support services, the extent to which such communications will be monitored. The facility informs residents, prior to giving them access to outside support services, of the mandatory reporting rules governing privacy, confidentiality, and/or privilege that apply for disclosures of sexual abuse made to outside victim advocates, including any limits to

confidentiality under relevant Federal, State, or local law.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 17, section C. 2., states, "The State Training School shall inform students, 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."

(c) State Training School for Boys PAQ states the facility maintains memoranda of understanding with community service providers that are able to provide residents with emotional support services related to sexual abuse.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 17, section C. 3., states, "The State Training School shall maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide students with confidential support services related to sexual abuse. The State Training School shall maintain copies of agreements or documentation showing attempts to enter into such agreements."

The facility provided a Memorandum of Understanding (MOU) Crisis Intervention Service. Page 1, section Purpose, states, "To establish written procedures that are in compliance with the Prison Rape Elimination Act (PREA) standards, concerning the exchange of information and the coordination of efforts and assets between the State Training School (STS) and Crisis Intervention Services with sexual assault or abuse concerns/incidents involving STS students." This MOU appears to expire and must be renewed annually. The MOU is signed by the State Training School Superintendent on 1.27.2023 and the Crisis Intervention Service Executive Director on 1.31.2023.

On 3.7.2023 at 9:32 am, this Auditor contacted Crisis Intervention Services at 206 3rd Street NE in Mason City, IA at 641.424.9133. After proper introductions and the reason for the call, the operator stated this is the same service for outside reporting. The Auditor was connected with a Supervisor who stated the agency is aware of the memorandum of understanding provide services advocacy services to the students at the State Training School. The supervisor stated, after normal business hours' calls are rolled to the National Help Line Victim Call Service Center, and whoever is on call would meet students at a hospital and begin working with the facility to establish services. Ongoing services at the facility would depend on what students prefer, if a student chooses to be private they advocate would not be able to follow up with them. When students choose to disclose who they are the agency will work

with facility staff to arrange services. The supervisor did state she has met with facility staff, has toured the facility and met with new PREA Director.

(d) The facility provides residents with reasonable and confidential access to their attorneys or other legal representation. The facility provides residents with reasonable access to parents or legal guardians.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 17, section C. 4., states, "The State Training School shall also provide students with reasonable and confidential access to their attorneys or other legal representation and reasonable access to parents or legal guardians." The PREA Compliance Manager stated the following:

- Students may visit with their parents/attorneys/JCOs on campus (in person) at scheduled times.
- Students may call parents/attorneys/JCOs by phone or through FaceTime.
- Students may write their parents/attorneys/JCOs.
- STS has policies that govern student communication, attorney contacts, etc."

Through such reviews, the facility meets the standard requirements.

115.354	Third-party reporting
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 297">Auditor Discussion</p> <p data-bbox="280 340 544 374">Document Review:</p> <ol data-bbox="280 412 1409 629" style="list-style-type: none"> <li data-bbox="280 412 831 445">1. State Training School for Boys PAQ <li data-bbox="280 483 1409 562">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <li data-bbox="280 600 1102 633">3. Post Audit: STS Investigation Report, dated 4.11.2023 <p data-bbox="280 741 427 775">Interviews</p> <ol data-bbox="280 813 1225 1061" style="list-style-type: none"> <li data-bbox="280 813 596 846">1. Random Students <li data-bbox="280 884 603 918">2. Targeted Students <li data-bbox="280 956 660 990">3. Youth Service Workers <li data-bbox="280 1028 1225 1061">4. Treatment Program Administrator / PREA Compliance Manager <p data-bbox="280 1099 1461 1216">Interview with students and staff demonstrated their reporting knowledge of third party reporting stating family members, or Juvenile Correction Officers could report sexual harassment or sexual abuse allegations for them, if needed.</p> <p data-bbox="280 1328 528 1361">Site Observation:</p> <p data-bbox="280 1400 1433 1516">During the tour of the Canteen where visits occur, a No Means No posting was present with external reporting information to include a phone number and email address.</p> <p data-bbox="280 1628 1469 1700">During interviews, a student reported a sexual harassment allegation to the Auditor who in turn completed a third party report to the facility PREA Compliance Manager.</p> <p data-bbox="280 1812 539 1845">Recommendation:</p> <p data-bbox="280 1883 1461 2045">The Auditor requested the facility forward upload completed investigation to the online audit system, once completed. The facility provided a completed investigation report with an unsubstantiated outcome and the report was uploaded to the supplemental files in the online audit system.</p>

(a) State Training School for Boys PAQ states the facility provides a method to receive third-party reports of resident sexual abuse or sexual harassment. The agency publicly distributes information on how to report resident sexual abuse or sexual harassment on behalf of residents. The agency website for third-party reporting is as follows: prea.report@dhs.state.ia.us

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 17, section D.1., states, "The State Training School shall establish an email and toll free line dedicated to receiving third-party reports of sexual abuse and sexual harassment and shall distribute publicly the information on how to report sexual abuse and sexual harassment on behalf of a student. The following email and toll free lines are established for such reporting prea.report@dhs.state.ia.us Department of Inspections and Appeals (DIA) complaint line Crisis Intervention Services Sexual Assault Hotline."

On 3.7.2023 at 11:49 am this Auditor sent the following email to prea.report@dhs.state.ia.us. My name is Karen Murray and I am preparing to audit the State Training School in Eldora, Iowa. Could you please provide information on how this address would respond if you were to receive a third party report? Thank you in advance for your time.

On 3.7.2023 at 12:39 pm, the following response was provided.

"This is Mark, PREA Coordinator responding. Ben and I man the email. If this was an actual allegation report, I/Ben would take the information from this report and notify STS Management, if it involved a current student(s) we would separate immediately and initiate an investigation. If the allegation involved a staff, we would separate the staff during the investigation and report to DIA (our 3rd party investigative agency), possibly police depending on seriousness of allegation, begin investigation.

In summary, we would respond immediately upon receiving the allegation by notifying proper staff, separate folks (victims/perps), notify proper agencies within 24hours, and conduct our own investigation, goal is to try and close out investigations within 5 business days of an allegation.

If the person making the report provided their information, we would respond letting them know we received the report and were investigating the concern. "

	<p>Through such reviews, the facility meets the standard requirements.</p>
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115.361	Staff and agency reporting duties
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 297">Auditor Discussion</p> <p data-bbox="280 353 288 376">.</p> <p data-bbox="280 416 544 445">Document Review:</p> <ol data-bbox="280 488 1437 813" style="list-style-type: none"> <li data-bbox="280 488 831 517">1. State Training School for Boys PAQ <li data-bbox="280 557 1406 629">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <li data-bbox="280 669 970 698">3. Post Audit: Revised STS Investigation Report <li data-bbox="280 739 1437 813">4. Post Audit: State Training School PREA Audit Action Plan Memorandum, dated 4.14.2023 <p data-bbox="280 927 437 956">Interviews:</p> <ol data-bbox="280 999 1225 1173" style="list-style-type: none"> <li data-bbox="280 999 596 1028">1. Random Students <li data-bbox="280 1068 659 1097">2. Youth Service Workers <li data-bbox="280 1137 1225 1173">3. Treatment Program Administrator / PREA Compliance Manager <p data-bbox="280 1216 1461 1330">Interviews with the staff and students demonstrated each actively practices and understood the importance of immediately reporting all allegations of sexual abuse and sexual harassment.</p> <p data-bbox="280 1444 541 1473">Site Observations:</p> <p data-bbox="280 1516 1430 1630">Investigation review demonstrated the victim’s parents, legal guardian, case worker, and or attorneys were not notified promptly when an allegation of sexual abuse was received, updated or resolved.</p> <p data-bbox="280 1744 448 1774">Action Plan:</p> <p data-bbox="280 1816 1461 2056">The facility to provide a sustainable action plan, via memorandum, stating who will be responsible for making prompt notifications, documenting such notifications and when such notifications will occur. The facility provided a revised STS Investigation Report demonstrating pages 1 and 2 have been revised to include the following prompts: ‘Date Parent or Caseworker Notified of Allegation’, Dates(s) Parent or Caseworker Notified of Investigation Updates/Outcome’, ‘Date Attorney and JCO</p>

Notified of Allegation', Date(s) Attorney and JCO Notified of Investigation Updates/ Outcome'.

The facility provided a State Training School PREA Audit Action Plan memorandum stating, "STS acknowledges that it has not been standard practice to notify alleged victim's parent(s)/guardian(s), attorney, and JCO promptly following all allegations of sexual abuse. Standard practice has been to notify these parties following credible allegations of sexual abuse and sexual harassment. STS will now act to ensure prompt notification of the alleged victim's parent(s)/guardian(s), attorney and JCO following all allegations of sexual abuse and upon the completion of investigations. STS will also ensure that notification of these parties is properly documented."

(a) State Training School for Boys PAQ states the agency requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency. The agency requires all staff to report immediately and according to agency policy any retaliation against Residents or staff who reported such an incident. The agency requires all staff to report immediately and according to agency policy any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 18, section VI. A. 1., states, "State Training School staff, contractors, and volunteers shall report, to their supervisor, immediately any knowledge, suspicion, or information regarding:

- a. An incident of sexual abuse or sexual harassment that occurred in the State Training School or another facility;
- b. Retaliation against students or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation."

(b) State Training School for Boys PAQ states the agency requires all staff to comply with any applicable mandatory child abuse reporting laws.

(c) State Training School for Boys PAQ states apart from reporting to the designated supervisors or officials and designated State or local service agencies, agency policy prohibits staff from revealing any information related to a sexual

abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 18, section VI. A. 2., states, "Apart from reporting to their supervisor, State Training School staff shall not reveal any information related to a sexual abuse or sexual harassment report to anyone other than to the extent necessary to make treatment or investigation decisions."

(d) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 18, section VI. A. 3., states, "Medical and mental health personnel shall be required to verbally inform students at the initiation of services of their duty to report and the limitations of confidentiality."

(e) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 18, section VI. A. 4-5., state,

4 "Upon receiving allegations of sexual abuse, the State Training School Superintendent or designee shall promptly report the allegation to local law enforcement, DIA and the Division Administrator and to the student victim's parents or legal guardians, as appropriate; unless there is official documentation showing the parents or legal guardians should not be notified.

5 If a juvenile court retains jurisdiction over the student victim, the State Training School Superintendent or designee shall also report the allegation to the juvenile's attorney or other legal representative within 14 days of receiving the allegation."

(f) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 18, section VI. A. 6., states, "The State Training School shall report all allegations of sexual abuse, including third-party and anonymous reports, to the State Training School designated investigators."

Through such reviews, the facility meets the standard requirements.

115.362	Agency protection duties
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 580 297">Auditor Discussion</p> <p data-bbox="280 340 544 374">Document Review:</p> <ol data-bbox="280 412 1418 557" style="list-style-type: none"> <li data-bbox="280 412 839 445">1. State Training School for Boys PAQ <li data-bbox="280 483 1418 557">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <p data-bbox="280 669 437 703">Interviews:</p> <ol data-bbox="280 741 1235 846" style="list-style-type: none"> <li data-bbox="280 741 1235 775">1. Treatment Program Administrator / PREA Compliance Manager <li data-bbox="280 813 938 846">2. Youth Counselor Supervisor / Investigator <p data-bbox="280 884 1442 1043">Interviews with the Treatment Program Administrator / PREA Compliance Manager and Youth Counselor Supervisor / Investigator demonstrated the facility staff act promptly and responds properly at the discovery of any incident involving sexual harassment and sexual abuse.</p> <p data-bbox="280 1155 1418 1352">(a) State Training School for Boys PAQ states 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. In the past 12 months, the number of times the agency or facility has determined that a resident was subject to a substantial risk of imminent sexual abuse was zero.</p> <p data-bbox="280 1464 1481 1538">State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 19, section VI. B. 1-3., states,</p> <ol data-bbox="280 1576 1458 1921" style="list-style-type: none"> <li data-bbox="280 1576 1458 1650">1. "The State Training School shall take immediate action to protect a student who is subject to substantial risk of imminent sexual abuse within its facility. <li data-bbox="280 1688 1458 1809">2. This will include separating the victim from the alleged perpetrator immediately and assuring there is no-contact between the two until the conclusion of a comprehensive investigation. <li data-bbox="280 1848 1426 1921">3. The victim will be supervised and monitored for safety and protection against potential retaliation." <p data-bbox="280 2033 1241 2067">Through such reviews the facility meets the standard requirements.</p>

115.363	Reporting to other confinement facilities
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 297">Auditor Discussion</p> <p data-bbox="280 340 544 374">Document Review:</p> <ol data-bbox="280 412 1418 629" style="list-style-type: none"> <li data-bbox="280 412 839 445">1. State Training School for Boys PAQ <li data-bbox="280 483 1418 562">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <li data-bbox="280 600 852 633">3. Email Notification, dated 7.22.2022 <p data-bbox="280 741 437 775">Interviews:</p> <ol data-bbox="280 813 1050 918" style="list-style-type: none"> <li data-bbox="280 813 572 846">1. Superintendent <li data-bbox="280 884 1050 918">2. Division Director of State Facilities / Agency Head <p data-bbox="280 956 1449 1196">Interviews with the Superintendent and Division Director of State Facilities demonstrated that they were aware upon receiving an allegation that a youth was sexually abused while confined at another facility, they had the responsibility to notify the head of the facility where the allegation occurred. Both staff stated they would begin an internal investigation and keep in contact with the facility and cooperate with them throughout the investigation process.</p> <p data-bbox="280 1308 525 1341">Site Observation:</p> <p data-bbox="280 1379 1481 1541">The facility had one reported allegation of sexual abuse while a youth was confined at another facility in the past 12 months. The facility provided the email notification during the pre-audit phase regarding the student who alleged to have experienced a sexual experience in a past facility.</p> <p data-bbox="280 1648 1481 2063">(a) State Training School for Boys PAQ states 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. The agency's policy also requires that the head of the facility notify the appropriate investigative agency. In the past 12 months, the facility has received zero allegations that a resident was abused while in confinement at another facility. The facility response to allegations would be to gather information; notify supervisor and compliance manager; submit an incident report; refer the allegation to the head of the facility of the alleged abuse within 72 hours; assist with</p>

investigation, as needed.”

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 19, section VI. C. 1., states, “Upon receiving an allegation that a student was sexually abused while a student at another facility, the State Training School Superintendent shall notify, as soon as possible but no later than 72 hours after receiving the allegation, the head of the facility or appropriate office of the agency where the alleged abuse occurred and shall also notify the appropriate investigative agency. The State Training School shall document that this notification was made.”

(b) State Training School for Boys PAQ states agency policy requires that the facility head provides such notification as soon as possible, but no later than 72 hours after receiving the allegation. Policy compliance can be found in provision (a) of this standard.

(c) State Training School for Boys PAQ states the facility documents that it has provided such notification within 72 hours of receiving the allegation. The PAQ states, “Student reported sexual assault that occurred when he was at Central Iowa Juvenile Detention Center. PREA Manager and student's assigned counselor interviewed student regarding his allegation. STS Superintendent attempted to contact the director of CIJDC by phone, but did not have any success. Superintendent contacted CIDJC by email to notify the facility about the student's allegation. Additionally, PREA Manager reported student's allegation to Department of Human Services.”

The facility provided an email notification from the Superintendent to the receiving agency, documenting a contact made with the receiving facility regarding an allegation of sexual abuse.

(d) State Training School for Boys PAQ states facility policy requires that allegations received from other agencies or facilities investigated in accordance with the PREA standards. In the last 12 months, there have been zero allegations of sexual abuse the facility received from other facilities.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 19, section VI. C. 1., states, “Upon receiving an allegation from another facility that a student was sexually abused while a resident at the State Training School, the allegation shall be investigated.”

	<p>Through such reviews, the facility meets the standard requirements.</p>
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115.364	Staff first responder duties
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 297">Auditor Discussion</p> <p data-bbox="280 340 544 374">Document Review:</p> <ol data-bbox="280 412 1418 557" style="list-style-type: none"> <li data-bbox="280 412 839 445">1. State Training School for Boys PAQ <li data-bbox="280 483 1418 557">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <p data-bbox="280 669 437 703">Interviews:</p> <ol data-bbox="280 741 700 844" style="list-style-type: none"> <li data-bbox="280 741 667 775">1. Youth Service Workers <li data-bbox="280 813 700 844">2. Youth Service Technician <p data-bbox="280 884 1453 1209">Interviews with staff demonstrated each were aware of their first responder responsibilities. Staff stated reporting information is posted throughout the facility. Staff stated they would separate victims from perpetrators into one of three areas, keep the victim with them and make sure students were safe. Staff stated they would not allow students to wash, drink or change clothing and preserve the area where the incident was alleged to have occurred until proper personnel could respond. Staff stated they would contact their immediate supervisor, a Youth Service Technician or the Duty Superintendent.</p> <p data-bbox="280 1319 526 1352">Site Observation:</p> <p data-bbox="280 1393 1430 1592">None of the seven sexual abuse allegations reported in the past months required students to be separated upon receipt of the allegation. Sources of allegations received included verbal reports to staff, a #211 hotline call, slips of paper and a third party report demonstrating internal and external reporting mechanisms are responded to with a completed investigation.</p> <p data-bbox="280 1702 1481 2072">(a) State Training School for Boys PAQ states the agency has a first responder policy for allegations of sexual abuse. 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, preserve, protect, collect 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. 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</p>

evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. In the past 12 months, seven allegations occurred where a resident was sexually abused. Of these allegations, the number of times the first security staff member to respond to the report separated the alleged victim and abuser was seven.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 19, section D. 1-2., states,

1. "Upon learning of an allegation that a student was sexually abused, the first staff member to respond shall immediately separate the student victim and alleged abuser while protecting and preserving the crime scene until appropriate steps can be taken to collect any evidence.

2. If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the student victim and 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."

(b) State Training School for Boys PAQ states the facility's' 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 and notify security staff. 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 was zero.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 19, section D. 3., states, "If the first staff responder is not a direct care or supervision staff member, the responder shall be required to request that the student victim not take any actions that could destroy physical evidence, and then notify the appropriate STS staff."

Through such reviews, the facility meets the standard requirements.

115.365	Coordinated response
	<p data-bbox="280 188 1007 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 580 300">Auditor Discussion</p> <p data-bbox="280 340 544 376">Document Review:</p> <ol data-bbox="280 412 1410 631" style="list-style-type: none"> <li data-bbox="280 412 831 448">1. State Training School for Boys PAQ <li data-bbox="280 483 1410 560">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <li data-bbox="280 595 1070 631">3. Response to Allegation of Sexual Assault, not dated <p data-bbox="280 739 437 775">Interviews:</p> <ol data-bbox="280 810 1225 1061" style="list-style-type: none"> <li data-bbox="280 810 660 846">1. Youth Service Workers <li data-bbox="280 882 1225 918">2. Treatment Program Administrator / PREA Compliance Manager <li data-bbox="280 954 564 990">3. Superintendent <li data-bbox="280 1025 858 1061">4. Executive Officer / PREA Coordinator <p data-bbox="280 1097 1410 1214">Interviews with facility staff demonstrated the response to allegations of sexual assault is written to coordinate actions taken in response to sexual abuse and sexual harassment incidents.</p> <p data-bbox="280 1330 528 1366">Site Observation:</p> <p data-bbox="280 1402 1426 1473">Review of the agency policy for incidents demonstrates clear direction to staff to ensure first responder duties are fulfilled.</p> <p data-bbox="280 1581 1426 1742">(a) State Training School for Boys PAQ states the facility developed a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership.</p> <p data-bbox="280 1850 1481 2056">State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 19, section E. 1., states, "The State Training School shall develop a written facility plan to coordinate actions taken in response to an incident of sexual abuse and sexual harassment among staff first responders, medical and mental health personnel, investigators, and facility leadership."</p>

The facility provided a Response to Allegation of Sexual Assault chart. The chart provides instruction for the following departments.

- First Responder
- YST
- Nurse
- Duty Superintendent
- Superintendent / PREA Manager
- Student Counselor
- Notes for all involved:

Through such reviews, the facility meets the standard requirements.

115.366	Preservation of ability to protect residents from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. State Training School for Boys PAQ 2. Collective Bargaining Agreement between the State of Iowa and The American Federation of State, County, and Municipal Employees, Council 61 AFL-CIO, dated 2021-2023 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Superintendent <p>The interview with the Superintendent demonstrated current collective bargaining is only in place for salary purposes.</p> <p>(a) State Training School for Boys PAQ states the agency, facility, or any other governmental entity is not responsible for collective bargaining on the agency's behalf or 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. The facility provided a collective bargaining agreement, which demonstrates the agreement is in place to protect only employee pay schedules. Employees are mandated to follow all other State Training School personnel and facility policy through the hiring process.</p> <p>Through such reviews, the facility meets the standard requirements.</p>

115.367	Agency protection against retaliation
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 580 297">Auditor Discussion</p> <p data-bbox="280 340 544 374">Document Review:</p> <ol data-bbox="280 412 1410 629" style="list-style-type: none"> <li data-bbox="280 412 831 445">1. State Training School for Boys PAQ <li data-bbox="280 483 1410 562">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <li data-bbox="280 600 971 633">3. Post Audit: Revised STS Investigation Report <p data-bbox="280 741 437 775">Interviews:</p> <ol data-bbox="280 813 572 846" style="list-style-type: none"> <li data-bbox="280 813 572 846">1. Youth Counselor <p data-bbox="280 884 1477 1126">An interview with the Youth Counselor demonstrated that students are introduced to retaliation procedures during the intake process where he explains his role as the retaliation monitor, goals of retaliation monitoring and again upon receipt of an allegation of sexual abuse. The Youth Counselor stated periodic check ins are completed and documented weekly for the first month and monthly thereafter for 90 days or as long as may be necessary to ensure the student is safe.</p> <p data-bbox="280 1234 528 1267">Site Observation:</p> <p data-bbox="280 1305 1433 1424">Review of investigation files demonstrated retaliation monitoring was completed; however, corresponding dates documentation was not documented on the investigation memo.</p> <p data-bbox="280 1532 539 1565">Recommendation:</p> <p data-bbox="280 1603 1473 1890">The facility document initial, periodic and end dates on the investigation memo or subsequent attachments to ensure checks were completed per standard requirements. The facility stated they have added prompt on standard Investigation Report Template to ensure relation check date ranges are identified following allegations of sexual abuse/harassment. The facility provided a revised STS Investigation Report demonstrating page 2 has an additional section for 'Retaliation checks started, start and end dates.'</p> <p data-bbox="280 1998 1469 2076">(a/e) State Training School for Boys PAQ states the agency has a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate</p>

with sexual abuse or sexual harassment investigations from retaliation by other residents or staff. The agency designates the Cottage Directors and / or Cottage Counselors with the responsibility of retaliation monitoring.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 20, section F. 1., states, "The State Training School has zero-tolerance for retaliation of any kind against student victims or staff members who report sexual abuse and sexual harassment or cooperate with sexual abuse or sexual harassment investigations. Immediately following the report of such an incident, a staff member or outside department will be charged with monitoring retaliation. Monitoring will include but not be limited to a counselor, direct care staff or appropriate supervisor checking in with a staff or student who reported or suffered abuse or was a victim of harassment to get verbal confirmation of the individual's current mental status and perceptions related to retaliation at least weekly."

(b) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 20, section F. 2., states, "The State Training School shall employ multiple protection measures, such as housing changes or transfers for student victims or abusers, removal of alleged staff or student abusers from contact with victims, and emotional support services for students or staff that fear retaliation for reporting sexual abuse or sexual harassment for cooperating with investigations."

(c/d) State Training School for Boys PAQ states 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. The number of times an incident of retaliation occurred in the past 12 months was zero.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 20, section F. 3., states, "For at least 90 days following a report of sexual abuse or sexual harassment, the State Training School shall monitor the conduct and treatment of students or staff who have reported sexual abuse and sexual harassment, as well as of student victims who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by students or staff, and shall promptly act to remedy any such retaliation. Items the agency should monitor include any student disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. The State Training School shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need.

In the case of students and staff involved in incidents or allegations, such monitoring shall include no less than weekly status checks.”

Through such reviews, the facility meets the standard requirements.

115.368	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: <ol style="list-style-type: none">1. State Training School for Boys PAQ2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 Interviews: <ol style="list-style-type: none">1. Youth Counselor <p>The Youth Counselor who supervises youth in isolation stated a student has never been placed in isolation for reasons related to PREA, in her employ. Furthermore, the Youth Counselor stated students are rarely in isolation for more than 15 minutes and the longest she has observed was three hours where staff were in constant contact with the youth until he was de-escalated and could resume programming.</p> <p>(a) State Training School for Boys PAQ states the facility has a policy that residents who allege to have suffered sexual abuse may only be placed in isolation as a last resort if less restrictive measures are inadequate to keep them and other residents safe, and only until an alternative means of keeping all residents safe can be arranged. The number of residents who allege to have suffered sexual abuse who were placed in isolation in the past 12 months was zero.</p> <p>State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 20, section G. 1., states, "Refer to Standard 115.342 for the use of segregation and housing option for student protection."</p> <p>Through such reviews, the facility meets the standard requirements.</p>

115.371	Criminal and administrative agency investigations
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 297">Auditor Discussion</p> <p data-bbox="280 340 544 374">Document Review:</p> <ol data-bbox="280 412 1418 703" style="list-style-type: none"> <li data-bbox="280 412 839 445">1. State Training School for Boys PAQ <li data-bbox="280 483 1418 557">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <li data-bbox="280 595 839 629">3. State Training School Investigation <li data-bbox="280 667 735 701">4. Investigation Dataset 2022 <p data-bbox="280 813 437 846">Interviews:</p> <ol data-bbox="280 884 938 918" style="list-style-type: none"> <li data-bbox="280 884 938 918">1. Youth Counselor Supervisor / Investigator <p data-bbox="280 956 1442 1158">The interview with the Youth Counselor Supervisor / Investigator demonstrated he clearly understood and articulated processes required during an investigation, to include interviewing of victims, witnesses, perpetrator, reviewing available video, staff placements, policy requirements and discussing observations with facility administration when determining an outcome.</p> <p data-bbox="280 1267 528 1301">Site Observation:</p> <p data-bbox="280 1339 1473 1496">The facility had seven sexual harassment investigations and seven sexual abuse investigations, each completed timely, thoroughly and objectively. Of the seven sexual abuse investigations, two were unsubstantiated and four were unfounded for various appropriate reasons.</p> <p data-bbox="280 1606 1377 1680">(a) State Training School for Boys PAQ states the agency/facility has a policy related to criminal and administrative agency investigations.</p> <p data-bbox="280 1792 1481 2036">State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 20, section VII. A. 1., states, “The State Training School will facilitate prompt, thorough, and objective investigations into all allegations of sexual abuse or sexual harassment. Where sexual abuse has been alleged, the allegation will be immediately forwarded to law enforcement or the Department of Inspections and Appeals as appropriate for a complete investigation.”</p>

(b) Policy compliance can be found in §115.334, regarding where sexual abuse is alleged, the agency shall use investigators who have received special training in sexual abuse investigations involving juvenile victims pursuant to § 115.334.

(c) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 21, section VII. A. 2., states, "The appropriate individuals shall gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview student victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator."

(d) State Training School for Boys PAQ states the agency does not terminate an investigation solely because the source of the allegation recants the allegation.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 21, section VII. A. 3., states, "The State Training School shall not terminate an investigation solely because the source of the allegation recants the allegation."

(e) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 21, section VII. A. 5., states, "When the quality of evidence appears to support criminal prosecution, the State Training School shall conduct compelled interviews only after consulting with law enforcement as to whether compelled interviews may be an obstacle for subsequent criminal prosecution."

(f) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 21, section VII. A. 6., states, "The credibility of a student victim, alleged abuser, or witness shall be assessed on an individual basis and shall not be determined by the person's status as student or staff. The State Training School will not require a student 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."

(g/h) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 21, section VII. A. 10., states, "Administrative investigations shall include an effort to determine whether staff actions or failures to act contributed to any sexual abuse or sexual harassment and 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.”

The facility provided a State Training School Investigation. The investigation documents the following information.

- Allegation Summary
- Investigators and Dates of Investigation
- Alleged Perpetrator(s) Information
- Alleged Victim Information
- Interview Summaries
- List of Individuals Interviewed
- List of Documents or Evidence Reviewed
- Investigative Conclusion
- Recommendation / Follow Up
- Student Notification
- JCO's Notified
- Safety Plan drafted
- Retaliation checks started?
- Student re-screened for perpetration/victimization
- Referred to counseling and/or victim advocacy.

The facility provided an Investigation Dataset 2022. The dataset is a spreadsheet documenting the following information on investigations.

- Event Date
- Investigation Start Date
- Investigation End Date
- Victim
- Perpetrator(s)
- Student/Staff Flag

- Investigator
- Definition
- Outcome
- Consequence
- Consequence Detail
- Safety Plan Modification
- Rite Track Incident Report
- Investigation Memo

(i) State Training School for Boys PAQ states substantiated allegations of conduct that appear to be criminal are referred for prosecution. 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 was two.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 21, section VII. A. 8, states, "In all cases where criminal charges have been substantiated through investigation, the State Training School will inform the local County Attorney of such charges, for their consideration for further legal action."

(j) State Training School for Boys PAQ states the agency retains all written reports pertaining to administrative or criminal investigation of alleged sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 21, section VII. A. 11., states, "State Training School shall retain all written reports related to criminal and administrative investigations of any incidents of sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the State Training School, plus five years."

Through such reviews, the facility meets the standard requirements.

115.372	<p>Evidentiary standard for administrative investigations</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. State Training School for Boys PAQ 2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Youth Counselor Supervisor / Investigator <p>The interview with the Youth Counselor Supervisor / Investigator demonstrated the facility shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>(a) State Training School for Boys PAQ states the agency imposes a standard of a preponderance of the evidence or a lower standard of proof for determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 22, section B. 1., states, “The State Training School shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.”</p> <p>Through such reviews, the facility meets the standard requirements.</p>
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115.373	Reporting to residents
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 580 297">Auditor Discussion</p> <p data-bbox="280 340 544 374">Document Review:</p> <ol data-bbox="280 412 1418 629" style="list-style-type: none"> <li data-bbox="280 412 839 445">1. State Training School for Boys PAQ <li data-bbox="280 483 1418 562">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <li data-bbox="280 600 834 629">3. Notice of Child Abuse Assessment <p data-bbox="280 741 437 775">Interviews:</p> <ol data-bbox="280 813 1235 1061" style="list-style-type: none"> <li data-bbox="280 813 611 846">1. Targeted Students <li data-bbox="280 884 1235 918">2. Treatment Program Administrator / PREA Compliance Manager <li data-bbox="280 956 938 990">3. Youth Counselor Supervisor / Investigator <li data-bbox="280 1028 876 1061">4. Chief of Police / Criminal Investigator <p data-bbox="280 1099 1418 1178">The interview with the one targeted student who reported demonstrated he had been notified of the outcome of his sexual abuse investigation.</p> <p data-bbox="280 1285 1386 1402">The interview with the Treatment Program Administrator / PREA Compliance Manager demonstrated the facility had realized student notifications were not completed in December of 2022 and corrected noncompliance.</p> <p data-bbox="280 1509 1469 1626">The interview with the Youth Counselor Supervisor / Investigator demonstrated either himself or the PREA Compliance Manager would personally notify the student of the outcome of an investigation.</p> <p data-bbox="280 1733 1423 1812">The interview with the Chief of Police demonstrated he would contact the facility Superintendent with the outcome of his investigation.</p> <p data-bbox="280 1924 528 1957">Site Observation:</p> <p data-bbox="280 1995 1418 2074">Review of the two unsubstantiated sexual abuse investigations demonstrated documentation of one student notification had been completed, after December</p>

2022, sustaining the facilities' internal corrective action as is noted in the above interview notes.

(a) State Training School for Boys PAQ states 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. 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 was seven.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 22, section C. 1., "Following an investigation into a student's allegations of sexual abuse suffered in its facility, the State Training School shall inform the student as to whether the allegation has been determined to be substantiated, unsubstantiated or unfounded."

(b) State Training School for Boys PAQ states if an outside entity conducts such investigations, the agency requests the relevant information from the investigative entity in order to inform the resident as to the outcome of the investigation. In the past 12 months, there has been two investigations of alleged resident sexual abuse. 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 was two.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 22, section C. 2., states, "If the State Training School did not conduct the investigation, it shall request the relevant information from the investigative agency in order to inform the student."

The facility provided a Notice of Child Abuse Assessment. This assessment demonstrates the Iowa Department of Education investigated a sexual harassment allegation and provided an outcome to the facility.

(c) State Training School for Boys PAQ states following a resident's allegation that a staff member has committed sexual abuse against the resident, the agency/facility subsequently does inform the Resident (unless the agency has determined that the allegation is unfounded) whenever:

- The staff member is no longer posted within the Resident's unit;
- The staff member is no longer employed at the facility;
- The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or
- The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility."

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 22, section C. 3., states, "Following a student's allegation that a staff member has committed sexual abuse against the student, the State Training School shall subsequently inform the student (unless the allegation was determined to be unfounded) whenever:

- a. The staff member is no longer posted within the student's cottage/housing unit;
- b. The staff member is no longer employed at the State Training School;
- c. The State Training School learns that the staff member has been charged with a crime related to sexual abuse within the facility; or
- d. The State Training School learns that the staff member has been convicted on a charge related to sexual abuse within the facility."

(d) State Training School for Boys PAQ states 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: the agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or the agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 22, section C. 4., states, "Following a student's allegation that he or she was sexually abused by another student, the State Training School shall subsequently inform the alleged victim whenever:

- a. The State Training School learns that the alleged abuser has been charged with a crime related to sexual abuse within the facility; or
- b. The State Training School learns that the alleged abuser has been convicted on

a charge related to sexual abuse within the facility.”

(e) State Training School for Boys PAQ states the agency has a policy that all notifications to residents described under this standard are documented. In the past 12 months, there has been zero notifications to a resident, pursuant to this standard.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 22, section C. 5., states, “All such notification or attempts shall be documented.”

Through such reviews, the facility meets the standard requirements.

115.376	Disciplinary sanctions for staff
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 297">Auditor Discussion</p> <p data-bbox="280 340 544 374">Document Review:</p> <ol data-bbox="280 412 1418 557" style="list-style-type: none"> <li data-bbox="280 412 839 445">1. State Training School for Boys PAQ <li data-bbox="280 483 1418 557">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <p data-bbox="280 669 437 703">Interviews:</p> <ol data-bbox="280 741 600 775" style="list-style-type: none"> <li data-bbox="280 741 600 775">1. Superintendent <p data-bbox="280 813 1474 1099">Interview with the Superintendent demonstrated depending on the type of allegation the employee would be retrained if allegation involved retaliation, notify staff they would be monitored until the investigation was completed. If warranted, staff would be removed from the area where the allegation was alleged to have occurred or placed on administrative leave until the outcome of the investigation was completed. If an allegation was substantiated the staff could be terminated and any relevant licensing body would be contacted.</p> <p data-bbox="280 1207 528 1240">Site Observation:</p> <p data-bbox="280 1279 1422 1395">In the last 12 months, the facility did not have any staff who were disciplined for violation of an agency sexual abuse or sexual harassment policy, due to the one applicable staff terminating their employment.</p> <p data-bbox="280 1507 1393 1624">(a) State Training School for Boys PAQ states staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.</p> <p data-bbox="280 1736 1474 2022">State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 22-23, section VIII. A. 1., states, "Employees will be subject to disciplinary action up to and including termination of employment for substantiated allegations of abuse and/or assault. Disciplinary action that results in termination for criminal charges/ conviction, or an employee's resignation preceding termination or the completion of an ongoing investigation, shall be reported to law enforcement agencies and any relevant licensing bodies."</p>

(b) State Training School for Boys PAQ states in the last 12 months, there has been zero staff from the facility that had violated agency sexual abuse or sexual harassment policies. 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 is zero.

(c) State Training School for Boys PAQ states 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. In the past 12 months there has been zero staff requiring discipline for sexual abuse or sexual harassment.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 23, section VIII. A. 2., states, "Disciplinary sanctions for violations of 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 sanction imposed for comparable offenses by other staff with similar histories."

(d) State Training School for Boys PAQ states all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies. In the past 12 months, zero staff has been terminated for sexual abuse or harassment. Policy compliance can be found in provision (a) of this standard.

Through such reviews, the facility meets the standard requirements.

115.377	Corrective action for contractors and volunteers
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 580 297">Auditor Discussion</p> <p data-bbox="280 340 544 374">Document Review:</p> <ol data-bbox="280 412 1418 557" style="list-style-type: none"> <li data-bbox="280 412 839 445">1. State Training School for Boys PAQ <li data-bbox="280 483 1418 557">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <p data-bbox="280 669 437 703">Interviews:</p> <ol data-bbox="280 741 576 775" style="list-style-type: none"> <li data-bbox="280 741 576 775">1. Superintendent <p data-bbox="280 813 1458 969">The interview with the Superintendent demonstrated any volunteer or contractor who engaged in sexual abuse would follow the same protocol as is in procedure for staff, be removed from the facility, be reported to law enforcement and he would personally contact any applicable licensing boards.</p> <p data-bbox="280 1081 528 1115">Site Observation:</p> <p data-bbox="280 1153 1466 1227">In the last 12 months the facility did not have any volunteers or contractors subject to disciplinary action due to violating sexual abuse or sexual harassment policies.</p> <p data-bbox="280 1339 1458 1621">(a) State Training School for Boys PAQ states agency policy requires that any contractor or volunteer who engages in sexual abuse be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. Agency policy requires that any contractor or volunteer who engages in sexual abuse be prohibited from contact with residents. In the past 12 months, there have been zero contractors or volunteers reported to law enforcement or relevant licensing bodies for engaging in sexual abuse of residents.</p> <p data-bbox="280 1733 1481 1935">State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 23, section VIII. B. 1., states, "Any contractor or volunteer who engages in sexual abuse or sexual harassment shall be prohibited from contact with students and shall be reported to law enforcement, unless the activity was clearly not criminal, and to relevant licensing bodies."</p> <p data-bbox="280 2047 1374 2080">(b) State Training School for Boys PAQ states the facility takes appropriate</p>

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.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 23, section VIII. B. 2., states, "The State Training School shall take appropriate remedial measures and shall consider whether to prohibit further contact with students, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer."

Through such reviews, the facility meets the standard requirements.

115.378	Interventions and disciplinary sanctions for residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. State Training School for Boys PAQ 2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Superintendent <p>Interviews with the Superintendent demonstrated youth could be removed from the program, have a level drop in their program - effecting their privileges, or be assigned to the Intensive Treatment Program.</p> <p>(a) State Training School for Boys PAQ states residents are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for resident-on-resident sexual abuse. Residents are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for resident-on-resident sexual abuse. In the past 12 months there have been five administrative findings of resident-on-resident sexual abuse have occurred at the facility. In the past 12 months there has been zero criminal findings of guilt for resident-on-resident sexual abuse, occurring at the facility.</p> <p>State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 23, section VIII. C. 1., states, "A student may be subject to disciplinary sanctions only pursuant to a formal disciplinary process following an administrative finding that the student engaged in student-on-student sexual abuse or following a criminal finding of guilt for student-on-student sexual abuse."</p> <p>(b) State Training School for Boys PAQ states in the event a disciplinary sanction for resident-on resident sexual abuse results in the isolation of a resident, the facility policy requires that residents in isolation have daily access to large muscle exercise, legally required educational programming, and special education services. In the event a disciplinary sanction for resident-on-resident sexual abuse results in the isolation of a resident, residents in isolation receive daily visits from a medical or mental health care clinician. In the past 12 months, the number of residents placed</p>

in isolation as a disciplinary sanction for resident-on-resident sexual abuse is zero.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 23, section VIII. C. 2., states, "Any disciplinary sanctions shall be commensurate with the nature and circumstances of the abuse committed, the student's disciplinary history, and the sanctions imposed for comparable offenses by other students with similar histories. In the event a disciplinary sanction results in the seclusion of a student, the State Training School shall not deny the student daily large-muscle exercise or access to any legally required educational programming or special education services. Students in seclusion shall receive daily visits from medical or mental health care personnel. Students shall also have access to other programs and work opportunities to the extent possible."

(c) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 23, section VIII. C. 3., states, "The disciplinary process shall consider whether a student's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed."

(d) State Training School for Boys PAQ states the facility does offer therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse. However, the facility does not require participation as a condition of access to programming or other benefits.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 23-24, section VIII. C. 4., states, "The State Training School shall consider whether to offer the offending student participation in such interventions as therapy, counseling, or other interventions to address and correct underlying reasons or motivations for the abuse, The State Training School may require participation in such interventions as a condition of access to any rewards-based behavior management system or other behavior-based incentives, but not as a condition to access to general programming or education."

(e) State Training School for Boys PAQ states the agency disciplines residents for sexual contact with staff only upon finding that the staff member did not consent to such contact.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 23-24, section VIII. C. 5., states, "The State Training School may discipline a student

for sexual contact with staff only upon a finding that the staff member did not consent to such contact.”

(f) State Training School for Boys PAQ states 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.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 23-24, section VIII. C. 6., states, “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.”

(g) State Training School for Boys PAQ states the agency prohibits all sexual activity between residents. If the agency prohibits all sexual activity between residents and disciplines residents for such activity, the agency deems such activity to constitute sexual abuse only if it determines that the activity is coerced.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 23-24, section VIII. C. 7., states, “The State Training School prohibits all sexual activity between students and may discipline students for such activity. However, the State Training School does not deem such activity to constitute sexual abuse if it determines that the activity is not coerced between students who are of legal consenting age.”

Through such reviews, the facility meets the standard requirements.

115.381	Medical and mental health screenings; history of sexual abuse
	<p data-bbox="280 188 1007 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 580 300">Auditor Discussion</p> <p data-bbox="280 340 544 376">Document Review:</p> <ol data-bbox="280 412 1422 860" style="list-style-type: none"> <li data-bbox="280 412 839 448">1. State Training School for Boys PAQ <li data-bbox="280 483 1422 564">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <li data-bbox="280 600 1406 680">3. State of Iowa Department of Health-Human Services, Student Safety Plan, dated 9.2022 <li data-bbox="280 716 1378 797">4. Iowa Department of Human Services, State Training School Authority for Release of Abuse Information Consent Form (E), not dated <li data-bbox="280 833 995 869">5. State Training School Psychosocial Evaluation <p data-bbox="280 967 437 1003">Interviews:</p> <ol data-bbox="280 1039 612 1290" style="list-style-type: none"> <li data-bbox="280 1039 612 1075">1. Random Students <li data-bbox="280 1111 612 1146">2. Targeted Students <li data-bbox="280 1182 408 1218">3. LPN <li data-bbox="280 1254 564 1290">4. Psychologist III <p data-bbox="280 1326 1461 1487">Interviews with students demonstrated they were offered mental health services during the intake process. (Although targeted students who the agency designated as targeted for disclosure of victimization and or abusiveness, random students disclosed past victimization during random interviews.)</p> <p data-bbox="280 1594 1485 1845">The interview with the LPN demonstrated limitations to confidentiality are disclosed by the LPN verbally upon initiation of services. The interview with the Psychologist III demonstrated limitations to confidentiality is disclosed in writing to students upon the initiation of services. The Psychologist III stated mental health referrals are received from staff who complete risk assessments and students are seen for disclosures related to sexual victimization and or abusiveness.</p> <p data-bbox="280 1953 528 1989">Site Observation:</p> <p data-bbox="280 2024 1445 2060">Utilization of the PREA Audit - Juvenile Facilities Documentation Review - Resident</p>

Files / Records template demonstrated each targeted resident who disclosed past sexual victimization and or abusiveness was offered mental health services upon receipt of the disclosure. Review of investigation files demonstrated mental health referrals were offered for all sexual abuse allegations and each of those investigations were completed within one to three days.

Recommendation:

Through the timeliness of each investigation, mental health referrals were evident; however, the Auditor requested corresponding dates be documented on the investigation memo should an investigation process take longer than 14 days, as documentation of dates would verify students were seen within standard requirements.

(a) State Training School for Boys PAQ states all residents at this facility who have disclosed any prior sexual victimization during a screening pursuant to §115.3341 are offered a follow-up meeting with a medical or mental health practitioner. Follow up meetings are offered within 14 days of the intake screening. In the past 12 months three residents who disclosed prior victimization during the intake screening were offered a follow-up meeting with a medical or mental health provider. Medical and mental health staff maintain secondary materials, documenting compliance with the above required services. In the past 12 months, the percent of residents who disclosed prior victimization during screening who were offered a follow-up meeting with a medical or mental health practitioner was 100.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 24, section IX. A. 1., states, "If the intake screening indicates that a student has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff shall ensure that the student is offered a follow-up meeting with medical or mental health personnel within 14 days of the intake screening."

The facility provided a State Training School Psychosocial Evaluation demonstrating presenting problems, history of present complaint and symptomatology is documented after disclosure and or evidence found in collateral information.

(b) State Training School for Boys PAQ states all residents who have ever previously perpetrated sexual abuse are offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening. In the past 12 months 100% residents who disclosed previously perpetrated sexual abuse, as indicated

during the screening process.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 24, section IX. A. 2., states, "If the intake screening indicates that a student has previously perpetrated sexual abuse; whether it occurred in an institutional setting or in the community, staff shall ensure that the student is offered a follow-up meeting with mental health personnel within 14 days of the intake screening."

(c) State Training School for Boys PAQ states information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health practitioners.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 24, section IX. A. 3., states, "Any information related to a sexual victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health personnel and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law.

The facility provided a State of Iowa Department of Health-Human Services, Student Safety Plan. The safety plan documents the following information.

- k. Student Name / Date
- l. Cottage / Counselor
- m. Other students involved
- n. Safety Plan written by
- o. Brief description of incident
- p. Contact with other students
- q. Activity in cottage
- r. Educational programs
- s. Recreation
- t. Hygiene
- u. Family visits

v. Notifications sent to:

w. Additional notes

x. Retaliation checks

(d) State Training School for Boys PAQ states medical and mental health practitioners obtain informed consent from residents before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the resident is under the age of 18.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 24, section IX. A. 4., states, "Medical and mental health personnel shall obtain informed consent from students before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the student is under the age of 18."

The facility provided an Iowa Department of Human Services, State Training School Authority for Release of Abuse Information Consent Form (E). The form documents the following information.

- Consenting party (Student at Majority Age):
- Consent IS GRANTED for student
- Consent is NOT GRANTED for student

Through such reviews, the facility meets the standard requirements

Document Review:

1. State Training School for Boys PAQ
2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022
3. State of Iowa Department of Health-Human Services, Student Safety Plan, dated 9.2022
4. Iowa Department of Human Services, State Training School Authority for Release of Abuse Information Consent Form (E), not dated
5. State Training School Psychosocial Evaluation
6. Post Audit: Revised STS Investigation Report

Interviews:

1. Random Students
2. Targeted Students
3. LPN
4. Psychologist III

Interviews with students demonstrated they were offered mental health services during the intake process. (Although targeted students who the agency designated as targeted for disclosure of victimization and or abusiveness, random students disclosed past victimization during random interviews.)

The interview with the LPN demonstrated limitations to confidentiality are disclosed by the LPN verbally upon initiation of services. The interview with the Psychologist III demonstrated limitations to confidentiality is disclosed in writing to students upon the initiation of services. The Psychologist III stated mental health referrals are received from staff who complete risk assessments and students are seen for disclosures related to sexual victimization and or abusiveness.

Site Observation:

Utilization of the PREA Audit - Juvenile Facilities Documentation Review - Resident Files / Records template demonstrated each targeted resident who disclosed past sexual victimization and or abusiveness was offered mental health services upon receipt of the disclosure. Review of investigation files demonstrated mental health referrals were offered for all sexual abuse allegations and each of those investigations were completed within one to three days.

Recommendation:

Through the timeliness of each investigation, mental health referrals were evident; however, the Auditor requested corresponding dates be documented on the investigation memo should an investigation process take longer than 14 days, as documentation of dates would verify students were seen within standard requirements. Post audit the facility provided a revised STS Investigation Report demonstrating page 2 has an additional comment, 'Referred for victim advocacy, medical and mental health follow-up.'

Additionally, during pre-audit discussions regarding the current consent for students 18 and older the facility was found to be compliant with this standard, should mental health or medical personnel receive the report after the youth has resigned consent forms after their 18th birthday and never having a history of a youth deny consent, in the past.

(a) State Training School for Boys PAQ states all residents at this facility who have disclosed any prior sexual victimization during a screening pursuant to §115.3341 are offered a follow-up meeting with a medical or mental health practitioner. Follow up meetings are offered within 14 days of the intake screening. In the past 12 months three residents who disclosed prior victimization during the intake screening were offered a follow-up meeting with a medical or mental health provider. Medical and mental health staff maintain secondary materials, documenting compliance with the above required services. In the past 12 months, the percent of residents who disclosed prior victimization during screening who were offered a follow-up meeting with a medical or mental health practitioner was 100.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 24, section IX. A. 1., states, "If the intake screening indicates that a student has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff shall ensure that the student is offered a follow-up meeting with medical or mental health personnel within 14 days of the intake screening."

The facility provided a State Training School Psychosocial Evaluation demonstrating presenting problems, history of present complaint and symptomatology is documented after disclosure and or evidence found in collateral information.

(b) State Training School for Boys PAQ states all residents who have ever previously perpetrated sexual abuse are offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening. In the past 12 months 100% residents who disclosed previously perpetrated sexual abuse, as indicated during the screening process.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 24, section IX. A. 2., states, "If the intake screening indicates that a student has previously perpetrated sexual abuse; whether it occurred in an institutional setting or in the community, staff shall ensure that the student is offered a follow-up meeting with mental health personnel within 14 days of the intake screening."

(c) State Training School for Boys PAQ states information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health practitioners.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 24, section IX. A. 3., states, "Any information related to a sexual victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health personnel and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law.

The facility provided a State of Iowa Department of Health-Human Services, Student Safety Plan. The safety plan documents the following information.

- k. Student Name / Date
- l. Cottage / Counselor
- m. Other students involved
- n. Safety Plan written by
- o. Brief description of incident
- p. Contact with other students
- q. Activity in cottage
- r. Educational programs
- s. Recreation
- t. Hygiene
- u. Family visits
- v. Notifications sent to:
- w. Additional notes
- x. Retaliation checks

(d) State Training School for Boys PAQ states medical and mental health practitioners obtain informed consent from residents before reporting information

about prior sexual victimization that did not occur in an institutional setting, unless the resident is under the age of 18.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 24, section IX. A. 4., states, "Medical and mental health personnel shall obtain informed consent from students before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the student is under the age of 18."

The facility provided an Iowa Department of Human Services, State Training School Authority for Release of Abuse Information Consent Form (E). The form documents the following information.

- Consenting party (Student at Majority Age):
- Consent IS GRANTED for student
- Consent is NOT GRANTED for student

Through such reviews, the facility meets the standard requirements.

115.382	Access to emergency medical and mental health services
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 297">Auditor Discussion</p> <p data-bbox="280 340 544 374">Document Review:</p> <ol data-bbox="280 412 1418 557" style="list-style-type: none"> <li data-bbox="280 412 839 445">1. State Training School for Boys PAQ <li data-bbox="280 483 1418 557">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <p data-bbox="280 669 437 703">Interviews:</p> <ol data-bbox="280 741 563 846" style="list-style-type: none"> <li data-bbox="280 741 408 775">1. LPN <li data-bbox="280 813 563 846">2. Psychologist III <p data-bbox="280 884 1466 1084">Interviews with medical and mental health staff demonstrated each would provide students with immediate access to emergency medical and mental health services upon receipt of an allegation of sexual abuse. The Psychologist III stated a mental health staff would be on site and prepared to meet with any student upon returning from a forensic exam.</p> <p data-bbox="280 1196 1474 1606">(a) State Training School for Boys PAQ states 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. Medical and mental health staff maintain secondary materials (e.g., form, log) documenting the timeliness of emergency medical treatment and crisis intervention services that were provided; the appropriate response by non-health staff in the event health staff are not present at the time the incident is reported; and the provision of appropriate and timely information and services concerning contraception and sexually transmitted infection prophylaxis.</p> <p data-bbox="280 1718 1481 1917">State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 25, section IX. B. 2., states, “Student victims of sexual abuse shall be offered timely information about and timely access to emergency contraception and sexual transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.”</p> <p data-bbox="280 2029 1414 2063">(b) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment,</p>

page 25, section IX. B. 1., states, "Student 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 personnel according to their professional judgment. If no qualified medical or mental health personnel are on duty at the time a report of recent sexual abuse is made, staff first responders shall take preliminary steps to protect the student victim as outlined in this policy and shall immediately notify the appropriate medical and mental health personnel."

(c) State Training School for Boys PAQ states 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. Policy compliance can be found in provision (b) of this standard.

(d) State Training School for Boys PAQ states 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.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 25, section IX. B. 3., states, "Treatment services shall be provided to the student victim without financial cost and regardless of whether the student victim names the abuser or cooperates with any investigation of the incident."

Through such reviews, the facility meets the standard requirements.

115.383	<p data-bbox="277 107 1469 197">Ongoing medical and mental health care for sexual abuse victims and abusers</p> <p data-bbox="277 232 1007 271">Auditor Overall Determination: Meets Standard</p> <p data-bbox="277 309 580 347">Auditor Discussion</p> <p data-bbox="277 385 547 423">Document Review:</p> <ol data-bbox="277 459 1410 607" style="list-style-type: none"> <li data-bbox="277 459 831 497">1. State Training School for Boys PAQ <li data-bbox="277 533 1410 607">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <p data-bbox="277 714 437 752">Interviews:</p> <ol data-bbox="277 788 555 898" style="list-style-type: none"> <li data-bbox="277 788 400 826">1. LPN <li data-bbox="277 862 555 898">2. Psychologist III <p data-bbox="277 934 1461 1090">Interviews with the LPN and Psychologist III demonstrated that ongoing treatment designated by hospital personnel would be followed as instructed. Both staff stated proper evaluations would be developed to ensure a continuum of care was in place for the student.</p> <p data-bbox="277 1200 1469 1319">(a) State Training School for Boys PAQ states 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.</p> <p data-bbox="277 1429 1481 1585">State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 25, section IX. C. 1., states, “The State Training School shall offer medical and mental health evaluation and, as appropriate, treatment to all students who have been victimized by sexual abuse in any prison, jail, lock up, or juvenile facility.”</p> <p data-bbox="277 1695 1445 1899">(b) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 25, section IX. C. 2., states, “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.”</p> <p data-bbox="277 2009 1422 2083">(b) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 25, section IX. C. 3., states, “The facility shall provide such victims with</p>
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medical and mental health services consistent with the community level of care.”

(d-e) This standard is not applicable as the facility does not house female offenders.

(f) State Training School for Boys PAQ states resident victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 25, section IX. C. 4., states, “Student victims of sexual abuse while at the State Training School shall be offered tests for sexually transmitted infections as medically appropriate.”

(g) State Training School for Boys PAQ states treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 25, section IX. C. 5., states, “Treatment services shall be provided to the student victim without financial cost and regardless of whether the student victim names the abuser or cooperates with any investigation arising out of the incident.”

(h) State Training School for Boys PAQ states if the facility is a prison, it 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.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 25, section IX. C. 5., states, “The State Training School shall attempt to conduct a mental health evaluation of all known student-on-student abusers within 60 days of learning of such abuse history and offer treatment and/or counseling when deemed appropriate.”

Through such reviews, the facility meets the standard requirements.

115.386	Sexual abuse incident reviews
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 297">Auditor Discussion</p> <p data-bbox="280 340 544 374">Document Review:</p> <ol data-bbox="280 414 1409 772" style="list-style-type: none"> 1. State Training School for Boys PAQ 2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 3. STS Investigation Memo Template, not dated 4. Post Audit: STS Sexual Abuse Incident Review Template, not dated 5. Post Audit: STS State Training School Action Plan Memorandum <p data-bbox="280 887 437 920">Interviews:</p> <ol data-bbox="280 958 1225 1205" style="list-style-type: none"> 1. Treatment Program Administrator / PREA Compliance Manager 2. Youth Counselor Supervisor / Investigator 3. Superintendent 4. Executive Officer / PREA Coordinator <p data-bbox="280 1243 1481 1444">Interviews with specialized staff demonstrated each were aware of the requirements to document and safeguard investigations. The investigator stated he documents investigations on an Investigation Memo which describes the investigations are completed promptly, thoroughly, objectively with summarized interviews of those involved in the investigation and a description of the investigation.</p> <p data-bbox="280 1554 517 1588">Site Observation</p> <p data-bbox="280 1626 1474 1738">The facility had seven total sexual abuse investigations with one resulting in an unsubstantiated outcome. Review of the investigation demonstrated a sexual abuse incident review was not completed.</p> <p data-bbox="280 1852 448 1886">Action Plan:</p> <p data-bbox="280 1924 1453 2085">Facility to provide a sustainable action plan, via memorandum to the DOJ Auditor, demonstrating how provisions will be completed at the end of each sexual abuse investigation and management team members who will review such investigations within the required 30-day review requirement. Post audit the facility provided a</p>

newly developed STS Sexual Abuse Incident Review Template to include all required components of the required review. Additionally, the facility provided an action plan stating, "STS acknowledges that its current sexual abuse incident review process could be enhanced to promote continuous improvement with the facility's compliance to PREA standards. Current sexual abuse incident review process typically includes the STS Superintendent, STS PREA Compliance Manager, HHS PREA Coordinator and HHS State-Operated Facilities Division Director. STS will act to ensure a robust, thorough incident review process that includes relevant facility and agency stakeholder that is properly documented."

(a) State Training School for Boys PAQ states 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. In the past 12 months there has been two administrative investigations of alleged sexual abuse completed at the facility,

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 26, section X. 1., states, "All incidents of sexual abuse will be reviewed within 30 days of the conclusion of the investigation by a review team consisting of management, supervisors, investigating staff, and medical or mental health personnel."

(b) State Training School for Boys PAQ states sexual abuse incident reviews are ordinarily conducted within 30 days of concluding the criminal or administrative investigation. 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 were two. Policy compliance can be found in provision (a) of this standard.

The facility provided a STS Investigation Memo Template. The template documents the following information.

- Allegation Summary
- Investigators and Dates of Investigation
- Alleged Perpetrator Information
- Alleged Victim Information
- Interview Summaries
- List of Individuals Interviewed

- List of Documents or Evidence Reviewed
- Investigation Conclusion
- Recommendation/Follow up
- Notifications
- List of Individuals Receiving Report

(c) State Training School for Boys PAQ states 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.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 26, section X. 2., states, "The review team shall consist of upper-level management staff, with input from line supervisors and investigating staff. The review team shall:

- a. Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent detect, or respond to sexual abuse;
- b. 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;
- c. Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse;
- d. Assess the adequacy of staff levels in that area during different shifts;
- e. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and
- f. Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to paragraphs (2)(a) -(2)(e) of this section, and any recommendations for improvement and submit such report to the Superintendent and agency PREA coordinator."

(d) State Training School for Boys PAQ states 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 Operations Lead / PREA Compliance Manager. Policy compliance can be found in provision (c) of this standard.

(e) State Training School for Boys PAQ states, the facility implements the recommendations for improvement or documents its reasons for not doing so.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 26, section X. 3., states, "The State Training School shall implement recommendations for improvement, or shall document its reasons for not doing so."

Through such reviews, the facility meets the standard requirements.

115.387	Data collection
	<p data-bbox="280 188 1007 224">Auditor Overall Determination: Meets Standard</p> <p data-bbox="280 264 580 300">Auditor Discussion</p> <p data-bbox="280 340 544 376">Document Review:</p> <ol data-bbox="280 416 1433 676" style="list-style-type: none"><li data-bbox="280 416 831 452">1. State Training School for Boys PAQ<li data-bbox="280 488 1409 564">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022<li data-bbox="280 600 1433 676">3. State of Iowa Department of Health and Human Services 2022 Annual Prison Rape Elimination Act (PREA), dated January 2023 <p data-bbox="280 855 437 891">Interviews:</p> <ol data-bbox="280 931 1225 1178" style="list-style-type: none"><li data-bbox="280 931 1225 967">1. Treatment Program Administrator / PREA Compliance Manager<li data-bbox="280 1003 564 1039">2. Superintendent<li data-bbox="280 1075 858 1111">3. Executive Officer / PREA Coordinator<li data-bbox="280 1146 1062 1182">4. Division Director of Secure Facilities / Agency Head <p data-bbox="280 1218 1449 1375">Interviews with Administrative staff demonstrated the team meets monthly and discusses ongoing investigations, outcomes of those investigations, analyzes data from investigations and implement recommendations to include close observation of the status of implementation of such recommendations.</p> <p data-bbox="280 1482 424 1518">(a)/(c)-1,2</p> <p data-bbox="280 1559 1481 1671">State Training School for Boys PAQ states 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.</p> <p data-bbox="280 1783 1481 1939">State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 26, section B. 1., states, "The State Training School shall collect accurate, uniform data for every allegation of sexual abuse using a standardized instrument and set of definitions."</p> <p data-bbox="280 2051 1455 2087">(b) State Training School for Boys PAQ states the agency aggregates the incident-</p>

based sexual abuse data at least annually. Practice compliance can be found in §115.388 through the agency PREA Annual Report

The facility provided a State of Iowa Department of Health and Human Services 2022 Annual Prison Rape Elimination Act (PREA). The report includes the following information.

- Staffing
- Training
- Policies
- Support Services
- Audits
- 2022 Sexual Incident Investigations & Reviews
- Data Review for Corrective Action and Publication
- General Definitions as defined by the PREA Standard 115.5
- Student on Student sexual abuse is defined by PREA Standard 115.6 and includes the following:
 - o Nonconsensual Sexual Acts
 - o Abusive Sexual Contact
 - o Student on Student Sexual Harassment:
 - o Student on Student Allegations
 - o Data Assessment
- Staff on Student sexual abuse is defined by PREA Standard 115.6 and includes the following:
 - o Staff Sexual Misconduct
 - o Staff Sexual Harassment
 - o Staff on Student Allegations
 - o Data Assessment
- Graphs demonstrating comparison data for years of 2018-2022 exists for Student-on-Student and Staff-on-Student allegations of nonconsensual sexual acts, abusive sexual contact, sexual harassment and allegations in total.

(d) State Training School for Boys PAQ states the agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 26, section B. 3., states, "The State Training School shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews."

(e) State Training School for Boys PAQ states this provision is not applicable as the agency does not have private facilities with which it contacts for the confinement of its residents.

(f) State Training School for Boys PAQ states the agency provided the Department of Justice (DOJ) with data from the previous calendar year upon request. The agency provided the Department of Justice with data in year 2021.

Through such reviews, the facility meets the standard requirements.

115.388	Data review for corrective action
	<p data-bbox="280 188 1007 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 580 300">Auditor Discussion</p> <p data-bbox="280 340 544 376">Document Review:</p> <ol data-bbox="280 412 1422 560" style="list-style-type: none"> <li data-bbox="280 412 839 448">1. State Training School for Boys PAQ <li data-bbox="280 483 1422 560">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <p data-bbox="280 667 1453 828">(a) State Training School for Boys PAQ states the agency reviews data collected and aggregated pursuant to §115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, and training, including:</p> <ul data-bbox="280 864 1358 1088" style="list-style-type: none"> <li data-bbox="280 864 735 900">· Identifying problem areas; <li data-bbox="280 936 1062 972">· Taking corrective action on an ongoing basis; and <li data-bbox="280 1008 1358 1088">· Preparing an annual report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole. <p data-bbox="280 1196 1485 1478">State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 27, section C. 1., states, “Data shall be reviewed by the PREA coordinator and PREA manager to identify problem areas and take corrective action. Identified problem areas and the corrective action for each will be documented in an annual report. This 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.”</p> <p data-bbox="280 1585 1461 1792">(b) State Training School for Boys PAQ states the annual report includes a comparison of the current year’s data and corrective actions to those from prior years. The annual report provides an assessment of the agency’s progress in addressing sexual abuse. Practice compliance is demonstrated through the agency annual reports.</p> <p data-bbox="280 1899 1469 2060">(c) State Training School for Boys PAQ states the agency makes its annual report readily available to the public, at least annually, through its website. Annual reports are approved by the agency head. The following is the agency website where the annual reports will be located is 2023-PREA-Annual-Report-1-6-23-FINAL.pdf</p>

(iowa.gov)

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 27, section C. 2., states, "The report shall be approved by the State Training School Superintendent and Division Administrator and made readily available to the public through the appropriate website. The State Training School may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of the State Training School, but must indicate the nature of the material redacted."

(d) State Training School for Boys PAQ states when the agency redacts material from an annual report for publication, the redactions are limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility. Policy compliance can be found in provision (c) of this standard.

Through such reviews, the facility meets the standard requirements.

115.389	Data storage, publication, and destruction
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 580 297">Auditor Discussion</p> <p data-bbox="280 340 544 374">Document Review:</p> <ol data-bbox="280 412 1422 560" style="list-style-type: none"> <li data-bbox="280 412 839 445">1. State Training School for Boys PAQ <li data-bbox="280 483 1422 560">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 11.28.2022 <p data-bbox="280 669 1417 745">(a) State Training School for Boys PAQ states the agency ensures that incident-based and aggregate data are securely retained.</p> <p data-bbox="280 855 1481 972">State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 27, section D. 1., states, “The State Training School shall ensure that data collected pursuant to this policy is securely retained.”</p> <p data-bbox="280 1081 1417 1240">(b) State Training School for Boys PAQ states agency policy requires that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public at least annually through its website.</p> <p data-bbox="280 1350 1481 1552">State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 27, section D. 2., states, “The State Training School shall make all aggregate sexual abuse data from its facility readily available to the public at least annually through the appropriate website. Before making aggregate sexual abuse data publicly available, the State Training School shall remove all personal identifiers.</p> <p data-bbox="280 1662 1425 1738">(c/d) State Training School for Boys PAQ states before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers.</p> <p data-bbox="280 1848 1481 2007">State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 27, section D. 3., states, “The State Training School shall maintain sexual abuse data collected pursuant to this policy for at least 10 years after the date of the initial collection.”</p>

	Through such reviews, the facility meets the standard requirements.
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115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>(a) During the prior three-year audit period, the agency ensured that each facility operated was audited, once.</p> <p>(b) This is the fourth audit cycle for the State Training School and the first year of the fourth audit cycle.</p> <p>(h) The Auditor was granted complete access to, and the ability to observe, all areas of the facility.</p> <p>(e) The Auditor was permitted to request and receive copies of any relevant documents (including electronically stored information).</p> <p>a The Auditor was permitted to conduct private interviews with residents.</p> <p>b Offenders were permitted to send confidential information or correspondence to the Auditor in the same manner as if they were communicating with legal counsel.</p> <p>Through such reviews, the facility meets the standards requirements.</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	(b) The agency has posted the current 2019 PREA audit report, on their website. Through such reviews, the facility meets the standards requirements.

Appendix: Provision Findings		
115.311 (a)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
115.311 (b)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
115.311 (c)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	na
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	na
115.312 (a)	Contracting with other entities for the confinement of residents	
	If this agency is public and it contracts for the confinement of its residents with private agencies or other entities including other government agencies, has the agency included the entity's obligation to adopt and comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents.)	na

115.312 (b)	Contracting with other entities for the confinement of residents	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents OR the response to 115.312(a)-1 is "NO".)	na

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

	or areas where staff or residents may be isolated)?	
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The composition of the resident population?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The number and placement of supervisory staff?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Institution programs occurring on a particular shift?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any applicable State or local laws, regulations, or standards?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any other relevant factors?	yes
115.313 (b)	Supervision and monitoring	
	Does the agency comply with the staffing plan except during limited and discrete exigent circumstances?	yes
	In circumstances where the staffing plan is not complied with, does the facility fully document all deviations from the plan? (N/A if no deviations from staffing plan.)	yes

115.313 (c)	Supervision and monitoring	
	Does the facility maintain staff ratios of a minimum of 1:8 during resident waking hours, except during limited and discrete exigent circumstances? (N/A only until October 1, 2017.)	yes
	Does the facility maintain staff ratios of a minimum of 1:16 during resident sleeping hours, except during limited and discrete exigent circumstances? (N/A only until October 1, 2017.)	yes
	Does the facility fully document any limited and discrete exigent circumstances during which the facility did not maintain staff ratios? (N/A only until October 1, 2017.)	yes
	Does the facility ensure only security staff are included when calculating these ratios? (N/A only until October 1, 2017.)	yes
	Is the facility obligated by law, regulation, or judicial consent decree to maintain the staffing ratios set forth in this paragraph?	yes
115.313 (d)	Supervision and monitoring	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: Prevailing staffing patterns?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes

115.313 (e)	Supervision and monitoring	
	Has the facility implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment? (N/A for non-secure facilities)	yes
	Is this policy and practice implemented for night shifts as well as day shifts? (N/A for non-secure facilities)	yes
	Does the facility have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility? (N/A for non-secure facilities)	yes
115.315 (a)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.315 (b)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting cross-gender pat-down searches in non-exigent circumstances?	yes
115.315 (c)	Limits to cross-gender viewing and searches	
	Does the facility document and justify all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches?	yes

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

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

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

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

115.317 (c)	Hiring and promotion decisions	
	Before hiring new employees who may have contact with residents, does the agency: Perform a criminal background records check?	yes
	Before hiring new employees who may have contact with residents, does the agency: Consult any child abuse registry maintained by the State or locality in which the employee would work?	yes
	Before hiring new employees who may have contact with residents, does the agency: Consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
115.317 (d)	Hiring and promotion decisions	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with residents?	yes
	Does the agency consult applicable child abuse registries before enlisting the services of any contractor who may have contact with residents?	yes
115.317 (e)	Hiring and promotion decisions	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with residents or have in place a system for otherwise capturing such information for current employees?	yes

115.317 (f)	Hiring and promotion decisions	
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.317 (g)	Hiring and promotion decisions	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.317 (h)	Hiring and promotion decisions	
	Unless prohibited by law, does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.318 (a)	Upgrades to facilities and technologies	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect residents from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	yes

115.318 (b)	Upgrades to facilities and technologies	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect residents from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
115.321 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.321 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes

115.321 (c)	Evidence protocol and forensic medical examinations	
	Does the agency offer all residents who experience sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.321 (d)	Evidence protocol and forensic medical examinations	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member?	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
115.321 (e)	Evidence protocol and forensic medical examinations	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes

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

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

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

115.331 (b)	Employee training	
	Is such training tailored to the unique needs and attributes of residents of juvenile facilities?	yes
	Is such training tailored to the gender of the residents at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male residents to a facility that houses only female residents, or vice versa?	no
115.331 (c)	Employee training	
	Have all current employees who may have contact with residents received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.331 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.332 (a)	Volunteer and contractor training	
	Has the agency ensured that all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes

115.332 (b)	Volunteer and contractor training	
	Have all volunteers and contractors who have contact with residents been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with residents)?	yes
115.332 (c)	Volunteer and contractor training	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.333 (a)	Resident education	
	During intake, do residents receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do residents receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
	Is this information presented in an age-appropriate fashion?	yes
115.333 (b)	Resident education	
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes

115.333 (c)	Resident education	
	Have all residents received such education?	yes
	Do residents receive education upon transfer to a different facility to the extent that the policies and procedures of the resident's new facility differ from those of the previous facility?	yes
115.333 (d)	Resident education	
	Does the agency provide resident education in formats accessible to all residents including those who: Are limited English proficient?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are deaf?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are visually impaired?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are otherwise disabled?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Have limited reading skills?	yes
115.333 (e)	Resident education	
	Does the agency maintain documentation of resident participation in these education sessions?	yes
115.333 (f)	Resident education	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to residents through posters, resident handbooks, or other written formats?	yes

115.334 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.331, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
115.334 (b)	Specialized training: Investigations	
	Does this specialized training include: Techniques for interviewing juvenile sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
	Does this specialized training include: Proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
	Does this specialized training include: Sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
	Does this specialized training include: The criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
115.334 (c)	Specialized training: Investigations	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes

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

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

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

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

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

115.342 (d)	Placement of residents	
	When deciding whether to assign a transgender or intersex resident to a facility for male or female residents, does the agency consider on a case-by-case basis whether a placement would ensure the resident's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns residents to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex residents, does the agency consider on a case-by-case basis whether a placement would ensure the resident's health and safety, and whether a placement would present management or security problems?	yes
115.342 (e)	Placement of residents	
	Are placement and programming assignments for each transgender or intersex resident reassessed at least twice each year to review any threats to safety experienced by the resident?	yes
115.342 (f)	Placement of residents	
	Are each transgender or intersex resident's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes
115.342 (g)	Placement of residents	
	Are transgender and intersex residents given the opportunity to shower separately from other residents?	yes

115.342 (h)	Placement of residents	
	If a resident is isolated pursuant to paragraph (b) of this section, does the facility clearly document: The basis for the facility's concern for the resident's safety? (N/A for h and i if facility doesn't use isolation?)	yes
	If a resident is isolated pursuant to paragraph (b) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged? (N/A for h and i if facility doesn't use isolation?)	yes
115.342 (i)	Placement of residents	
	In the case of each resident who is isolated as a last resort when less restrictive measures are inadequate to keep them and other residents safe, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
115.351 (a)	Resident reporting	
	Does the agency provide multiple internal ways for residents to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: 2. Retaliation by other residents or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes

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

115.352 (a)	Exhaustion of administrative remedies	
	<p>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.</p>	yes
115.352 (b)	Exhaustion of administrative remedies	
	<p>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.)</p>	yes
	<p>Does the agency always refrain from requiring an resident to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)</p>	yes
115.352 (c)	Exhaustion of administrative remedies	
	<p>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.)</p>	yes
	<p>Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)</p>	yes

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

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

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

115.353 (a)	Resident access to outside confidential support services and legal representation	
	Does the facility provide residents with access to outside victim advocates for emotional support services related to sexual abuse by providing, posting, or otherwise making accessible mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies?	no
	Does the facility enable reasonable communication between residents and these organizations and agencies, in as confidential a manner as possible?	yes
115.353 (b)	Resident access to outside confidential support services and legal representation	
	Does the facility inform residents, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.353 (c)	Resident access to outside confidential support services and legal representation	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide residents with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.353 (d)	Resident access to outside confidential support services and legal representation	
	Does the facility provide residents with reasonable and confidential access to their attorneys or other legal representation?	yes
	Does the facility provide residents with reasonable access to parents or legal guardians?	yes

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

115.361 (d)	Staff and agency reporting duties	
	Are medical and mental health practitioners required to report sexual abuse to designated supervisors and officials pursuant to paragraph (a) of this section as well as to the designated State or local services agency where required by mandatory reporting laws?	yes
	Are medical and mental health practitioners required to inform residents of their duty to report, and the limitations of confidentiality, at the initiation of services?	yes
115.361 (e)	Staff and agency reporting duties	
	Upon receiving any allegation of sexual abuse, does the facility head or his or her designee promptly report the allegation to the appropriate office?	yes
	Upon receiving any allegation of sexual abuse, does the facility head or his or her designee promptly report the allegation to the alleged victim's parents or legal guardians unless the facility has official documentation showing the parents or legal guardians should not be notified?	yes
	If the alleged victim is under the guardianship of the child welfare system, does the facility head or his or her designee promptly report the allegation to the alleged victim's caseworker instead of the parents or legal guardians? (N/A if the alleged victim is not under the guardianship of the child welfare system.)	yes
	If a juvenile court retains jurisdiction over the alleged victim, does the facility head or designee also report the allegation to the juvenile's attorney or other legal representative of record within 14 days of receiving the allegation?	yes
115.361 (f)	Staff and agency reporting duties	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes

115.362 (a)	Agency protection duties	
	When the agency learns that a resident is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the resident?	yes
115.363 (a)	Reporting to other confinement facilities	
	Upon receiving an allegation that a resident was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
	Does the head of the facility that received the allegation also notify the appropriate investigative agency?	yes
115.363 (b)	Reporting to other confinement facilities	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
115.363 (c)	Reporting to other confinement facilities	
	Does the agency document that it has provided such notification?	yes
115.363 (d)	Reporting to other confinement facilities	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes

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

115.366 (a)	Preservation of ability to protect residents from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.367 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.367 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations, such as housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services?	yes

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

115.367 (d)	Agency protection against retaliation	
	In the case of residents, does such monitoring also include periodic status checks?	yes
115.367 (e)	Agency protection against retaliation	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.368 (a)	Post-allegation protective custody	
	Is any and all use of segregated housing to protect a resident who is alleged to have suffered sexual abuse subject to the requirements of § 115.342?	yes
115.371 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency does not conduct any form of administrative or criminal investigations of sexual abuse or harassment. See 115.321(a).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency does not conduct any form of administrative or criminal investigations of sexual abuse or harassment. See 115.321(a).)	yes
115.371 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations involving juvenile victims as required by 115.334?	yes

115.371 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.371 (d)	Criminal and administrative agency investigations	
	Does the agency always refrain from terminating an investigation solely because the source of the allegation recants the allegation?	yes
115.371 (e)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
115.371 (f)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as resident or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring a resident who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.371 (g)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes

115.371 (h)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.371 (i)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.371 (j)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.371(g) and (h) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years unless the abuse was committed by a juvenile resident and applicable law requires a shorter period of retention?	yes
115.371 (k)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the facility or agency does not provide a basis for terminating an investigation?	yes
115.371 (m)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
115.372 (a)	Evidentiary standard for administrative investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes

115.373 (a)	Reporting to residents	
	Following an investigation into a resident's allegation of sexual abuse suffered in the facility, does the agency inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
115.373 (b)	Reporting to residents	
	If the agency did not conduct the investigation into a resident's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the resident? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes

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

115.373 (e)	Reporting to residents	
	Does the agency document all such notifications or attempted notifications?	yes
115.376 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
115.376 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
115.376 (c)	Disciplinary sanctions for staff	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
115.376 (d)	Disciplinary sanctions for staff	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies, unless the activity was clearly not criminal?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes

115.377 (a)	Corrective action for contractors and volunteers	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with residents?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.377 (b)	Corrective action for contractors and volunteers	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with residents?	yes
115.378 (a)	Interventions and disciplinary sanctions for residents	
	Following an administrative finding that a resident engaged in resident-on-resident sexual abuse, or following a criminal finding of guilt for resident-on-resident sexual abuse, may residents be subject to disciplinary sanctions only pursuant to a formal disciplinary process?	yes

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

115.378 (e)	Interventions and disciplinary sanctions for residents	
	Does the agency discipline a resident for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
115.378 (f)	Interventions and disciplinary sanctions for residents	
	For the purpose of disciplinary action, does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
115.378 (g)	Interventions and disciplinary sanctions for residents	
	Does the agency always refrain from considering non-coercive sexual activity between residents to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between residents.)	yes
115.381 (a)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.341 indicates that a resident has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the resident is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening?	yes
115.381 (b)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.341 indicates that a resident has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the resident is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening?	yes

115.381 (c)	Medical and mental health screenings; history of sexual abuse	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.381 (d)	Medical and mental health screenings; history of sexual abuse	
	Do medical and mental health practitioners obtain informed consent from residents before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the resident is under the age of 18?	yes
115.382 (a)	Access to emergency medical and mental health services	
	Do resident victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
115.382 (b)	Access to emergency medical and mental health services	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do staff first responders take preliminary steps to protect the victim pursuant to § 115.362?	yes
	Do staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
115.382 (c)	Access to emergency medical and mental health services	
	Are resident victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes

115.382 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.383 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.383 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.383 (c)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.383 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are resident victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if all-male facility.)	na
115.383 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph § 115.383(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if all-male facility.)	na
115.383 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are resident victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes

115.383 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.383 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility attempt to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners?	yes
115.386 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
115.386 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.386 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes

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

115.387 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.387 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.387 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents? (N/A if agency does not contract for the confinement of its residents.)	na
115.387 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes

115.388 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
115.388 (b)	Data review for corrective action	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.388 (c)	Data review for corrective action	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.388 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
115.389 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.387 are securely retained?	yes

115.389 (b)	Data storage, publication, and destruction	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
115.389 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.389 (d)	Data storage, publication, and destruction	
	Does the agency maintain sexual abuse data collected pursuant to § 115.387 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	Frequency and scope of audits	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes
115.401 (b)	Frequency and scope of audits	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	yes
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	na

115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
115.401 (n)	Frequency and scope of audits	
	Were inmates, residents, and detainees permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
115.403 (f)	Audit contents and findings	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes