

PREA Facility Audit Report: Final

Name of Facility: Booth Hall Residential Reentry Center

Facility Type: Community Confinement

Date Interim Report Submitted: NA

Date Final Report Submitted: 01/15/2022

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
Auditor Full Name as Signed: Karen d. Murray	Date of Signature: 01/15/2022

AUDITOR INFORMATION	
Auditor name:	Murray, Karen
Email:	kdmconsults1@gmail.com
Start Date of On-Site Audit:	01/06/2022
End Date of On-Site Audit:	01/07/2022

FACILITY INFORMATION	
Facility name:	Booth Hall Residential Reentry Center
Facility physical address:	1299 Raymond Street, P.O. Box 1346, Gillette, Wyoming - 82718
Facility Phone	
Facility mailing address:	PO Box 1346, Gillette, Wyoming - 82717

Primary Contact	
Name:	Richard Burton
Email Address:	richard.burton@voanr.org
Telephone Number:	13076703021

Facility Director	
Name:	Richard Burton
Email Address:	richard.burton@voanr.org
Telephone Number:	13076703021

Facility PREA Compliance Manager	
Name:	Natalie Coxbill
Email Address:	natalie.coxvill@voanr.org
Telephone Number:	

Facility Characteristics	
Designed facility capacity:	148
Current population of facility:	104
Average daily population for the past 12 months:	103
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Both females and males
Age range of population:	>18
Facility security levels/resident custody levels:	Work Release
Number of staff currently employed at the facility who may have contact with residents:	27
Number of individual contractors who have contact with residents, currently authorized to enter the facility:	0
Number of volunteers who have contact with residents, currently authorized to enter the facility:	0

AGENCY INFORMATION	
Name of agency:	Volunteers of America Northern Rockies
Governing authority or parent agency (if applicable):	
Physical Address:	1876 South Sheridan Avenue, Sheridan, Wyoming - 8201
Mailing Address:	
Telephone number:	

Agency Chief Executive Officer Information:	
Name:	
Email Address:	
Telephone Number:	

Agency-Wide PREA Coordinator Information**Name:** Richard Burton**Email Address:** richard.burton@voanr.org**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:

1

- 115.242 - Use of screening information

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:	2022-01-06
2. End date of the onsite portion of the audit:	2022-01-07

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
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	Gillette Abuse Refuge Foundation at 910 East 3rd Street I, Gillette, WY 82716 at 307.686.8071

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	148
15. Average daily population for the past 12 months:	103
16. Number of inmate/resident/detainee housing units:	3
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:	98
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:	2
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:	0
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:	28
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:	1
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
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):	This facility does not utilize restricted housing.
Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
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:	24
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:	0
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:	0
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:	The facility does not utilize volunteers and or contractors due to the pandemic and restricting such contacts.
INTERVIEWS	
Inmate/Resident/Detainee Interviews	
Random Inmate/Resident/Detainee Interviews	

53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	15
54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	<input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input checked="" type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None
55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	Residents were chosen based on those in the facility at the time of the audit as many were either at work during the onsite visit and or sleeping as residents also work the night shift. The auditor was able to choose a balanced population of male and female residents, age, race, ethnicity, length of time in the facility and housing assignment.
56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No
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):	The number of random interviews was increased from 10-15 due to not having enough residents in the targeted categories.
Targeted Inmate/Resident/Detainee Interviews	
58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	5
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".	
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:	0

<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>The facility keeps current statistical data on all residents of each targeted category, and they did have, nor did they have any disabled residents at the time of the audit. The Auditor did not witness any residents with a physical disability during the tour and or onsite review.</p>
<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>
<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>The facility keeps current statistical data on all residents of each targeted category, and they did not have, nor did they have any blind or visually impaired residents at the time of the audit. The Auditor did not witness any residents who were blind and or visually impaired during the tour and or 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>The facility keeps current statistical data on all residents of each targeted category, and they did not have, nor did they have any deaf or hard of hearing residents at the time of the audit. The Auditor did not witness any residents who were deaf or hard of hearing during the tour and or onsite review.</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:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<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. <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.
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).	The facility keeps current statistical data on all residents of each targeted category, and they did not have, nor did they have any deaf or hard of hearing residents at the time of the audit. The Auditor did not witness any residents who were deaf or hard of hearing during the tour and or onsite review.
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:	2
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<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. <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.
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).	The facility keeps current statistical data on all residents of each targeted category, and they did not have, nor did they have any transgender residents at the time of the audit. The Auditor did not witness any residents who were transgender during the tour and or onsite review.
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:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<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. <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.
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).	The facility keeps current statistical data on all residents of each targeted category, and they did not have, nor did they have any deaf or hard of hearing residents at the time of the audit. The Auditor did not witness any residents who were transgender during the tour and or onsite review.

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:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<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. <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.
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).	The facility keeps current statistical data on all residents of each targeted category, and they did not have, nor did they have any residents who had reported sexual abuse at the time of the audit.
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:	28
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:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<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. <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.
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).	The facility does not have any type of restrictive housing.
70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	No text provided.
Staff, Volunteer, and Contractor Interviews	
Random Staff Interviews	
71. Enter the total number of RANDOM STAFF who were interviewed:	8

72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	<input checked="" type="checkbox"/> Length of tenure in the facility <input checked="" type="checkbox"/> Shift assignment <input checked="" type="checkbox"/> Work assignment <input type="checkbox"/> Rank (or equivalent) <input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken) <input type="checkbox"/> None
73. Were you able to conduct the minimum number of RANDOM STAFF interviews?	<input type="radio"/> Yes <input checked="" type="radio"/> No
a. Select the reason(s) why you were unable to conduct the minimum number of RANDOM STAFF interviews: (select all that apply)	<input type="checkbox"/> Too many staff declined to participate in interviews. <input checked="" type="checkbox"/> Not enough staff employed by the facility to meet the minimum number of random staff interviews (Note: select this option if there were not enough staff employed by the facility or not enough staff employed by the facility to interview for both random and specialized staff roles). <input type="checkbox"/> Not enough staff available in the facility during the onsite portion of the audit to meet the minimum number of random staff interviews. <input type="checkbox"/> Other
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):	This Auditor interviewed all random staff who were working, on both shifts, during the onsite portion of the audit.
Specialized Staff, Volunteers, and Contractor Interviews	
Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.	
75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	6
76. Were you able to interview the Agency Head?	<input checked="" type="radio"/> Yes <input type="radio"/> No
77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	<input checked="" type="radio"/> Yes <input type="radio"/> No
78. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No

<p>79. Were you able to interview the PREA Compliance Manager?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" 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)</p>
<p>80. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)</p>	<p><input type="checkbox"/> Agency contract administrator</p> <p><input checked="" type="checkbox"/> Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment</p> <p><input type="checkbox"/> Line staff who supervise youthful inmates (if applicable)</p> <p><input type="checkbox"/> Education and program staff who work with youthful inmates (if applicable)</p> <p><input type="checkbox"/> Medical staff</p> <p><input checked="" type="checkbox"/> Mental health staff</p> <p><input type="checkbox"/> Non-medical staff involved in cross-gender strip or visual searches</p> <p><input checked="" type="checkbox"/> Administrative (human resources) staff</p> <p><input type="checkbox"/> Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff</p> <p><input type="checkbox"/> Investigative staff responsible for conducting administrative investigations</p> <p><input type="checkbox"/> Investigative staff responsible for conducting criminal investigations</p> <p><input checked="" type="checkbox"/> Staff who perform screening for risk of victimization and abusiveness</p> <p><input type="checkbox"/> Staff who supervise inmates in segregated housing/residents in isolation</p> <p><input checked="" type="checkbox"/> Staff on the sexual abuse incident review team</p> <p><input checked="" type="checkbox"/> Designated staff member charged with monitoring retaliation</p> <p><input checked="" type="checkbox"/> First responders, both security and non-security staff</p> <p><input checked="" type="checkbox"/> Intake staff</p> <p><input type="checkbox"/> Other</p>
<p>81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>

82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input type="radio"/> Yes <input checked="" type="radio"/> No
83. Provide any additional comments regarding selecting or interviewing specialized staff.	The facility is not utilizing volunteers and or contractors during the pandemic.

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: discussions related to testing critical functions are expected to be included in the relevant Standard-specific overall determination narratives.

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. Reviewing/examining all areas of the facility in accordance with the site review component of the audit instrument?	<input checked="" type="radio"/> Yes <input type="radio"/> No
86. Testing and/or observing all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., intake process, risk screening process, PREA education)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
88. Informal conversations with staff during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
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).	No text provided.

Documentation Sampling

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.

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?	<input checked="" type="radio"/> Yes <input type="radio"/> No
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91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).

No text provided.

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	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0
Total	0	0	0	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	0	0	0	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	0	0	0	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	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0
Total	0	0	0	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	0	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	0	0	0	0

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:

0

a. Explain why you were unable to review any sexual abuse investigation files:

The facility has not had any investigations in the last 12-36 months.

99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)
Inmate-on-inmate sexual abuse investigation files	
100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	0
101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)
Staff-on-inmate sexual abuse investigation files	
103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	0
104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
Sexual Harassment Investigation Files Selected for Review	
106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	0
a. Explain why you were unable to review any sexual harassment investigation files:	The facility had not had any investigations for the past 12 months.

107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)
Inmate-on-inmate sexual harassment investigation files	
108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0
109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
Staff-on-inmate sexual harassment investigation files	
111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0
112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" 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 type="radio"/> Yes <input type="radio"/> No <input checked="" 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	

<p>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.</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<p>Non-certified Support Staff</p>	
<p>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.</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<p>AUDITING ARRANGEMENTS AND COMPENSATION</p>	
<p>121. Who paid you to conduct this audit?</p>	<p><input type="radio"/> The audited facility or its parent agency</p> <p><input type="radio"/> My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)</p> <p><input checked="" type="radio"/> A third-party auditing entity (e.g., accreditation body, consulting firm)</p> <p><input type="radio"/> Other</p>
<p>Identify the name of the third-party auditing entity</p>	<p>PREA Auditors of America</p>

Standards
Auditor Overall Determination Definitions
<ul style="list-style-type: none"> • 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
<p>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.</p>

115.211	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	<p data-bbox="244 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 210 451 237">Auditor Discussion</p> <p data-bbox="244 273 432 300">Document Review:</p> <ol data-bbox="244 327 1485 562" style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall, Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 3. Volunteers of America Northern Rockies Organizational Chart, dated 5.2021 4. Volunteers of America Northern Rockies Job Description – Director of Booth Hall, dated 3.2017 <p data-bbox="244 651 352 678">Interviews:</p> <ol data-bbox="244 705 794 965" style="list-style-type: none"> 1. Random Residents 2. Targeted Residents 3. Random staff 4. Assistant Director / PREA Compliance Manager 5. PREA Coordinator / Senior Director of Corrections <p data-bbox="244 992 1485 1122">Through interviews with residents and staff and review of resident and staff files, it is evident that this facility interweaves requirements for this standard in their daily protocols. Both residents and staff could speak to facility PREA practices and protocols being used as is described in the agency's PREA policy. The PREA Coordinator could attest to having the required time to institute and implement PREA protocols.</p> <p data-bbox="244 1211 496 1238">Site Review Observation:</p> <p data-bbox="244 1265 1485 1395">During the tour the Auditor noted each bathroom had individual curtained an or doored showers. Toilets were all behind a door and bathroom doors were kept closed at all times. In addition, the facility has sufficient cameras throughout with no apparent blind spots. Utility rooms do not have cameras; however, residents are not allowed in these rooms without staff and or the door being left open when occupied.</p> <p data-bbox="244 1485 1469 1579">During the tour of the facility, the Auditor witnessed PREA Zero-tolerance, Audit Notices and Crisis Intervention posters in dayrooms. PREA posters included information on third party, internal and external reporting to include contact and address information for advocates and hotline numbers.</p> <p data-bbox="244 1668 1460 1798">During the tour of the facility, various residents addressed the Senior Director of Corrections demonstrating they not only knew him, but felt comfortable asking him questions. In addition, it was apparent staff and residents knew the Assistant Director and demonstrated a mutual respect. Through interactions with all staff was a testament to a positive culture at the facility.</p> <p data-bbox="244 1888 1476 2076">(a) The Volunteers of America - Booth Hall PAQ states the facility 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 written policy outlining how it will implement the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment. The policy includes definitions of prohibited behaviors regarding sexual abuse and sexual harassment. The policy includes sanctions for those found to have participated in prohibited behaviors. The policy includes a description of agency strategies and responses to reduce and prevent sexual abuse and sexual harassment of residents.</p>

Volunteers of America Northern Rockies- Booth Hall, Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 70, section Policy, states, "Volunteers of America (VOA) will ensure a fundamental commitment to treating residents with dignity and respect. VOA has a "zero-tolerance policy" relative to sexual abuse, sexual harassment, sexual assault, and sexual misconduct. VOA shall comply with federal and respective state laws as they pertain to PREA, sexual violence and sexual misconduct. If there is a variation in laws, the stricter regulation will apply.

It is the policy of VOA to provide training to staff and residents to prevent sexual misconduct and to fully investigate and prosecute those involved in such conduct. This policy shall be available to all staff, contractors, volunteers, interns, visitors, and residents.

VOA will designate at least one upper-level corporate staff member to become the PREA Coordinator to ensure compliance with all standards across agency programs/facilities."

All new contracts and contract renewals for the confinement of residents will include the contract agency's obligation to adopt and comply with PREA standards. Any new contract or contract renewal will provide for monitoring to ensure the contractor is complying with PREA standards."

Page 85, section Sanctions, states, " Sexual Misconduct is Prohibited and Will Be Sanctioned. Sexual misconduct, either resident on-resident or staff-on-resident, is prohibited regardless of whether either or both of the participants believed the act was consensual.

- Violators are subject to administrative discipline, criminal sanctions, or both."

Page 76-77, section Prevention, states, "The Program Director or designee will take all necessary steps to prevent rapes, assaults and other violent behaviors in the program/ facility. Preventative measures may include, but are not limited to:

- a. Physical plant strategies
- b. Staff Training
- c. Constant Communication
- d. Staffing
- e. Develop a staffing plan

(b) The Volunteers of America - Booth Hall PAQ states The PREA Coordinator has sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its community confinement facilities. The position of the PREA Coordinator in the agency's organizational structure.

The agency provided a Volunteers of America Northern Rockies- Booth Hall Organizational chart. This agency employs a SD of Corrections who serves as the PREA Coordinator.

The agency provided a Director of Booth Hall job description. Page two of the job description states essential functions include PREA Coordinator.

115.212	Contracting with other entities for the confinement of residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <p>1. Volunteers of America - Booth Hall PAQ</p> <p>Interviews:</p> <p>1. Senior Director of Corrections / PREA Coordinator</p> <p>During the pre-audit phase, the PREA Coordinator conveyed the agency did not have privatized contracts.</p> <p>(a) The Volunteers of America - Booth Hall PAQ states agency does not contract with private agencies for confinement services of their Residents.</p>

115.213	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy 902.00, Staff Sexual Misconduct Offenders, dated 2021 3. Volunteers of America Northern Rockies Memorandum Re: Staffing Plan, dated 12.2.2021 4. Volunteers of America Northern Rockies Memorandum Re: Staffing Plan, dated 10.12.2021 5. Volunteers of America Northern Rockies Memorandum Re: Staffing Plan, dated 6.26.2020 6. Volunteers of America Northern Rockies Memorandum Re: Staffing Plan, dated 2.7.2019 7. Volunteers of America Northern Rockies 115.213 Supervision and Monitoring: Booth Hall Staff Plan, dated 2021 8. Volunteers of America Northern Rockies 115.213 Supervision and Monitoring: Booth Hall Staff Plan, dated 2020 9. Volunteers of America Northern Rockies 115.213 Supervision and Monitoring: Booth Hall Staff Plan, dated 2019 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random residents 2. Targeted residents 3. Random staff 4. Assistant Director / PREA Compliance Manager 5. Executive Director of Corrections / PREA Coordinator <p>Staff and residents interviewed could attest to supervisory staff conducting unannounced rounds, at random times, but at least hourly. Staff attested to completing rounds at random times and through random direction.</p> <p>(a) The Volunteers of America - Booth Hall PAQ states the facility requires the facility 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 113. 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 135.</p> <p>The facility provided Volunteers of America Northern Rockies 115.213 Supervision and Monitoring: Booth Hall Staff Plan for years 2019-2021. The Staff Plan includes the following components:</p> <ul style="list-style-type: none"> · The physical Layout of each facility · Staffing Schedule · The composition of the resident population · The prevalence of substantiated and unsubstantiated cases for the year 2020 · Other relevant factors to include transportation of residents into the community <p>(a) The Volunteers of America - Booth Hall PAQ states the facility does not document each time the staffing plan is not complied with.</p>

The facility provided Volunteers of America Northern Rockies Memorandums Re: Staffing Plan, from the Director of Corrections, PREA Coordinator for 12.2.2021, 10.12.2021, 6.26.20 and 2.7.2019. Memorandums for 2021 state the following:

10.12.2021: "Due to the COVID vaccination mandate and the hard ship of hiring staff the shifts will change to two 12-hour shift. Upon review, we determined that adequate staffing has taken place for the 6:00 am – 6:00 pm shift. It was determined that adequate staffing has taken place for the 6:00 pm – 6:00 am shift. It should be noted that when staff have called off on any of the three shifts, it was filled with either approved overtime, Program Manager, BOP Program Manager, or Case Managers. The 6:00 jam – 6:00 pm shift runs with four staff. The 6:00 pm – 6:00 am sift runs with four staff members. Once the staffing pattern has increased the facility will look at going back to the 8-hour shifts."

12.2.2021: "The contract for the Department of Corrections is modifying the contract to increase the beds. The contract will increase to 80 state clients. With this increase, we determined that the adequate staffing has taken place for the 6:00 am – 6:00 pm shift. It was determined that adequate staffing has taken place for the 6:00pm – 6:00am shift. It should be noted that when staff have called off on any of the three shifts, it was filled with either approved overtime, Program Manager, BOP Program Manager, or Case Managers. The 6:00 am – 6:00 pm shift runs with five staff. The 6:00 pm – 6:00 am shift runs with five staff members."

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

115.215	Limits to cross-gender viewing and searches
	<p data-bbox="244 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 208 451 237">Auditor Discussion</p> <p data-bbox="244 271 432 300">Document Review:</p> <ol data-bbox="244 327 1469 651" style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders, 902.00, dated 2021 3. Volunteers of America Northern Rockies Booth Hall Staff 's Program Handbook, dated 11.2019 4. National PREA Resource Center Guidance in Cross Gender and Transgender Pat Searches, dated 2.2015 5. 20 Signed Volunteers of America Northern Rockies Cross Gender and Transgender Pat Searches Acknowledgement, dated 12.14.2021 through 12.22.2021 <p data-bbox="244 741 352 770">Interviews:</p> <ol data-bbox="244 797 794 1055" style="list-style-type: none"> 1. Random residents 2. Targeted residents 3. Correctional Specialists / Random Staff 4. Intake staff 5. Senior Director of Corrections / PREA Coordinator <p data-bbox="244 1088 1490 1211">Interviews with staff demonstrated cross-gender searches are not conducted; however, staff interviewed stated they had never heard of such a search and or searched a resident opposite of their own gender. Residents reported their initial and any subsequent searches were completed. respectfully. When residents are brought in from another facility only a pat search is required. In addition, pat searches are only required when returning from work and or an approved off site.</p> <p data-bbox="244 1245 847 1274">Currently, there were no transgender residents at the facility.</p> <p data-bbox="244 1357 496 1386">Site Review Observation:</p> <p data-bbox="244 1420 1485 1547">During the tour of the facility the Auditor observed the North and Federal Control areas and the waiting room for check ins from residents returning to the community. Control Desk Correctional Specialists were respectful to residents when returning and leaving the facility. In the Administrative area, the Auditor witnessed, without staff being aware, an intake. The staff were personable, respectful, and confidential in questioning in a private location.</p> <p data-bbox="244 1630 1490 1827">(a) Volunteers of America - Booth Hall 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 conducted zero cross-gender strip or cross-gender visual body cavity searches of residents. In the past 12 months, the number of cross-gender strip or cross-gender visual body cavity searches of residents was zero. In the past 12 months, the number of cross-gender strip or cross-gender visual body cavity searches of residents that did not involve exigent circumstances or were performed by non-medical staff was zero.</p> <p data-bbox="244 1910 1490 2040">Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders, 902.00, page 75, section Searches 1., states, "VOA shall not conduct cross-gender strip searches or cross-gender visual body cavity searches except in exigent circumstances or when performed by medical practitioners. If the circumstance requires a cross-gender search, the staff member shall document and justify the reason in the Resident Log within Secure Manage."</p> <p data-bbox="244 2123 1490 2152">(b) Volunteers of America - Booth Hall PAQ states the facility does not permit cross-gender pat-down searches of female</p>

residents, absent exigent circumstances. The facility does not restrict female residents' access to regularly available programming or other outside opportunities in order to comply with this provision. The number of pat-down searches of female residents that were conducted by male staff was zero. The number of pat-down searches of female residents conducted by male staff that did not involve exigent circumstance(s) was zero. The number of pat-down searches of female residents conducted by male staff that did not involve exigent circumstance(s) was zero.

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders, 902.00, page 75, section Searches 2., states, "The facility shall not permit pat searches of females by male staff except in exigent circumstances. If the circumstance requires this type of search, the staff member shall document and justify the reason."

(a) Volunteers of America - Booth Hall PAQ states the facility policy does require that all cross-gender strip searches, cross-gender visual body cavity searches, and cross-gender pat-down searches be documented and justified as cross-gender strip searches and body cavity searches are not allowed.

Policy compliance can be found in provision (a) of this standard.

(d) Volunteers of America - Booth Hall 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 an area where residents are likely to be showering, performing bodily functions, or changing clothing.

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders, 902.00, page 75, section Searches 4., states, "The facility will 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 room checks."

Volunteers of America Northern Rockies Booth Hall Staff 's Program Handbook, page 16, second paragraph, states, "Any staff member entering of the opposite gender is required to announce their presence when entering a dorm room or restroom. At the beginning of each shift, the Lead Security Tech or Acting Security Tech is required to announce the following over the facility intercom system: "Male and female staff are on duty 24 hours a day, seven days a week and may be in and out of your living quarters at any time. Thank you."

(e) The Volunteers of America - Booth Hall 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 (described in 115.215(e)-1) occurred in the past 12 months was zero.

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders, 902.00, page 76, section Transgender 2., states, "The facility shall not search or physically examine a transgender or intersex resident for the sole purpose of determining the resident's genital status. If the resident's genital status is unknown, it may be determined during conversations with the resident, by reviewing medical records, or if necessary, by learning that information as a part of a broader medical examination conducted in private by a medical practitioner."

(f) The Volunteers of America - Booth Hall PAQ states 80 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.

The facility provided National PREA Resource Center Guidance in Cross Gender and Transgender Pat Searches. This curriculum includes the following learning objectives:

- Learn the relevant PREA Standards for cross-gender pat searches and for searches of transgender and Intersex residents and residents;
- Understand and apply the definition of exigent circumstances;
- Learn and understand key terms relevant to conducting appropriate searches and considerations for searches of transgender or intersex residents and residents;
- Practice the steps of cross-gender pat searches and searches of transgender or intersex residents and residents; and
- Observe, analyze and provide feedback to peers on practice searches.

The facility provided 20 Signed Volunteers of America Northern Rockies Cross Gender and Transgender Pat Searches Acknowledgements. Each acknowledgment states, "I have been trained and fully understand the Cross-Gender and Transgender Pat Search Training, Prison Rape Elimination Act of 2003 (PREA), PREA Community Confinement Standards (115.215(f)) and Volunteers of America – Booth Hall Staff Sexual Misconduct Against Offenders (PREA) policy 902.00."

115.216	Residents with disabilities and residents who are limited English proficient
	<p data-bbox="244 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 208 451 237">Auditor Discussion</p> <p data-bbox="244 271 435 300">Document Review:</p> <ol data-bbox="244 327 1465 506" style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders, 902.00, dated 2021 3. Language Services Client Agreement Letter, dated 2.4.2016 <p data-bbox="244 591 352 620">Interviews:</p> <ol data-bbox="244 647 783 790" style="list-style-type: none"> 1. Targeted residents 2. Intake staff 3. Senior Director of Corrections PREA Coordinator <p data-bbox="244 817 1481 949">During interviews with staff, each stated residents were not used for translation services. Barriers were not apparent during interviews and or the facility tour. There were no limited English speaking residents at the facility. Residents spoke to being given PREA information within 72 hours of admission that they understood and were able to remember, for the most part, as many shared a high level of anxiety and learning facility practices at the time of admission wasn't easy to focus on.</p> <p data-bbox="244 1034 1481 1128">(a) The Volunteers of America - Booth Hall PAQ states the agency has established procedures to provide disabled residents equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment.</p> <p data-bbox="244 1214 1489 1346">Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders, page 73, section Resident Orientation Training 2., states, "The information will be communicated orally and in written form in a manner that is clearly understood by the resident, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled as well as residents who have limited reading skills."</p> <p data-bbox="244 1431 1461 1563">(b) The Volunteers of America - Booth Hall PAQ states the agency has established procedures to provide residents with limited English proficiency equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. The facility addresses compliance in provision (a) of this standard.</p> <p data-bbox="244 1648 1484 1912">Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders, page 73, section Resident Orientation Training 2, states, "Upon admission, all residents will receive an orientation that includes VOA's zero-tolerance policy relating to sexual assault/rape or sexual misconduct and how to report it. This will also include information about sexual misconduct, including background information on PREA, prevention, intervention, self-protection, reporting, treatment and counseling and confidentiality. Training will occur via video presentation or through training curriculum approved by the Chief Operating Officer. This is in addition to the Resident handbook, brochures, orientation training, and posters located throughout the facility." In addition, the residents watch the PREA Video in English and Spanish, with subtitles, for the blind, deaf or hard of hearing.</p> <p data-bbox="244 1998 1481 2157">The facility provided a Language Services Client Agreement letter; however, the current agreement expired after three years of execution. Upon the Senior Director of Corrections learning of the expired contract he contacted Language Line and learned a large annual fee would exist if the Agreement was renewed. The facility demonstrated a language translation application on their cell phones serves them in quick situations and Google Translation could assist them if they needed to conduct an intake, with Google Translation.</p>

(a) The Volunteers of America - Booth Hall 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 §115.264, 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 § 115.264, or the investigation of the resident's allegations was zero.

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders, page 73, section Resident Orientation Training 3, states, "The information will be communicated orally and in written form in a manner that is clearly understood by the resident, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled as well as residents who have limited reading skills."

115.217	Hiring and promotion decisions
	<p data-bbox="244 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 208 451 237">Auditor Discussion</p> <p data-bbox="244 271 435 300">Document Review:</p> <ol data-bbox="244 327 1481 506" style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 3. Volunteers of America Booth Hall PREA Employee Acknowledgements, not dated <p data-bbox="244 591 352 620">Interviews:</p> <ol data-bbox="244 647 794 736" style="list-style-type: none"> 1. Human Resource Generalist 2. Senior Director of Corrections / PREA Coordinator <p data-bbox="244 763 1437 824">Interviews with staff demonstrated applicants determined to have been convicted of sexual abuse or sexual harassment charges are screened out during the application review process.</p> <p data-bbox="244 909 499 938">Site Review Observation:</p> <p data-bbox="244 965 1430 1032">During review of staff personnel files reviewed, no contract staff were currently used by the facility, demonstrated 100% compliance.</p> <p data-bbox="244 1117 1453 1211">In addition, of the files reviewed demonstrated each had criminal and applicable background checks conducted upon hire. The agency is consistent with five-year background checks, institutional reference checks, adjudications statements were completed for all staff interviewed, to include those staff who were hired before PREA was implemented at the facility.</p> <p data-bbox="244 1296 1481 1525">(a) The Volunteers of America - Booth Hall PAQ states agency policy prohibits hiring or promoting anyone who may have contact with residents and prohibits enlisting the services of any contractor who may have contact with residents who: (1) Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997); (2) Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or (3) Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.</p> <p data-bbox="244 1615 1485 1709">Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 77, third bullet, states, "VOA shall not hire or promote anyone who may have contact with residents, and shall not enlist the services of any contractor who may have contact with residents, who:</p> <ol data-bbox="244 1736 1465 1951" style="list-style-type: none"> 1. Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution. 2. Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt, or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or 3. Has been civilly or administratively adjudicated to have engaged in the activity described in this section." <p data-bbox="244 2036 1442 2096">The facility provided Volunteers of America Booth Hall PREA Employee Acknowledgements. The acknowledgment asks the following questions:</p> <ul data-bbox="244 2123 1437 2152" style="list-style-type: none"> · Have you ever engaged in sexual abuse in a jail, prison, lockup, community confinement facility, juvenile facility or

other institutions as defined in 42 USC 1997?

- Have you ever 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 activities listed above?"

(b) The Volunteers of America - Booth Hall PAQ states agency policy requires the consideration of any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with residents.

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 77, fourth bullet, states, "VOA shall consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with residents."

(c) The Volunteers of America - Booth Hall PAQ states the agency policy requires that before it hires any new employees who may have contact with residents, it (a) conducts criminal background record checks, and (b) consistent with federal, state, and local law, makes its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. In the past 12 months, the number of persons hired who may have contact with residents who have had criminal background record checks was 24.

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 77, fifth bullet, states, "Before hiring new employees, who may have contact with residents, the facility/program shall:

1. Perform a criminal background records check; and
2. Consistent with federal, state and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse."

(d) The Volunteers of America - Booth Hall PAQ states the agency policy requires that a criminal background record check be completed 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 was zero.

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 77, third bullet, states, "The facility/program shall also perform a criminal background records check before enlisting the services of any contractor or volunteer who may have contact with residents."

(e) Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 77-78, seventh bullet, states, "All VOA employees who may have contact with residents will be subject to a criminal background record check at least once every five years. Background forms will be submitted to Wyoming Department of Corrections and verified through NCIC. Current employees found to have committed previous acts of sexual misconduct will be ineligible for promotions and may be subject to termination. Additionally, every employee will be required as part of the annual performance review process to disclose any previously undisclosed incidences of misconduct. As a reminder, every VOA employee has an on going obligation to disclose any such misconduct and may be terminated for material omissions or providing materially false information regarding such conduct."

(f) Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 78, first bullet, states, "VOA staff shall ask all applicants and employees, contractors and volunteers who may have contact with residents directly about previous misconduct described in this section in written applications or interviews for

hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews or current employees. Employees shall have a continuing affirmative duty to disclose any such misconduct.”

(g) Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 78, second bullet, states, Material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.”

(h) Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 78, third bullet, states, “Unless otherwise prohibited by law, the facility/program 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 who such employee has applied to work.”

115.218	Upgrades to facilities and technology
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> Volunteers of America - Booth Hall PAQ <p>Interviews:</p> <ol style="list-style-type: none"> Senior Director of Corrections / PREA Coordinator <p>Although the facility has had an addition built, this addition was not added within the last audit cycle.</p> <p>Site Review Observation:</p> <p>During a tour of the facility, new additions were not apparent.</p> <p>(a) The Volunteers of America - Booth Hall PAQ states the agency has not acquired a new facility or made substantial expansions or modifications to existing facilities since the last PREA audit.</p>

115.221	Evidence protocol and forensic medical examinations
	<p data-bbox="244 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 210 451 237">Auditor Discussion</p> <p data-bbox="244 273 435 300">Document Review:</p> <ol data-bbox="244 327 1490 891" style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 3. National Protocol for Sexual Assault Medical Forensic Examinations Second Edition, dated 4.2013 4. Memorandum of Understanding between Gillette Abuse Refuge Foundation and Volunteers of America Northern Rockies Memorandum, dated 2.26.2016 5. Memorandum of Understanding between Campbell County Memorial Hospital and Volunteers of America Northern Rockies, dated 3.18.2016 6. Memorandum of Understanding between Behavioral Health Services, Campbell County Memorial Hospital and Volunteers of America Northern Rockies, dated 2.1.2016 7. Volunteers of America Northern Rockies Memorandum, RE: PREA Standard 115.221 (d) 1-3, (c) and (f), dated 3.1.2015 8. Wyoming Department of Corrections Contract Language <p data-bbox="244 981 352 1008">Interviews:</p> <ol data-bbox="244 1034 798 1294" style="list-style-type: none"> 1. Random residents 2. Targeted residents 3. Random staff 4. Assistant Director / PREA Compliance Manager 5. Senior Director of Corrections / PREA Coordinator <p data-bbox="244 1321 1477 1482">Interviews with all residents and staff interviewed demonstrated most were clearly aware of reporting protocols for sexual harassment and abuse. Due to newly implemented vaccination protocols, many staff have left the facility and many staff are recent new hires. Two of the new hires had been working 3-7 days and could not answer each of the questions asked, they were transparent and accepted mentoring provided by the Auditor. Staff interviewed were comfortable reporting internally and understood the processes for reporting externally.</p> <p data-bbox="244 1572 1490 1666">As stated, all but two staff interviewed clearly articulated first responder duties to include protecting, preserving and reporting. When each were asked where this information was located, responses included postings in the units and around the facility and pulled out their PREA information cards with detailed information regarding need to know reporting information.</p> <p data-bbox="244 1756 499 1783">Site Review Observation:</p> <p data-bbox="244 1809 1493 1971">There were zero criminal and or administrative investigations. Upon completion of the Pre-Audit Questionnaire the facility had stated five investigations had occurred over the past 12 months. However, after conversations with Senior Director of Corrections, Assistant Director and the Auditor, we found that four of the allegations, after law enforcement or Wyoming Department of Corrections review were not PREA related. The final investigation was founded for staff not following agency policy and was not a PREA violation.</p> <p data-bbox="244 2060 1474 2154">(a) The Volunteers of America - Booth Hall PAQ states the agency/facility is not 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-on-resident sexual abuse or staff</p>

sexual misconduct).

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA), page 81, section Investigations 1., states, "VOA is not responsible for investigating allegations of sexual abuse. The VOA report all investigations to Department of Corrections, Bureau of Prisons, and/or the Sheriff's Department, and will rely on these agencies to conduct these investigations but shall request that the investigating agency follow the requirements as outlined in §115.221 (a) through (e) of the standards."

As is stated above, investigations are conducted by either the local Sheriff's Department or the Wyoming Department of Corrections. The facility contracts accept clients from the Federal Government and the Wyoming Department of Corrections and are mandated by their contract requirements. The following contract language was provided to support the facility has proper investigation protocols in practice.

· Page 5, section D., Policy and Compliance, states, "Contractor shall manage the ACC facility and ACC residential program in accordance with the following, which are attached and incorporated herein by reference; Attachment B. ACC Manual; Agency Policies and Procedures Affecting Adult Community Corrections; Agency Field Services Operational Standards and Procedure Affecting Adult Community Corrections; and Attachment C, ACC Code of Conduct. All policies and procedures referenced herein that are not attachments to this Contract and shall be provided by the Agency to Contractor once this Contract is fully executed. In the event of conflict, the more restrictive or stringent guidelines, standards, policies, procedures, and provisions applied to management of the ACC facility and ACC residential program shall take precedence. Contractor's staff shall acknowledge they have read and understand all applicable guidelines, standards, policies, and procedures affecting the management of the ACC facility and ACC residential program, by providing documentation of review conducted during orientation and annual training.

· Page 64, section Reporting of Allegations of Incidents of Sexual Misconduct, third paragraph, states, "The WDOC Duty Officer or designee shall be responsible for checking all messages on the toll-free number no less than twice each day and shall initiate actions as noted below:

- o The WDOC Duty Officer or designee shall also contact the appropriate Chief Executive Officer (CEO) and provide him/her with notice of the alleged sexual misconduct.
- o The CEO or designee will initiate an investigation by contacting the WDOC Investigations Unit (IU) with information following placement of the residents in a secure/safe housing location.
- o The agency shall also provide 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, and that is able to receive and immediately forward resident reports of sexual abuse or sexual harassment to agency officials, allowing the resident to remain anonymous on request.
- o Staff shall accept reports made verbally, in writing, anonymously, and from third parties and shall promptly document any verbal reports."

(b) The Volunteers of America - Booth Hall PAQ states the protocol being developmentally appropriate for is not applicable as the facility does not house youthful offenders. 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) The Volunteers of America - Booth Hall PAQ states the facility offers all residents who experience sexual abuse access to forensic medical examinations. Forensic medical examinations are offered without financial cost to the victim. Where possible, examinations are conducted by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs). When SANEs or SAFEs are not available, a qualified medical practitioner performs forensic medical examinations. The facility documents efforts to provide SANEs or SAFEs. The number of forensic medical exams conducted during the past 12 months is zero. The number of SANEs/SAFEs during the past 12 months was zero. The number of exams performed by a qualified medical practitioner during the past 12 months was zero.

section Investigations 2., states, "VOA shall offer all victims of sexual abuse access to forensic medical examinations whether on-site or at an outside facility, without financial cost, where evidentiary or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. VOA shall document its efforts to provide SAFEs or SANEs."

(d) The Volunteers of America - Booth Hall PAQ states the facility attempts to make available to the victim a victim advocate from a rape crisis center, either in person or by other means. The efforts are documented. If and when a rape crisis center is not available to provide victim advocate services, the facility provides a qualified staff member from a community-based organization or a qualified agency staff member.

The facility provided Memorandum of Understanding between Gillette Abuse Refuge Foundation and Volunteers of America Northern Rockies Memorandum. The memo states, "This agreement is set forth in which residents whom are victims of sexual abuse at the Volunteers of America Northern Rockies Booth Hall RE-Entry Center may receive assistance from a victim advocate. This agreement shall include but not limited to providing intervention and related assistance to victims of sexual assault. The victim may also request from the victim advocate staff member to accompany and support the victim through a forensic medical examination process and investigatory interview." This agreement remains active until either party issues a written cancellation.

On 12.30.2021 at 12:45 pm MST, this Auditor contacted the Gillette Abuse Refuge Foundation at 910 East 3rd Street I, Gillette, WY 82716 at 307.686.8071. Upon the Auditor making the operator aware of the reason for the call, 'Lisa' the operator, stated she would offer services to anyone who called for sexual victim services. She stated she would figure out the reason for the call and would then forward the call to one of the victim advocates. Upon the Auditor asking if she was aware of an agreement with Volunteers of America, Lisa stated she was aware of the facility; however, not aware of the MOU. The operator stated I could contact the Director; however, I made the operator aware I wanted to understand what would happen if a resident of Booth Hall phoned the agency. The operator then stated, "we would offer advocate services to anyone who called." The Auditor noted the agency closed at 4:30 pm and asked Lisa what would happen if someone called after closing. The operator stated, 'the call would ring to an answering service who would send the call to advocate.'

The facility provided a Memorandum of Understanding between Campbell County Memorial Hospital and Volunteers of America Northern Rockies. Page 1, section 5., states, "Volunteers of America Northern Rockies shall adhere to the following standards:

- 115.221 (c)1-2 – the facility offers to all residents who experience sexual abuse access to forensic medical examinations.
- o The medical examinations are offered without financial cost to the victim.
- o Transportation of any rape victim will be done through the Campbell County's Sheriff's Department or Ambulance directly to the Campbell County Memorial Hospital Emergency Room."

This agreement remains active until either party issues a written cancellation.

The facility provided a Memorandum of Understanding between Behavioral Health Services, Campbell County Memorial Hospital and Volunteers of America Northern Rockies. Page 1, section 5., states, "Volunteers of America Northern Rockies shall adhere to the following standards:

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

This MOU shall remain in full force and effect until terminated.

On 12.30.2021 at 12:26 pm MST, this Auditor contacted the Campbell County Memorial Hospital at 501 South Burma Avenue, Gillette, WY 82716, phone number 307.688.1000. Upon the Auditor making the operator aware of the reason for the call, the call was transferred to the Emergency Room. Once the Emergency Room staff answered the call, the Auditor again explained the reason for the call. The Emergency Room attendant stated her or the staff in the surrounding area were aware of providing the hospital providing forensic exams and services to Booth Hall. The Emergency Room attendant stated they would call in a nurse for the exam; however, the patient would not be kept at this hospital.

(e) The Volunteers of America - Booth Hall PAQ states a qualified staff or community member accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provides emotional support, crisis intervention, information and referrals.

The facility provided a Volunteers of America Northern Rockies Memorandum, RE: PREA Standard 115.221 (d) 1-3, (c) and (f). The memorandum is addressed to the Chief Operating Officer and states, "As per PREA Standard 115.221 (d) 1-3, (e) and (f), we have identified Mary Sue Redle as our Victims Advocate fulfilling the standard requirements above. Mary Sue Redle has completed the mandatory 40 hours of Domestic Violence and Sexual Assault Advocate Training through the Gillette Abuse Refuge Foundation and maintains her certification since May 22, 2007."

On 12.30.2021 at 12:39 pm MST, this auditor contacted the receptionist at Booth Hall and verified the facility employees Mary Sue Redle.

Residents are made aware of outside advocate and SANE/SAFE services through the Resident Handbook. Page 22-23 of the Resident Handbook Lists 14 different advocacy service organizations, to include GARF – Gillette Abuse Refuge Foundation.

(f, h) The Volunteers of America - Booth Hall PAQ states the agency is not responsible for conducting allegations of sexual abuse and relies on the Wyoming Department of Corrections and or the Campbell County Sheriff's Department.

115.222	Policies to ensure referrals of allegations for investigations
	<p data-bbox="244 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 208 451 237">Auditor Discussion</p> <p data-bbox="244 271 432 300">Document Review:</p> <ol data-bbox="244 327 1477 448" style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 <p data-bbox="244 533 352 562">Interviews:</p> <ol data-bbox="244 589 794 846" style="list-style-type: none"> 1. Informal Resident Interviews 2. Random Residents 3. Targeted Residents 4. Random staff 5. Senior Director of Corrections / PREA Coordinator <p data-bbox="244 880 1458 972">Resident and staff interviews demonstrated each can report incidents of sexual abuse and sexual harassment through the grievance process, verbally reporting to a staff, using their personal cell phones or telling a family member. Each stated being comfortable reporting incidents of sexual harassment and assault.</p> <p data-bbox="244 1059 1477 1151">(a) The Volunteers of America - Booth Hall PAQ states the agency ensures 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 zero allegations of sexual abuse and sexual harassment that were received.</p> <p data-bbox="244 1238 1490 1503">Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 82-83, section 7, states, "VOA shall ensure that allegations of sexual abuse or sexual harassment are referred to The Wyoming Department of Corrections Investigative Unit, or the Campbell County sheriff's Office to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior, and to document all such referrals. Any State entity responsible for conducting administrative or criminal investigations of sexual abuse or sexual harassment in the facility/ program shall have in place a policy governing the conduct of such investigations. If an external agency conducts the investigation, the facility/program shall be responsible to follow up with the agency and document requests to gain access to final reports.</p> <p data-bbox="244 1536 1465 1628">· External Investigators shall gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator."</p> <p data-bbox="244 1715 1484 1910">(b) The Volunteers of America - Booth Hall PAQ states the agency has a policy that requires that 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 criminal investigation is published on the agency website at https://www.voanr.org/reporting. Policy compliance for provision (b)-1, can be found in provision (a) of this standard.</p> <p data-bbox="244 1998 1455 2060">(c) This provision is not applicable as the Wyoming Department of Corrections Investigative Unit or the Campbell County Sheriff's Office is responsible for conducting criminal investigations.</p>

115.231	Employee training
	<p data-bbox="244 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 208 451 237">Auditor Discussion</p> <p data-bbox="244 271 435 300">Document Review:</p> <ol data-bbox="244 327 1481 622" style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 3. Sample: Volunteers of America PREA Acknowledgement, dated 10.25.21 through 12.21.2021 4. Volunteer of America Employee PREA Training Sign-In Sheet Training Logs, dated throughout 2019, 2020 and 2021 5. National PREA Resource Center PREA Employee Training, Units 1-5, dated 8.2014 <p data-bbox="244 707 352 736">Interviews:</p> <ol data-bbox="244 763 788 909" style="list-style-type: none"> 1. Random staff 2. Specialized staff 3. Senior Director of Corrections /PREA Coordinator <p data-bbox="244 936 1481 1032">Interviews with random staff demonstrated each were aware of and received initial and annual PREA training. Staff reported initial training was completed by the Assistant Director/PREA Compliance Manager via a facility video and in-service sessions to include review of agency policy.</p> <p data-bbox="244 1120 416 1149">Site Observation:</p> <p data-bbox="244 1176 1370 1205">Review of personnel files demonstrated each have received initial and annual training to include specialized staff.</p> <p data-bbox="244 1290 1401 1355">(a) The Volunteers of America - Booth Hall PAQ states the agency trains all employees who may have contact with residents on the agency's zero-tolerance policy for sexual abuse and sexual harassment.</p> <p data-bbox="244 1440 1185 1469">The facility provided the National PREA Resource Center PREA Employee Training, Units 1-5.</p> <ul data-bbox="244 1496 1240 1814" style="list-style-type: none"> · Unit 1 encompasses the Prison Rape Elimination Act: Overview of the Law and Your Role. · Unit 2 encompasses: Residents' Rights to be free from Sexual Abuse and Sexual Harassment · Staff and Residents' Rights to be Free from Retaliation · Unit 3 encompasses: Prevention and Detection of Sexual Abuse and Sexual Harassment · Unit 4 encompasses: Professional Boundaries · Unit 5 encompasses: Effective and Professional Communication with Residents <p data-bbox="244 1899 1481 2029">(b) The Volunteers of America - Booth Hall PAQ states training is tailored to the gender of the residents at the facility. Employees who are reassigned from facilities housing the opposite gender are given additional training. Compliance can be found in provision (a) of this standard. Volunteers of America states, in the PAQ fields, "All staff are trained receive the same training of all genders of the facility." "Since we are a mixed facility, all staff will receive training on mixed genders."</p> <p data-bbox="244 2114 1458 2143">(c) The Volunteers of America - Booth Hall PAQ states between trainings the agency provides employees who may have</p>

contact with residents with refresher information about current policies regarding sexual abuse and harassment. The frequency with which employees who may have contact with residents receive refresher training on PREA requirements annually.

The facility provided several Volunteers of America PREA Acknowledgement, dated 10.25.21 through 12.21.2021. Acknowledgement's state, "I have been trained and fully understand the Prison Rape Elimination Act 2003 (PREA), PREA Community Confinement Standards (28CFR 115) and Volunteers of America – Booth Hall Staff Sexual Misconduct Against Offenders (PREA) policy #902.00."

In addition, the facility provided Volunteer of America Employee PREA Training Sign-In Sheet Training Logs, dated throughout 2019, 2020 and 2021.

(d) The Volunteers of America - Booth Hall PAQ states the agency documents that employees who may have contact with residents understand the training they have received through employee signature or electronic verification

115.232	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 3. Volunteers of America Northern Rockies PREA Acknowledgment, not dated <p>Site Observation:</p> <p>Currently, contractors and volunteers are not being utilized at the facility.</p> <p>(a) The Volunteers of America - Booth Hall 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 sexual harassment prevention, detection, and response. The number of volunteers and contractors, who may 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 zero. The facility states they have no volunteers at this time due to COVID.</p> <p>Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 72, section Staff Training 3., states, "All volunteers, interns and contractors who have repeated contact with residents must be trained in their responsibilities under this policy and procedure. The level and type of training shall be based on the services they provide and the level of contact they have with residents, but all will be notified of the agency's zero-tolerance policy regarding sexual abuse, sexual assault/rape, sexual misconduct and sexual harassment and informed how to report such incidents. The facility shall maintain documentation confirming the volunteer/intern/contractor understands the training. Volunteers and contractors who do not have repeated contact with residents shall sign the Visitor's Log which shall have a statement such as "This facility has zero tolerance for all forms of sexual abuse and harassment. If you are involved or witness an incident of sexual abuse or harassment of our residents, you must report such immediately to the PREA Coordinator, Facility Director or designee".</p> <p>(b) The Volunteers of America - Booth Hall 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. The Volunteers of America – Booth Hall PAQ states, "All volunteers receive the same training as regular staff."</p> <p>(c) The Volunteers of America - Booth Hall PAQ states the agency maintains documentation confirming that volunteers and contractors who have contact with residents understand the training they have received. The facility provided a blank Volunteers of America Northern Rockies PREA Acknowledgment, signed by all staff, volunteers and contractors.</p>

115.233	Resident education
	<p data-bbox="244 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 208 451 237">Auditor Discussion</p> <p data-bbox="244 271 435 300">Document Review:</p> <ol data-bbox="244 327 1481 741" style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 3. Wyoming Department of Corrections PREA Information for Inmates, not dated 4. 9KS VOA Booth Hall – RRC, Inmate Acknowledgment, not dated 5. National PREA Resource Center, An End to Silence: Inmate's Handbook on identifying and Addressing Sexual Abuse, dated 9.2014 6. Volunteers of America Northern Rockies Sexual Harassment, Sexual Abuse and Assault Prevention Resident Acknowledgment, dated 10.2018 <p data-bbox="244 831 352 860">Interviews:</p> <ol data-bbox="244 887 491 1032" style="list-style-type: none"> 1. Random Residents 2. Targeted Residents 3. Random staff <p data-bbox="244 1059 1485 1155">Interviews with the 15 random and five targeted residents, each reported their knowledge on PREA, reporting options to staff being verbal – addressing staff being the most used, putting a note in the communications box in the Control Centers, telling a trusted adult and or calling the phone numbers posted on Zero-tolerance Posters throughout the facility.</p> <p data-bbox="244 1240 416 1270">Site Observation:</p> <p data-bbox="244 1299 1449 1359">Of the 20 resident files reviewed, each demonstrated evidence of PREA education within 72 hours and 30 days of intake. Files reviewed demonstrated 100% compliance.</p> <p data-bbox="244 1447 1481 1608">(a) The Volunteers of America - Booth Hall PAQ states residents receive information at time of intake about the zero-tolerance policy, how to report incidents or suspicions of sexual abuse or harassment, their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. The number of residents admitted during past 12 months who were given this information at intake was 269.</p> <p data-bbox="244 1695 1485 1926">Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 73, section Resident Orientation Training 1., state, "Upon admission, all residents will receive an orientation that includes VOA's zero-tolerance policy relating to sexual assault/rape or sexual misconduct and how to report it. This will also include information about sexual misconduct, including background information on PREA, prevention, intervention, self-protection, reporting, treatment and counseling and confidentiality. Training will occur via video presentation or through training curriculum approved by the Chief Operating Officer. This is in addition to the Resident handbook, brochures, orientation training, and posters located throughout the facility."</p> <p data-bbox="244 2011 1465 2072">The facility provided a Volunteers of America Northern Rockies Sexual Harassment, Sexual Abuse and Assault Prevention Resident Acknowledgment. This acknowledgment informs and affirms the resident knowledge of the following:</p> <ul data-bbox="244 2101 574 2130" style="list-style-type: none"> · What is sexual harassment

- What is resident on resident sexual abuse and assault
- What is staff on resident sexual abuse and assault
- There is no such thing as consensual sex between a staff member and a resident
- It is your right to be safe from sexual harassment, sexual abuse and/or assault. It is guaranteed by policy and federal law.
- Confidentiality (regarding reporting)

This acknowledgment is placed in both the Federal and State intake packets.

(a) The Volunteers of America - Booth Hall PAQ states the facility provides residents who are transferred from a different community confinement facility with refresher information referenced in 115.233(a)-1. The number of residents transferred from a different community confinement facility during the past 12 months was one. The number of residents transferred from a different community confinement facility, during the past 12 months, who received refresher information was zero. The agency states residents who are transferred from a different community confinement facility will receive the above described brochure, a resident handbook and watch the PREA Video. Policy compliance can be found in provision (a) of this standard.

(c) The Volunteers of America - Booth Hall PAQ states Resident PREA education is available in formats accessible to all residents, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled and those who have limited reading skills.

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 74, section 3., states, "The information will be communicated orally and in written form in a manner that is clearly understood by the resident, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled as well as residents who have limited reading skills."

Residents review the PREA video in English and Spanish formats, with subtitles to accommodate the deaf, blind or hard of hearing.

(d) The Volunteers of America - Booth Hall PAQ states the agency maintains documentation of resident participation in PREA education sessions. Documentation acknowledgments can be found in provision (a) of this standard.

(e) The Volunteers of America - Booth Hall 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.

115.234	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Senior Director of Corrections / PREA Coordinator <p>The Senior Director of Corrections / PREA Coordinator explained the facility does not employ investigators. All investigations, Administrative and Criminal are completed by the Wyoming Department of Corrections and or the local Sheriff's Department as is required by state and Federal contract requirements.</p> <p>(a) The Volunteers of America - Booth Hall PAQ states agency policy does not requires that investigators are trained in conducting sexual abuse investigations in confinement settings.</p> <p>Volunteers of America, Booth Hall facility does not conduct Administrative and or Criminal Investigations.</p> <p>(b) The facility does not conduct Administrative or Criminal Investigations.</p> <p>(c) The Volunteers of America - Booth Hall PAQ states the agency does not maintain documentation showing that investigators have completed the required training. The number of investigators currently employed who have completed the required training is zero.</p>

115.235	Specialized training: Medical and mental health care
	<p data-bbox="244 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 208 451 237">Auditor Discussion</p> <p data-bbox="244 271 435 300">Document Review:</p> <ol data-bbox="244 327 1481 595" style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 3. Certificate of Completion, PREA: Behavioral Health Care for Sexual Assault Victims in a Confinement Setting, dated 1.5.2022 4. Certificate of Completion, PREA: 201 for Medical and Mental Health Practitioners, dated 1.5.2022 <p data-bbox="244 680 352 710">Interviews:</p> <ol data-bbox="244 736 794 824" style="list-style-type: none"> 1. Clinician 2. Senior Director of Corrections / PREA Coordinator <p data-bbox="244 853 1473 916">Interviews with the Clinician demonstrated she was able to follow procedural steps until law enforcement and or an external investigator responded to the facilities notification.</p> <p data-bbox="244 1001 419 1030">Site Observation:</p> <p data-bbox="244 1059 1465 1122">During file review of the mental health staff training records, she had completed specialized medical and mental health and training mandated by standard 115.231.</p> <p data-bbox="244 1207 1484 1368">(a) The Volunteers of America - Booth Hall 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 and have received the training required by agency policy is one. The percent of all medical and mental health care practitioners who work regularly at this facility and have received the training required by agency policy is 100%.</p> <p data-bbox="244 1456 1465 1550">Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 73, section 5, states, "Agency clinical practitioners who will work with facility residents will receive specialized training on:</p> <ol data-bbox="244 1579 1074 2045" style="list-style-type: none"> a. How to detect and assess signs of sexual abuse and harassment b. How to preserve physical evidence of sexual abuse c. How to respond effectively and professionally to victims of sexual abuse and harassment d. How and to whom to report allegations of sexual abuse/harassment. i. The agency shall maintain documentation that clinical practitioners have received the trainings referenced in this standard either by the agency or elsewhere." ii. Clinical practitioners shall also receive the training mandated for employees under PREA standard 115.231 for employees. <ol data-bbox="244 2130 1453 2159" style="list-style-type: none"> 5. The facility provided two certificates of completion for the Mental Health to include PREA: Behavioral Health Care for

Sexual Assault Victims in a Confinement Setting and PREA: 201 for Medical and Mental Health Practitioners.

(b) The Volunteers of America - Booth Hall PAQ states the agency medical staff at this facility do not conduct forensic medical exams.

(c) The Volunteers of America - Booth Hall PAQ states the agency maintains documentation showing that mental health practitioners have completed the required training. This facility does not employ or contract with medical personnel.

(d) Mental Health training records indicate annual PREA training mandated for all employees is completed, annually.

115.241	Screening for risk of victimization and abusiveness
	<p data-bbox="244 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 208 451 237">Auditor Discussion</p> <p data-bbox="244 271 435 300">Document Review:</p> <ol data-bbox="244 327 1481 506" style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 3. Volunteers of America RCC PREA Risk Screening, not dated <p data-bbox="244 591 352 620">Interviews:</p> <ol data-bbox="244 647 480 792" style="list-style-type: none"> 1. Intake staff 2. Random residents 3. Targeted residents <p data-bbox="244 819 1468 916">Interviews with intake staff demonstrated that risk assessments are completed with each resident within 72 hours of intake. Residents interviewed attested to being asked questions regarding their risk level; stated they believed to be roomed appropriately and were able to suggest and receive room assignments of their choice.</p> <p data-bbox="244 1001 416 1030">Site Observation:</p> <p data-bbox="244 1057 1422 1120">During review of 20 resident files reviewed, this Auditor noted each resident had received screening within 72 hours of admission.</p> <p data-bbox="244 1205 316 1234">115.41</p> <p data-bbox="244 1261 1490 1323">(a) The Volunteers of America - Booth Hall PAQ states the agency has a policy that requires screening (upon admission to a facility or transfer to another facility) for risk of sexual abuse victimization or sexual abusiveness toward other residents.</p> <p data-bbox="244 1413 1485 1608">Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 73, section 1., state, "Residents shall be assessed using the objective assessment instrument entitled the PREA Screener. VOA will use the Wyoming Department of Corrections screening form. VOA case managers or Clinical staff will complete the PREA Screener with the resident within 72 hours of arrival to the facility (whether new intake or a transfer) for potential vulnerabilities or tendencies with regards to sexually aggressive behavior. Housing assignments shall be made accordingly for any separation needs."</p> <p data-bbox="244 1693 1490 1859">(b) The Volunteers of America - Booth Hall PAQ states the agency policy requires that residents be 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) 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 269.</p> <p data-bbox="244 1944 1461 2007">(c-e) The Volunteers of America - Booth Hall PAQ states the risk assessment is conducted using an objective screening instrument.</p> <p data-bbox="244 2092 1176 2121">The facility provided a Volunteers of America RCC PREA Screening. This screening includes:</p>

- Resident Name: BOP #
- Date/Time of Arrival Date/Time of Initial Screening (within 75 hours of arrival)
- Status Facility: CPH 9KS VOA Booth Hall
- Staff member conducting screening Scheduled Reassessment Date:

Questions regarding Risk of Sexual Victimization

- Has the resident been the victim of prison or jail rape or sexual assault?
- Is the resident under the age of 21 or over the age of 65?
- Does the resident have small physical stature?
- Does the resident have developmental, physical, or mental health disability?
- Is the resident perceived to be or does he/she consider themselves gay, lesbian, bisexual, transgender, intersex, gender nonconforming or for males only – overtly effeminate?
- Has the resident experienced sexual victimization in a non-correctional setting?
- Was the resident involved in sexual activities while incarcerated?
- Has the resident been in protective custody with the past ten years?
- Does the resident express fear of concern for his/her safety in the RRC?

o Vulnerability designation

Vulnerability Override Consideration – Rational for the Recommended Override

- Was the resident previously incarcerated in a county, state or federal facility?
- Is the residents' criminal history exclusively non-violent?
- Does the resident have a current or prior conviction for a sex offense against a child or adult?

o Rational for the Recommended Override for the Vulnerability Designation

Risk of Sexual Abusiveness

- Does the resident have a history of institutional predatory sexual behavior?
- Has the resident committed prior acts of sexual abuse?
- Does the resident have prior convictions for violent offenses?
- Does the resident have a history of prior institutional violence?
- Ins the resident's risk assessment for Violent Recidivism?

o Abusiveness Designation

(e) The Volunteers of America - Booth Hall PAQ states the policy requires that the facility reassess each resident's risk of victimization or abusiveness within a set time period, not to exceed 30 days after the resident's arrival at the facility, based upon any additional, relevant information received by the facility since the intake screening. The number of residents entering the facility (either through intake or transfer) within the past 12 months whose length of stay in the facility was for 30 days or more who were reassessed for their risk of sexual victimization or of being sexually abusive within 30 days after their arrival at the facility based upon any additional, relevant information received since intake was 269, 100%.

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 75, section 9., states, "Within a set period of time, not to exceed thirty (30) days from the resident's arrival at the facility, the facility will reassess the resident's risk of sexual victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening. This shall be accomplished using a chart review, however if information is discovered that reveals the resident may be likely as a victim or abuser, a full re-assessment will be completed using the PREA Screener or the Wyoming Department of Corrections Risk Assessment form."

(f) The Volunteers of America - Booth Hall PAQ states the policy requires that a resident's risk level be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the resident's risk of sexual victimization or abusiveness.

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 75, section 10., states, "A resident's risk level shall also be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the resident's risk of sexual victimization or abusiveness."

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

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 74, section 5., "Residents may not be disciplined for refusing to answer, or for not disclosing complete information in response to questions."

(h) Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 74, section 6., states, "The agency shall implement appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this section in order to ensure that sensitive information is not exploited to the resident's detriment by staff or other residents."

115.242	Use of screening information
	<p data-bbox="244 145 766 174">Auditor Overall Determination: Exceeds Standard</p> <p data-bbox="244 208 451 237">Auditor Discussion</p> <p data-bbox="244 271 435 300">Document Review:</p> <ol data-bbox="244 327 1481 506" style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 3. Volunteers of America PREA Risk Assessment Placement Tool samples, not dated <p data-bbox="244 591 352 620">Interviews:</p> <ol data-bbox="244 647 759 907" style="list-style-type: none"> 1. Targeted residents 2. Random residents 3. Correctional Specialists 4. Intake staff 5. Assistant Director/PREA Compliance Manager <p data-bbox="244 934 1481 1064">Interviews with Intake staff and the Assistant Director / PREA Compliance Manager demonstrated only resident risk level is shared with Correctional Specialist. Correctional Specialists interviewed stated vulnerable and aggressive residents are housed appropriately to ensure the safety of all residents. Targeted and random residents speak to the intake process being respectable. Targeted residents and stated, upon admission, same sex staff search same sex residents.</p> <p data-bbox="244 1149 419 1178">Site Observation:</p> <p data-bbox="244 1205 1436 1234">During review of 20 resident files, this Auditor noted each resident had received screening within 72 hours of admission.</p> <p data-bbox="244 1321 1481 1417">(a) The Volunteers of America - Booth Hall PAQ states the agency/facility uses information from the risk screening required by §115.241 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive.</p> <p data-bbox="244 1503 1468 1599">Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 74, section 13., states, "The agency shall make individualized determinations about how to ensure the safety of each resident</p> <p data-bbox="244 1684 1465 1814">The facility provided samples of completed Volunteers of America PREA Risk Assessment Placement Tool. This form has a confidential summary on the outcome of a risk assessment. Following the summary are actual assessment, housing placement, bed placement, work assignment, education and program assignment. All forms are added to the initial PREA assessment upon intake and revisited when necessary or at least every six months.</p> <p data-bbox="244 1899 1469 2029">(b) The Volunteers of America - Booth Hall PAQ states the agency/facility makes individualized determinations about how to ensure the safety of each resident. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 74, section 14i, states, "When the facility/ program learns that a resident is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the resident.</p> <ol data-bbox="244 2056 1469 2085" style="list-style-type: none"> i. Facility leadership will immediately assess and report the situation to determine action steps to ensure resident safety."

(c) The Volunteers of America - Booth Hall PAQ states the agency/facility makes housing and program assignments for transgender or intersex residents in the facility on a case-by-case basis. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 75, section 11, states, "If during the re-evaluation the resident's initial screening results need to be modified, the case manager will complete the necessary section of the appropriate screening form. The agency shall use information from the risk screening conducted pursuant to this section to inform housing, bed, work, education, and program assignments with the goal of keeping separate, or under direct supervision of staff, those residents at high risk of being sexually victimized from those at high risk of being sexually abusive."

(d) Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 76, section 4, states, "A transgender or intersex resident's own view with respect to his or her own safety shall be given serious consideration."

(e) Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 76, section 5., states, "Transgender and intersex residents shall be given the opportunity to shower separately from other residents. Furthermore, a resident may approach a Lead Mentor or designee and request staff to clear the showers to ensure privacy. Staff will clear the showers of other residents, then monitor the shower entrance to ensure privacy until the shower is complete. Individual room showers are available in all other rooms."

(f) Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 76, section 6., states, "VOA will not place lesbian, gay, bisexual, transgender, or intersex residents in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such residents."

Due to the design of the risk assessment, confidential summary and risk assessment outcome documentation, the facility exceeds this standards requirements.

115.251	Resident reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 3. Wyoming Department of Corrections Hotline Poster, not dated 4. Volunteers of America Northern Rockies Booth Hall Residential Re-Entry Center Wyoming Department of Corrections Residential Handbook, dated 4.2021 5. CPH 9KS RRC Resident Handbook, dated 5.2021 6. Volunteers of America Northern Rockies Booth Hall Residential Re-Entry Center, WDOC Sanctions Handbook, dated 4.2021 7. Volunteers of America Northern Rockies Booth Hall Staff's Program Handbook, dated 11.2019 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random staff 2. Random residents 3. Targeted residents <p>Staff and residents were comfortable reporting verbally to any staff. As reported, residents demonstrated being comfortable talking with the Assistant Director/PREA Compliance Manager and the Senior Director of Corrections/PREA Coordinator. In addition, each resident interviewed stated he or she would report to staff verbally as their first thought and choice.</p> <p>Site Observations:</p> <p>During the tour the Auditor witnessed residents with their own cell phones. Informal discussions with residents reported they could use their personnel cell phones to make hotline calls.</p> <p>(a) The Volunteers of America - Booth Hall PAQ states the agency has established procedures allowing for multiple internal ways for residents to report privately to agency officials about: (a) sexual abuse or sexual harassment; (b) retaliation by other residents or staff for reporting sexual abuse and sexual harassment; and (c) staff neglect or violation of responsibilities that may have contributed to such incidents.</p> <p>Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 78, section Reporting Procedures, states, "A resident may report sexual abuse and sexual harassment, retaliation by other residents or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents to any staff member, either verbally or in writing. A resident may correspond directly with the Division Director or Chief Operating Officer if desired.</p> <p>The facility/ program shall also provide 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, and that is able to receive and immediately forward resident reports of sexual abuse or sexual harassment to agency officials, allowing the resident to remain anonymous on request The residents are encouraged to utilize the Hotline number of 1-877-9-NOHARM. Or 307-737-6781."</p>

The facility provided Wyoming Department of Corrections PREA Information for Inmates. This form contains information and hotline contact information for the Wyoming Department of Corrections and is contain Volunteer of America agency information. On Friday, December 30, 2021 at 12:45, the Auditor phoned the hotline contact information at the Wyoming Department of Corrections at 307.686.8071. The auditor received a voicemail that instructed the caller to leave a message and he call would be returned. This Auditor left a message introducing herself and the reason for the call. On December 30, 2021, at 7:04 pm the Auditor received a return call from the Wyoming Department of Corrections Duty Officer. The Duty Officer explained that the Wyoming Department of Corrections has a cell phone which is rotated through Duty Officers who listens to and answers voice mails twice daily. The Duty Officer went on to say that they would call the inmate back at the facility from which they called, hopefully they have left their name, request the inmate, take his or her information and begin steps for ensuring an investigation takes place.

(b) The Volunteers of America - Booth Hall PAQ states the agency provides at least one way for residents to report abuse or harassment to a public or private entity or office that is not part of the agency.

The facility provided Wyoming Department of Corrections PREA Information for Inmates. This form contains information and hotline contact information for the Wyoming Department of Corrections and is contain Volunteer of America agency information. On Friday, December 30, 2021, at 12:45, the Auditor phoned the hotline contact information at the Wyoming Department of Corrections at 307.686.8071. The auditor received a voicemail that instructed the caller to leave a message and he call would be returned. This Auditor left a message introducing herself and the reason for the call. On December 30, 2021, at 7:04 pm the Auditor received a return call from the Wyoming Department of Corrections Duty Officer. The Duty Officer explained that the Wyoming Department of Corrections has a cell phone which is rotated through Duty Officers who listens to and answers voice mails twice daily. The Duty Officer went on to say that they would call the inmate back at the facility from which they called, hopefully they have left their name, request the inmate, take his or her information and begin steps for ensuring an investigation takes place.

(c) The Volunteers of America - Booth Hall 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.

Policy compliance can be found in provision (a) of this standard.

The facility provided a CPH 9KS RRC Handbook. Page 9, states, "Reporting: To report an allegation of sexual violence, you can give a verbal or written statement to any staff member. You can also call 1-877-9NO-HARM and leave a confidential voice message. The call is free and can only be used to report sexual misconduct, harassment, assaults including sexual assaults or other criminal activity by offenders or staff either as a victim or as a witness."

(d) The Volunteers of America - Booth Hall PAQ states the agency has established procedures for staff to privately report sexual abuse and sexual harassment of residents.

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 78, section 2, states, "Staff shall be able to privately report sexual abuse and sexual harassment of residents in writing to the PREA Coordinator, Division Director or Chief Operating Officer. Staff also have access to the Whistleblower Hotline, an anonymous hotline established to provide a vehicle for all employees to report alleged or perceived abuses or suspected capricious or illegal acts committed by any VOA staff member."

The facility provided a Volunteers of America Northern Rockies Booth Hall Staff's Program Handbook. Page 16, section 2, states, "Staff shall be able to privately report sexual abuse and sexual harassment of residents in writing to the PREA Coordinator, Division Director or Chief Operating Officer. Staff also have access to the Whistleblower Hotline, an anonymous hotline established to provide a vehicle for all employees to report alleged or perceived abused or suspected capricious or illegal acts committed by any VOA staff Member."

115.252	Exhaustion of administrative remedies
	<p data-bbox="244 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 210 451 237">Auditor Discussion</p> <p data-bbox="244 273 435 300">Document Review:</p> <ol data-bbox="244 327 1481 448" style="list-style-type: none"> <li data-bbox="244 327 695 353">1. Volunteers of America - Booth Hall PAQ <li data-bbox="244 387 1481 448">2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 <p data-bbox="244 533 352 560">Interviews:</p> <ol data-bbox="244 586 480 676" style="list-style-type: none"> <li data-bbox="244 586 477 613">1. Random residents <li data-bbox="244 647 480 676">2. Targeted residents <p data-bbox="244 703 1469 801">Residents interviewed were aware of the grievance procedures and understood they could complete a grievance. Although residents were aware of grievance procedures, none interviewed stated this process as one they had utilized. In the last 12 months there were zero grievances files for sexual harassment or sexual abuse.</p> <p data-bbox="244 887 416 913">Site Observation:</p> <p data-bbox="244 940 1189 967">Residents were able to file a grievance; however, residents preferred verbally reporting to staff.</p> <p data-bbox="244 1061 1481 1223">(a) The Volunteers of America - Booth Hall PAQ states the agency has an administrative procedure for dealing with resident grievances regarding sexual abuse. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 79, section Grievances 1., states, "VOA shall not impose a time limit on when a resident may submit a grievance regarding an allegation of sexual abuse. The agency may apply otherwise-applicable time limits on any portion of a grievance that does not allege an incident of sexual abuse."</p> <p data-bbox="244 1308 1465 1406">(b) The Volunteers of America - Booth Hall 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. Policy compliance can be found in provision (a) of this standard.</p> <p data-bbox="244 1491 1469 1653">c) The Volunteers of America - Booth Hall 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 require that a resident grievance alleging sexual abuse not be referred to the staff member who is the subject of the complaint. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 79, section Grievances 4., states, "VOA shall ensure that:</p> <ul data-bbox="244 1680 1469 1800" style="list-style-type: none"> <li data-bbox="244 1680 1469 1742">• A resident who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and <li data-bbox="244 1769 1134 1800">• Such grievance is not referred to a staff member who is the subject of the complaint." <p data-bbox="244 1886 1490 2016">(d) The Volunteers of America - Booth Hall PAQ states the agency policy and procedure requires that a decision on the merits of any grievance or portion of a grievance alleging sexual abuse be made within 90 days of the filing of the grievance. In the past 12 months, the number of grievances filed that alleged sexual abuse was zero. In the past 12 months, the number of grievances alleging sexual abuse that reached final decision within 90 days after being filed was zero.</p> <p data-bbox="244 2101 1485 2163">Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 79, section Grievances 5., states, "VOA shall issue a final agency decision on the merits of any portion of a grievance</p>

alleging sexual abuse within 90 days of the initial filing of the grievance. Computation of the 90-day time period shall not include time consumed by residents in preparing any administrative appeal.”

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 79, section Grievances 6., states, “VOA may claim an extension of time to respond, of up to 70 days, if the normal time period for response is insufficient to make an appropriate decision. VOA shall notify the resident in writing of any such extension and provide a date by which a decision will be made.”

(e) The Volunteers of America - Booth Hall 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 if a resident declines to have third-party assistance in filing a grievance alleging sexual abuse, the agency documents the resident's decision to decline. The number of grievances alleging sexual abuse filed by residents in the past 12 months in which the resident declined third-party assistance, containing documentation of the resident's decision to decline was zero.

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 79, section Grievances 8., “Third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, shall be permitted to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of residents. 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. If the resident declines to have the request processed on his or her behalf, the agency shall document the resident's decision.”

(f) The Volunteers of America - Booth Hall PAQ states the agency has a policy and established procedures for filing an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse. Agency policy and procedure for emergency grievances alleging substantial risk of imminent sexual abuse requires an initial response within 48 hours. The number of emergency grievances alleging substantial risk of imminent sexual abuse that were filed in the past 12 months was zero. The agency's policy and procedure for emergency grievances alleging substantial risk of imminent sexual abuse requires that a final agency decision be issued within 5 days. The number of grievances alleging substantial risk of imminent sexual abuse filed in the past 12 months that reached final decisions within 5 days was zero.

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 79, section Grievances 9, states, “After receiving an emergency grievance alleging a resident is subject to a substantial risk of imminent sexual abuse, VOA shall immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken, shall provide an initial response within 48 hours, and shall issue a final agency decision within 5 calendar days. The initial response and final agency decision shall document the agency's determination whether the resident is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.”

(g) The Volunteers of America - Booth Hall PAQ states the agency has a written policy that limits its ability to discipline a resident for filing a grievance alleging sexual abuse to occasions where the agency demonstrates that the resident filed the grievance in bad faith. In the past 12 months, the number of resident grievances alleging sexual abuse that resulted in disciplinary action by the agency against the resident for having filed the grievance in bad faith was zero.

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 79, section Grievances 10, states, “VOA may discipline a resident for filing a grievance related to alleged sexual abuse only where VOA demonstrates that the resident filed the grievance in bad faith.”

115.253	Resident access to outside confidential support services
	<p data-bbox="244 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 210 451 237">Auditor Discussion</p> <p data-bbox="244 273 432 300">Document Review:</p> <ol data-bbox="244 327 1477 719" style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 3. Volunteers of America Northern Rockies Booth Hall Residential Re-Entry Center Wyoming Department of Corrections Residential Handbook, dated 4.2021 4. Volunteers of America Northern Rockies Booth Hall Residential Re-Entry Center, WDOC Sanctions Handbook, dated 4.2021 5. Memorandum of Understanding between Gillette Abuse Refuge Foundation and Volunteers of America Northern Rockies Memorandum, dated 2.26.2016 <p data-bbox="244 808 352 835">Interviews:</p> <ol data-bbox="244 862 483 949" style="list-style-type: none"> 1. Random residents 1. Targeted residents <p data-bbox="244 976 1469 1041">Most residents interviewed informally and formally were aware of the outside advocate as an option for reporting. However, as has been stated throughout this report, resident preference was to talk directly with facility staff.</p> <p data-bbox="244 1126 416 1153">Site Observation:</p> <p data-bbox="244 1180 1374 1207">PREA posters were witnessed in resident day rooms to include advocate address and phone number information.</p> <p data-bbox="244 1301 1469 1496">(a) The Volunteers of America - Booth Hall 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 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 with access to such services by enabling reasonable communication between residents and these organizations in as confidential a manner as possible.</p> <p data-bbox="244 1581 1485 1776">Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 81, section Resident Access 1, states, "The VOA shall 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. VOA makes these contacts available through brochures and, through information provided in the Resident Handbook."</p> <p data-bbox="244 1861 1493 1993">Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 81, section Resident Access 2, states, "VOA shall inform residents, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws."</p> <p data-bbox="244 2078 1453 2143">The facility provided Volunteers of America Northern Rockies Booth Hall Residential Re-Entry Center, WDOC Sanctions Handbook. Page 20, top of the page provides the Gillette Abuse Refuge Foundation street address, phone number, email</p>

and website information.

(b) The Volunteers of America - Booth Hall PAQ states the facility informs residents, prior to giving them access to outside support services, of the extent to which such communications will be monitored. Policy compliance can be found in provision (a) of this standard.

(a) The Volunteers of America - Booth Hall PAQ states the agency or facility maintains memorandum of understanding (MOUs) or other agreements with community service providers that are able to provide residents with emotional support services related to sexual abuse.

The facility provided Memorandum of Understanding between Gillette Abuse Refuge Foundation and Volunteers of America Northern Rockies Memorandum. The memo states, "This agreement is set forth is which residents whom are victims of sexual abuse at the Volunteers of America Northern Rockies Booth Hall RE-Entry Center may receive assistance from a victim advocate. This agreement shall include but not limited to providing intervention and related assistance to victims of sexual assault. The victim may also request from the victim advocate staff member to accompany and support the victim through a forensic medical examination process and investigatory interview." This agreement remains active until either party issues a written cancellation.

115.254	Third party reporting
	<p data-bbox="244 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 210 451 237">Auditor Discussion</p> <p data-bbox="244 273 435 300">Document Review:</p> <ol data-bbox="244 327 1481 506" style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 3. Wyoming Department of Corrections Hotline Poster <p data-bbox="244 591 352 618">Interviews:</p> <ol data-bbox="244 645 480 790" style="list-style-type: none"> 1. Random residents 2. Targeted residents 3. Random staff <p data-bbox="244 817 1461 880">Residents and random staff interviewed demonstrated their reporting knowledge of third party reporting stating that trusted family members, friends and or legal counsel could report sexual harassment or sexual abuse allegations.</p> <p data-bbox="244 965 1490 1064">(a) The Volunteers of America - Booth Hall PAQ states the agency or facility provides a method to receive third-party reports of resident sexual abuse or sexual harassment. The agency or facility publicly distributes information on how to report resident sexual abuse or sexual harassment on behalf of residents.</p> <p data-bbox="244 1149 1477 1480">The facility provided Wyoming Department of Corrections Hotline Poster. This form contains information and hotline contact information for the Wyoming Department of Corrections and is contain Volunteer of America agency information. On Friday, December 30, 2021 at 12:45, the Auditor phoned the hotline contact information at the Wyoming Department of Corrections at 307.686.8071. The auditor received a voicemail that instructed the caller to leave a message and he call would be returned. This Auditor left a message introducing herself and the reason for the call. On December 30, 2021 at 7:04 pm the Auditor received a return call from the Wyoming Department of Corrections Duty Officer. The Duty Officer explained that the Wyoming Department of Corrections has a cell phone which is rotated through Duty Officers who listens to and answers voice mails twice daily. The Duty Officer went on to say that they would call the inmate back at the facility from which they called, hopefully they have left their name, request the inmate, take his or her information and begin steps for ensuring an investigation takes place.</p> <p data-bbox="244 1565 1485 1727">The facility provided Wyoming Department of Corrections Contract language, mandating the facility to adhere to the following contract requirements. Page 65, section, Third Party Reporting, states, "The agency shall establish a method ot receive third-party reports of sexual abuse and sexual harassment and shall distribute publicly information on how to report sexual abuse and sexual harassment on behalf of a resident. Third party reports may also be made in writing, utilizing WDOC Form #542, DVS 3rd Party PREA Reporting Form."</p>

115.261	Staff and agency reporting duties
	<p data-bbox="244 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 210 451 237">Auditor Discussion</p> <p data-bbox="244 273 435 300">Document Review:</p> <ol data-bbox="244 327 1481 560" style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 3. Volunteers of America Inmate on Inmate/Staff on Inmate Sexual Assault Allegation PREA Flow Chart, not dated 4. Volunteers of America Prison Rape Elimination Act, PREA, Sexual Assault Reporting Procedure, not dated <p data-bbox="244 649 352 676">Interviews:</p> <ol data-bbox="244 703 834 1016" style="list-style-type: none"> 1. Random residents 2. Targeted residents 3. Random staff 4. Clinician 5. Assistant Director / PREA Compliance Manager 6. Senior Department of Corrections / PREA Coordinator <p data-bbox="244 1048 1492 1111">Interviews with the all staff and residents interviewed demonstrated each actively practices and understood the importance of immediately reporting all allegations of sexual abuse and sexual harassment.</p> <p data-bbox="244 1196 1476 1393">(a) The Volunteers of America - Booth Hall 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 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.</p> <p data-bbox="244 1478 1481 1644">Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 80, section Staff Reporting 1., states, "All staff shall report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency; retaliation against residents or staff who reported such incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation."</p> <p data-bbox="244 1729 1476 1792">The facility provided a Volunteers of America Prison Rape Elimination Act, PREA, Sexual Assault Reporting Procedure flyer. The flyer speaks all requirements for each provision of standard 115.251 a-e.</p> <p data-bbox="244 1877 1465 1971">The facility provided a Volunteers of America Inmate on Inmate/Staff on Inmate Sexual Assault Allegation PREA Flow Chart. The flow chart instructs reporting steps beginning with whom accepted the allegation, internal notification, reporting procedures to external notifications to law enforcement who begin investigations for all allegations.</p> <p data-bbox="244 2056 1465 2150">(b) The Volunteers of America - Booth Hall PAQ states, apart from reporting to designated supervisors or officials and designated state or local services agencies, agency policy prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and</p>

management decisions.

(c) Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 80, section Staff Reporting 6, states, "At VOA, unless otherwise precluded by federal, state or local law, medical and mental health practitioners shall be required to report sexual abuse and to inform the resident of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services."

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 80, section Staff Reporting 7, states, "Regardless of any non-statutory confidentiality obligation (e.g. privileged communication such as therapist-client, doctor-patient, clergyman-penitent; etc.), all staff have an affirmative obligation to report any resident who has reported to them a sexual assault allegation. The staff member must report the relevant information, including who, what, when and where, of the allegation."

(d) This provision is not applicable as the Volunteers of America Northern Rockies- Booth Hall does not provide services for youthful offenders.

(e) Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 80, section Staff Reporting 8, states, "VOA staff shall report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility director."

115.262	Agency protection duties
	<p data-bbox="244 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 210 451 237">Auditor Discussion</p> <p data-bbox="244 273 432 300">Document Review:</p> <ol data-bbox="244 327 1477 506" style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 3. Completed Wyoming Department of Corrections – Incident Reporting Forms, dated 7.18.2017 <p data-bbox="244 591 352 618">Interviews:</p> <ol data-bbox="244 645 794 792" style="list-style-type: none"> 1. Residents 2. Assistant Director. PREA Compliance Manager 3. Senior Director of Corrections / PREA Coordinator <p data-bbox="244 819 1449 882">Interviews with residents and staff demonstrated the facility has not had an internal report of abuse reported in the last 12 months.</p> <p data-bbox="244 967 1493 1232">(a) The Volunteers of America - Booth Hall 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 determined that a resident was subject to a substantial risk of imminent sexual abuse was four. If the agency or facility made such determinations in the past 12 months, the average amount of time (in hours) that passed before taking action was four hours. The longest amount of time (in hours or days) elapsed before taking action was 14 hours. The facility provided the following commentary, on the PAQ, "The staff member that received the first notification did not report until arriving on the unit the next day. Once the director found out about it by the staff member action was taken immediately."</p> <p data-bbox="244 1317 1297 1344">The facility provided five completed incident reporting forms. Each form includes the following information:</p> <ul data-bbox="244 1370 1107 1917" style="list-style-type: none"> • Unit • Date/Time • Date IU Notified/Time IU Notified • Date Central Office Duty Officer Notified/Time Central Office Duty Officer Notified • Type of Incident • Inmates/Offenders Involved • Is Victim Notification Required • Staff/Civilians Involved • Narrative or Event and Action Initiated • Submitted by/CEO Review

115.263	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Senior Director of Corrections / PREA Coordinator <p>The interview with the Senior Director of Corrections / PREA Coordinator demonstrated that he was aware that upon receiving an allegation that a resident was sexually abused while confined at another facility, he had the responsibility to notify the head of the facility where the allegation occurred.</p> <p>(a-b) The Volunteers of America - Booth Hall 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. During the past 12 months, the number of allegations the facility received that a resident was abused while confined at another facility was zero.</p> <p>Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 82, section Reporting to Other Confinement Facilities 1, states, "Upon receiving an allegation that a resident was sexually abused while confined at another facility/program, the Director shall notify the head of the facility or appropriate official of the agency where the alleged abuse occurred."</p> <p>Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 82, section Reporting to Other Confinement Facilities 2, "Such notification shall be provided as soon as possible, but no later than seventy-two (72) hours after receiving the allegation."</p> <p>(a) The Volunteers of America - Booth Hall PAQ states the agency or facility policy requires that allegations received from other facilities and agencies are investigated in accordance with the PREA standards. In the past 12 months, the number of allegations of sexual abuse the facility received from other facilities has been zero.</p> <p>Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 82, section Reporting to Other Confinement Facilities 3, states, "The facility head or agency office that receives such notification shall ensure that the allegation is investigated in accordance with this policy."</p>

115.264	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random staff <p>Interviews with random staff interviewed demonstrated each were aware of their first responder responsibilities. Staff stated reporting information is carried with them on their PREA cards. S</p> <p>(a) The Volunteers of America - Booth Hall 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 the alleged victim and abuser. The policy requires that, upon learning of an allegation that a resident was sexually abused, the first security staff member to respond to the report shall be required to preserve and protect any crime scene until appropriate steps can be taken to collect any evidence. The policy requires that, upon learning of an allegation that a resident was sexually abused and the abuse occurred within a time period that still allows for the collection of physical evidence, the first security staff member to respond to the report shall be required to request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. The policy requires that, upon learning of an allegation that a resident was sexually abused and the abuse occurred within a time period that still allows for the collection of physical evidence, the first security staff member to respond to the report shall be required to ensure that the alleged abuser not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.</p> <p>In the past 12 months, zero allegations occurred where an inmate was sexually abused. In the past 12 months, there were zero allegations where staff were notified within a time period that still allowed or the collection of evidence.</p> <p>Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021, page 79, Staff First Responder Duties 2., states, "The first operations staff to respond to the report shall be required to:</p> <ul style="list-style-type: none"> • Separate the alleged victim and abuser, if they have not already been separated; • Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence; • If the abuse occurred within a time period, that still allows for the collection of <p>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, drinking, or eating; and</p> <ul style="list-style-type: none"> • If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, drinking, or eating." <p>(b) The Volunteers of America - Booth Hall 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</p>

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.

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021, page 79, Staff First Responder Duties 1., states, "Upon learning of an allegation that a resident was sexually abused, the first staff member to respond to the report shall request that the alleged victim not take any actions that could destroy physical evidence, and then notify appropriate leadership." Policy compliance can be found in provision (a) of this standard.

115.265	Coordinated response
	<p data-bbox="244 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 208 451 237">Auditor Discussion</p> <p data-bbox="244 271 435 300">Document Review:</p> <ol data-bbox="244 327 1481 562" style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 3. Volunteers of America Inmate on Inmate/Staff on Inmate Sexual Assault Allegations, PREA Flow Chart, not dated. 4. Volunteers of America Prison Rape Elimination Act, PREA, Sexual Assault Reporting Procedure, not dated <p data-bbox="244 651 352 680">Interviews:</p> <ol data-bbox="244 707 798 846" style="list-style-type: none"> 1. Random staff 2. Assistant Director / PREA Compliance Manager 3. Senior Director of Corrections / PREA Coordinator <p data-bbox="244 880 1476 940">Interviews with the random and specialized staff demonstrated the response to allegations of sexual assault is written in the flow chart and is to be followed in response to sexual abuse and sexual harassment incidents.</p> <p data-bbox="244 1025 416 1055">Site Observation:</p> <p data-bbox="244 1081 1364 1111">Review of the PREA Flow Chart demonstrates clear direction to staff to ensure first responder duties are fulfilled.</p> <p data-bbox="244 1196 1458 1294">(a) The Volunteers of America - Booth Hall PAQ states the facility has developed a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership.</p> <p data-bbox="244 1379 1477 1440">The facility provided a Volunteers of America Prison Rape Elimination Act, PREA, Sexual Assault Reporting Procedure flyer. The flyer speaks all requirements for each provision of standard 115.251 a-e.</p> <p data-bbox="244 1525 1466 1624">The facility provided a Volunteers of America Inmate on Inmate/Staff on Inmate Sexual Assault Allegation PREA Flow Chart. The flow chart instructs reporting steps beginning with whom accepted the allegation, internal notification, reporting procedures to external notifications to law enforcement who begin investigations for all allegations.</p>

115.266	Preservation of ability to protect residents from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <p>1. Volunteers of America - Booth Hall PAQ</p> <p>(a) The Volunteers of America - Booth Hall PAQ states the agency, facility, or any other governmental entity is not responsible for collective bargaining on the agency's behalf has not entered into or renewed any collective bargaining agreement or other agreement since August 20, 2012, or since the last PREA audit, whichever is later.</p>

115.267	Agency protection against retaliation
	<p data-bbox="244 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 210 451 237">Auditor Discussion</p> <p data-bbox="244 273 435 300">Document Review:</p> <ol data-bbox="244 327 1481 448" style="list-style-type: none"> <li data-bbox="244 327 695 353">1. Volunteers of America - Booth Hall PAQ <li data-bbox="244 387 1481 448">2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 <p data-bbox="244 533 352 560">Interviews:</p> <ol data-bbox="244 593 794 678" style="list-style-type: none"> <li data-bbox="244 593 770 620">1. Assistant Director / PREA Compliance Manager <li data-bbox="244 649 794 678">2. Senior Director of Corrections / PREA Coordinator <p data-bbox="244 705 1481 801">Interviews with the Assistant Director / PREA Compliance Manager and the Senior Director of Corrections j/ PREA Coordinator demonstrated that the Assistant Director / PREA Compliance Manager would complete retaliation monitoring for the facility.</p> <p data-bbox="244 891 1481 1019">(a) The Volunteers of America - Booth Hall PAQ states the agency has a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff. The agency does not designate staff member(s) or charges department(s) with monitoring for possible retaliation.</p> <p data-bbox="244 1108 1481 1265">Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 81, section Protection Against Retaliation 1., states, "VOA will 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. VOA PREA Coordinator/Training Officer has been designated as the staff responsible for monitoring possible retaliation."</p> <p data-bbox="244 1355 1481 1550">(b) Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 81, section Protection Against Retaliation 2., states, "Multiple protection measures shall be employed, such as housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. Any use of segregated housing to protect a resident who is alleged to have suffered sexual abuse shall be subject to the requirements of PREANS 115.242."</p> <p data-bbox="244 1639 1481 1796">(c) The Volunteers of America - Booth Hall PAQ states the facility monitors the conduct or treatment of Inmates or staff who reported sexual abuse and of inmates who were reported to have suffered sexual abuse to ascertain if there are any changes that may suggest possible retaliation by Inmates or staff. The facility will monitor conduct or treatment until the Inmate is discharged. The facility acts promptly to remedy any such retaliation. In the past 12 months, the facility has had zero incidents of retaliation.</p> <p data-bbox="244 1886 1481 2013">Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 81, section Protection Against Retaliation 7-8., state, "The agency shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need. If any other individual who cooperates with an investigation expresses a fear of retaliation, the agency shall take appropriate measures to protect that individual against retaliation."</p> <p data-bbox="244 2103 1481 2157">The Volunteers of America - Booth Hall 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</p>

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. Agency and policy compliance can be found in provision (a) of this standard.

(d) In the case of residents, such monitoring does include periodic checks. The Assistant Director / PREA Compliance Manager is required to meet with residents initially, within 72 hours and 15 days thereafter for at least 90 days or as long as necessary. Retaliation monitoring is documented in the facilities database, Secure Manage, under the PREA tab "Retaliation Monitoring".

(e) Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 81, section Protection Against Retaliation 8, states, "If any other individual who cooperates with an investigation expresses a fear of retaliation, the agency shall take appropriate measures to protect that individual against retaliation."

115.271	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	<p data-bbox="244 208 451 237">Auditor Discussion</p> <p data-bbox="244 331 432 353">Document Review:</p> <ol data-bbox="244 387 1481 504" style="list-style-type: none"> <li data-bbox="244 387 692 409">1. Volunteers of America - Booth Hall PAQ <li data-bbox="244 443 1481 504">2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 <p data-bbox="244 593 352 616">Interviews:</p> <ol data-bbox="244 649 794 672" style="list-style-type: none"> <li data-bbox="244 649 794 672">1. Senior Director of Corrections / PREA Coordinator <p data-bbox="244 705 1481 766">The Senior Director of Corrections / PREA Coordinator stated the all investigations are completed by either the local sheriff's department and or the Wyoming Department of Corrections.</p> <p data-bbox="244 855 1481 1041">(a) The Volunteers of America - Booth Hall PAQ states the agency/facility has a policy related to criminal and administrative agency investigations. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 83, section 14, states, "When outside agencies investigate sexual abuse, the facility shall cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation."</p> <p data-bbox="244 1131 1249 1153">(b) Volunteers of America Northern Rockies- Booth Hall facility does not use their own investigators.</p> <p data-bbox="244 1243 1492 1538">(c-e) The Volunteers of America - Booth Hall PAQ states the agency/facility has a policy related to criminal and administrative agency investigations. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 82, section 7, "VOA shall ensure that allegations of sexual abuse or sexual harassment are referred to The Wyoming Department of Corrections Investigative Unit, or the Campbell County sheriff's Office to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior, and to document all such referrals. Any State entity responsible for conducting administrative or criminal investigations of sexual abuse or sexual harassment in the facility/ program shall have in place a policy governing the conduct of such investigations. If an external agency conducts the investigation, the facility/program shall be responsible to follow up with the agency and document requests to gain access to final reports.</p> <p data-bbox="244 1572 1465 1662">§ External Investigators shall gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator."</p> <ul data-bbox="244 1695 1449 1785" style="list-style-type: none"> <li data-bbox="244 1695 1449 1785">• When the quality of evidence appears to support criminal prosecution, the agency shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution." <p data-bbox="244 1818 1171 1841">§ The agency shall not terminate an investigation solely because the source of the allegation</p> <p data-bbox="244 1874 1489 1998">§ recants the allegation. The credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person's status as inmate or staff. No agency shall require an inmate 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."</p> <p data-bbox="244 2087 1476 2154">(d) Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 83, section 8, states, "Administrative investigations shall include an effort to determine whether staff actions or</p>

failures to act contributed to the abuse 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. All referrals for investigation shall be forwarded to the PREA coordinator for investigation."

(e) Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 83, section 9 states, "Criminal investigations shall be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible."

(h) Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 83, section 10, states, "Substantiated allegations of conduct that appears to be criminal shall be referred for prosecution."

(i) Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 83, section 11, states, "The facility/ program shall retain all written reports regarding the investigation for as long as the alleged abuser is incarcerated or employed by the agency, plus five years."

(j) Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 83, section 11, states, "The departure of the alleged abuser or victim from the employment or control of the facility or agency shall not provide a basis for terminating an investigation."

(l) Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 83, section 14, states, "When outside agencies investigate sexual abuse, the facility shall cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation."

115.272	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 <p>(a) The Volunteers of America - Booth Hall PAQ Bureau 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. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders, page 84, section 18, states, "The agency shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated."</p>

115.273	Reporting to residents
	<p data-bbox="244 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 210 451 237">Auditor Discussion</p> <p data-bbox="244 273 435 300">Document Review:</p> <ol data-bbox="244 327 1481 560" style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 1. Wyoming Department of Investigations Report, dated 4.16.2004 2. Volunteers of America Memorandum RE: Notification of Allegation, not dated <p data-bbox="244 649 1481 846">(a) The Volunteers of America - Booth Hall 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 three. Of the alleged sexual abuse investigations that were completed in the past 12 months, the number of residents who were notified, verbally or in writing, of the results of the investigation was three.</p> <p data-bbox="244 931 1481 994">Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 83, section 17, states, "Upon completion of an investigation where a staff member is accused of sexual abuse:</p> <ul data-bbox="244 1021 1481 1406" style="list-style-type: none"> • The Wyoming Department of Corrections, Federal Bureau of Prisons or the Campbell County Sheriff's Office shall inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. • Following a resident's allegation that a staff member has committed sexual abuse against the resident, VOA shall subsequently inform the inmate (unless it is determined that the allegation is unfounded) whenever <ul style="list-style-type: none"> o The staff member is no longer posted within the resident's unit; o The staff member is no longer employed at the facility; o The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or o The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility. <p data-bbox="244 1433 1481 1496">Following a resident's allegation that he or she has been sexually abused by another resident, VOA shall subsequently inform the alleged victim whenever</p> <ul data-bbox="244 1523 1481 1612" style="list-style-type: none"> o The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or o The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility." <p data-bbox="244 1697 1481 1823">(b) The Volunteers of America - Booth Hall PAQ states an outside entity conducts such investigations, the agency requests the relevant information from the investigative entity in order to inform the resident of the outcome of the investigation. The number of investigations of alleged resident sexual abuse in the facility that were completed by an outside agency in the past 12 months was zero.</p> <p data-bbox="244 1908 1481 2105">(c) The Volunteers of America - Booth Hall PAQ states following a resident's allegation that a staff member has committed sexual abuse against the resident, the agency/facility subsequently informs the resident (unless the agency has determined that the allegation is unfounded) whenever: (a) the staff member is no longer posted within the resident's unit; (b) the staff member is no longer employed at the facility; (c) the agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or (d) the agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility.</p>

There has been zero substantiated or unsubstantiated complaint of sexual abuse committed by a staff member against a resident in an agency facility in the past 12 months. Policy compliance for this standard can be found in provision (a) of this standard.

(d) The Volunteers of America - Booth Hall 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: (a) the agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or (b) the agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. Policy compliance for this standard can be found in provision (a) of this standard.

(e) The Volunteers of America - Booth Hall 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 an inmate, pursuant to this standard. Of those motivations, in the past 12 months, zero were documented. Policy compliance for this revision can be found in provision (a) of this standard.

115.276	Disciplinary sanctions for staff
	<p data-bbox="244 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 210 451 237">Auditor Discussion</p> <p data-bbox="244 273 432 300">Document Review:</p> <ol data-bbox="244 327 1481 443" style="list-style-type: none"> <li data-bbox="244 327 692 353">1. Volunteers of America - Booth Hall PAQ <li data-bbox="244 387 1481 443">2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 <p data-bbox="244 533 352 560">Interviews:</p> <ol data-bbox="244 586 815 676" style="list-style-type: none"> <li data-bbox="244 586 791 613">1. Assistant Director / PREA Compliance Manager <li data-bbox="244 647 815 676">2. Senior Director of Corrections / PREA Coordinator <p data-bbox="244 703 1469 766">The Assistant Director / PREA Compliance Manager and the Senior Director of Corrections / PREA Coordinator attested to the facility having had zero staff who was disciplined for violation of an agency sexual abuse or sexual harassment policy.</p> <p data-bbox="244 855 427 882">Recommendation:</p> <p data-bbox="244 909 1489 1003">The Auditor strongly recommends the facility add a "PREA" section under the Termination of Employment form currently used to track staff terminations. This would enable staff to accurately report institutional reference checks, when requests are received from employers.</p> <p data-bbox="244 1093 1390 1155">(a) The Volunteers of America - Booth Hall 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="244 1245 1442 1370">Volunteers of America Northern Rockies- Booth Hall Division Policy Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 85, section, Sanctions 2., states, "Staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. (PREANS 115.276.a) Additionally, staff may be subject to criminal sanctions."</p> <p data-bbox="244 1460 1474 1518">(b) The Volunteers of America - Booth Hall PAQ states in the last 12 months, there has been one staff from the facility that had violated agency sexual abuse or sexual harassment policies.</p> <p data-bbox="244 1523 1453 1585">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</p> <p data-bbox="244 1675 1474 1832">(c) The Volunteers of America - Booth Hall 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 have one staff requiring discipline for sexual abuse or sexual harassment.</p> <p data-bbox="244 1921 1493 2083">Volunteers of America Northern Rockies- Booth Hall Division Policy Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 85, section, Sanctions 4., states, "Disciplinary sanctions for violations of VOA policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories."</p>

(d) The Volunteers of America - Booth Hall 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 have been terminated for sexual abuse or harassment.

Volunteers of America Northern Rockies- Booth Hall Division Policy Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 85, section, Sanctions 5., states, "Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse. b) All terminations for violations of VOA's sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies."

115.277	Corrective action for contractors and volunteers
	<p data-bbox="244 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 208 451 237">Auditor Discussion</p> <p data-bbox="244 271 435 300">Document Review:</p> <ol data-bbox="244 327 1481 445" style="list-style-type: none"> <li data-bbox="244 327 695 356">1. Volunteers of America - Booth Hall PAQ <li data-bbox="244 383 1481 445">2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 <p data-bbox="244 533 352 562">Interviews:</p> <ol data-bbox="244 589 796 618" style="list-style-type: none"> <li data-bbox="244 589 796 618">1. Senior Director of Corrections / PREA Coordinator <p data-bbox="244 645 1426 707">The Senior Director of Corrections / PREA Coordinator reported during the last audit cycle, 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="244 795 416 824">Site Observation:</p> <p data-bbox="244 851 1155 880">No contractor or volunteer files were reviewed as the facility does not currently utilize either.</p> <p data-bbox="244 967 1490 1162">(a) The Volunteers of America - Booth Hall 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, contractors or volunteers have not been reported to law enforcement agencies and relevant licensing bodies for engaging in sexual abuse of residents. In the past 12 months, the number of contractors or volunteers reported to law enforcement for engaging in sexual abuse of residents was zero.</p> <p data-bbox="244 1249 1449 1379">Volunteers of America Northern Rockies - Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 86, section Corrective Action for Contractors and Volunteers 1, states, "Any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with residents and shall be reported to law enforcement agencies and to relevant licensing bodies, unless the activity was clearly not criminal."</p> <p data-bbox="244 1467 1481 1561">(b) The Volunteers of America - Booth Hall PAQ the facility takes appropriate remedial measures and considers whether to prohibit further contact with inmates in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.</p> <p data-bbox="244 1648 1485 1778">Volunteers of America Northern Rockies - Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 86, section Corrective Action for Contractors and Volunteers 1, states, "The facility shall take appropriate remedial measures and shall consider whether to prohibit further contact with residents in the case of any violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer."</p>

115.278	Disciplinary sanctions for residents
	<p data-bbox="244 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 208 451 237">Auditor Discussion</p> <p data-bbox="244 271 432 300">Document Review:</p> <ol data-bbox="244 327 1477 443" style="list-style-type: none"> <li data-bbox="244 327 692 356">1. Volunteers of America - Booth Hall PAQ <li data-bbox="244 383 1477 443">2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 <p data-bbox="244 533 352 562">Interviews:</p> <ol data-bbox="244 589 794 618" style="list-style-type: none"> <li data-bbox="244 589 794 618">1. Senior Director of Corrections / PREA Coordinator <p data-bbox="244 645 1485 705">The interview with the Senior Director of Corrections / PREA Coordinator demonstrated residents who falsely reported PREA allegations would typically be moved to another dorm or removed from the facility.</p> <p data-bbox="244 795 1469 987">(a-b) The Volunteers of America - Booth Hall PAQ states residents are subject to disciplinary sanctions only pursuant to a formal disciplinary process following an administrative finding that a resident engaged in 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, the number of administrative findings of resident-on-resident sexual abuse that have occurred at the facility was zero. In the past 12 months, the number of criminal findings of guilt for resident-on-resident sexual abuse that have occurred at the facility was zero.</p> <p data-bbox="244 1077 1485 1205">Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 86, section Disciplinary Sections for Residents 2., states, "Residents shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the resident engaged in resident-on-resident sexual abuse or following a criminal finding of guilt for resident-on-resident sexual abuse.</p> <p data-bbox="244 1294 927 1323">(c) Policy compliance can be found in provision (a) of this standard.</p> <p data-bbox="244 1413 1485 1606">The Volunteers of America - Booth Hall PAQ states, "The facility offers therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 86, section Disciplinary Sections for Residents 5, states, "VOA offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, VOA shall consider whether to require the offending resident to participate in such interventions as a condition of access to programming or other benefits."</p> <p data-bbox="244 1695 1485 1852">(d) The Volunteers of America - Booth Hall PAQ states the agency disciplines residents for sexual conduct with staff only upon finding that the staff member did not consent to such contact. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 86, section Disciplinary Sections for Residents 6, states, "VOA may discipline a resident for contact with staff only upon a finding that the staff member did not consent to such contact."</p> <p data-bbox="244 1942 1477 2134">(e) The Volunteers of America - Booth Hall 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. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 86, section Disciplinary Sections for Residents 7, 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</p>

evidence sufficient to substantiate the allegation.”

(f) The Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 86, section Disciplinary Sections for Residents 1, states, “Residents are subject to sanctions under the administrative Prohibited Acts for the Federal Bureau of Prisons or the Code of Conduct for the Wyoming Department of Corrections. Additionally, residents may be subject to criminal sanctions.”

115.282	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random residents 2. Targeted residents 3. Clinician 4. Assistant Director / PREA Compliance Manager <p>Interviews with residents, Clinician and the Assistant Director / PREA Compliance Manager demonstrated disclosure reports are reported during the risk assessment, which is completed by the Assistant Director / PREA Compliance Manager. Each resident interviewed who disclosed attested to being provided with follow up mental health care for the disclosure of prior sexual abuse.</p> <p>Site Observation:</p> <p>A review of inmate files demonstrated inmate disclosures are documented and follow up mental health appointments are offered and documented. The facility does not provide onsite medical services.</p> <p>(a) The Volunteers of America - Booth Hall 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. The facility would keep a note in the resident's electronic record if it was discussed or an appointment was scheduled.</p> <p>Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 86, section Treatment for Victims 1., states, "Resident victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by the medical and mental health practitioners according to their professional judgment."</p> <p>(b) Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 86, section Treatment for Victims 2., states, "Where available, if no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, operations staff first responders shall take the preliminary steps to protect the victim and shall immediately notify the appropriate medical and mental health practitioners."</p> <p>(c) The Volunteers of America - Booth Hall 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.</p> <p>Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 86, section Treatment for Victims 4, states, "Resident victims of sexual abuse while incarcerated shall be offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in</p>

accordance with professionally accepted standards of care, where medically appropriate.”

(d) The Volunteers of America - Booth Hall 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.

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 86, section Treatment for Victims 5, states, “Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.”

115.283	Ongoing medical and mental health care for sexual abuse victims and abusers
	<p data-bbox="244 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 208 451 237">Auditor Discussion</p> <p data-bbox="244 271 435 300">Document Review:</p> <ol data-bbox="244 327 1481 450" style="list-style-type: none"> <li data-bbox="244 327 695 356">1. Volunteers of America - Booth Hall PAQ <li data-bbox="244 383 1481 450">2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 <p data-bbox="244 533 352 562">Interviews:</p> <ol data-bbox="244 589 483 734" style="list-style-type: none"> <li data-bbox="244 589 483 618">1. Targeted residents <li data-bbox="244 645 432 674">2. Random staff <li data-bbox="244 701 379 730">3. Clinician <p data-bbox="244 763 1465 860">Interviews with mental health staff, random staff and residents demonstrated that each interviewed are aware of access to emergency medical and mental health services. Of the residents interviewed, none reported needing access to emergency medical or mental health services.</p> <p data-bbox="244 943 1430 1039">(a) The Volunteers of America - Booth Hall 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="244 1122 1481 1218">Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 86, section 7, states, "VOA shall offer medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail or lockup."</p> <p data-bbox="244 1301 1481 1435">(b) Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 86, section 8, 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="244 1518 1485 1615">(c) Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 86, section 8, states, "The facility shall provide such victims with medical and mental health services consistent with the community level of care."</p> <p data-bbox="244 1697 1458 1868">(d-e) The Volunteers of America - Booth Hall PAQ states female victims of sexually abusive vaginal penetration while incarcerated are offered pregnancy tests. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 86, section 10, states, "Resident victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests. If pregnancy results from sexual abuse, such victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services."</p> <p data-bbox="244 1951 1485 2018">(f) The Volunteers of America - Booth Hall PAQ states resident victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate.</p> <p data-bbox="244 2101 1406 2159">The Volunteers of America - Booth Hall PAQ states female victims of sexually abusive vaginal penetration while incarcerated are offered pregnancy tests. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual</p>

Misconduct Against Offenders (PREA) 902.00, page 86, section 11, states, "Resident victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections as medically appropriate."

(d) Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 86, section 12, states, "Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident."

(h) This Volunteers of America - Booth Hall PAQ states the facility does not attempt 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.

Upon speaking with the PREA Coordinator regarding the PAQ stating 'No', clarification was provided, indicating the facility indeed does attempt to conduct mental health evaluations for resident-on-resident abusers. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 75, section 7, 3rd bullet, states, "The VOA staff shall attempt to conduct a mental health evaluation of all known resident on-resident abusers within sixty (60) days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners."

115.286	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 3. Volunteers of America Sexual Abuse Incident Review, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Senior Director of Corrections / PREA Coordinator <p>The Senior Director of Corrections clearly articulated his review of all incidents and reported there were no investigations of sexual harassment and sexual abuse in the last 12 months.</p> <p>(a) The Volunteers of America - Booth Hall 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 had been zero criminal and or administrative investigations of alleged sexual abuse completed at the facility,</p> <p>Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 84, section Incident Review 1., states, "VOA shall conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation (whether conducted by an external agency or trained internal staff), including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded."</p> <p>The facility provided a Volunteers of America Sexual Abuse Incident Review. The Sexual Abuse Incident Review demonstrates the following incident details are reviewed and documented:</p> <ul style="list-style-type: none"> • Dates of Incident • Staff member involved • Area of Facility where incident took place • Facts of the incident • Consensual or Non-consensual facts • Camera review findings • Analysis of substantiated case o Complete review of findings o Deficiency areas in need of change o Identified changes in supervision <p>The above finding and action plan will be put in place immediately. Signed, Division Director</p> <p>(b) The Volunteers of America - Booth Hall 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</p>

review within 30 days, excluding only "unfounded" incidents were one.

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 84, section Incident Review 2, "Such review shall normally occur within thirty (30) days of the conclusion of the investigation."

(c) The Volunteers of America - Booth Hall 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.

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 84, section Incident Review 3, "The review team shall include Chief Operating Officer, Facility Director, Program Manager, and PREA Coordinator, with input from line supervisors, investigators, and medical or mental health practitioners."

(d) The Volunteers of America - Booth Hall 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 PREA Coordinator.

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 84, section Incident Review 4, states," The review team shall: (

- Consider whether the allegation or investigation indicates a need to change policy or

practice to better prevent, detect, or respond to sexual abuse;

Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics

at the facility;

- Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse;
- Assess the adequacy of staffing levels in that area during different shifts;
- Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and
- Prepare a report of its findings, including but not necessarily limited to determinations made above in this section, and any recommendations for improvement and submit such report to the Facility Director, facility PREA Coordinator and the Chief Operating Officer.

(a) The Volunteers of America - Booth Hall PAQ states, the facility implements the recommendations for improvement or documents its reasons for not doing so. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 84, section Incident Review 5 states," VOA shall implement the recommendations for improvement or shall document its reasons for not doing so."

115.287	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 3. Sample 2020 Incident Report Audit – Survey of Sexual Victimization <p>(a) The Volunteers of America - Booth Hall 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>Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 88, section Data Collection 1-4, state, “</p> <ol style="list-style-type: none"> 1. There shall be a system in place to collect data on incidents of a sexual nature. Such data will be analyzed to determine possible corrective action or improved operations. 2. Upon the report of a PREA incident, the designated facility PREA Coordinator will initiate a PREA Incident Report. The facility PREA Coordinator shall submit this form to the VOA Division Director or designee as soon as possible after an incident occurs and again once the investigation is finalized. A final report will be created and forwarded to the Chief Operating Officer. 3. The PREA Coordinator shall maintain logs and records of all allegations and investigations of sexual misconduct to include information on the outcome of any criminal or disciplinary charges. 4. An case records associated with claims of sexual abuse, including incident reports, investigative reports, resident information, case disposition, medical and counseling evaluation findings and recommendations for post-release treatment” <p>(b) The Volunteers of America - Booth Hall PAQ states the agency aggregates the incident-based sexual abuse at least annually.</p> <p>Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 88, section Data Collection 5, states, “The PREA Coordinator shall aggregate the incident-based sexual abuse data at least annually.”</p> <p>(c) The Volunteers of America - Booth Hall PAQ states the standardized instrument includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice.</p> <p>Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 88, section Data Collection 6, states, “The incident-based data collected shall include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.”</p>

(d) The Volunteers of America - Booth Hall 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.

Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 88, section Data Collection 7, states, "The PREA Coordinator shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews."

(e) This provision is not applicable as Volunteers of America Northern Rockies- Booth Hall as they do not have private facilities.

(f) The Volunteers of America - Booth Hall PAQ states the agency provided the Department of Justice (DOJ) with data from the previous calendar year upon request. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, page 88, section Data Collection 9, states, "The PREA Coordinator will report to the BJS on a yearly basis. The report shall include the specifications of the Survey on Sexual Violence required under PREA for BJS. Upon request, the agency shall provide all such data from the previous calendar year to the Department of Justice no later than June 30."

115.288	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Volunteers of America - Booth Hall PAQ 2. Volunteers of America Northern Rockies- Booth Hall Policy Staff Sexual Misconduct Against Offenders (PREA) 902.00, dated 2021 3. PREA Annual Report 2019 4. PREA Annual Report 2020 5. Agency website PREA Reports for Booth Hall Volunteers of America (voanr.org) <p>(a) The Volunteers of America - Booth Hall PAQ states the agency reviews data collected and aggregated pursuant to §115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training, including: (a) identifying problem areas; (b) taking corrective action on an ongoing basis; and (c) preparing an annual report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole.</p> <p>(b) The Volunteers of America - Booth Hall 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.</p> <p>(c) The Volunteers of America - Booth Hall 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.</p> <p>The Agency Annual Report is available on the following website: PREA Reports for Booth Hall Volunteers of America (voanr.org)</p> <p>(d) The Volunteers of America - Booth Hall 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.</p> <p>The agency provided the Volunteers of America Northern Rockies- Booth Hall Prison Rape Elimination Act Annual Reports 2019-2020. At the time of the OAS upload, the Annual Report for 2020 did include comparative data. The Annual Report for 2020 was revised to include comparative data for years 2018, 2019, 2020.</p>

115.289	Data storage, publication, and destruction
	<p data-bbox="244 147 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="244 210 451 237">Auditor Discussion</p> <p data-bbox="244 273 435 300">Document Review:</p> <ol data-bbox="244 327 1477 443" style="list-style-type: none"> <li data-bbox="244 327 695 353">1. Volunteers of America - Booth Hall PAQ <li data-bbox="244 383 1477 443">2. Volunteers of America Northern Rockies- Booth Hall Policy and Procedures 1.00.140.101 Prison Rape Elimination Act, dated 7.20.2021 <p data-bbox="244 533 1497 627">(a) The Volunteers of America - Booth Hall PAQ states the agency ensures that incident-based and aggregate data are securely retained. Volunteers of America Northern Rockies- Booth Hall Policy and Procedures 1.00.140.101, page 11, section I., states, "All reports and data shall be maintained for a period of 10 years from the date of the final annual report."</p> <p data-bbox="244 716 1453 810">(b) The Volunteers of America - Booth Hall 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="244 900 1409 960">Volunteers of America Northern Rockies- Booth Hall Policy and Procedures 1.00.140.101, page 11, section I., states, "Following the director review, a final report shall be issued and distributed/made available:</p> <ol data-bbox="244 987 635 1131" style="list-style-type: none"> <li data-bbox="244 987 504 1014">1. To agency personnel <li data-bbox="244 1043 635 1070">2. To the public (via agency website) <li data-bbox="244 1099 571 1126">3. To the DOJ (upon request)" <p data-bbox="244 1216 1461 1310">(c) The Volunteers of America - Booth Hall PAQ states before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers. Volunteers of America Northern Rockies- Booth Hall Policy and Procedures 1.00.140.101, page 11, section H., states, "All personal identifiers shall be removed prior to publication."</p> <p data-bbox="244 1400 884 1426">(d) Compliance can be found in provision (a) of this standard.</p>

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 by the agency, or by a private organization on behalf of the agency, was audited at least once?</p> <p>(b) This is the third year of the current audit cycle.</p> <p>(h) The Auditor had access to, and the ability to observe, all areas of the audited facility.</p> <p>(i) The auditor was permitted to request and receive copies of any relevant documents (including electronically stored information).</p> <p>(n) Inmates were permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel.</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	(f) The agency has published on its agency website all Final Audit Reports.

Appendix: Provision Findings		
115.211 (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
115.211 (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 community confinement facilities?	yes
115.212 (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
115.212 (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.)	na
115.212 (c)	Contracting with other entities for the confinement of residents	
	If the agency has entered into a contract with an entity that fails to comply with the PREA standards, did the agency do so only in emergency circumstances after making all reasonable attempts to find a PREA compliant private agency or other entity to confine residents? (N/A if the agency has not entered into a contract with an entity that fails to comply with the PREA standards.)	na
	In such a case, does the agency document its unsuccessful attempts to find an entity in compliance with the standards? (N/A if the agency has not entered into a contract with an entity that fails to comply with the PREA standards.)	na
115.213 (a)	Supervision and monitoring	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring to protect residents against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The physical layout of each facility?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the resident population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes

115.213 (b)	Supervision and monitoring	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (NA if no deviations from staffing plan.)	na
115.213 (c)	Supervision and monitoring	
	In the past 12 months, has the facility assessed, determined, and documented whether adjustments are needed to the staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility assessed, determined, and documented whether adjustments are needed to prevailing staffing patterns?	yes
	In the past 12 months, has the facility assessed, determined, and documented whether adjustments are needed to the facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility assessed, determined, and documented whether adjustments are needed to the resources the facility has available to commit to ensure adequate staffing levels?	yes
115.215 (a)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting any cross-gender strip searches or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.215 (b)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting cross-gender pat-down searches of female residents, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female residents' access to regularly available programming or other outside opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.)	yes
115.215 (c)	Limits to cross-gender viewing and searches	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female residents?	yes
115.215 (d)	Limits to cross-gender viewing and searches	
	Does the facility have policies that enable residents to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enable residents to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	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?	yes

115.215 (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 the resident's genital status is unknown, does the facility determine genital status during conversations with the resident, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
115.215 (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

115.216 (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 with residents with disabilities including residents who: Have intellectual disabilities?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Who are blind or have low vision?	yes
115.216 (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

115.216 (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 §115.264, or the investigation of the resident's allegations?	yes
115.217 (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 two questions immediately above ?	yes
	Does the agency prohibit the enlistment of 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)?	yes
	Does the agency prohibit the enlistment of the 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 the 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 questions immediately above ?	yes
115.217 (b)	Hiring and promotion decisions	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with residents?	yes
	Does the agency consider any incidents of sexual harassment in determining to enlist the services of any contractor who may have contact with residents?	yes
115.217 (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, 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
115.217 (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
115.217 (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

115.217 (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
115.217 (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
115.217 (h)	Hiring and promotion decisions	
	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
115.218 (a)	Upgrades to facilities and technology	
	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.)	no
115.218 (b)	Upgrades to facilities and technology	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect residents from sexual abuse? (N/A if agency/facility has not installed or updated any video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012 or since the last PREA audit, whichever is later.)	no
115.221 (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
115.221 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth where applicable? (NA if the agency/facility is not responsible for conducting any form of criminal or administrative sexual abuse investigations.)	na
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (NA if the agency/facility is not responsible for conducting any form of criminal or administrative sexual abuse investigations.)	yes

115.221 (c)	Evidence protocol and forensic medical examinations	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	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
115.221 (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
115.221 (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
115.221 (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 agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes
115.221 (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? (N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.221(d) above).	yes
115.222 (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

115.222 (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
115.222 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for conducting criminal investigations. See 115.221(a).)	yes
115.231 (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 confinement?	yes
	Does the agency train all employees who may have contact with residents on: The common reactions of sexual abuse and sexual harassment victims?	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?	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
115.231 (b)	Employee training	
	Is such training tailored to the gender of the residents at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male residents to a facility that houses only female residents, or vice versa?	yes

115.231 (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
115.231 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.232 (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
115.232 (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
115.232 (c)	Volunteer and contractor training	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.233 (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
	During intake, do residents receive information explaining: Their rights to be free from sexual abuse and sexual harassment?	yes
	During intake, do residents receive information explaining: Their rights to be free from retaliation for reporting such incidents?	yes
	During intake, do residents receive information regarding agency policies and procedures for responding to such incidents?	yes
115.233 (b)	Resident education	
	Does the agency provide refresher information whenever a resident is transferred to a different facility?	yes

115.233 (c)	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
115.233 (d)	Resident education	
	Does the agency maintain documentation of resident participation in these education sessions?	yes
115.233 (e)	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
115.234 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.231, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).	na
115.234 (b)	Specialized training: Investigations	
	Does this specialized training include: Techniques for interviewing sexual abuse victims?(N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).	na
	Does this specialized training include: Proper use of Miranda and Garrity warnings?(N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).	na
	Does this specialized training include: Sexual abuse evidence collection in confinement settings?(N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).	na
	Does this specialized training include: The criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).	na
115.234 (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 criminal or administrative sexual abuse investigations. See 115.221(a).)	na

115.235 (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 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
115.235 (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 does not employ medical staff or the medical staff employed by the agency do not conduct forensic exams.)	na
115.235 (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
115.235 (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 §115.231? (N/A for circumstances in which a particular status (employee or contractor/volunteer) does not apply.)	yes
	Do medical and mental health care practitioners contracted by and volunteering for the agency also receive training mandated for contractors and volunteers by §115.232? (N/A for circumstances in which a particular status (employee or contractor/volunteer) does not apply.)	yes
115.241 (a)	Screening for risk of victimization and abusiveness	
	Are all residents assessed during an intake screening for their risk of being sexually abused by other residents or sexually abusive toward other residents?	yes
	Are all residents assessed upon transfer to another facility for their risk of being sexually abused by other residents or sexually abusive toward other residents?	yes
115.241 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.241 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes

115.241 (d)	Screening for risk of victimization and abusiveness	
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: The age of the resident?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: The physical build of the resident?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident has previously been incarcerated?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident's criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident has prior convictions for sex offenses against an adult or child?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the resident about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the resident is gender non-conforming or otherwise may be perceived to be LGBTI)?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: The resident's own perception of vulnerability?	yes
115.241 (e)	Screening for risk of victimization and abusiveness	
	In assessing residents for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior acts of sexual abuse?	yes
	In assessing residents for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior convictions for violent offenses?	yes
	In assessing residents for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: history of prior institutional violence or sexual abuse?	yes
115.241 (f)	Screening for risk of victimization and abusiveness	
	Within a set time period not more than 30 days from the resident's arrival at the facility, does the facility reassess the resident's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes
115.241 (g)	Screening for risk of victimization and abusiveness	
	Does the facility reassess a resident's risk level when warranted due to a: Referral?	yes
	Does the facility reassess a resident's risk level when warranted due to a: Request?	yes
	Does the facility reassess a resident's risk level when warranted due to a: Incident of sexual abuse?	yes
	Does the facility reassess a resident's risk level when warranted due to a: Receipt of additional information that bears on the resident's risk of sexual victimization or abusiveness?	yes

115.241 (h)	Screening for risk of victimization and abusiveness	
	Is it the case that residents are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes
115.241 (i)	Screening for risk of victimization and abusiveness	
	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
115.242 (a)	Use of screening information	
	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?	yes
	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
115.242 (b)	Use of screening information	
	Does the agency make individualized determinations about how to ensure the safety of each resident?	yes
115.242 (c)	Use of screening information	
	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
115.242 (d)	Use of screening information	
	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
115.242 (e)	Use of screening information	
	Are transgender and intersex residents given the opportunity to shower separately from other residents?	yes

115.242 (f)	Use of screening information	
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing: lesbian, gay, and bisexual residents in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I residents pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing: transgender residents in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I residents pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing: intersex residents in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I residents pursuant to a consent decree, legal settlement, or legal judgement.)	yes
115.251 (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: 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
115.251 (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
115.251 (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
115.251 (d)	Resident reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of residents?	yes

115.252 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address resident grievances regarding sexual abuse. This does not mean the agency is exempt simply because a resident does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
115.252 (b)	Exhaustion of administrative remedies	
	Does the agency permit residents to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring a resident to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.252 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: a resident who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
115.252 (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 is 70 days per 115.252(d)(3)), does the agency notify the resident in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	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
115.252 (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 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

115.252 (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
115.252 (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
115.253 (a)	Resident access to outside confidential support services	
	Does the facility provide residents with access to outside victim advocates for emotional support services related to sexual abuse by giving residents mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility enable reasonable communication between residents and these organizations, in as confidential a manner as possible?	yes
115.253 (b)	Resident access to outside confidential support services	
	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
115.253 (c)	Resident access to outside confidential support services	
	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
115.254 (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

115.261 (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 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 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 regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
115.261 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, do staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
115.261 (c)	Staff and agency reporting duties	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform residents of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
115.261 (d)	Staff and agency reporting duties	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
115.261 (e)	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
115.262 (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
115.263 (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
115.263 (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
115.263 (c)	Reporting to other confinement facilities	
	Does the agency document that it has provided such notification?	yes
115.263 (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

115.264 (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
115.264 (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
115.265 (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
115.266 (a)	Preservation of ability to protect residents from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	no
115.267 (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
115.267 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes

115.267 (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:4. 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 reassignment of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.267 (d)	Agency protection against retaliation	
	In the case of residents, does such monitoring also include periodic status checks?	yes
115.267 (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
115.271 (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/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.221(a).)	na
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.221(a).)	na
115.271 (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 as required by 115.234?	yes

115.271 (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
115.271 (d)	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
115.271 (e)	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
115.271 (f)	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
115.271 (g)	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
115.271 (h)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.271 (i)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.271(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
115.271 (j)	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
115.271 (l)	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 any form of administrative or criminal sexual abuse investigations. See 115.221(a).)	yes
115.272 (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

115.273 (a)	Reporting to residents	
	Following an investigation into a resident's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
115.273 (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
115.273 (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
115.273 (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
115.273 (e)	Reporting to residents	
	Does the agency document all such notifications or attempted notifications?	yes
115.276 (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
115.276 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes

115.276 (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
115.276 (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
115.277 (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
115.277 (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
115.278 (a)	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, are residents subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
115.278 (b)	Disciplinary sanctions for residents	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the resident's disciplinary history, and the sanctions imposed for comparable offenses by other residents with similar histories?	yes
115.278 (c)	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
115.278 (d)	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 require the offending resident to participate in such interventions as a condition of access to programming and other benefits?	yes
115.278 (e)	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

115.278 (f)	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
115.278 (g)	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
115.282 (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
115.282 (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 security staff first responders take preliminary steps to protect the victim pursuant to § 115.262?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
115.282 (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
115.282 (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
115.283 (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
115.283 (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
115.283 (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
115.283 (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. Note: in "all-male" facilities, there may be residents who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes

115.283 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph § 115.283(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if “all-male” facility. Note: in “all-male” facilities, there may be residents who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.283 (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
115.283 (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
115.283 (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
115.286 (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
115.286 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.286 (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
115.286 (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 §§ 115.286(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.286 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes

115.287 (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
115.287 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.287 (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
115.287 (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
115.287 (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
115.287 (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
115.288 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
115.288 (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
115.288 (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
115.288 (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
115.289 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.287 are securely retained?	yes

115.289 (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
115.289 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.289 (d)	Data storage, publication, and destruction	
	Does the agency maintain sexual abuse data collected pursuant to § 115.287 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	Frequency and scope of audits	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes
115.401 (b)	Frequency and scope of audits	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	no
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	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.)	yes
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with residents?	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