

# PREA Facility Audit Report: Final

**Name of Facility:** Bob Richards Regional Youth Detention Center

**Facility Type:** Juvenile

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 01/29/2026

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
<b>Auditor Full Name as Signed:</b> J. Aaron Keech	<b>Date of Signature:</b> 01/29/2026

AUDITOR INFORMATION	
<b>Auditor name:</b>	Keech, Aaron
<b>Email:</b>	akeech37@gmail.com
<b>Start Date of On-Site Audit:</b>	12/10/2025
<b>End Date of On-Site Audit:</b>	12/11/2025

FACILITY INFORMATION	
<b>Facility name:</b>	Bob Richards Regional Youth Detention Center
<b>Facility physical address:</b>	200 Marable Way, Rome, Georgia - 30165
<b>Facility mailing address:</b>	

Primary Contact
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<b>Name:</b>	Christopher Raiford
<b>Email Address:</b>	christopherraiford@djj.state.ga.us
<b>Telephone Number:</b>	706-508-8767

<b>Superintendent/Director/Administrator</b>	
<b>Name:</b>	Christopher Raiford
<b>Email Address:</b>	christopherraiford@djj.state.ga.us
<b>Telephone Number:</b>	706-508-8767

<b>Facility PREA Compliance Manager</b>	
<b>Name:</b>	
<b>Email Address:</b>	
<b>Telephone Number:</b>	

<b>Facility Health Service Administrator On-Site</b>	
<b>Name:</b>	Debra Smith
<b>Email Address:</b>	debra.smith@djj.state.ga.us
<b>Telephone Number:</b>	404-947-9838

<b>Facility Characteristics</b>	
<b>Designed facility capacity:</b>	64
<b>Current population of facility:</b>	47
<b>Average daily population for the past 12 months:</b>	47
<b>Has the facility been over capacity at any point in the past 12 months?</b>	No
<b>What is the facility's population designation?</b>	Men/boys

<b>Age range of population:</b>	10-20 years old
<b>Facility security levels/resident custody levels:</b>	All
<b>Number of staff currently employed at the facility who may have contact with residents:</b>	52
<b>Number of individual contractors who have contact with residents, currently authorized to enter the facility:</b>	9
<b>Number of volunteers who have contact with residents, currently authorized to enter the facility:</b>	8

### AGENCY INFORMATION

<b>Name of agency:</b>	Georgia Department of Juvenile Justice
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	3408 Covington Highway, Decatur, Georgia - 30032
<b>Mailing Address:</b>	
<b>Telephone number:</b>	4045086500

### Agency Chief Executive Officer Information:

<b>Name:</b>	Shawanda Reynolds-Cobb
<b>Email Address:</b>	shawandareynoldscobb@djj.state.ga.us
<b>Telephone Number:</b>	404-508-7200

### Agency-Wide PREA Coordinator Information

<b>Name:</b>	Jennifer Walls	<b>Email Address:</b>	jenniferwalls@djj.state.ga.us
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## Facility AUDIT FINDINGS

### 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:

8

- 115.331 - Employee training
- 115.333 - Resident education
- 115.334 - Specialized training: Investigations
- 115.335 - Specialized training: Medical and mental health care
- 115.341 - Obtaining information from residents
- 115.342 - Placement of residents
- 115.372 - Evidentiary standard for administrative investigations
- 115.386 - Sexual abuse incident reviews

#### Number of standards met:

35

#### Number of standards not met:

0

## POST-AUDIT REPORTING INFORMATION

Please note: Question numbers may not appear sequentially as some questions are omitted from the report and used solely for internal reporting purposes.

### GENERAL AUDIT INFORMATION

#### On-site Audit Dates

1. Start date of the onsite portion of the audit:	2025-12-10
2. End date of the onsite portion of the audit:	2025-12-11

#### 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:	Auditor corresponded and communicated with The Harbor House Inc., the local rape crisis resource center.

### AUDITED FACILITY INFORMATION

14. Designated facility capacity:	64
15. Average daily population for the past 12 months:	47
16. Number of inmate/resident/detainee housing units:	4
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" 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**

<b>23. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:</b>	38
<b>25. 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:</b>	0
<b>26. 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:</b>	2
<b>27. 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:</b>	0
<b>28. 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:</b>	0
<b>29. 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:</b>	0
<b>30. 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:</b>	0

<p><b>31. 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:</b></p>	<p>0</p>
<p><b>32. 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:</b></p>	<p>2</p>
<p><b>33. 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:</b></p>	<p>0</p>
<p><b>34. 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:</b></p>	<p>0</p>
<p><b>35. 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):</b></p>	<p>On the two site review days, the auditor interviewed a total of fifteen (15) residents, thirteen (13) random resident interviews and two (2) targeted resident interviews. The two (2) targeted interviews were characterized as one (1) resident with a cognitive, and one (1) resident who reported sexual abuse. There were no youth within the population characterized as having LEP, LGBTI, who disclosed prior sexual victimization, segregated housing/isolation for risk of sexual victimization, deaf or hearing impaired, physical disability, or low vision or blind. Due to the population of thirty-eight (38) residents, the auditor was able to obtain the overall minimum number of juvenile interviews, and random juvenile interviews. The auditor was unable to meet the targeted juvenile interviews requirement due to no staff identified were in the facility's population.</p>

<b>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</b>	
<b>36. 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:</b>	52
<b>37. 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:</b>	8
<b>38. 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:</b>	9
<b>39. 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:</b>	No text provided.
<b>INTERVIEWS</b>	
<b>Inmate/Resident/Detainee Interviews</b>	
<b>Random Inmate/Resident/Detainee Interviews</b>	
<b>40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</b>	13

<p><b>41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</b></p>	<p><input type="checkbox"/> Age</p> <p><input type="checkbox"/> Race</p> <p><input type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic)</p> <p><input type="checkbox"/> Length of time in the facility</p> <p><input type="checkbox"/> Housing assignment</p> <p><input type="checkbox"/> Gender</p> <p><input type="checkbox"/> Other</p> <p><input type="checkbox"/> None</p>
<p><b>42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</b></p>	<p>On the two site review days, the auditor interviewed a total of fifteen (15) residents, thirteen (13) random resident interviews and two (2) targeted resident interviews. The two (2) targeted interviews were characterized as one (1) resident with a cognitive, one (1) resident who reported sexual abuse. There were no youth within the population characterized as having LEP, LGBTI, who disclosed prior sexual victimization, segregated housing/isolation for risk of sexual victimization, deaf or hearing impaired, physical disability, or low vision or blind. Due the population of thirty-eight (38) residents, the auditor was able to obtain the overall minimum number of juvenile interviews, random juvenile interviews. The auditor was unable to meet the targeted juvenile interviews requirement due to no staff identified were in the facility's population.</p>
<p><b>43. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

<p><b>44. 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):</b></p>	<p>On the two site review days, the auditor interviewed a total of fifteen (15) residents, thirteen (13) random resident interviews and two (2) targeted resident interviews. The two (2) targeted interviews were characterized as one (1) resident with a cognitive, and one (1) resident who reported sexual abuse. There were no youth within the population characterized as having LEP, LGBTI, who disclosed prior sexual victimization, segregated housing/isolation for risk of sexual victimization, deaf or hearing impaired, physical disability, or low vision or blind. Due the population of thirty-eight (38) residents, the auditor was able to obtain the overall minimum number of juvenile interviews, random juvenile interviews. The auditor was unable to meet the targeted juvenile interviews requirement due to no staff identified being in the facility's population.</p>
<p><b>Targeted Inmate/Resident/Detainee Interviews</b></p>	
<p><b>45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</b></p>	<p>2</p>
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
<p><b>47. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>

<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></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>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).</b></p>	<p>The auditor discussed the characteristics of residents with the PREA Coordinator, facility Director, and PREA Compliance Manager to conduct the appropriate number of targeted resident interviews. The auditor reviewed information in the pre-audit questionnaire, reviewed on-site documentation, and asked staff and random resident interviews if there were any targeted or vulnerable residents within the population; however, the residents expressed that there were no additional residents that fit the targeted resident criteria.</p>
<p><b>48. 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:</b></p>	<p>1</p>
<p><b>49. 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:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></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>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).</b></p>	<p>The auditor discussed the characteristics of residents with the PREA Coordinator, facility Director, and PREA Compliance Manager to conduct the appropriate number of targeted resident interviews. The auditor reviewed information in the pre-audit questionnaire, reviewed on-site documentation, and asked staff and random resident interviews if there were any targeted or vulnerable residents within the population; however, the residents expressed that there were no additional residents that fit the targeted resident criteria.</p>
<p><b>50. 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:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></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>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).</b></p>	<p>The auditor discussed the characteristics of residents with the PREA Coordinator, facility Director, and PREA Compliance Manager to conduct the appropriate number of targeted resident interviews. The auditor reviewed information in the pre-audit questionnaire, reviewed on-site documentation, and asked staff and random resident interviews if there were any targeted or vulnerable residents within the population; however, the residents expressed that there were no additional residents that fit the targeted resident criteria.</p>

<p><b>51. 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:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></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>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).</b></p>	<p>The auditor discussed the characteristics of residents with the PREA Coordinator, facility Director, and PREA Compliance Manager to conduct the appropriate number of targeted resident interviews. The auditor reviewed information in the pre-audit questionnaire, reviewed on-site documentation, and asked staff and random resident interviews if there were any targeted or vulnerable residents within the population; however, the residents expressed that there were no additional residents that fit the targeted resident criteria.</p>
<p><b>52. 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:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></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>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).</b></p>	<p>The auditor discussed the characteristics of residents with the PREA Coordinator, facility Director, and PREA Compliance Manager to conduct the appropriate number of targeted resident interviews. The auditor reviewed information in the pre-audit questionnaire, reviewed on-site documentation, and asked staff and random resident interviews if there were any targeted or vulnerable residents within the population; however, the residents expressed that there were no additional residents that fit the targeted resident criteria.</p>
<p><b>53. 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:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></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>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).</b></p>	<p>The auditor discussed the characteristics of residents with the PREA Coordinator, facility Director, and PREA Compliance Manager to conduct the appropriate number of targeted resident interviews. The auditor reviewed information in the pre-audit questionnaire, reviewed on-site documentation, and asked staff and random resident interviews if there were any targeted or vulnerable residents within the population; however, the residents expressed that there were no additional residents that fit the targeted resident criteria.</p>

<p><b>54. 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:</b></p>	<p>1</p>
<p><b>55. 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:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></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>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).</b></p>	<p>The auditor discussed the characteristics of residents with the PREA Coordinator, facility Director, and PREA Compliance Manager to conduct the appropriate number of targeted resident interviews. The auditor reviewed information in the pre-audit questionnaire, reviewed on-site documentation, and asked staff and random resident interviews if there were any targeted or vulnerable residents within the population; however, the residents expressed that there were no additional residents that fit the targeted resident criteria.</p>
<p><b>56. 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 Alleged to have Suffered Sexual Abuse)" protocol:</b></p>	<p>0</p>

<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></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>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).</b></p>	<p>The auditor discussed the characteristics of residents with the PREA Coordinator, facility Director, and PREA Compliance Manager to conduct the appropriate number of targeted resident interviews. The auditor reviewed information in the pre-audit questionnaire, reviewed on-site documentation, and asked staff and random resident interviews if there were any targeted or vulnerable residents within the population; however, the residents expressed that there were no additional residents that fit the targeted resident criteria.</p>
<p><b>57. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</b></p>	<p>No text provided.</p>
<p><b>Staff, Volunteer, and Contractor Interviews</b></p>	
<p><b>Random Staff Interviews</b></p>	
<p><b>58. Enter the total number of RANDOM STAFF who were interviewed:</b></p>	<p>13</p>

<p><b>59. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</b></p>	<p><input checked="" type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input checked="" type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p><b>60. Were you able to conduct the minimum number of RANDOM STAFF interviews?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>61. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b></p>	<p>No text provided.</p>
<p><b>Specialized Staff, Volunteers, and Contractor Interviews</b></p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p><b>62. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</b></p>	<p>32</p>
<p><b>63. Were you able to interview the Agency Head?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>64. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

<b>65. Were you able to interview the PREA Coordinator?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>66. Were you able to interview the PREA Compliance Manager?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

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

- Agency contract administrator
- Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment
- Line staff who supervise youthful inmates (if applicable)
- Education and program staff who work with youthful inmates (if applicable)
- Medical staff
- Mental health staff
- Non-medical staff involved in cross-gender strip or visual searches
- Administrative (human resources) staff
- Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff
- Investigative staff responsible for conducting administrative investigations
- Investigative staff responsible for conducting criminal investigations
- Staff who perform screening for risk of victimization and abusiveness
- Staff who supervise inmates in segregated housing/residents in isolation
- Staff on the sexual abuse incident review team
- Designated staff member charged with monitoring retaliation
- First responders, both security and non-security staff
- Intake staff

	<input type="checkbox"/> Other
<b>68. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>a. Enter the total number of VOLUNTEERS who were interviewed:</b>	2
<b>b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input checked="" type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Mental health/counseling <input checked="" type="checkbox"/> Religious <input type="checkbox"/> Other
<b>69. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>a. Enter the total number of CONTRACTORS who were interviewed:</b>	3
<b>b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input checked="" type="checkbox"/> Security/detention <input checked="" type="checkbox"/> Education/programming <input checked="" type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input checked="" type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other
<b>70. Provide any additional comments regarding selecting or interviewing specialized staff.</b>	No text provided.

## SITE REVIEW AND DOCUMENTATION SAMPLING

### Site Review

PREA Standard 115.401 (h) states, "The auditor shall have access to, and shall observe, all areas of the audited facilities." In order to meet the requirements in this Standard, the site review portion of the onsite audit must include a thorough examination of the entire facility. The site review is not a casual tour of the facility. It is an active, inquiring process that includes talking with staff and inmates to determine whether, and the extent to which, the audited facility's practices demonstrate compliance with the Standards. Note: As you are conducting the site review, you must document your tests of critical functions, important information gathered through observations, and any issues identified with facility practices. The information you collect through the site review is a crucial part of the evidence you will analyze as part of your compliance determinations and will be needed to complete your audit report, including the Post-Audit Reporting Information.

<b>71. Did you have access to all areas of the facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>Was the site review an active, inquiring process that included the following:</b>	
<b>72. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>73. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>74. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>75. Informal conversations with staff during the site review (encouraged, not required)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No

**76. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).**

The auditor had access to the entire facility property and was able to conduct interviews and was provided with documentation in accordance with the standard. The auditor was permitted to request and receive copies of any relevant documents (including electronically stored information). The auditor was permitted to conduct private interviews with residents and staff. Residents were permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel. The auditor tested the grievance process by placing a form in one grievance box. The Facility PREA Coordinator notified the auditor of receiving the notice and that it was within the required timeline pursuant to the agency policy. With regards to the resident's ability to report sexual abuse in a written format, send and receive mail, accessibility to mail drop boxes is available in areas accessible to residents housed in the facility. Drop boxes are clearly identified, secured by a lock and key, and access to the boxes are limited to the facility Director, Grievance Officer, and Director of Programs. Residents can report sexual abuse and harassment to a private entity outside of the facility by reporting such incidents by dialing the Hotline. The notice (in the form of a poster) had the mailing address where residents can report in writing. A test call was completed using the external/private entity number, and center staff responded immediately, while she also explained the reporting and investigating process when a resident reports sexual abuse and harassment. The auditor also tested the interpreter and translation services telephone number and was able to speak with the supervisor and confirmed the availability of services.

## 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.

**77. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?**

Yes

No

**78. 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.

**79. 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
<b>Inmate-on-inmate sexual abuse</b>	1	0	1	0
<b>Staff-on-inmate sexual abuse</b>	0	0	0	0
<b>Total</b>	1	0	1	0

**80. 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
<b>Inmate-on-inmate sexual harassment</b>	0	0	0	0
<b>Staff-on-inmate sexual harassment</b>	2	0	2	0
<b>Total</b>	2	0	2	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.

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual abuse</b>	0	0	0	1
<b>Staff-on-inmate sexual abuse</b>	0	0	0	0
<b>Total</b>	0	0	0	1

### 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.

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual harassment</b>	0	0	0	0
<b>Staff-on-inmate sexual harassment</b>	0	0	2	0
<b>Total</b>	0	0	2	0

**Sexual Abuse and Sexual Harassment Investigation Files Selected for Review**

**Sexual Abuse Investigation Files Selected for Review**

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

1

<p><b>86. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p><b>Inmate-on-inmate sexual abuse investigation files</b></p>	
<p><b>87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>1</p>
<p><b>88. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p><b>89. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p><b>Staff-on-inmate sexual abuse investigation files</b></p>	
<p><b>90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>0</p>
<p><b>91. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p><b>92. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p><b>Sexual Harassment Investigation Files Selected for Review</b></p>	
<p><b>93. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>2</p>
<p><b>94. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p><b>Inmate-on-inmate sexual harassment investigation files</b></p>	
<p><b>95. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>0</p>
<p><b>96. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p><b>97. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

<b>Staff-on-inmate sexual harassment investigation files</b>	
<b>98. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b>	2
<b>99. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
<b>100. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
<b>101. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</b>	The agency PREA Coordinator provided the auditor with the three sexual abuse and sexual harassment administrative investigative reports and files.
<b>SUPPORT STAFF INFORMATION</b>	
<b>DOJ-certified PREA Auditors Support Staff</b>	
<b>102. 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.</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No

## Non-certified Support Staff

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

Yes

No

## AUDITING ARRANGEMENTS AND COMPENSATION

**108. Who paid you to conduct this audit?**

The audited facility or its parent agency

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

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

Other

<b>Standards</b>
<p><b>Auditor Overall Determination Definitions</b></p> <ul style="list-style-type: none"> <li>• Exceeds Standard (Substantially exceeds requirement of standard)</li> <li>• Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period)</li> <li>• Does Not Meet Standard (requires corrective actions)</li> </ul>
<p><b>Auditor Discussion Instructions</b></p> <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>

<b>115.311</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>Evidence Reviewed: Policy 23.1 Prison Rape Elimination Act; Policy 23.2 Sexual Assault; Policy 3.1, Delegation of Authority and Organizational Chart; Organizational Chart - Department of Juvenile Justice (Agency); Organizational Chart - DJJ Division of Professional Development; Bob Richards RYDC Organizational Chart; 23.1, Attachment K, Requirements of a PREA Case; Designation of PREA Coordinator and Compliance Manager Memorandum; PREA Accountability Statement; Information Obtained from Interviews.</p> <p>115.311(a): The Georgia Department of Juvenile Justice (DJJ) has zero tolerance towards all forms of sexual abuse and sexual harassment of youth in DJJ custody. The DJJ strictly prohibits any form of sexual activities involving youth with other youth and youth with staff, visitors, contractors, volunteers, and interns as defined by DJJ Standards, Georgia State Law, and DJJ policies. Such conduct is subject to administrative and disciplinary sanctions, termination, and criminal prosecution. In addition, the Department takes appropriate actions to reduce the risk of sexual abuse and sexual harassment within the DJJ facilities, contracted residential</p>

programs, and community service offices (CSO) by implementing the PREA Standards established by the United States Department of Justice (DOJ). The auditor's review of policies, interviews with staff and residents, and observations during the site visit conclude that the facility takes the agency's zero-tolerance policy very seriously and cultivates a reporting culture by responding promptly and appropriately to allegations of sexual abuse and sexual harassment.

115.311(b): The agency employs an upper-level, agency-wide PREA Coordinator, who oversees the Compliance Unit; she is a direct report to the Deputy Director of Audits and the agency Commissioner. Based on an interview with the PREA Coordinator, she has sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all DJJ facilities. She employs support staff and directs designated facility Compliance Managers in the agency's compliance efforts. Interactions occur through verbal, written, and electronic communications and through routine meetings. A soon-to-be-assigned PREA Specialist will be employed to directly oversee facility audits and annual compliance reviews. If there are issues with complying with a PREA standard, the PREA Coordinator consults with the Agency's Executive Leadership, policy managers, and facility staff to resolve concerns. Regular and ongoing communication is held with the PREA Coordinator's office and field staff for support and compliance assessments. The auditor reviewed PowerPoint presentations, agendas, and training documentation as evidence that the PREA Coordinator's office regularly meets with the PREA Compliance Managers to keep them current with PREA matters.

115.311(c): The facility has a full-time Compliance Manager, who is the designated PREA Compliance Manager. Compliance Manager reports directly to the facility director, as confirmed by review of the Organizational Chart, during her interview and during an interview with the facility Director. During these interviews, it was evident that the Compliance Manager has authority over all PREA-related duties and has the full support of the facility Director. During her interview, the compliance manager confirmed that she has sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards. She personally reviews intake information, attends all leadership meetings, and disseminates findings of screenings with the leadership team. She interacts with staff and residents regularly and reinforces compliance with PREA standards and policies in daily operations. If she identifies a compliance issue, she advises the facility Director in creating corrective action plans that set realistic, achievable, and measurable goals for corrective actions. She is proactive and takes immediate action when made aware of an issue.

A systematic review and analysis of the evidence concluded that the facility and agency have demonstrated compliance with all provisions of this standard.

<b>115.312</b>	<b>Contracting with other entities for the confinement of residents</b>
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**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Evidence Reviewed: Policy 2.16 Contracts Administration; Policy 20.1, Community Quality Assurance Monitoring; Policy 20.24, Community Residential Programs; Policy 23.1, Prison Rape Elimination Act; DJJ Contracts: Chenault Youth Services, Anchor of Hope House, LLC, Gentle Loving Care Center, Living Our Lives, Right Path Oasis Children's Group Home, Inc.; DJJ Comprehensive Audits: Chenault Youth Services, Anchor of Hope House, LLC, Gentle Loving Care, Living Our Lives, Right Path Oasis Children's Group Home, Inc.; PREA Facility Final Audit Reports: Chenault Youth Services, Anchor of Hope House, LLC, Gentle Loving Care Center, Living Our Lives, Right Path Oasis Children's Group Home, Inc.; Information Obtained from Interviews.

115.312(a)(b): Policy 2.16 establishes that the Department of Juvenile Justice administers all contracts through two central processing points, the Office of Contracts, and the Office of Procurement to ensure that the Department adheres to all local, state, and federal contracting laws, standards and guidelines and monitors all contracts for compliance. Policy 23.1 establishes that new contracts or contract renewals with public and private entities for the confinement of youth as well as contracts for professional services for youth will include the entity's obligation to adopt and comply with PREA standards. All contractors, including Residential Providers must ensure that all PREA incidents are reported to the DJJ Office of Investigations. Policy 23.1 further establishes that District Directors and Community PREA Compliance Managers will monitor and conduct internal audits of all Community/Court Service Offices for PREA compliance and will submit reports to the Agency PREA Coordinator; The Regional Treatment Services Specialists will monitor and conduct internal audits of all Community Residential Providers for PREA compliance and will submit reports to the Agency PREA Coordinator. Policies 20.1, Community Quality Assurance Monitoring, and 20.24, Community Residential Programs policies further direct monitoring of these contractors for PREA compliance.

Based on information provided with the PAQ and confirmed through email with the Contracts Administrator, the agency has entered or renewed 39 contracts for the confinement of residents since the last PREA audit. The Auditor's review of five contracts provided and five PREA Audit Final Reports confirmed the requirement for these contract facilities to comply with PREA as a condition of maintaining a contract with DJJ for housing youth in their custody; and review of five DJJ Comprehensive Audit Reports confirmed regular compliance monitoring by the agency. These contractors are established providers of Youth Care Services for a Child Caring Institute (CCI), Base for a Child Placing Agency (CPA) Room, Board, and Watchful Oversight (RBWO). An interview with the Agency Contract Administrator and PREA Coordinator confirmed that DJJ contractors acknowledge that, in addition to self-monitoring requirements, the Department will conduct announced or unannounced compliance monitoring to include site visit monitoring. Any Contractor that fails to comply with the Prison Rape Elimination Act (PREA), including PREA Standards and DJJ Department Policies will result in termination of the contract.

	<p>Community Residential Providers who have 51% or more DJJ residents will be subject to Department of Justice (DOJ) audits. Currently, five facilities meet this contractual requirement for DOJ PREA audits. Community Residential Providers are responsible for contracting with DOJ Certified Auditors to conduct an independent audit with the assistance of the Agency-wide PREA Coordinator at least once each audit cycle.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency have demonstrated compliance with all provisions of this standard.</p>
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<b>115.313</b>	<b>Supervision and monitoring</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Evidence Reviewed: Policy 7.6, Video Monitoring System; Policy 8.1, Security Management; Policy 8.20, Room Checks; Policy 23.1, PREA; Policy 23.2, Sexual Assault; Director's Accountability Statement, Subject 115.313; 23.1 Attachment A, Facility Annual Staffing Report dated 2022-2024; Secure Facility Staffing (SFS) Reports randomly dated 2024-2025; Attachment B, Unannounced PREA Rounds; CCTV Logs; List of Cameras and Locations; Direct Care Staff PREA Ratio Form; Director's Letter of Justification for PREA Ratio; Information Obtained from Interviews; Personal Observations During Site Visit.</p> <p>115.313(a)(b)(c)(d): Policy 23.1 establishes that facilities will develop, implement, and document an approved staffing report that provides for adequate levels of staffing and, where applicable, video monitoring, to protect youth against sexual abuse following Policy 7.6, Video Monitoring Systems. Each time the staffing plan is not complied with, the facility will document and justify all deviations from the staffing plan. The facility is required to review, adjust, and complete the Facility Annual Staffing Report (23.1, Attachment A) and submit its report by the 10th of December with the required signatures to the Agency PREA Coordinator. Policy 23.1 also states that each facility will maintain staff ratios of a minimum of 1:8 during resident wake hours and 1:16 during sleep hours. Only agency-approved POST-certified staff members or staff members with additional PREA training can be counted in the supervision ratio. The facility documents this information daily in the Secure Facility Staffing Report System (SFS). The most common reasons for deviating from the staffing plan in the 12 months preceding the audit were reported as staff shortages from callouts, inclement weather, and influx of youth during crisis events. Staffing allocations are driven through legislation and recommendations from designated agency staff through the State's budget program process. Facility staff have input with the Agency Head through proper channels to provide feedback and recommendations as to additional staffing needs when appropriate. An annual staffing report is prepared at the facility level each year which constitutes the current staffing report and the annual review.</p>

As of February 2, 2025, the staff/contractors assigned to Bob Richards RYDC is as follows: Facility Director, Secretary III, Associate Superintendent, Assistant Director Programs, Business Operations Manager, Nurse Manager, Sergeant, Education Director, Lead Teacher, Secretary II, Recreation Supervisor, HR Transaction Technician II, 3 Register Nurses, Medical Clerk, Teacher, Special Education Teacher, 3 Detention Counselors, 1 Part time Detention Counselor, Financial Operations Staff, Food Service Manager, Food Service Supervisor, 4 Food Service Employee III, Instructor Practical Teacher, 3 Social Services Provider II, Psychiatrist, Psychologist, Professional Education Worker Part Time, Medical Doctor, Dentist, 2 Housekeepers, Laundry Worker, Storekeeper, Captain, 3 Lieutenant, 2 JCOs, 18 JCO I and IIs. At present, facility vacancies were: Teacher, Special Education Teacher, Part-time Recreation Worker, HR Tech 1, Food Service Employee, Food Service Worker Part-time, Nurse Practitioner, JTS Clerk, JTS JCO Specialist, Assistant Director of Security, Secretary III, 2 Lieutenants, 2 Sergeants, and 23 JCOs.

The auditor reviewed the Facility Annual Staffing Report, prepared and reviewed by the facility Director, PREA Compliance Manager, and the Assistant Director of Security. This report was also reviewed and approved by the Regional Administrator, Assistant Deputy Commissioner/Secure Facilities, and the agency's PREA Coordinator. Additionally, the facility provided the Facility Annual Staffing Reports for 2022-2025, indicating that the annual review of the staffing plan was conducted each year since the last PREA audit. The staffing plan is based on a bed capacity of 64. The population during the site visit was 38, and the average daily population for the 12 months prior to the audit was 47. As evidenced by the annual report review and the Director's Accountability Statement, and confirmed during the auditor's interview with the facility Director, the management team took into consideration: 1) Generally accepted juvenile detention and correctional/secure residential practices; 2) Any judicial findings of inadequacy; 3) Any findings of inadequacy from Federal investigative agencies; 4) Any findings of inadequacy from internal or external oversight bodies; 5) All components of the facility's physical plant (including "blind-spots" or areas where staff or residents may be isolated); 6) The composition of the resident population; 7) The number and placement of supervisory staff; (8) Institution programs occurring on a particular shift; 9) Any applicable State or local laws, regulations, or standards; 10) The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and 11) Any other relevant factors when conducting the annual review. The facility enters the daily staffing into the agency's Secure Facility Staffing (SFS) Report System, which is the database to track staffing deviations and compliance with the required ratios. The facility provided a complete SFS Report for every day between November 2024 through November 2025. Based on this report, the facility did not fall below the ratio requirements of 1:8 during resident waking hours and 1:16 during resident sleep hours. Staffing deviations were required to ensure the facility had adequate coverage. Each time the staffing plan was deviated from, these incidents were clearly documented. The PREA Compliance Manager explained that when situations occur in which the staff-to-youth ratio requirements are not met, the Bob Richards team implemented a holdover roster. Security staff from other shifts volunteer on their days off to assist and ensure adequate staffing levels. Non-security personnel

also contribute by covering posts that do not require security staff but still need to be filled, such as the main control and the front lobby. Additionally, security teams from other DJJ facilities participate in the reservation pay system. Once approved by the facility Director, these staff are eligible to work at Bob Richards RYDC. The facility provided a list of staff who are trained to assist with the supervision of residents when security staff shortages occur, and the auditor spoke with two staff from the list to confirm their training and the responsibilities they have when assisting. During the site visit, the auditor observed staff-to-youth ratios in various areas throughout the facility on first and second shifts and found the facility met the required staffing ratios.

The facility currently houses male youth with a total bed capacity of 64. There are four pods where youth are housed by gender, male youths. Youth participate in recreation in the indoor gymnasium and in the outside recreation area. The facility provided a list of approximately 220 cameras with locations identified. These cameras allow monitoring in all areas of the facility where youth are allowed, except inside resident rooms, showers, toilet areas, and those areas where residents may be subject to an unclothed body search. These cameras are monitored by the main control room and footage is recorded and stored for up to 90 days. Additionally, these cameras may be accessed by the Facility Director, Secretary III, Associate Superintendent, Assistant Director of Programs, Captains, and Lieutenants, and their interviews confirmed that they frequently spot check critical areas throughout the day and night using the camera system in addition to making frequent and unpredictable rounds. The auditor's site visit included observations of staff line of sight, blind spots, areas where residents are not allowed, indirect supervision practices, and camera placements and staff viewing. The auditor's observation of the camera locations and positioning found that there were no viewing obstructions, and no areas were identified that were not adequately covered by a camera. The facility has installed "PREA compliant" shower curtains that allow staff to observe the number of residents in the area without compromising the privacy of the occupant. The auditor reviewed the CCTV logbook located in the master control room and observed entries between November 2024, through November 2025, indicating that the CCTV cameras are checked during unannounced rounds and by the Administrative Duty Officer (ADO) to assess operability and to monitor the facility for issues or concerns. Inoperable cameras are noted in the logbook, and a work order is entered so the camera can be repaired. An interview with the Director, Captain, and maintenance staff confirmed that camera outages are reported immediately for repair and considered a high priority to restore operability. Rooms that residents are not allowed in were marked accordingly, and the auditor observed that entries into these areas are covered by camera views.

115.313(e): Policies 23.1 and 8.2 require an ADO or facility Director to conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment. The unannounced rounds cover all shifts and all areas of the facility. At least two unannounced rounds must be conducted after 12:30 am and no later than 4:30 am per month. Staff are prohibited from alerting other staff to such rounds. Staff members cannot conduct unannounced rounds during his/her assigned shifts.

	<p>Staff are required to document these rounds on Attachment B, the Unannounced PREA Rounds form, which is maintained in a binder. The unannounced PREA rounds logbook, or other related documentation, is always maintained in the main control room for audits and PREA investigators' review. The auditor reviewed 30 Unannounced Rounds forms completed between November 2024 and November 2025, and found that intermediate-level/ higher-level supervisors conduct and document unannounced rounds on all shifts, day and night, to identify and deter staff sexual abuse and sexual harassment. Interviews with random staff confirmed they are aware that they are prohibited from alerting other staff when these unannounced rounds occur. Interviews were conducted with three intermediate-level staff regarding their experience of making unannounced rounds, and they all explained their methodology, which was consistent with the requirements of provision (e) of this standard. These interviews also confirmed that they frequently make random, unannounced visits to various areas of the facility during normal work hours as well.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency have demonstrated compliance with all provisions of this standard.</p>
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<b>115.315</b>	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Evidence Reviewed: Policy 4.5, Staff Training Requirements; Policy 7.6, Video Monitoring System; Policy 8.22, Searches and Contraband Control; Policy 23.1, PREA; Policy 23.3, LGBTI; 23.1 Attachment C, Cross Gender Searches Documentation; Bob Richards RYDC 23.3 PREA, Local Operating Procedures (LOP); Cross-gender Pat Search Training Video Link; Guidance in Cross-Gender and Transgender Pat Searches PowerPoint Training and Facilitator Guide, PRC/The Moss Group; Limits to Cross Gender Viewing and Searches PowerPoint DJJ Handout; Director's Statement 115.315; Sample of Training Records; Sexual Orientation Gender Identity Expression (SOGIE) Assessment Form; Transgender Declaration of Preference; List of any vulnerable youth (LGBTI), Post Orders for Showers; Information Observed During Site Visit; Information Obtained from Interviews.</p> <p>115.315(a)(b)(c): Policy 23.1 establishes that the facility will not conduct cross-gender strip and body cavity searches of youth. Policy 8.22 establishes that cross-gender pat-down searches may only be conducted in exigent circumstances, which are any set of temporary and unforeseen circumstances that require immediate action to combat a threat to the security or institutional orders of the facility. All such searches must be documented, detailing the exigent circumstances using Attachment C, Cross Gender Searches Documentation. The facility indicated in the PAQ that there were no cross-gender searches of any kind conducted in the 12 months preceding the audit, which was further corroborated by a written statement</p>

and subsequent interview with the facility Director, and interviews with 13 random staff; therefore, no documented logs exist for the auditor's review.

Random staff interviews (13) confirmed that only in exigent circumstances would a cross-gender strip search or visual body cavity search be required and that a supervisor's approval would be required before proceeding with the search. They were aware that any searches of this type would be documented on a log and an SIR be completed. Half of the random staff interviewed struggled with explaining exigent circumstances related to whether they are restricted from conducting cross gender pat down searches. The auditor recommended remedial staff training on this topic during the evidence review phase. As indicated by the PREA Coordinator, facility staff received the requested training and provided documentation for compliance. Residents reported to the auditor during interviews that they have never been unclothed in full view of non-medical, opposite gender staff. The auditor interviewed 15 youth who confirmed that they have never been searched by an officer of the opposite gender and that staff of the opposite gender announce their presence when entering a resident housing unit. There were no transgender/ intersex youth admitted to the facility during the site visit to interview.

115.315(d): Policy 23.1 states that staff members of the opposite gender must announce their presence when entering a youth housing unit. Youth access will not be restricted to regularly available programming or other out-of-cell opportunities to comply with PREA provisions. Policy 7.6 states that, for reasons of privacy, CCTV will not be used to monitor showers and toilet areas; areas used for strip searches, individual cells; and medical exam and treatment rooms. The auditor reviewed all camera views in the facility and found none that viewed an area where there is an expectation that a resident would be unclothed, including in the youths' cells. The auditor's review of the facility's 23.3 PREA LOP includes procedures for conducting youth showers. These procedures establish that the officer will unlock the shower door for the youth, then the youth will close and lock the door. Staff will not enter the room while the youth are showering or allow more than one occupant in a shower room. The LOP further establishes that, except for medical examinations or urine drug screens, staff will not view youth showering, performing bodily functions, or changing clothing except when such viewing is incidental to routine cell checks.

Interviews with 13 random staff confirmed their knowledge of these procedures. During the site visit, the auditor observed areas used to conduct strip searches and pat-down searches and assessed whether opposite-gender staff can watch the conduct of a strip search, absent exigent circumstances. Unclothed body searches are only conducted in the youths' cells or in the intake area and always by same-gender staff. The auditor reviewed camera views from the central control and found that no views were observable in areas where a resident may be undressed, taking a shower, using the toilet, or during an unclothed body search. This was also confirmed through informal conversations with staff who stated they have never encountered a time when they observed a youth undressed. Interviews with female officers confirmed that they may occasionally encounter a youth using the restroom, incidental to making cell checks, at which time they simply continue moving and do not loiter. During the site visit, the auditor observed opposite-gender

announcements being made when entering a living unit, the shower area, and the medical unit. Conversations with staff during the site visit found that they make their appropriate opposite gender announcements and have not participated in or observed any opposite-gender strip searches or viewing at the facility. All 13 youth interviews indicated opposite gender staff announce themselves when entering the living unit. Youth were also knowledgeable about the “cover-up rule” and observed one another’s privacy.

115.315(e): Policy 23.1 establishes that staff are not permitted to search or physically examine a transgender or intersex youth to determine the youth’s genital status. If the youth’s genital status is unknown, it may be determined during a conversation with the youth or, if necessary, by learning that information as a part of a broader medical examination conducted in private by a medical services staff. The gender of the staff member searching a transgender or intersex resident will depend on the individual resident’s specific needs and the facility’s operational concerns. Under most circumstances, this will be a case-by-case determination, which may change throughout confinement and should take into consideration the gender expression of the resident. The facility uses information from Policy 23.3, Attachment A: Transgender/Intersex Declaration of Preference Statement, when deciding a case-by-case determination of staff gender during searches of Transgender or Intersex residents. Random staff interviews (13) also confirmed staff awareness of the policy that prohibits staff from searching or physically examining a transgender or intersex resident for the sole purpose of determining the resident’s genital status and that under no circumstances would they conduct this type of search.

115.315(f): Policy 23.1 states that DJJ staff responsible for searches will be trained in conducting cross-gender pat-down searches and searches of transgender and intersex residents professionally, respectfully, and in the least intrusive manner possible, consistent with security needs. The facility reported on the PAQ that 100% of all security staff received training on conducting cross-gender pat-down searches and searches of transgender and intersex residents professionally and respectfully, consistent with security needs. The auditor conducted interviews with 12 security staff and found they had all received their initial search training when they attended the academy before being a certified Juvenile Correctional Officer (JCOs). Additionally, a refresher is provided on searches each year during the PREA portion of in-service. The auditor reviewed the searches curricula Cross- gender Pat Search Training Video Link; Guidance in Cross-Gender and Transgender Pat Searches PowerPoint Training and Facilitator Guide, PRC/The Moss Group; Limits to Cross Gender Viewing and Searches PowerPoint DJJ Handout, and found they meet the requirements of provision (f). The auditor reviewed the JCO academy training topics and OJT checklist and confirmed that search training is included in both. An interview with the facility's PREA Compliance Manager and Facility Director confirmed that search procedures are reviewed as part of the OJT checklist when new officers return from the academy.

A systematic review and analysis of the evidence concluded that the facility and agency have demonstrated compliance with all provisions of this standard.

<b>115.316</b>	<b>Residents with disabilities and residents who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed: Policy 13.32; Policy 15.7, Access to Telephone; Policy 15.10, Language Assistance Services; Policy 23.1, PREA; Special Education Teaching Certificate; List of Special Education Teachers PREA Intake Flyers (English &amp; Spanish); PREA Posters (English/Spanish); Youth Safety Tips Poster (English/Spanish); DJJ Website Translations; Contracts with Ad Astra; Lionbridge; Interpreters Unlimited, LanguageLine Solutions, LATN Contract; Translation Station; Deaf Hard of Hearing Email for Services; Director Memorandum identifying vulnerable youth with disabilities; Email Deaf, Hard of Hearing ACA covered in Special Education Program; Observations During Site Visit; Information Obtained During Interviews.</p> <p>115.316(a): Policy 15.7 requires each facility to be equipped with a telecommunication system that facilitates the transmission of messages, volume control, and the effective communication of juveniles and other parties with speech and hearing impairments. Youth who receive services for the Deaf/Hard of Hearing through Special Education or Section 504 will have access to assistive and adaptive technology (including TTY phones) during and after school hours, as outlined in their Individualized Education Program (IEP) or Section 504 plan. The facility case manager (e.g., RTI Chair, Special Education teacher) will request the technology (TTY phone) through their local administrator, who will then receive the technology (TTY phone) from the Director of Special Education. Policy 13.32 states that the Department of Juvenile Justice-Georgia Preparatory Academy (DJJ-GPA) shall identify school-age students with disabilities and provide these students a free and appropriate public education in compliance with state rules and the Individuals with Disabilities Education Act (IDEA 2004). DJJ-GPA shall provide a continuum of special education services to ensure that students with disabilities are educated with their non-disabled peers to the maximum extent possible. Policy 23.1 states that the facility will use definitions from Policy 13.32, Special Education Services, to provide age-appropriate and disability services to youth by special education instructors. In consultation with the Education Principal/Lead Teacher, each Director will ensure that education staff develop guidelines that will assist youth with disabilities in delivering PREA information. The guidelines include identifying staff responsible for services; processes for accessing services during regular hours, weekends, holidays, and after hours; Documentation in JTS; Timeframe in which the service is to be delivered; and follow-ups. The auditor spoke with the Lead Teacher at the facility, who explained the process for assisting with and accommodating communications for disabled youth. She also confirmed that education has not been called on to assist with the delivery of the PREA education during the 12 months preceding the audit; however, she stated that the facility is prepared to access these resources if needed, and services will be provided. The facility currently has a Special Education Teacher employed at the facility at the time of the audit. The Lead Teacher explained that any of the certified teachers could assist with providing these</p>

services as needed. The facility provided state certificates for 1 teacher employed by the facility.

115.316(b): Policy 15.10 states that the DJJ shall prohibit discrimination based on their proficiency in the English language. To ensure effective communication with all youth at all points of contact and meaningful access to all programs and services, language assistance services shall be provided to youth with limited English proficiency (LEP), at no cost to the youth. As needed, documents intended for youth (e.g., youth handbooks, help request forms, grievance forms, etc.) will be translated into Spanish. Other language translations will be made as needed. Oral communication with LEP youth will be provided by bilingual staff or through an interpreter. Each secure facility will give the LEP youth the "I Speak" Form (Attachment B) at intake to identify the youth's language needs. The specified language proficiency of the youth will be recorded in the Juvenile Tracking System (JTS). The facility's PREA intake posters are available in English and Spanish. Accommodations will be made following Policy 15.10, Language Assistance Services, to ensure that youth who are limited English proficient (LEP), deaf, or disabled can report sexual abuse to staff directly, through interpretive technology, or non-youth interpreters.

Policy 13.32, Special Education Services, and its definitions of disabilities are to be used by education staff to provide age- appropriate and disability services to youth by special education instructors. In consultation with the Education Principal/Lead Teacher, each Director will ensure that education staff develop guidelines that will assist youth with disabilities in delivering PREA information. These procedures include identifying staff responsible for services; processes for accessing services to include weekends, holidays, and after-hours; creating documentation in JTS; establishing timeframes in which service is to be delivered; and follow-ups. The agency maintains contracts for language interpreters, virtual and in-person services. The auditor reviewed these contracts which included Ad Astra; Lionbridge; Interpreters Unlimited, LanguageLine Solutions, and Translation Station. The agency also makes available a link on its public website provided by the State of Georgia. This link provides automatic translation of text into seven languages. Conversations with staff during the site inspection confirmed that staff were aware of this link being available for communicating with LEP residents, but have never had the need to use it. The PREA posters and literature is published in English and Spanish, being the most common languages encountered; however, the PREA Coordinator and Compliance Manager explained that additional translations will be made for other languages should a youth be admitted needing a language other than English or Spanish.

The auditor obtained a resident roster by housing unit from the facility on the first day of the site visit. The auditor also requested a list of all youth with a disability and who are identified as LEP. The facility provided the requested lists with the following findings: hearing impaired (0); vision impaired (0); physical disability (0); cognitive impairment (1); LEP (0). The auditor's observations during the site visit and informal conversations with staff corroborated that there were no youth with hearing, vision, or other physical disability or LEP. During resident interviews, the

auditor observed that each youth had a solid understanding of the PREA educational information provided to them. Based on file reviews, interviews, and staff conversations, no special accommodation was needed for the PREA education delivery. The JDC explained that the facility provides interpreters, when needed, to assist Deaf and non-English speaking youth in the facility as described in provision (d) of this standard, below. Also, staff readers and interpreters are available, if needed. Skilled educators/staff are involved in providing the required information to youth with cognitive or functional disabilities, as explained during an interview with a special education teacher. The collective of all interviews confirmed that the agency ensures that residents are educated regarding their rights to be free from sexual abuse, sexual harassment, and retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. If youth require interpretation services, they will coordinate with their JDC, who will take them to a location with the appropriate phone equipment to access the interpreter services.

The housing unit telephones provide speed dialing instructions in both English and Spanish. An interview with the Agency Head confirmed the agency has established procedures to provide residents with disabilities and residents who are limited English proficient 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. She also spoke about the procedures in place to ensure meaningful and full access to the agency's sexual safety efforts and resources. An interview with the intake officer revealed that she bases her delivery of the intake orientation and PREA educational material on each youth's ability to communicate. She engages the youth in conversation and takes into consideration the age of the youth and any noted disabilities. While presenting the information, she monitors body language and responses for understanding. Additionally, she has the youth read a portion of the educational material to help determine the youth's reading ability. If the youth is not proficient in reading the material, she reads the printed information to the youth. She also indicated that there has not been a youth admitted during the 12 months preceding the audit that required special services during the delivery of the PREA information at intake. During the site visit, the auditor observed instructions for accessing interpreter services posted in counseling, intake, medical, and education.

115.316(c): Policy 15.10 establishes that family members, children, friends, and untrained volunteers will not be used as interpreters unless specifically requested by the youth or the youth's parent or legal representative and upon approval of the JDC. Facility Directors are required to ensure that all staff are trained to access language assistance services. The agency has a translations link on its public website that may be used by staff or other interested parties. Policy prohibits the use of youth interpreters, youth readers, or other types of youth assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the youth's safety, the performance of first-responder duties under 115.364, or the investigation of the youth's allegations. All exigent circumstances must be documented. The auditor observed the contact information

	<p>for the interpreter service providers posted in the intake area, control room, and medical department for use by staff as needed. The facility reported on the PAQ that there were no instances where resident interpreters, readers, or other resident assistants were used or needed during the 12 months preceding the audit. The auditor learned through conversations with staff that interpretation services will be readily available to residents, with assistance from education, medical, mental health, or counseling staff as needed. Random staff (13) interviews confirmed they knew how to access interpreter services should they be required. They also confirmed that the use of resident interpreters, resident readers, or other types of resident assistants to assist disabled residents or LEP residents when making an allegation of sexual abuse or sexual harassment was prohibited.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency have demonstrated compliance with all provisions of this standard.</p>
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<b>115.317</b>	<b>Hiring and promotion decisions</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed: Policy 3.52, Background Investigations; Policy 5.9, Personnel Records; Policy 23.1, PREA; 23.1 Attachment D, PREA Employment Questionnaire; 23.1 Attachment E, PREA Acknowledgement; Employee List; Contract Staff List; Email from HR about PREA Pre-employment questionnaire; DHS Division of Family and Children Services Child Abuse Registries Memo; HR Agenda-Reference Check/HR Friday Call; Background Memorandum from HR Director; Personnel Records; Self-Initiated Corrective Action Plan (CAP) Observations During Site Visit; Information Obtained During Interviews.</p> <p>115.317(a)(b)(f)(g): Policy 23.1 establishes that Facilities/Programs/Offices will not hire or promote anyone who has been found guilty of sexual abuse or sexual misconduct and sexual harassment. DJJ must determine if all prospective employees and employees being considered for promotions have any allegations of sexual assault, sexual harassment, or any civil/administrative liabilities for sexual misconduct before employment and promotion. Policy 23.1 establishes that DJJ is required to determine if all prospective employees and/or employees being considered for promotions have any allegations of sexual assaults, sexual harassment, and/or any civil/administrative liabilities for sexual misconduct before employment and/or promotion. Each applicant is required to complete Attachment D, the PREA Pre-Employment Questionnaire, as a part of the interview process.</p> <p>Policy 3.52 establishes that an applicant for a position that involves contact with youth confined in a secure facility is automatically disqualified from employment if he/she has any conviction for sexual abuse in a prison, jail, secure community placement, or juvenile facility; any conviction for engaging or attempting to engage</p>

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 in the absence of a conviction, any civil or administrative finding that the applicant engaged in any sexual activity described previously. Additionally, Policy 23.1 directs that staff or contractors who omit material information regarding sexual abuse and sexual harassment or provide materially false information will be terminated. As of May 24, 2023, the PREA Pre-Employment Questionnaire was integrated into the Background Check Application System (BCAS) electronically for new hire and promotion candidates. When candidates, employees, or vendors are sent the background check link via BCAS, candidates will be prompted (and required) to complete the PREA Pre-Employment Questionnaire questions. The form is stored electronically within BCAS and includes the following questions 1) 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 such activity. The agency previously kept paper copies of the signed form 23.1 Attachment D, obtained during interviews, at local personnel offices; however, now this documentation is obtained and retained digitally by the Criminal History Unit (CHU). Policy 23.1 requires that Employees/Part-Time/Per Diem/Interns and individual contract employees must read and sign the Staff PREA Acknowledgement Statement (Attachment E), and a copy will be maintained in the personnel file or the appropriate file. This form acknowledges that the employee has received and reviewed Policy 23.1, which imposes a continuing affirmative duty to disclose any misconduct.

The auditor reviewed a sample of 15 Staff PREA Acknowledgement Statements for employees, contractors, and volunteers during file reviews. Since the PREA Pre-Employment Questionnaire questions are asked as part of the BCAS system, digitally paper forms are no longer retained at the facility level. The auditor requested and received a random sample of 15 PREA Employment Questionnaires for review, confirming that these are asked each time a background check requested form is submitted. During an interview with the local HR representative, she explained that employees are required to disclose any previous misconduct and that all new hires are informed of the continuing affirmative duty to disclose any such conduct, and that material omissions regarding such misconduct or materially false information are grounds for termination during the initial orientation process and through policy review. She further confirmed that employees are screened by DHS for Child Protection Services (CPS) involvement. During the interview, she also confirmed the facility considers prior 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. The interview confirmed that candidates involved in a prior incident of sexual harassment would require special approval to be employed or promoted and that the decision would be made by central office leadership. The agency's database is checked for incidents of sexual harassment before promoting an internal candidate. Interviews with 13 random staff confirmed

they are aware of their continuing affirmative duty to disclose to the agency any misconduct or encounters with law enforcement.

115.317(c)(d)(e): Policy 3.52 and Policy 23.1 establish that DJJ shall conduct background investigations on applicants, volunteers, interns, contractors, and employees who may have contact with youth. The CHU is the DJJ unit responsible for reviewing and processing criminal records checks and other background-related verification checks for applicants and current employees as required. Background investigations include the investigation and/or verification of the following information: Criminal history (including fingerprint check); Sex offender registry; Employment history; Internal investigations; Social media; Education verification; Professional credential; Credit history; Military service record investigation (for applicants with a prior military service); Driver's history; and/or Any information provided on the State of Georgia Application for Employment and/or the State of Georgia State Security Questionnaire Loyalty Oath.

Policy 23.1 directs that the Department shall conduct criminal background record checks at least every five years for non-security employees in facilities and offices, as well as contractors, in accordance with DJJ 3.52, Background Investigations. The Department performs a criminal background records check and consults applicable sex offender registries before enlisting the service of any contractor who may have contact with youth in accordance with DJJ 3.52, Background Investigation. Policy 3.52 directs that all employees and contractors will have a criminal record check completed every five years. The CHU will establish and maintain a schedule, by organizational unit, which will ensure that the criminal record check of every employee and contractor is conducted every five years. All current employees selected to fill a position because of a promotion shall have a criminal record check prior to being placed into the position. Policy 3.52 requires reference checks to be conducted by making its best effort to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. The auditor reviewed the procedure from the Georgia Department of Human Services, confirming employees are screened for CPS involvement, which was also verified during an interview with Central HR.

During interviews with one of the facility's Human Resources staff (HR) the auditor confirmed that the agency performs criminal background checks and considers pertinent civil or administrative adjudications for all newly hired employees, those who are being considered for promotions, and contractors who may have contact with residents prior to employment or services rendered. She also explained that employees have an updated background check either every five years or when they are considered for a promotion. The CHU regulates the procedures to ensure these background checks are run and completed a portion each year, as required to keep current and within the requirements of PREA. Employee background checks are initiated by the facility's HR; however, background checks on contract employees are initiated by the Central Office program office where they are attached. Background checks for contract service providers are completed at the local facility by the business office staff or through the central office department securing the

contract.

The agency's PREA Coordinator explained the recurring background check procedure during her interview and provided the auditor with a memorandum from the agency's Director of Human Resources dated November 4, 2024, regarding PREA Background Checks. This memorandum explained that in 2022, the Office of Human Resources' CHU ran background checks for the entire agency to follow PREA standards. However, to ensure that no one is missed, CHU will restart the 5-year cycle beginning the first of the 2025 calendar year and conclude no later than the end of the first quarter of 2025. This will be the restart of running background checks for the entire agency every five years. This process will also include contractors for the agency. To ensure the process does not leave anyone out, a detailed employee report will be sent to CHU from the manager of the Office of Human Resources Operations Unit. This report will include all the full-time and part-time staff for the agency. Additionally, each Secure Facility and Community Supervision Office will be contacted by CHU to obtain a list of all contractors working for the agency. All agency employees and contractors will have their background checks run every five years to ensure compliance with PREA Standards. New hires have their background checks conducted at the time of hire and then again during the 5-year PREA check window, even if the hire date is within a year of the agency-wide PREA background re-check window. In addition, all internal candidates will have their backgrounds run at the time of promotion.

The facility reported 13 new employees were hired, and 4 contracts for services were in place, where criminal background checks were conducted on all staff during the 12 months preceding the audit. The following lists were requested and received before the site visit: Contracted Staff (5); Employees (15); Volunteers (4). Of these records reviewed, all staff had a background check before employment; 15 employees had verification of the five-year check; 2 had a background check prior to promotion; all contracted staff had a background check before employment, and completed a five-year check which was completed; and volunteers had a current background check completed. While the background check process is managed by the CHU, the PREA Compliance Manager maintains a tracking spreadsheet of all employees to document when these background checks are conducted and to indicate when the next checks are due. The auditor's review of the spreadsheets confirmed they were complete and being tracked regularly.

115.317(h): Policy 23.1 requires that, unless prohibited by law or DJJ Policies, the Department's Office of Human Resources, in coordination with the Office of Investigations and Office of Legal Services, will provide information on substantiated allegations of sexual abuse or sexual harassment between a current or former employee and a youth upon receiving a request from an institutional employer. An interview with the local HR staff confirmed that if a request is received for information on substantiated allegations regarding a prior employee, the request would be forwarded to Central HR to respond. The auditor spoke with a Central HR representative, the PREA Coordinator, and the Office of Investigations PREA Unit Supervisor and learned in coordination with the OHR, Office of Investigations and Office of Legal Services, the agency will provide information on substantiated

	<p>allegations of sexual abuse or sexual harassment or information about a resignation during investigation upon receiving a request from the requesting employer and authorization of the prior employee. There were no known requests from a prospective employer received during the 12 months preceding the audit.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency have demonstrated compliance with all provisions of this standard.</p>
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<b>115.318</b>	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed: Policy 7.1, Physical Plant Requirements; Policy 8.15, Video Cameras; Policy 23.1, PREA; CCTV List with Locations; PREA Design Compliance Memo; Director’s Accountability Statement; Facility Schematics; Video Monitoring System; PREA Accountability Statement from Director indicating no expansions or video upgrades; Observations During Site Visit; Information Obtained from Interviews.</p> <p>115.318(a): Policy 23.1 establishes that the agency will consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect youth from sexual abuse in addition to the requirements in Policy 7.1, Physical Plant Requirements, when designing or acquiring a new facility or planning substantial expansion or modification of existing facilities. Policy 23.1 further establishes that the agency will not consider open bay living units to house youth. The Agency PREA Coordinator serves on the primary committee for PREA planning purposes. The facility indicated on the PAQ that there was no new construction at the facility since the last PREA audit. An interview with the Agency Head confirmed that during designing, acquiring, or planning modifications to facilities, PREA standards are taken into consideration and incorporated by involvement of the agency’s PREA Coordinator. She explained that the goal is to create an environment with high visibility and direct lines of sight, while maintaining privacy for the residents during showers and in other areas where they may be in various stages of undress. The agency also provided for the auditor's review a copy of the PREA Design Compliance Memorandum to provide documented evidence that PREA standards are considered during major physical plant modifications.</p> <p>115.318(b): Policy 23.1 establishes that when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the agency will consider how such technology may enhance the agency's ability to protect residents from sexual abuse. The policy further establishes that youth will not be recorded or viewed when showering, performing bodily functions, or changing clothing. In addition, CCTV will not be installed in youth rooms. The Agency Head explained during her interview that the agency uses technology to</p>

	<p>provide additional supervision and monitoring of staff and youth interactions. Whether installing or updating newly installed monitoring technology, the agency strives to have technology that will enhance the agency's ability to keep youth and staff safe. The electronic monitoring system is checked frequently to ensure it is working properly. Any system problems encountered are immediately reported for repair. The auditor reviewed the CCTV logbook maintained in master control and found regularly documented entries of checks to ensure that the cameras are in working condition. A document provided with the PAQ indicated the facility has approximately 220 cameras. Information provided on the PAQ and an interview with the facility Director confirmed that there were no modifications to the camera system since the last PREA audit.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency have demonstrated compliance with all provisions of this standard</p>
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<b>115.321</b>	<b>Evidence protocol and forensic medical examinations</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>Evidence Reviewed: Policy 2.10, Payment of Youth Medical Expenses; Policy 8.42, Crime Scene Preservation; Policy 22.3, Internal Investigations; Policy 23.1, PREA; Policy 23.2, Sexual Assault; 23.1 Attachment K, Requirements of a PREA Case; Children's Advocacy Centers of Georgia (CACGA) Commercial Sexual Exploitation of Children (CSEC) Response Contact Sheet and Comprehensive Guide; CSEC First Responder Instructions; Emergency Medical Treatment and Labor Act (EMTALA) Know Your Rights; PREA EMTALA Notice; GBI Property and Evidence General Information; List of Medical Staff; List of Mental Health Staff; Children's Healthcare of Atlanta/Stephanie V. Blank Center Partnership Memo; MOU Harbor House CAC; PREA Accountability Statement from Director; Observations During Site Visit; Information Obtained from Interviews.</p> <p>115.321(a)(b): Policy 23.1 establishes that the Office of Investigations is responsible for conducting administrative and criminal sexual abuse investigations, including youth-on-youth and staff-on-youth sexual abuse, following Policy 22.3, Internal Investigations. These investigations follow the guidelines of a National Sexual Abuse Protocol or a similarly comprehensive and authoritative protocol. DJJ and the facility do not have other agencies investigating sexual abuse or sexual harassment allegations that are alleged to have occurred on DJJ property. The auditor reviewed Policy 8.42, which outlines the agency's uniform evidence protocol, and found it to be developmentally appropriate for youth. Interviews with the Agency Head, PREA Coordinator, and PREA Unit Chief Investigator confirmed that the DJJ Office of Investigations is the designated law enforcement agency for investigating allegations of sexual abuse that occurred in a DJJ facility. They further explained that the agency's uniform evidence protocol is consistent with that of the Georgia</p>

Bureau of Investigation (GBI) and developmentally appropriate for youth. Interviews with 13 random staff confirmed their knowledge and understanding of the agency's protocol for obtaining usable physical evidence if a resident alleges sexual abuse. Most staff were able to articulate the evidence procedures outlined in the facility's Coordinated Response Plan and PREA policy. Most staff confirmed they would implement the first responder protocols if they were the first person to be made aware that a resident had been the victim of sexual assault; additionally, they would report the incident through their chain-of-command and would discuss the incident only with those who need to know. Given that staff knowledge on first responder duties was average, the auditor recommended that during the evidence review period, the facility complete remedial staff training on the first responder duties, evidence protocol, location of the coordinated response plan, and investigative entities. The PREA Coordinator submitted staff training documentation before the completion of the final report.

115.321(c): Policy 23.1 establishes that victims of sexual abuse will have timely, unimpeded access to emergency medical treatment, crisis intervention services, and victim advocacy, the nature and scope of which are determined by medical services staff and mental health practitioners according to their professional judgment. Any youth reported or believed to have been sexually assaulted will be immediately referred to the on-site health care staff for an appropriate evaluation to determine emergency care needs. An interview with the Health Services Director, which was also corroborated in written correspondence, confirmed that Medical Services partners with DJJ Secure Campuses in providing support to sexually abused youth in their custody and for responding effectively to abuse when it occurs. DJJ offers all youth who experience sexual abuse access to forensic medical examinations at an outside facility, without financial cost, when evidentiary or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. DJJ secure campuses are not required by federal law to have hospital agreements (MOU's). Medical services, including any SANE/SAFE PREA event evaluation/treatments, are covered by the EMTALA federal law. Based on interviews with the Health Services Administrator (HSA) and the facility Director, there were no forensic medical exams conducted during the 12 months preceding the audit.

The facility provided the comprehensive assessment information from Georgia's Commercial Sexual Exploitation of Children (CSEC) Response Team, which indicates partner agencies to provide Forensic Medical Exam to assess a victim's health care needs, coordinated treatment of any injuries, and collected evidence for potential use during case investigation and prosecution. Bob Richards RYDC does not employ SAFE/SANE staff. The agency partners with the Atrium Health Floyd Medical Center for comprehensive youth medical and forensic evaluations, and no MOU is required. These examinations are conducted in a safe, child-friendly environment staffed by a team of professionals with extensive pediatric experience. The auditor spoke with a representative at the Atrium Health Floyd Medical Center who confirmed they have an exam room at their center and provide SAFE/SANE services by trained staff to care for children and teens who are victims of sexual abuse. She also confirmed

there have been no SAFE/SANE exams conducted for any resident from Bob Richards RYDC during the 12 months preceding the audit. An interview with the facility Director, PREA Compliance Manager, and HSA confirmed that emergency medical needs and SAFE examinations would occur at the Atrium Health Floyd Medical Center, and victim advocacy services would be provided at The Harbor House.

115.321(d)(e)(h): Policy 23.1 establishes that the facility, through the DJJ Office of Contracts, will enter a memorandum of understanding (MOU) with local rape crisis centers or community service providers that can provide youth with access to outside victim advocates for emotional support services related to sexual abuse. The mailing addresses and telephone numbers, including toll-free hotline numbers of local, state, or national victim advocacy groups or rape crisis organizations, will be posted in the facility or otherwise made available to youth who are victims of sexual abuse. The mailing addresses and telephone numbers of immigration service agencies will be provided to youth who have been sexually abused and are being detained solely for civil immigration purposes. The facility enables reasonable communication between youth and these organizations and agencies in as confidential a manner as possible. It is the responsibility of the facility Director to ensure that all youth victims of sexual assault receive the same level of care as if they were in a community setting. All victims will be immediately referred for outside medical testing and evaluation. Upon release from a secure facility, the Community Case Manager will provide the youth with follow-up referrals for services in the community. The facility Director will provide youth access, upon request from the youth or recommendation from medical services staff, to external medical and mental health victim services for sexual abuse incidents.

Interviews with the facility Director and the agency's PREA Coordinator confirmed that if a youth requests a victim advocate, one will be provided by the Harbor House. The Stephanie V. Blank Center is a child advocacy center that provides services in a safe, child-friendly environment staffed by a team of professionals with extensive pediatric experience. These services include comprehensive medical and forensic evaluations, behavioral health assessment and counseling, and medicine and distance learning. As a participant in the CSEC Network, an MOU with CHOA/ Stephanie V. Blank Center is not required to benefit from the service. If requested by the victim, a victim advocate or a qualified agency staff member will accompany the victim through the forensic medical examination process and investigatory interviews and provide emotional support, crisis intervention, information, and referrals.

The facility also has an MOU with Harbor House, who are available to provide an advocate as well. Additionally, the DJJ Office of Victim Services will be contacted to assist in coordinating the advocacy services. An interview with one PREA Unit investigator confirmed that youth victims are offered an advocate before investigatory interviews. There were three sexual abuse allegations reported during the 12 months before the audit, but no youth involved required a forensic medical examination. There was one resident at the facility during the site visit who reported sexual abuse, who indicated he was seen by facility medical staff and did not

	<p>require emergency medical services or a forensic medical examination.</p> <p>115.321(f)(g): The agency is responsible for investigating administrative or criminal allegations of sexual abuse and does not rely on another agency to conduct these investigations.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency have demonstrated compliance with all provisions of this standard.</p>
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<b>115.322</b>	<b>Policies to ensure referrals of allegations for investigations</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>Evidence Reviewed: Policy 8.5, Special Incident Reporting; Policy 22.3, Internal Investigations; Policy 23.1, PREA; Policy 23.2, Sexual Assault; 23.1 Attachment K, Elements of a PREA Case; DJJ Public Website; Incident Reports (SIR); Case Files; 2024 Georgia Department of Human Services, Child Protective Services Mandated Reporter Form; Information Obtained from Interviews.</p> <p>115.322(a)(b): Policy 23.1 establishes that Directors ensure that all allegations of sexual abuse or sexual harassment are referred for investigation following Policy 8.5, Special Incident Reporting. The Director of Investigations ensures that all claims of sexual abuse and sexual harassment on DJJ property or in a community residential program, including third-party and anonymous reports, are investigated. The Office of Investigations follows the procedures in Policy 22.3, Internal Investigations. There were three allegations of sexual abuse reported during the 12 months preceding the audit. The auditor’s review of these allegation files found that the referrals for investigations were clearly documented in the incident report, and copies of any email notifications and subsequent correspondence were retained in the case files. The auditor’s interviews with the Assistant Facility Director and Chief Investigator confirmed that all sexual abuse and sexual harassment allegations reported are referred for investigation. The agency’s PREA policy is published on its public website at <a href="https://djj.georgia.gov/prison-rape-elimination-act-prea">https://djj.georgia.gov/prison-rape-elimination-act-prea</a>.</p> <p>An interview with the Agency Head and the agency’s PREA Coordinator confirmed that an administrative and/or criminal investigation has been completed for all allegations of sexual abuse or sexual harassment by designated DJJ Office of Investigations PREA Unit Investigators. These investigators are required to respond immediately to allegations of sexual abuse and sexual harassment in DJJ facilities. An interview with one PREA Unit Investigator confirmed that all allegations of sexual abuse and sexual harassment are referred to their office for evaluation and investigation. If deemed to meet the criteria for a PREA case, a criminal and/or administrative investigation is immediately initiated. Based on a review of the incident reports and case files, once the facility Director became aware of the incident, it was reported immediately to the PREA Unit Chief Investigator.</p>

	<p>115.322(c)(d)(e): Policy 22.3 establishes that the DJJ Office of Investigations is the investigative authority for PREA-related cases involving youth in DJJ custody and under supervision. An interview with the Agency Head, the agency's PREA Coordinator, and PREA Unit Chief Investigator confirmed that the agency is responsible for conducting administrative and criminal investigations into claims of sexual abuse and does not rely on separate entities.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency have demonstrated compliance with all provisions of this standard.</p>
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<b>115.331</b>	<b>Employee training</b>
	<p><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p><b>Auditor Discussion</b></p> <p>Evidence Reviewed: Policy 3.22, Harassment; Policy 4.1, Training Program; Policy 4.5, Staff Training Requirements; Policy 23.1, PREA; 4.5 Attachment A, Training Matrix; 4.2 Attachment A, Juvenile Correctional Officer On-The-Job Training Checklist and Manual; 23.1 Attachment G, PREA Training Series and Matrix; PREA Employee Training Series - Module One: Overview of the Law and Your Role, Module Two: Residents' right to be free from sexual abuse and sexual harassment and from retaliation for reporting, Module Three: Professional Boundaries, Module Four: Prevention and Detection of Sexual Abuse, Module Five: Response and Reporting of Sexual Abuse and Sexual Harassment, Module Six: Respectful and Professional Communication with Youth; Gender Responsive Training PowerPoint; Staff Training Record Samples; PREA Refresher Training (Annual Training); Staff Poster: PREA is Good Safety &amp; Security; Staff First Responder Cards; DJJ 23.1, Attachment E, Signed PREA Acknowledgement Forms (uploaded to 115.317); Observations During Site Visit; Information Obtained from Interviews.</p> <p>115.331(a)(b)(c)(d): Policy 23.1 establishes that all staff must be able to fulfill their responsibilities under the agency's sexual abuse prevention, detection, and response policies and procedures. Staff are required to complete the PREA Training Series (6 hours of training) as listed in Attachment G, PREA Training Series. The Training Matrix, 4.5 Attachment A, outlines that all levels of staff must complete PREA Refresher training each year, which includes the same topics. In addition to training, key information is continuously and readily available and/or visible to all staff through posters and PREA compliance discussions, reminders in shift briefings, and staff meetings. The agency's PREA refresher training is conducted annually, and all staff are required to complete the online refresher training as designated by the agency's PREA Coordinator. In addition to the agency's training requirements, the State of Georgia, Department of Administrative Services, Office of the State Inspector General requires that all covered employees, including part-time, temporary, seasonal employees, and independent contractors who are regularly on agency premises and/or regularly interact with agency personnel to complete</p>

employee sexual harassment prevention training on an annual basis and shall provide sexual harassment prevention training to all new or transferred covered employees within thirty (30) calendar days of hire; and sexual harassment prevention training for supervisors and managers on an annual basis to be completed within thirty (30) calendar days of employment or promotion to a supervisory or managerial position.

Through employee signature or electronic verification, employees document that they understand the training they have received. In addition to the required classroom and computer-based training, the OJT curriculum includes information about the resident's rights to be free from sexual abuse and sexual harassment. The OJT Training Guide packet verifies that employees who may have contact with residents receive comprehensive on-the-job training on the dynamics of sexual abuse and sexual harassment in juvenile facilities, common reactions of juvenile victims of sexual abuse and sexual harassment, how to detect and respond to signs of threatened and actual sexual abuse and how to distinguish between consensual sexual contact and sexual abuse between residents, how to avoid inappropriate relationships with residents.

The OJT and the Gender Responsive training include communicating effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender-nonconforming residents. The agency trains all employees who may have contact with residents on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities and on relevant laws regarding the applicable age of consent. All employees receive PREA training through multiple courses reflected in Modules 1-6 PREA Training curricula including Overview of the Law and Your Role; Residents' Right to be free from sexual abuse and sexual harassment, and retaliation; Professional Boundaries; Prevention and Detection of Sexual Abuse; Response and Reporting of Sexual Abuse and Sexual Harassment; and Respectful and Professional Communication with Youth upon hire. The auditor's review of the training curriculum confirmed that collectively these modules capture all topics that are required of provision (a.1-11). Staff First Responder Cards are issued to employees after the initial training is received in the academy. The auditor observed boldly colored, large signage stating "PREA Is Good Safety & Security," posted throughout the facility as a constant reminder to staff of the importance of the agency's zero-tolerance policy. Due to the extensive, multiple PREA training courses available and the annual refresher training requirement for staff, the agency exceeds the provisions of this standard.

The auditor randomly selected employees who were hired within the 12 months preceding the audit and 15 existing employees for a review of training records, and all had evidence of initial PREA training and the current year's refresher training. The PREA Compliance Manager tracks PREA training on the Personnel Audit spreadsheet mentioned in 115.317. The auditor's review of these spreadsheets confirmed that all staff are current with their 2025 annual refresher training. During 13 random staff interviews the auditor found staff to be knowledgeable about the agency's zero- tolerance policy regarding sexual abuse and sexual harassment; how to fulfill their responsibilities regarding sexual abuse and sexual harassment

prevention, detection, reporting, and response, in accordance with agency policies and procedures; the residents' right to be free from sexual abuse and sexual harassment; residents' and employees' right to be free from retaliation for reporting sexual abuse and sexual harassment or cooperating with a PREA investigation; the dynamics of sexual abuse and sexual harassment in juvenile confinement; the common reactions of juvenile victims of sexual abuse and harassment; how to detect and respond to signs of threatened and actual sexual abuse; how to avoid inappropriate relationships with residents; how to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming residents; how to comply with Georgia law related to mandatory reporting of sexual abuse to outside authorities and relevant laws regarding the applicable age of consent. The annual refresher training is completed through the agency's online training system, and an electronic signature is captured upon completion of the training with an acknowledgement that the employee understands the training received. The auditor reviewed the signed DJJ 23.1, Attachment E, PREA Acknowledgement forms for the 15 employees whose training records were reviewed. These forms are completed and signed by all employees during their initial orientation for employment.

A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard. Due to the extensive, multiple PREA training courses available, the annual refresher training requirement for staff, and the State of Georgia training requirements, the agency exceeded the provisions of this standard, and the facility exceeds based on the PREA Compliance Manager tracking employee PREA training at the local level.

<b>115.332</b>	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Evidence Reviewed: Policy 4.1, Training Program; Policy 14.3, Citizen and Volunteer Involvement; Policy 23.1, PREA; 2.2 Attachment F, PREA Acknowledgement Statement; 14.3 Attachment C, Volunteer/Guest Consent and PREA Acknowledgement; 23.1, Attachment E, PREA Acknowledgement; 2.2 Attachment F, PREA Acknowledgement Statement; 23.1 Attachment G, PREA Training Series; Training Records; Contractor/Volunteer PREA Acknowledgement Forms; Contractor Training Records; List of Contractors/ Contractor Personnel File Audit; Volunteer List; Information Obtained from Interviews.
	115.332(a)(b)(c): Policy 23.1 establishes that the facility Director shall ensure that all volunteers, interns, and contractors who have contact with youth at the facility have been trained on their responsibilities under the agency's sexual abuse prevention, detection, and response policies and procedures. Policy 23.1 also establishes that the level and type of training provided to volunteers, interns, and

	<p>contractors is based on the services they provide and their level of contact with youth. All volunteers, interns, and contractors who do not provide direct services or services on an ongoing basis to youth will be informed of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment, and how to report sexual abuse. Volunteers complete the online PREA training and Policy 14.3, Citizen and Volunteer Involvement, Attachment C, Volunteer/Guest Consent, and PREA Acknowledgement. Contractors and Interns must complete PREA training as required by Attachment G, PREA Training Series, previously outlined in 115.331. The HUB E-learning System tracks PREA Training. The employee contractors receive the same comprehensive training and annual refresher that the staff is required to take. The agency maintains documentation confirming that the volunteers and contractors understand the training they have received through an electronic signature obtained after the online modules are completed.</p> <p>The following lists were requested and received before the site visit: Twenty-three (23) Contract Staff and Volunteers. The auditor requested and reviewed training records for 5 contractors and 4 volunteers. Of the 9 contractors/volunteers whose records were reviewed, the auditor concluded all have been trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response as required. Interviews with three contractors and two volunteers indicated they have received the required training. The auditor interviewed two volunteers and 3 contractors who indicated they have received PREA contractor training based on agency requirements, both initial and refresher training.</p> <p>A systematic review and analysis of all evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard.</p>
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<b>115.333</b>	<b>Resident education</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed: Policy 13.32, Special Education Services; Policy 15.4, Viewing, Listening, and Reading Materials; Policy 17.2, Youth and Parent Orientation; Policy 18.30, Service Planning; Policy 23.1, PREA; 18.30 Attachment B, Approved Selection of Programs Protocol; 17.2 Attachment A, Orientation Acknowledgement Statement; 23.1 Attachment H, PREA Youth Acknowledgement Statement; PREA Curriculum-Condensed Version - Male (RYDC/YDC); Break the Silence Poster English/Spanish; Youth Education Flyer; Student Handbook (English &amp; Spanish); Zero Tolerance! Report Sexual Abuse Intake Notification, English/Spanish; Youth Safety Guide (PREA); Youth Safety Tips Poster; PREA Poster; Youth Poster No Means No English/Spanish; DJJ Commissioner's Video mp4 file and SharePoint Link for Facility Access; Completed Youth Orientation Acknowledgement Statements; Completed PREA Youth Acknowledgement Statements; Education PREA Letter December 13,</p>

2012; Teacher Certifications; Contracts with Ad Astra, Lionbridge, Interpreters Unlimited, LanguageLine Solutions, LATN, and Translation Station; PREA Statements; Resident Education Documents from Interviewed Youth while onsite; Observations During Site Visit; Information Obtained from Interviews.

115.333(a)(b)(e): The Georgia DJJ curriculum model comprises several sets of resources, tailored to the entire duration of a youth's confinement. Resources include male and female gender-specific materials, as well as elements addressing LBGTIQ youth, those with behavioral health issues, and youth with handicaps of disabilities. The model is designed around a core element, provided to all youth at different stages in their programming, starting at the reception process. Different models address youth who are present for short stays, as well as those who may be confined for several years. Short-stay youth receive a basic PREA curriculum. Long-stay youth are provided with a more extensive PREA education. Additional issue-specific PREA resources are provided through the behavioral health clinicians for those youth on their caseload, and for youth who may be in several higher risk categories. A very significant element is the inclusion of PREA Motivational Interviewing assessments and several sets of PREA-specific situational confidence resources. The curriculum is designed to empower youth to make good choices, to take specific action steps, and to address more broadly the range of abuse and victimization so many of them have experienced in their lives.

Policy 23.1 establishes that youth will receive age-appropriate information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment, and how to report incidents of sexual abuse and sexual harassment during the intake process. Policy 23.1 further establishes that within 72 hours of the intake process, the facility will provide a comprehensive age-appropriate orientation to youth, with the staff advising youth of the right to be free from sexual abuse, sexual harassment, and retaliation for reporting such incidents. The auditor reviewed the Commissioner's Video and the agency informational handouts, available for males and various age ranges. The materials collectively inform the youth of the agency's zero tolerance for sexual abuse and sexual harassment and the protocol for responding to such incidents. The agency's PREA Coordinator authorizes all materials used during orientation.

The auditor's review of the training aids, informational literature, and curriculum used to convey the PREA message to youth during intake and orientation found it comprehensive, age-appropriate, and gender specific. Each youth is shown the DJJ Commissioner's Video during the intake process, which covers the agency's zero-tolerance policy and reporting methods. The facility maintains documentation of each youth's participation in the orientation, and the facility's case manager documents the youth's participation in a JTS PREA communications note. In addition to the initial notification about PREA and comprehensive education, the agency also offers a PREA Class to youth who are going to be assigned to the facility for longer periods of time. Policy 18.30 directs that the Juvenile Detention Counselor and/or support staff will provide the PREA curriculum to youth. The auditor reviewed the gender specific six-part curriculum for the PREA Class which includes Introduction to PREA, Reducing Your Risk, Targets, Boundaries, Protective Measures, and Putting it

All Together. The course provides scenario-based content that is discussed with the youth by the instructor in a classroom setting. Each youth has a worksheet and completes the worksheet for each part as the class proceeds to provide a self-assessment in helping them understand what behaviors or activities may increase their risk for sexual victimization and what they can do to increase their risk of being safe from sexual abuse and sexual harassment.

The facility reported on the PAQ that 342 residents were admitted during the 12 months preceding the audit and that all were given PREA information at intake as well as comprehensive age-appropriate education on their rights to be free from sexual abuse and sexual harassment, from retaliation for reporting such incidents, and on agency policies and procedures for responding to such incident within 10 days of arrival. Before the site visit, the auditor selected 20 youth from the list of admissions between November 2024 through November 2025. The auditor also reviewed 15 additional files for the youth interviewed during the site visit, with admission dates from November 2024- November 2025. A review of these 35 records concluded that each youth received information at time of intake about the zero-tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment during intake on the day of arrival, and each youth received comprehensive age-appropriate education on their rights to be free from sexual abuse and sexual harassment, from retaliation for reporting such incidents, and on agency policies and procedures for responding to such incidents on the same day. As all 35 records reviewed indicated comprehensive PREA education was delivered on the same day of arrival, the facility exceeded the requirements of provision (b).

During the site visit, the auditor obtained a printed youth roster listed by housing unit, indicating 38 residents were currently admitted. The auditor also requested a list of residents meeting the following criteria: residents with a disability, residents who are LEP, residents who identify as LGBTI (lesbian, gay, bisexual, transgender, intersex), residents who have disclosed prior sexual victimization during risk screening, residents who have made a report of sexual abuse or sexual harassment at the facility, and residents who have been placed in isolation for being at risk for sexual abuse. There was one youth who was identified as having a cognitive disability, as outlined in the youth protocol questions. The youth was interviewed, indicating he understood the information presented in a manner he understood.

Based on the auditor's observations during the site visit, informal conversations with staff and residents during the site visit, and a review of the demographics noted on the youth roster, the auditor found no evidence to contradict the targeted categories listed as none. The auditor took into consideration factors such as demographics, housing units, age, and length of time at the facility, and programming when selecting the random residents. Due to there being no youth for the targeted categories, the auditor interviewed 15 youth detained at the facility.

The auditor utilized questions from the Juvenile Resident Survey found on the PRC website when conducting these interviews and documented them on a modified questionnaire form. As a result of the resident interviews, the auditor concluded that they all received PREA education at this facility on the same day of arrival. Some of the residents had been at other DJJ facilities and received training there as well.

As a result of the resident interviews, the auditor concluded that they all received PREA education at this facility on the same day of arrival. Some of the residents had been at other DJJ facilities and received training there as well. They explained that the information provided to them at intake was discussed with them in a one-on-one setting by the intake officer and that they understood the zero-tolerance policy and ways to make a report of sexual abuse and sexual harassment. They explained that the information provided to them at intake was discussed with them in a one-on-one setting by the intake officer and that they understood the zero-tolerance policy and ways to make a report of sexual abuse and sexual harassment. All 15 residents interviewed said they received PREA information from the intake officer within the first 1-2 hours of arriving at the facility. They all said they had watched the Commissioner's video in the intake area upon admission.

The auditor asked each resident to explain what they had learned from the video and staff presentation of the information, and what they had been told by staff about the zero tolerance for sexual abuse and sexual harassment, and their rights. Each used their own words to describe what they remembered and conveyed the information to the auditor based on their communication capabilities. The residents explained that the video included information about PREA, grievances, bullying, and other information about their rights. The residents also told the auditor that they met with a counselor who also told them about PREA. All residents interviewed were able to articulate to the auditor their knowledge of the facility's prohibition of any form of sexual activities between youth, between youth and staff, between youth and volunteers or interns; that the agency has a zero tolerance policy regarding sexual abuse and sexual harassment; that they have a right to be free from sexual abuse and sexual harassment; they were all able to explain at least three methods available to them to report an incident of sexual abuse or sexual harassment or retaliation. The most common answers were to tell an officer or call the ombudsman's office. They were aware of the third-party reporting and knew that they could tell someone on the outside who could make the report on their behalf. Overall, the auditor concluded that they all had a good understanding of their right to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents. Additionally, they understood the agency's and facility's rules about PREA, various methods to report an incident, and what would happen if they reported an incident.

New admission was provided with a formal orientation presentation on admission to Bob Richards RYDC, which includes a verbal review of the youth handbook, a Youth Prison Rape Elimination Act (PREA) Brochure, a review of all topics on the PREA Youth Acknowledgement Statement, and a viewing of the Commissioner's video. The PREA Youth Acknowledgement Statement covers prohibited acts and activities, information concerning sexual abuse/harassment intervention, self-protection, reporting sexual abuse and sexual harassment methods, and the right to be free from retaliation. LEP youth are provided with an interpreter through the central office contracts if needed. She also explained that the video is closed captioned and that youth with limited reading skills or cognitive disabilities are provided one-on-one assistance as needed to understand the orientation, video presentation, and

written materials, which will be coordinated with the education department, as needed. After the initial orientation, the youth is seen by medical for the medical intake screening and then meets with the JDC, who provides the comprehensive age-appropriate orientation to the youth, which includes covering PREA educational materials. The Commissioner's video is a locally produced video that reinforces the agency's zero-tolerance for sexual abuse and outlines expectations for standards of conduct. The video speaks in depth to the reporting of alleged sexual abuse, child abuse, and bullying. Youth are allowed to ask questions concerning the video to ensure they have a comprehensive understanding of its meaning. During an interview with a JDC, the auditor confirmed that the counselor's portion of the orientation is always completed on the date of arrival unless the resident arrives at the facility after regular business hours, in which case the counselor meets with them the next business day.

During the orientation, the JDC meets with the youth one-on-one in their office and covers some of the same PREA information discussed during the initial intake, and ensures that the youth understands the information covered in the Commissioner's Video. The JDC reads/explains the following topics: prohibition of any form of sexual activities between youth, between youth and staff, between youth and volunteers or interns; that the agency has a zero tolerance policy regarding sexual abuse and sexual harassment; that the youth has a right to be free from sexual abuse and sexual harassment; methods that youth may use to report any incident of sexual abuse or sexual harassment or retaliation. The methods of reporting covered include a) completing a help request form; b) using the grievance process; c) dropping a note in the Director's box; d) telling a counselor, youth probation or parole officer, medical staff, or mental health staff Director or Director, parent or guardian, chaplain or minister, or any trusted adult; e) tell the legal counselor; f) using the RAINN/National Sexual Abuse Hotline, 800 numbers listed on PREA posters, GA Network to End Sexual Assault (GNESA), GA DJJ Victim Services, GA Ombudsman Office, GA Department of Human Services/Division of Family and Children Services; g) writing a confidential letter to an outside Student Handbook in English and Spanish and the PREA Specialist explained that it can be translated into other languages upon request. At the end of the orientation, youth are asked to sign the orientation form, which also notes that they received comprehensive PREA training.

115.333(c): Based on a memorandum and interview with the agency's PREA Coordinator, the designated PREA training was delivered to all youth housed at a DJJ facility and documented by signed PREA Acknowledgement Forms as a baseline for the agency's initial PREA roll-out. The same intake and orientation process is repeated each time a youth transfers from another facility. Youth interviews (15) confirmed that they were educated on the agency's zero-tolerance policy on sexual abuse and sexual harassment as described in the documentation review of this standard.

115.333(d): Policy 23.1 establishes that education staff will provide youth under the Individuals with Disabilities Education Improvement Act (IDEA 2004) 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 as outlined in Policy 13.32, Special Education Services. In addition, accommodation will be made following Policy 15.10, Language Assistance Services, to ensure that youth who are limited English proficient (LEP), deaf, or disabled can report sexual abuse to staff directly, through interpretive technology, or non-youth interpreters. The facility had no LEP youth assigned during the site visit, nor during the 12 months preceding the audit; therefore, the auditor tested the facility's access to interpretation services. The auditor reviewed the contracts for services with Ad Astra, Lionbridge, Interpreters Unlimited, LanguageLine Solutions, LATN, and Translation Station. The auditor has utilized DJJ contracted services at other DJJ facilities where they were needed to conduct interviews and found that they work directly from an open phone line. The contact information for the interpreter services was found in the main control room, the medical department, and JDCs' offices. The auditor confirmed during interviews with the facility Director, medical staff, JDCs, mental health counselors, education staff, and youth would be provided with an interpreter if needed, whether they ask for it or not, and these communications are documented in the youth's file notes. The facility Director and a teacher explained that if the facility receives a youth who is not proficient in the English language, a system will be implemented to ensure that the resident has reasonable and prompt access to an interpreter as needed. All reporting methods via telephone have English and Spanish options available.

Youth can anonymously report and access confidential emotional support services by telephone using the designated speed dial number. Informal conversations with staff confirmed that interpretation services would be accessed in a private location. Youth do not have direct access to the interpreter services, but can easily access them by requesting their JDC, a teacher, or any other staff member they feel comfortable asking. Interviews with the facility Director confirmed that accommodation will be made for any youth as required. The agency holds multiple interpreting contracts where an interpreter may be used to deliver the PREA information or to translate written documents. The auditor confirmed that all youth received the intake education in a method that they understand, regardless of disability or their rights to be free from sexual abuse, sexual harassment, and retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents, as outlined in the documentation review of this standard. language barriers.

115.333(f): Policy 23.1 establishes that the facility Director will ensure key PREA information is continuously available or visible to youth through posters, student handbooks, or other written formats. During the site visit, the auditor noticed that all DJJ sexual safety posters delineated in the evidence review above were displayed in the intake area so that youth see these upon arrival. Additionally, the auditor observed the "Break the Silence" poster, "No Means No" poster, Sexual Abuse and Sexual Harassment are Never Okay poster, and "Zero Tolerance How-To-Report" poster placed throughout the facility in readily accessible and conspicuous locations. These locations include each housing unit, multi-purpose room, education, facility entry, staff areas, main corridor, administration area, recreation area, and

	<p>medical. Additionally, handout literature was observed in the library, intake, education, and staff offices. The auditor observed all signage to be colorful and extra-large in size so they can be easily read/accessed by all youth from a distance. Signage is provided in English and Spanish and may be translated into other languages when needed. Samples of the signage displayed at the facility are located on the agency's public website at <a href="https://djj.georgia.gov/prison-rape-elimination-act-prea">https://djj.georgia.gov/prison-rape-elimination-act-prea</a>. The information provided by the signage was not obscured, unreadable, or missing, and was found to be accurate and consistent throughout the facility. Informal conversations with staff and youth verified that signage is visible throughout the facility all the time, and not just because of the audit.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard, and the facility has exceeded by consistently providing comprehensive education to residents within 24 hours.</p>
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<b>115.334</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed: Policy 8.42, Crime Scene Preservation; Policy 22.1, Sworn Law Enforcement; Policy 22.3, Internal Investigations; Policy 23.1, PREA; Policy 3.22, Personnel: Harassment; 3.22 Attachment B, Statewide Sexual Harassment Prevention Policy; GBI Evidence Protocol; GBI 2023-02 Forensic Services Update OPS Bulletin; GBI Operations Support; Investigations: Modules 1-6 Investigation Training; PREA Training Matrix; DOJ PREA Auditor Letter - Investigator Training Requirements; List of Designated PREA Investigators; Investigator Training Records; Information Obtained from Interviews.</p> <p>115.334(a)(b)(c): Policy 23.1 establishes that the Office of Investigations will receive specialized training as required by PREA standards. Specialized training includes techniques for interviewing juvenile sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or referral to the District Attorney's Office for prosecution following Policy 22.3, Internal Investigations. All PREA investigators must complete the National Institute of Corrections (NIC) online training PREA: Investigating Sexual Abuse in a Confinement Setting within 60 days after the hire date. The DJJ Office of Investigations has a PREA Investigative Unit to investigate PREA allegations statewide, comprised of a team of four investigators and an investigator/supervisor.</p> <p>Interview with the Chief Investigator and review of training records confirmed that all investigators in the unit have the required specialized investigations training and basic PREA training. The auditor reviewed the transcripts provided for all five</p>

	<p>investigators to indicate their completion of the NIC investigator's training, Fundamentals of Criminal Investigations, Interviews and Interrogations, Commercial Exploitation of Children, Child Sexual Abuse Prevention, PREA Management Training, Sexual Assault Investigations, Crime Scene Processing, Responding to Sexual Assaults, Victim Assistance Training, Investigation and Prosecution of Child Abuse, Investigation and Prosecution of Child Abuse, Investigations of Crimes Against Children, and Crime Scene Photography. Additionally, Policy 3.22 establishes that the Office of Investigations will investigate harassment allegations involving staff, and special investigations training is required. The extensive specialized training received by the PREA Unit Investigative Team is above and beyond the minimum requirements of this standard and therefore exceeds provision (b). Transcripts also confirmed that all investigators are current with their general PREA training.</p> <p>115.334(d): Policy 22.3 establishes that the DJJ Office of Investigations is the investigative authority for PREA-related cases involving youth in DJJ custody and under supervision. An interview with the Agency Head, the agency's PREA Coordinator, and Chief Investigator confirmed that the agency is responsible for conducting administrative and criminal investigations into claims of sexual abuse and does not rely on a separate entity.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard and exceeded provision (b).</p>
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<b>115.335</b>	<b>Specialized training: Medical and mental health care</b>
	<p><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p><b>Auditor Discussion</b></p> <p>Evidence Reviewed: Policy 23.1, PREA; List of Medical Staff; List of Mental Health Staff; Augusta Medical College Contract; NIC PREA Certificates; PREA Training Matrix; Modules 1-6 PREA Training; General Training Certificates; Training Transcripts; PREA Accountability Statement; Information Obtained from Interviews.</p> <p>115.335(a)(c)(d): Policy 23.1 establishes that the Office of Medical Health Care Services full, part-time, and all contract staff is required to complete the National Institute of Corrections (NIC) online training PREA: Medical Health Care for Sexual Abuse Victim in a Confinement Setting, and the Office of Behavioral Health Services full, part-time, and all contract staff is required to complete the NIC online training PREA: Behavioral Health Care for Sexual Abuse Victim in a Confinement Setting, within 60 days after hire date. In 2024, the agency added the NIC specialized training to its curriculum, and it is delivered through the online training Hub so it can be recorded on the employee/contractor individual transcript. Training records are maintained in the agency's training database. The auditor's review of the established training curriculum found it meets all topic requirements of this</p>

	<p>standard which includes how to detect and assess signs of sexual abuse and sexual harassment; how to preserve physical evidence of sexual abuse; how to respond effectively and professionally to juvenile victims of sexual abuse and sexual harassment; and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment.</p> <p>The facility indicated on their PAQ that seven medical staff and mental health staff regularly work at the facility and that they all have received the required training. The auditor reviewed rosters of medical and mental health staff, confirming these numbers along with accompanying training records. After reviewing these records, the auditor concluded that all 7 had completed the medical and mental health specialized training, as well as the required basic PREA training. Interviews with two medical and one mental health staff confirmed they were knowledgeable in detecting and assessing signs of sexual abuse and sexual harassment; preserving physical evidence of sexual abuse; responding effectively and professionally to juvenile victims of sexual abuse and sexual harassment; and reporting allegations or suspicions of sexual abuse and sexual harassment.</p> <p>Additionally, they explained their mandated reporter responsibilities and accurately outlined their responsibilities as a first responder. When reviewing training transcripts for medical staff, the auditor observed that some had recently completed the specialized training or had the training multiple times, even though they had been employed longer. During an interview with the statewide Medical Managing Director, the auditor learned that a directive was issued for all contract medical staff to complete the agency's curriculum of specialized training in the HUB system during 2024-2025 to ensure that the training was accurately recorded in their records and to provide refresher training on the specialized topics. Since the standard requires the specialized training to be taken once, and the medical staff recently took the training as a refresher, the agency has exceeded the minimum requirements of this standard.</p> <p>115.335 (b): Medical staff employed by the agency do not conduct forensic examinations; therefore, the facility and agency are exempt from this provision.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard and exceeded due to all medical staff taking the medical and mental health specialized training refresher during the 12 months before the audit.</p>
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<b>115.341</b>	<b>Obtaining information from residents</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	Evidence Reviewed: Policy 11.1, Medical Intake Screening; Policy 11.2, Nurse health Assessment and Physical Examination; Policy 12.10, Mental Health Screening; Policy

15.6, Access to Mail; Policy 17.1, Admission to a Secure Facility; Policy 17.3, Custody and Housing Assessment; Policy 23.1, PREA; Policy 23.3 Lesbian, Gay, Bisexual, Transgender, Intersex (LGBTI); PREA Accountability Statement; PREA Screening Reports (PSR); Custody and Housing Assessments and Reassessments; 23.3 Attachment B, Sexual Orientation, Gender Identity and Expression (SOGIE) Assessment; 23.3 Attachment A, Transgender/Intersex Declaration of Preference Statement; Documentation of Housing and Programming Decisions; PREA Assessment Screening Report Training Guide (May 2024); PREA Accountability Statement; Screening Reports of Youth interviewed on-site; Observations During Site Visit; Information Obtained from Interviews.

115.341(a)(b)(c)(d): Policy 23.1 establishes that as soon as possible, but always within 72 hours of a youth's arrival to a facility, the PREA Compliance Manager will obtain and use information about each youth's personal history and behavior to reduce the risk of sexual abuse by or upon a resident. The facility Director, lieutenant level or higher designee, and PREA Compliance Manager review the PREA screening report to make the final determination of the youth's vulnerability to victimization. When a youth is admitted to a secure facility, the youth is screened for vulnerability to victimization and sexually aggressive behavior before room assignment. The PREA Compliance Manager reviews room assignments made by staff to confirm that considerations were given to a youth's potential for victimization or predatory behavior and that the assignment was made appropriately. Interviews with intake staff confirmed that housing placements are based on the results of the Custody and Housing Report. All youth are afforded a single-occupancy room. The facility indicated on the PAQ that 342 youth entered the facility (either through intake or transfer) within the past 12 months, whose length of stay in the facility was for 72 hours or more, and all were screened for risk of sexual victimization or risk of sexually abusing other residents within 72 hours of their entry into the facility.

Policy 17.3 establishes that a Housing Assessment is needed for supervision, additional safety precautions, or separation from certain other youths. Completed for all youths before assigning them to a room. This assessment is used to determine the appropriate housing placement within the facility and is used for both assessment and reassessment. The Custody Assessment is used in conjunction with the Housing Assessment to ensure the safe placement of youth. Each facility completes the Custody (Security and Stratification) Assessment and the Housing Vulnerability Assessment for each youth upon admission and then again every 90 days or more often when required.

The agency's risk assessment system was updated in 2024, and a new training guide was issued to all affected staff. Policy 23.1 states that youth vulnerability assessments will be conducted and documented by generating the PSR. Policy 23.1 also establishes that the youth's information will be ascertained through conversations with the youth during the intake process, Mental Health Screening, Medical Screening, Nurse Health Appraisal, Medical Physical Examination, education documentation, and other relevant documents from the youth's files or JTS. Information from the screening and other resources is populated into the youth's

PSR. The auditor reviewed the PSR form and the User Guide for completing the screening and found the instrument to be objective and to ascertain the required information delineated in this provision, including prior sexual victimization or abusiveness; any gender nonconforming appearance or manner or identification as lesbian, gay, bisexual, transgender, or intersex (LGBTI), and whether the resident may therefore be vulnerable to sexual abuse; current charges and offense history; age; level of emotional and cognitive development; physical size and stature; mental illness or mental disabilities; intellectual or developmental disabilities; physical disabilities; the youth's perception of vulnerability; and any other specific information about the individual youth that may indicate a heightened need for supervision, additional safety precautions, or separation from certain other youths.

Before the site visit, the auditor was provided with a list of youth who were admitted to the facility between November 2024 through November 2025, and the auditor randomly selected 20 residents for document review prior to the site visit. The auditor also reviewed screening documents for 15 residents at the facility during the site visit, resulting in a total of 35 Of the PSRs reviewed, the instruments were completed within 72 hours. The auditor observed a Custody and Housing Assessment for this youth whose PSR was not completed within 72 hours and found that it was completed on the same day the youth arrived.

The auditor determined that the facility has met substantial compliance with the requirement to complete the risk screening within 72 hours. The PREA Compliance Manager and two staff that perform the screening instrument explained during their interview that the screening instruments are completed within the first few hours of admission, well within the 72-hour requirement. This also includes youth admitted over the weekend, from Friday to Sunday.

Interviews with the three intake officers who perform the screening assessment, medical staff, and mental health staff confirmed that residents are screened upon admission to the facility or transferred from another facility for risk of sexual abuse victimization or sexual abusiveness toward other residents. These interviews and the auditor's review of the PSR training guide found that information for the risk assessment is collected from court documents, historical information from prior incarcerations, medical assessments, mental health assessments, and intake interviews. Interviews with 15 residents verified that they were asked questions like whether they have ever been sexually abused in the past, whether they identify with being gay, bisexual or transgender, whether they have any disabilities, and whether they think they might be in danger of sexual abuse at this facility during intake. All youth told the auditor that these interviews were conducted privately without anyone else being able to hear their responses.

Collectively, all information obtained from asking the questions from the risk screening instrument by the intake officer and medical staff is entered into the system. This information gets calculated in with information collected during the Custody and Housing Assessment to determine a youth's risk level. A Custody and Housing Assessment is completed on every youth before assigning a housing location. The final review of the PSR is conducted by the PREA Compliance Manager.

	<p>An interview with the agency’s PREA Coordinator and facility Director also found that information is entered into the system at each level of interview and during assessments conducted upon the youth's arrival to a facility, to include information obtained from reviewing court records, case files, and behavior records, which collectively produces the PSR and subsequently determines the youth's risk for sexual vulnerability or aggressiveness. The auditor observed the area of the facility where the screening process occurs and verified that it is in a setting that ensures as much privacy as possible. All youth are assessed upon arrival, even if they have been at the facility prior or if they are transferring in from another DJJ facility. The auditor reviewed 14 Custody and Housing Assessments during the file reviews that confirmed reassessments are conducted periodically, throughout the residents' assignment to the facility, as required by (a)-4. Policies 21.1 and 17.3 require that the resident's risk level be reassessed periodically throughout their confinement. While on-site, the auditor observed a youth intake, and the intake staff completed the required screening instrument in a private office setting and completed the assessment per policy and standard requirement.</p> <p>115.341(e): Policy 23.1 establishes that the facility will control the dissemination of the youth's information by complying with all applicable disclosure requirements and the facility’s PREA Compliance Manager. The dissemination of information ensures that sensitive information is not exploited to the residents' detriment by staff or another resident. User access is highly controlled, and unauthorized attempts to access the information in the PSR by someone other than an authorized PREA officer will result in a message display of "User does not have permission to access PREA Screening Report".</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency have demonstrated compliance with all provisions of this standard and the facility exceeds based on the PSR sampled being completed within 24 hours and the daily maintenance of a Youth File Audit to track timeliness of risk assessments and noted risk factors to be used in accordance with 115.342.</p>
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<b>115.342</b>	<b>Placement of residents</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<p><b>Auditor Discussion</b></p> <p>Evidence Reviewed: Policy 8.1, Security Management; Policy 8.8, Use of Isolation; Policy 15.11, Request for Services; Policy 17.3, Custody and Housing Assessment; Policy 18.4, Work Activities for Youth; Policy 23.1, PREA; Policy 23.3, LGBTI; PSR; Custody and Housing Assessments; 23.3 Attachment B, Sexual Orientation, Gender Identity and Expression (SOGIE) Assessment; 23.3 Attachment A, Transgender/ Intersex Declaration; PREA Screening Report Training Guide, May 2024; Bob Richards RYDC Custody and Housing Plan; Observations During Site Visit; Information Obtained During Interviews.</p>

115.342(a): Policy 23.1 establishes that the PREA Compliance Manager will disseminate the PSR results to the facility management team on a need-to-know basis. The facility uses information from the risk screening required by §115.341 to inform housing, bed, work, education, and program assignments to keep all residents safe and free from sexual abuse. Policy 17.3 mandates a Housing Assessment for all youth before room assignment. This assessment determines the suitable housing placement within the facility for both initial and ongoing evaluations. Each facility completes the Custody (Security and Stratification) Assessment and the Housing Vulnerability Assessment for each youth upon admission and then again every 90 days or more often when required.

The auditor reviewed 35 PSRs and Custody and Housing Assessments for youth randomly selected by the auditor, confirming, based on this sample, that the facility conducts the initial assessment and reassessment at least every 90 days and any time a special incident report is generated involving the resident. An interview with the facility Director and PREA Compliance Manager confirmed implementation of a system that ensures that staff members working directly with the youth are informed of the status of at-risk youth or youth posing a risk to others.

The PREA Compliance Manager reviews the PSR for each youth admitted to the facility and ensures that the residents have been properly housed and that any referrals needed have been made. The facility treatment team members continually review the youth's adjustment within the facility. Information from these reviews helps assign housing, beds, programs, and work to ensure youth safety from sexual abuse. The detailed information gathered is solely used for evaluating the youth's risk in relation to management and security decisions and is not disclosed to line staff.

Interviews with programming and security staff confirmed that staff work closely together to communicate and share necessary information that can impact the safety of residents and staff at the facility. The PSR pulls information from a variety of sources and interfaces with the Custody & Housing Assessment information (explained in 115.341). The PSR calculates risk potential, including 1) vulnerability, 2) sexually abusive behavior, 3) violent/aggressive behavior. The risk level can be adjusted during the youth's Custody & Housing Assessment, based on new information or every 90 days, considering any additional data provided and the youth's behavior in the institution.

The auditor reviewed notes from the youth interviews, the current housing roster, initial screening forms (PSR), Custody & Housing Assessment reports, and information collected from conversations with staff. Based on the analysis of this data, the auditor verified that youth housing and programming decisions use the information from these assessments. The facility currently houses males only with a total bed capacity of 64. There are four pods plus the intake area where youth are housed. Youth participate in recreation in the gymnasium during in-school gym class and during after-school recreation. They are allowed to participate in additional facility events as appropriate, just like the youth from the other four pods. All rooms are single occupancy throughout the facility and doors are secured. The Custody

and Housing Plan establishes protocols to ensure safe housing for all youth. In cases where youth cannot be separated by unit, youth who are vulnerable to sexual abuse based on the PSR are placed near the officer's station. In cases where a youth is potentially vulnerable, but also potentially sexually aggressive, that youth is housed near the officer's station. Residents attend programming, education, and recreation with their unit; therefore, daily movement does not allow for the housing units to mix. Movement of youth is controlled and is coordinated in pre-assigned groups within each housing unit, which also provides a means of keeping youth separate, as needed, who reside in the same unit. On special occasions, the facility may have a full facility activity at which time additional staff are present to provide more supervision during the activity; otherwise, youth are kept separated by housing units and within movement groups.

115.342(b)(h)(i): Policy 23.1 establishes that youth may be isolated from others only as a last resort when less restrictive measures are inadequate to keep them and other youth safe, and then only until an alternative means of keeping all youth safe can be arranged. If a youth is separated for safety reasons, the facility must document the basis for the concern; the reason(s) why no alternative means of separation can be arranged; and conduct a weekly review to determine if there is a need for continued separation from the general population. Policy 8.8 governs the use of isolation for youth. Before placing a youth in isolation, every least-restrictive measure has been considered, and they cannot be held for more than four hours of continuous isolation. The facility reported on the PAQ that no residents at risk of sexual victimization were placed in isolation. This was confirmed by the facility Director and PREA Compliance Manager during their interviews. As there were no youth placed in isolation for sexual safety purposes, no documentation was available for review. Any youth placed in isolation continues to receive education and program services, and small muscle activities during isolation status, but if exigent circumstances existed where services were unable to be provided, they would be appropriately documented. Interviews with medical and mental health staff confirmed that they make rounds at least once daily, if not more frequently, for any youth in isolation status, regardless of the reason. A review of the case files verified that the youth were not placed in isolation following a report of sexual abuse or sexual harassment.

115.342(c)(d)(e)(f): Policy 23.1 establishes that each youth in a secure facility will be housed based on their custody and housing assessment. Custody and housing assignments are not based solely on the youth's sexual orientation or gender identity. Housing, bed, program, education, and work assignments are based on information obtained from assessments and screenings. The facility makes individualized determinations about how to ensure the safety of each youth. Youth who identify as LGBTI are not assigned specific housing, beds, or other placements solely based on their identification or status. Furthermore, the facility does not consider LGBTI identification or status as a factor for increased risk of sexual abuse. Policy 23.1 also establishes that when assigning a transgender or intersex youth to a male or female facility, staff considers on a case-by-case basis whether a placement would ensure the youth's health and safety and whether the placement

would present management or security problems. Such placements and programming assignments are reassessed monthly, or sooner if necessary, to review any threats to safety experienced by the youth. Serious consideration is given to the youth's views concerning their safety.

Policy 23.3 requires that if a youth identifies as LGBTI, the SOGIE Assessment (23.3 Attachment B) must be completed within 2 hours to assist with custody and housing assessment. The policy mandates that transgender or intersex youth complete the Transgender/Intersex Declaration of Preference Statement (23.3 Attachment A) to guide housing and management decisions. The auditor requested SOGIE Assessments and Transgender/Intersex Declaration of Preference Statements for four residents who answered yes to the question of identifying with LGBTI. Both residents had a SOGIE form completed, and one of the residents identified as transgender, and the Transgender/ Intersex Declaration of Preference Statement (23.3 Attachment A) form was completed, and Custody and Housing Assessments were completed as required. The four youth were released from custody before the site visit, and no youth identified as LGBTI present to interview. The auditor's review of PSRs for the youth currently housed at the facility further confirmed that no youth housed at the facility during the site visit had disclosed a sexual orientation of gay, lesbian, or bisexual, and no youth identified as transgender or intersex during the intake screening.

Policy 23.3 further establishes that placement and programming assignments for transgender or intersex youth will be reassessed at least every 30 days, or as needed, based on the safety and well-being of the youth, by the PREA Compliance Manager and the facility leadership team in consultation with the youth's treatment team to review any threats to safety experienced by the youth.

Policy 23.1 directs that changes in the youth's housing placement should not be based solely on the youth's gender identity but on the youth's safety and well-being. All reviews of housing decisions are recorded in JTS. Since policy requires that transgender or intersex youth be reassessed at least every 30 days, the agency exceeds provision (e), which requires the reassessment to occur at least twice yearly. Additionally, Custody and Housing Assessments are conducted on all residents at least every 90 days, which would provide four assessments per year instead of the two required.

The agency does not have dedicated housing based on a resident's sexual orientation based on review of the agency's policy, housing roster and interviews with the agency's PREA Coordinator, facility Director, PREA Compliance Manager, and medical and mental health staff confirmed that each youth is assessed individually and given a treatment plan that considers all information available to staff and the youth's own perception of safety and needs when making decisions about where they will be housed. An interview with the three intake officers verified that if, during intake screening, a youth identifies as transgender or intersex, they would notify the facility Director and PCM immediately for guidance on appropriate initial housing for the youth. Interviews with the facility Director and PREA Compliance Manager confirmed that medical and mental health staff would be

	<p>consulted, and the central office Victim Services office would be contacted for additional guidance.</p> <p>115.342(g): Policy 23.3 and the facility's 23.3 PREA LOP establish that staff will provide transgender youth with safety and privacy when using the shower and bathroom and when dressing and undressing. Transgender or intersex youth will not shower or undress in front of other youth. Interviews with 15 random staff members confirmed that transgender/intersex youth will be allowed to shower separately upon request. All youth are afforded privacy during showers and while changing clothes.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard and exceeded the requirements based on the frequency required for completion of the Housing &amp; Custody Assessment for all residents at least every 90 days, and review of transgender residents every 30 days. Additionally, the facility exceeds the daily maintenance of a Youth File Audit to track the timeliness of risk assessments and noted risk factors to be used in making housing, programming, and education decisions.</p>
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<b>115.351</b>	<b>Resident reporting</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Evidence Reviewed: Policy 8.5, Special Incident Reporting; Policy 15.2, Grievance Process; Policy 15.3, Youth Access to Courts and Counsel; Policy 15.4, Viewing, Listening, and Reading Materials; Policy 15.5, Youth Visitation; Policy 15.6, Access to Mail; Policy 15.7, Access to Telephone; Policy 15.9, Ombudsman; Policy 17.1, Admission and Release; Policy 23.1, PREA; 17.1 Attachment A, Notification of Foreign National in Detention; Consular and Trade Offices Contact Information/ Manual; Consular and Trade Offices Contact Poster published by Georgia State Government; Bob Richards RYDC Ombudsman Calls; Tip Line Calls; 8.5 Attachment C, Youth Statement for Record; 15.2 Attachment A, Grievance Form; Reporting Sexual Abuse or Contacting Advocacy Services Outside the Facility (Emotional Support Flyer); Tip Submission Form from DJJ Website; MOU with Harbor House CAC; 115.351 Statement Civil Immigration; PREA Accountability Statement; Observations During Site Visit; Information Obtained from Interviews.</p> <p>115.351(a)(b): The DJJ provides multiple internal ways for youth to report sexual abuse, sexual harassment, retaliation by other youth or staff for reporting sexual abuse, and violation of responsibilities that may have contributed to an incident of sexual abuse that is easily understood, private, and secure. Youth assigned to a secure facility may report sexual abuse or seek relief against retaliation by completing a Help Request Form; using the grievance process; telling a counselor,</p>

community case manager, medical or mental health staff, Director or Director, Parent/Guardian, Chaplain or Minister, facility PREA Compliance Manager, or any trusted adult; writing to the DJJ Ombudsman Office at the Central Office or calling toll free at 1-855-396-2978.

The auditor observed postings throughout the facility, in common areas, and in each housing unit, which included these various reporting methods. In addition to signage, reporting method information is available through pamphlets, the resident handbook, and other written material. DJJ provides multiple ways for residents to report abuse or harassment to a public or private entity or office not part of the agency. calling the external toll-free number to the National Sexual Abuse Hotline 1-800-656-HOPE (4673) or selecting the speed dial #2 from the housing unit phone for an anonymous call; the Department of Family and Children Services Hotline at 855-422-4453; Crisis intervention/Advocacy Support Services (by mail); Children's Healthcare of Atlanta at 404-785-3820.

Policy 23.1 establishes that the facility shall give youth mailing addresses and telephone numbers (including toll-free hotline numbers) for agencies providing immigrant services for youth detained solely for civil immigration purposes and enable reasonable communication between youth and the organizations as confidentially as possible. The facility keeps a copy of the United States Department of State Consular Notification and Access book as part of its civil immigration resources. This book was provided to the auditor for review, along with contact information. The agency does not detain youth solely for civil immigration purposes, and the facility Director provided a statement that there were no residents detained solely for civil immigration purposes during the 12 months preceding the audit. The auditor confirmed that this information is accessible to non-citizen youth at the facility. The facility also has a pamphlet with the toll-free number for the U.S. Immigration and Customs Enforcement (ICE) and would utilize 17.1 Attachment A, Notification of Foreign National in Detention, should they admit a non-citizen youth. Written correspondence is also an acceptable avenue for residents to report sexual abuse and harassment outside the facility and agency. The facility ensures that the youth's correspondence addressed to the designated external reporting entity remains unopened.

The facility provided an email from the Ombudsman's Office stating there were no complaints filed by a resident during the 12 months preceding the audit. The facility provided an email from the Victim Services Office stating there were no PREA calls reported to their office during the 12 months preceding the audit. While on-site, the auditor tested the reporting line by using the Victim Services option, the call went to voicemail, and the auditor was unable to leave a message. The result was shared with the PREA Coordinator and Compliance Manager to notify the relevant parties to address and correct the issue. Before the end of the site review, this matter was resolved, and the auditor re-tested the Victim Services reporting option, resulting in a successful call.

During the site visit, the auditor observed signage posted that provides the direct phone number and mailing address for the Children's Healthcare of Atlanta,

Stephanie V. Blank Center, and direct phone number for the DJJ Ombudsman Office and Victim Services Office to report a PREA allegation; however, the youth must enter their assigned PIN to place the free call. The youth are provided with a speed dial system that enables them to make unmonitored calls to the Ombudsman and Victim Services offices. They have the option to remain anonymous if they choose. These voice prompts are accessible through the housing unit phone. Dialing instructions are posted near the phone banks in each dayroom/housing unit. The instructions are simple and easy to follow. The auditor placed a test call to the Ombudsman (#4) and spoke with representatives who explained that if a report is received in this manner from a youth that they would take as much information as the caller wanted to provide, allowing them to remain anonymous if requested, then forward a copy of the complaint to the facility Director, PREA Coordinator, and the Office of Investigations, PREA Unit. The Ombudsman's Office provided an email confirming the successful test call. The auditor called speed-dial #2 and reached the National Sexual Assault Hotline and found that they will provide confidential 24/7 support and will report sexual abuse on behalf of the victim with their consent.

During interviews with 15 residents, the auditor found they were all aware of how to use the speed dial system to make a PREA report. They were knowledgeable that they could tell any "trusted adult", an officer, make a report in writing, file a grievance, write to the facility Director or any other staff, or through a medical sick call request. They also knew they could make a report for someone else or someone else could make a report for them. The auditor's interviews with 15 random staff found that they are aware of the various methods that youth can make a private report of sexual abuse/sexual harassment, and were aware that they were to accept a verbal, written, anonymous, or third-party report. Half of the random staff interviewed had a challenging time providing the auditor with several ways they could privately report resident sexual abuse, such as going outside of their chain of command, should they feel it is necessary to privately report sexual abuse and sexual harassment of youth by reporting to the Tip Line or going directly to the Office of Investigations PREA Unit Chief. As a result, the auditor recommended remedial staff training on this topic before the issuance of this report. The PREA Coordinator and Compliance Manager provided the auditor with documentation indicating the training was completed promptly and before the completion of the final report. The facility Director explained that residents can privately report sexual abuse or sexual harassment, retaliation by other residents or staff for reporting sexual abuse and sexual harassment, or staff neglect to any staff, to the PREA Hotline, Ombudsman, or Victim Services. The auditor observed during the site visit locked boxes labeled for the Grievances, Mail, and Help Requests in the main corridor and housing units.

115.351(c)(d): Policy 23.1 establishes that all Facilities/Programs/Offices shall comply with DJJ 8.5, Special Incident Reporting when reporting sexual abuse and sexual harassment, including verbal, anonymous, and third-party reports, occurring on DJJ or DJJ-contracted property. Policy 8.5 states that all staff, volunteers, interns, and contractors having first knowledge of an incident or receiving a report of an alleged incident will report immediately, as outlined in the specific protocols, and

	<p>follow up with a written report (SIR). The staff member filing the SIR will verbally report the incident to their immediate SIR. The auditor's review of Policy 15.4 and interviews with 15 staff and 15 youth, and personal observations of property in youth rooms during the site visit confirmed that youth can possess writing utensils and have access to paper, envelopes, and postage. There were two residents at the facility who had reported sexual abuse or sexual harassment at the facility during the 12 months preceding the audit. During the resident interviews, one youth who reported sexual abuse shared information about the incident, specifically, the facility and staff followed the response plan.</p> <p>115.351(e): The agency has established procedures for staff to privately report sexual abuse and sexual harassment of residents by using the Stop Crime Online, the Intelligent Tip Line Form, or a third-party private reporting method to report sexual abuse, sexual harassment, and retaliation. DJJ honors all anonymous third-party private reporting. Inquiries and complaints may also be submitted to the DJJ Ombudsman's office by email at <a href="mailto:djjombudsman@djj.state.ga.us">djjombudsman@djj.state.ga.us</a> or by calling 1-855-396-2978. These procedures are communicated to staff through policy and training.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard.</p>
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<b>115.352</b>	<b>Exhaustion of administrative remedies</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Evidence Reviewed: Policy 15.2, Grievance Process; Policy 23.1, PREA; Grievance Log; Student Handbook English and Spanish; PREA Accountability Statement from Facility Director; Observations During Site Visit; Information Obtained from Interviews.</p> <p>115.352(a): Residents are allowed to submit a grievance regarding an allegation of sexual abuse and/or sexual harassment at any time, regardless of when the incident is alleged to have occurred. Grievance forms may be placed in locked boxes located in each housing unit marked "Grievances". The boxes observed grievance forms. The facility will not discipline a youth for filing a grievance alleging sexual abuse unless the facility demonstrates that the youth filed the grievance in bad faith. Policy 15.2 Grievance Process indicates a directive clarifying that any grievance that involves PREA shall follow the procedures in Policy 23.1, Prison Rape Elimination Act, rather than the procedures of Policy 15.2, Grievance Process. Based on the FAQ published on July 19, 2022, an interview with the PREA Coordinator and PCM, and the language in the agency's grievance process policy, the agency is exempt from 115.352. Grievances alleging sexual abuse will be processed immediately, but no later than 24 hours of retrieval, and assigned for investigation following agency</p>

	<p>protocols. The auditor's review of the SIRs and investigative case files found that zero allegations were reported through the grievance process. On the second day of the on-site visit, the auditor tested the youth grievance system by placing a grievance letter into the box located on the living unit, resulting in the facility's PREA Coordinator notifying receipt within policy requirements.</p> <p>Grievances alleging sexual abuse will be processed immediately, but no later than 24 hours of retrieval, and assigned for investigation following agency PREA investigative protocols. The auditor observed the designated boxes and forms that were available to residents at any time. Additionally, the agency has recently implemented a telephone system for use by residents to file a grievance, which goes directly to the facility's designated grievance clerk (Director of Programs) office. The auditor reviewed the grievance log from the past twelve months and observed zero grievances coded as PREA. An interview with the Grievance Officer confirmed that there were zero allegations received through the facility's grievance process related to sexual abuse or sexual harassment during the 12 months preceding the audit and that each allegation was referred to the Office of Investigations PREA Unit. When an allegation of sexual abuse or sexual harassment is received on a grievance, it is immediately reported to the PREA Compliance Manager and the facility Director, who will ensure it is sent to the Office of Investigations PREA Unit. During an interview with the Facility Director, the auditor confirmed that any allegation reported using a grievance form would be immediately referred to the Office of Investigations, PREA Unit Chief Investigator, according to the established PREA investigative protocols.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency are compliant with this standard through exemption.</p>
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<b>115.353</b>	<b>Resident access to outside confidential support services and legal representation</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Evidence Reviewed: Policy 15.11, Request for Services; Policy 15.3, Youth Access to Courts and Counsel; Policy 15.5, Youth Visitation; Policy 15.6, Access to Mail; Policy 15.7, Access to Telephone; Policy 15.9, Rights of Youth Ombudsman; Policy 23.1, PREA; Attachment 23.1F, Consent to Disclose Protected &amp; Confidential PREA Related Information; CSEC Response Pamphlet and First Responder Guide; Consular and Trade Offices Contact Information/Manual; CSEC Response Contact Sheet and Comprehensive Assessment Handout; Youth Consent to Disclose Protected and Confidential PREA Information; Emotional Support Flyer/Poster; Memo: Children's Healthcare of Atlanta, Stephanie V. Blank Center; Harbor House CAC MOU; Office of Victim Services Brochure; Student Handbook (English &amp; Spanish); Onsite Corrective Action; Self-initiated CAP; Observations During Site Visit; Information Obtained from</p>

Interviews.

115.353(a)(b): Policy 23.1 establishes that the facility will provide youth 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, and for youth detained solely for civil immigration purposes, immigrant services agencies. During orientation, staff inform youth about the monitoring of their communications. The facility allows reasonable communication between the youth and these organizations in as confidential a manner as possible. Upon arrival at each DJJ facility, youth are advised that while in DJJ facilities, they are under constant supervision by staff and other electronic equipment. DJJ informs youth at intake that by law, they must report any abuse allegations, regardless of whether the incident occurred in a DJJ facility or before. The facility presented signed DJJ Attachment 23.1F, Consent to Disclose Protected & Confidential PREA Related Information for 34 youth admitted during the 12 months prior to the audit and selected by the auditor for review. The facility reported that no youth have requested outside victim advocacy.

There was one youth at the facility during the site visit who reported sexual abuse to interview. Interviews with 15 youth confirmed that they are aware their communications are monitored by the facility through cameras and staff presence; furthermore, they know that telephone calls made from the housing unit phones may be monitored and recorded. The auditor asked the intake staff to explain how the youth are told about limitations of confidentiality regarding disclosure of information collected during the PREA screening, and was told that during intake, Attachment 23.1F, Consent to Disclose Protected & Confidential PREA Related Information form is covered with each youth admitted to the facility.

They explained that this form explains to the youth that DJJ is required by law to report all claims of abuse, including sexual abuse and sexual assault, whether or not the alleged incident occurred on DJJ property or while they were in DJJ custody; that DJJ staff are mandated reporters and are required by law to report; any alleged incident must be reported to the Department of Facility and Children Services (DFCS). Once this is discussed by staff members with each youth, they are required to sign and date the form. During the site review, the auditor observed contact information for advocacy resources available to youth.

During an interview with the agency's PREA Coordinator, the auditor was informed that the DJJ partners with Children's Healthcare of Atlanta (CHOA), Stephanie V. Blank Center, a child advocacy service providing comprehensive medical and forensic evaluations, behavioral health assessments and counseling, and medicine and distance learning. This center is covered by EMTALA. As a partnering entity with EMTALA, DJJ does not need an MOU to benefit from these services. The agency publishes and distributes an Emotional Support Flyer (Break the Silence! Posters) to all facilities for posting. This flyer provides the telephone number and mailing address for CHOA-Stephanie V. Blank Center for Safe and Healthy Children for access by youth. The Stephanie V. Blank Center is listed as the outside victim

advocate for emotional support on these posters, which includes the direct phone number and address of the center. The auditor observed this flyer posted in each housing unit, the multi-purpose room, corridors, staff areas, recreation area, and education area. Youth can easily read and access this flyer.

The signage language is clear, easy to understand, and at an appropriate reading level for the youth housed at Bob Richards RYDC. Signage is available in English and Spanish, with translation options for other languages upon request. The signage text size, formatting, and physical placement accommodate most readers, including those of average height, low vision/visually impaired, or those physically disabled. The signage information is clear, unobstructed by graffiti, and undamaged. The auditor verified that the information on the signage is accurate and consistent throughout the facility. Speed dial instructions for contacting external advocates (RAINN) are posted next to telephones and on PREA posters in each housing unit, multi-purpose room, corridor, staff area, recreation area, and education section. Additionally, these instructions are communicated via a recorded message when the caller picks up the phone handset before dialing. These dialing instructions are provided in both English and Spanish. The facility provides the mailing address and phone number of U.S. Immigration & Customs Enforcement, 500 12th Street SW, Washington, D.C. 20536, 404-346-2300 for non-citizen youth access and information from the Consular and Trade Offices Contact list published by Georgia. The agency does not detain youth solely for civil immigration processing.

The facility provided an MOU with The Harbor House Child Advocacy Center, which is the local community service provider that would provide advocacy and counseling services to youth who are victims of sexual abuse, and offer consultation on issues or situations where the expertise of CAC would benefit the youth. Both the facility Director and PREA Compliance Manager confirmed that youth victims may receive services from the Children's Treehouse CAC or the Stephanie V. Blank Center and that they can contact these services directly by phone or mail, contact the Victim Services Office who can connect them, or speak with their JDC or mental health counselor to obtain assistance with making contact. Youth may contact RAINN using the housing unit phones and dialing speed dial-2, where they can reach an emotional support counselor.

Interviews with 15 residents found that they had some knowledge about community services and could explain what type of services are provided by these centers, and were familiar with the Harbor House CAC. Each youth interviewed understood that reporting abuse or harassment is mandatory, regardless of who they told. During interviews, youth explained they knew they could talk or write with anyone, inside or outside the facility, and that they could receive mental health counseling. The auditor tested the RAINN speed dial from a random housing unit and connected with a counselor. The auditor noted that writing utensils, envelopes, and paper were accessible to the youth. This observation was confirmed through a review of relevant policies and interviews with both youth and staff members. Residents can place mail in locked boxes on each unit. Mail is collected from these boxes Monday through Friday. There were two residents at the facility who had reported sexual abuse or sexual harassment at the facility during the 12 months preceding the

	<p>audit. During the resident interviews, one youth who reported sexual abuse shared information about the incident, specifically, facility staff providing information related to emotional support services. The second resident declined to discuss and provide information with the facility's response involving the sexual harassment incident.</p> <p>115.353(c): DJJ partners with Georgia's Commercial Sexual Exploitation of Children (CSEC) for advocacy services. As the CSEC Response provider for the state of Georgia, the CSEC Response Team, a program of the Children's Advocacy Centers of Georgia, provides direct services for victims in the form of advocacy services, assessment, intensive case management services, and facilitates training and outreach to help build infrastructure and community capacity at its 52 child advocacy centers. CHOA-Stephanie V. Blank Center and the Harbor House are both participating members of this agreement.</p> <p>115.353(d): The facility provides youth with reasonable and confidential access to their attorneys or other legal representation and their parents or legal guardians as instructed in Policy 15.3, Youth Access to Courts and Counsel; Policy 15.5, Youth Visitation; Policy 15.6, Access to Mail; and Policy 15.7, Access to Telephone. According to the facility Director, attorney visits and calls are not monitored, and residents can meet with their legal representatives at reasonable times through scheduled appointments. The facility has a private interview room that is used for this purpose. Interviews with 15 residents verified that they are allowed to meet in person or talk with legal representatives without being monitored. All youth explained that they can talk or visit with family members/friends and their Probation Officer from outside without restriction. They understand that visits and phone conversations made from the housing unit phones are recorded and monitored.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard.</p>
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<b>115.354</b>	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed: Policy 8.5, Special Incident Reporting; Policy 15.3, Youth Access to Courts and Counsel; Policy 15.4, Viewing, Listening, and Reading Material; Policy 15.5, Youth Visitation; Policy 15.6, Access to Mail; Policy 15.7, Access to Telephone; Policy 15.9, Ombudsman; Policy 17.1, Admission and Release; Policy 23.1, PREA; 17.1 Attachment A, Notification of Foreign National in Detention; Ombudsman/Tip Line Call Report; Consular and Trade Offices Contact Information/Manual; Youth Poster No Means No; See Something Say Something Pamphlet; Third-Party Tip Line Pamphlet; Observations During Site Visit; Information Obtained from Interviews.</p> <p>115.354(a): Policy 23.1 establishes that a staff, parent/guardian, youth in the</p>

community, or a residential community placement may use Stop Crime Online, the Intelligent Tip Line/Form, or any other third-party private reporting method to report sexual abuse, sexual harassment, and retaliation. DJJ honors all anonymous third-party private reporting. Inquiries and complaints may be submitted to the DJJ Ombudsman's office by email at [djjombudsman@djj.state.ga.us](mailto:djjombudsman@djj.state.ga.us) or by calling 1-855-396-2978. In addition, this information is included on signage at the facility's main entrance and in visiting areas, as well as on the agency's public website. The TIP-Line was set up to provide another channel for reporting sexual abuse, sexual harassment, staff misconduct, and policy violations. Information shared on the DJJ TIP Line can include victims' names and identify their alleged assailants, so the TIP Line can result in arrests and prosecutions. If staff or public partners have something important to report and they want to keep it anonymous, they can complete the email form on the TIP Line site. The auditor placed a test call from outside the facility and left a message, sent an email directly to the ombudsman's office, and completed the TIP form online. The auditor received confirmation that these tests were received, and had it been an actual report, the Office of Investigations Chief Investigator would have been notified. There were zero Tip Line calls, and none were related to PREA. A report provided by the Ombudsman's Office confirms there were no third-party reports received on behalf of a youth regarding sexual abuse during the 12 months preceding the audit.

During the site visit, the auditor actively observed posted and printed signage throughout the facility, which was easily readable and accessible by youth, easy to understand, and at an appropriate reading level for juveniles. Signage is posted in English and Spanish, which is the most common second language spoken in Georgia. The signage text size, formatting, and physical placement accommodate most readers, including those of average height, low vision/visually impaired, or those physically disabled/in a wheelchair. The information provided by the signage is unobscured, unreadable due to graffiti, or missing due to damage. The information on the signage is accurate. Third-party reporting information was posted at the entrance lobby of the facility and in the multi-purpose room where youth have visits with authorized family members and friends, and in the private interview rooms used for visits by legal representatives. Additionally, the DJJ website has an Online TIP Reporting Form on its public website and an application for language translations.

A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard.

<b>115.361</b>	<b>Staff and agency reporting duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Evidence Reviewed: Policy 8.5, Special Incident Reporting; Policy 8.9, Child Abuse

Reporting; Policy 23.1, PREA; 8.5 Attachment B, Staff Statement for Record; 8.5 Attachment J, Chain of Command Notification Form; 115.361 Attachment, 23.1 Attachment F, Consent to Disclose Protected & Confidential PREA Related Information; 2024 DHS Mandated Reporter Form; Observations During Site Visit; Information Obtained from Interviews.

115.361(a): The facility requires all staff to report immediately, following Policies 8.5 and 8.9, any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility or contract program, retaliation against youth or staff who reported such an incident, and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. All staff and practitioners must report sexual abuse to designated supervisors or the PREA Investigations Unit Field Supervisor. Interviews with 13 random staff and review of training material confirmed the agency requires all staff to report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility; retaliation against residents or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. There were three allegations reported during the 12 months preceding the audit and each allegation was promptly referred to the appropriate office for investigation.

115.361(b)(d)(e): Policy 8.9 establishes that the DJJ uses a standardized process for reporting and responding to child abuse allegations. All suspicions of child abuse, child neglect, youth-on-youth sexual penetration, youth-on-youth sexual contact, penetration by staff/contractor/volunteer/intern, and staff/contractor/volunteer/intern sexual contact involving any DJJ youth shall be reported immediately in compliance with Georgia law. Any sexual contact between staff and youth, regardless of whether it is consensual, is prohibited and is subject to administrative sanctions and criminal prosecution. Policy 23.1 establishes that upon receiving an allegation of sexual abuse, the facility Director or designee will promptly report the allegation to the appropriate agency office and the alleged victim's parents/legal guardian; unless the facility has official documentation showing the parents/legal guardians should not be notified. If a youth is under guardianship of the Child Welfare System, the report shall be made to the alleged victim's case worker instead of the parents or legal guardians. If a juvenile court retains jurisdiction over the alleged victim, the facility Director or designee shall report the allegation to the youth's attorney of record within 14 days of receiving the allegation. Medical/mental health staff will report all allegations of abuse/harassment to designated supervisors. When completing the required SIR, staff must complete the JPPS/Court-notified and Parent/Guardian-notified sections. Reportable incidents are made to the Georgia Department of Family and Children Services (DFCS), and according to Policy 8.9, must be made within 24 hours using the Georgia Child Protective Services Mandated Report Form. The auditor's review of documentation where residents reported prior sexual victimization during the intake process confirmed that the appropriate notification was made according to the state's mandatory reporting laws.

Interviews with 13 random staff confirmed staff received training on the agency's

zero-tolerance policy on sexual abuse and sexual harassment, how to fulfill responsibilities regarding sexual abuse and sexual harassment reporting and response, and how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities; and relevant laws regarding the applicable age of consent. Interviews also verified that they understand they are mandated reporters and must report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment to a designated supervisor or official immediately upon learning of it. Interview with the facility Director confirmed that when the facility receives an allegation of sexual abuse or sexual harassment, regardless of the method received (including third-party and anonymous) the facility Director (or the designated ADO) will notify the Regional Administrator and the Office of Investigations immediately. The parent or guardian is notified, unless the youth is under the guardianship of the State or Juvenile Court, and notification would be made to the youth's respective DFCS caseworker or the youth's attorney, as applicable. In addition, policy 8.5, Attachment J, provides a specific Chain of Command Notification list and protocol for incidents to ensure the parties who need to be made aware of an incident are notified.

115.361(c): Policy 23.1 establishes that staff are prohibited from revealing any information related to a sexual abuse report to anyone other than to make treatment, investigation, and other security and management decisions, and all staff interviewed were knowledgeable of this requirement. Notification protocols are addressed in Policy 8.5, Attachment J, which outlines the specific Chain of Command Notification list and protocol for incidents to ensure the parties who need to be made aware of an incident are notified. Interviews with 13 random staff members found that they have been trained on the prohibition to share information related to a sexual abuse report to anyone other than those who need to know. Staff understood there would be disciplinary consequences if they violated this policy.

115.361(d): Policies 8.90, 8.5, and 23.1 apply to medical and mental health staff who are also mandated reporters. Medical and mental health staff interviewed indicated that they disclose the limitations of confidentiality and their duty to report abuse during medical intake and at the initiation of services. The Consent to Disclose Protected & Confidential PREA Related Information is reviewed with each resident upon admission during intake, which is then signed and maintained in the resident's file. The auditor observed these signed documents during the review of 35 resident files.

115.361(f): All allegations of sexual abuse on DJJ property, in DJJ custody, or a residential program contracted by DJJ, including third-party and anonymous reports, must be reported to and will be criminally and/or administratively investigated by the DJJ Office of Investigations. An interview with the facility Director confirmed that all allegations of sexual abuse and sexual harassment (including those from third-party and anonymous sources) are reported directly to the PREA Unit Chief Investigator.

A systematic review and analysis of the evidence concluded that the facility and agency have demonstrated compliance with all provisions of this standard.

<b>115.362</b>	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed: Policy 8.7, Protective Custody; Policy 8.9, Child Abuse Reporting; Policy 23.1, PREA; Policy 23.2, Sexual Assault; 8.7 Attachment B, Confinement Checks Form; Bob Richards RYDC Custody and Housing Plan; Custody &amp; Housing Reports (115.341/342); Observations During Site Visit; Information Obtained from Interviews.</p> <p>115.362(a): Policy 8.7 establishes that the DJJ ensures that all youth have a mechanism by which to inform DJJ staff that they believe they are at risk of harm from others. Staff will ensure that youth who make such notifications are protected by utilizing the least restrictive alternative and that the situation is addressed as soon as possible. The facility provided the approved Custody and Housing Plan, which outlines the stratification plan for safely housing youth. The facility reported on the PAQ that there were no instances where it was determined a resident was subject to a substantial risk of imminent sexual abuse. Interviews with the facility Director, Regional Administrator, PREA Compliance Manager, medical and mental health staff, and security supervisors further confirmed there were no incidents in the 12 months preceding the audit where it was determined a resident was at substantial risk of imminent sexual abuse.</p> <p>They also explained that should they learn that a resident is subject to a substantial risk of imminent sexual abuse, they would immediately take the resident to a safe location or secure the resident in his room for monitoring until the threat could be assessed and resolved in the most appropriate means. The auditor observed that each youth is afforded a single-occupancy secure room. An interview with the Agency Head found that when a resident is subject to risk of imminent sexual abuse, the facility is trained to respond immediately, with no delay, and to make an initial assessment which includes speaking with the youth. This assessment will determine if a change in housing, facility, treatment, or services provided is needed. In the interim, the PREA Compliance Manager will monitor the situation.</p> <p>The initial assessment, which includes speaking with the youth, will determine whether changes in housing, treatment, and services are necessary or if a move to another facility is appropriate. The facility Director explained that a notification of an imminent threat will be made immediately to the Regional Administrator, with a request for transfer to another facility if the youth cannot be housed safely at Bob Richards RYDC. Which was confirmed during an interview with the Regional Administrator. The youth will be removed from the threat immediately and remain with staff if deemed necessary, mental health and medical staff will be notified, and the shift will be briefed on the situation. The 13 random staff interviewed explained that they would separate the youth from the danger and secure them in either their room or in a staff area under direct staff supervision, awaiting further direction from the facility Director. Staff are trained to respond to reports of substantial risk of</p>

	<p>imminent sexual abuse immediately.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency have demonstrated compliance with all provisions of this standard.</p>
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<b>115.363</b>	<b>Reporting to other confinement facilities</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed: Policy 23.1, PREA; Sexual Abuse Coordinated Team Response Forms; PREA Accountability Statement Form; Case Files; Information Obtained from Interviews.</p> <p>115.363(a)(b)(c): Policy 23.1 establishes that upon receiving an allegation that a youth was sexually abused or sexually harassed while confined at another facility, the Director of the facility that received the allegation will notify the Director of the facility or appropriate office of the agency where the alleged abuse occurred as soon as possible, but no later than 72 hours, and will also notify the Office of Investigations. The facility will document that it has provided the required notification. The facility indicated on the PAQ that they had not received an allegation that a youth was abused while confined at another facility, which was also corroborated during the auditor's interviews with the facility Director, PREA Compliance Manager, and the PREA Unit Chief Investigator.</p> <p>115.363(d): The agency policy requires that allegations received from other agencies or facilities are investigated following the PREA standards. The facility indicated that no allegations were received from other facilities claiming sexual abuse or sexual harassment occurred at this facility. The auditor's review of the three allegations reported during the 12 months preceding the audit found that one was received from another DJJ probation office after receiving a third-party report. This allegation was reported directly to the Office of Investigations, PREA Unit Chief. The PREA Unit Chief Investigator explained that had the allegation involved a current employee, the Regional Administrator and facility Director would have been advised of the incident to the extent that the staff would have been removed from youth contact during the investigation. Interviews with the Agency Head, PREA Coordinator, and facility Director confirmed that allegations received from another facility would be forwarded to the Office of Investigations, PREA Unit Chief, where they would be investigated, regardless of where they were alleged to have occurred or where the allegations were reported.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency have demonstrated compliance with all provisions of this standard.</p>

<b>115.364</b>	<b>Staff first responder duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed: Policy 23.1, PREA; Policy 23.2, Sexual Assault; 23.1 Attachment M, Sexual Abuse Coordinated Team Response; 23.2 Attachment A, Facility Coordinated Response to Sexual Abuse Incident; Bob Richards RYDC Coordinated Response Plan; Staff First Responder Cards; PREA Accountability Statement; Observations During Site Visit; Information Obtained from Interviews.</p> <p>115.364 (a)(b): Policy 23.1 establishes that the staff member receiving sexual abuse information will immediately refer the youth to the medical services staff for initial evaluation and determination of the need for an outside medical referral for further testing and evaluation. The first direct care staff member to respond to the allegation will take immediate action to protect and ensure the victim is safe and separate the alleged victim and perpetrator; obtain basic information such as where the incident occurred and who may be involved, but will not ask any other questions; preserve and protect the crime scene, if applicable, until appropriate steps can be taken to collect any evidence; request that the alleged victim, and ensure that the abuser, does not take any actions that will destroy physical evidence, including washing, brushing teeth, changing clothes, urinating, defecating, drinking, eating if the abuse occurred within a period that still allows for the collection of physical evidence; and, if the first staff responder is a non-direct care staff member, ensure the victim is safe and instruct the victim and perpetrator not to take any actions that will destroy physical evidence and then immediately notify direct care staff. The auditor's review of 23.2 Attachment A found concise instructions for the facility staff to follow for an incident of sexual assault, identifying the responsible staff and the task required.</p> <p>Interviews were conducted with fifteen random staff, all considered security staff. When asked if you are the first person alerted that a juvenile has allegedly been the victim of sexual abuse, what is your responsibility in that situation, fifteen (15) random staff confidently and knowingly recited the duties and responsibilities of the first responder. There were three allegations reported during the 12 months preceding the audit, and the auditor confirmed that staff actions were appropriate in each case. There were no allegations that required the collection of physical evidence other than video footage.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency have demonstrated compliance with all provisions of this standard.</p>

<b>115.365</b>	<b>Coordinated response</b>
	<b>Auditor Overall Determination:</b> Meets Standard

	<p><b>Auditor Discussion</b></p> <p>Evidence Reviewed: Policy 23.1, PREA; Policy 23.2, Sexual Assault; 23.1 Attachment M Template; 115.365 2024-2025 CACGA Community Roster; Case Files; 115.365 PREA Accountability Statement; Bob Richards RYDC Coordinated Response Plan; PREA Accountability Statements; Observations During Site Visit; Information Obtained from Interviews.</p> <p>115.365(a): Policy 23.1 establishes that the facility will follow the Sexual Abuse Coordinated Team Response (23.1, Attachment M) in responding to all sexual abuse incidents. This plan outlines the procedures and specific duties of the First Responders, Control Room Operator, Medical Staff, Mental Health Staff, Administrative Duty Officer, Investigator, and Facility Leadership. Additionally, the plan establishes and defines the roles of the Sexual Abuse Coordinated Team Members. The auditor reviewed the most recently updated Sexual Abuse Coordinated Team Response form and found it was reviewed and acknowledged by individual members of the team within the past twelve months. During interviews with the facility Director, medical staff, mental health staff, and investigator, the auditor verified they were knowledgeable about the coordinated response plan and that they are active participants in responding to sexual abuse incidents and in conducting reviews after the investigation concludes. They all explained to the auditor how they would work together to ensure an immediate and cohesive response to incidents of sexual abuse at the facility. More than half of the random staff interviewed were not completely sure of the location of the coordinated response plan. The auditor recommended follow-up staff training on this matter. During the evidence review phase, facility administration completed the follow-up staff training. The facility had three allegations reported during the 12 months preceding the audit, and the auditor’s review of the related incident reports and case files confirmed that the facility used a coordinated response to each incident.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency have demonstrated compliance with all provisions of this standard.</p>
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<b>115.366</b>	<b>Preservation of ability to protect residents from contact with abusers</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Evidence Reviewed: Policy 23.1, PREA; 115.366 Director's Statement; Information Obtained from Interviews.</p> <p>115.366(a): Policy 23.1 establishes that neither the agency nor any other governmental entity responsible for collective bargaining on the agency’s behalf shall enter or renew any collective bargaining agreement or other agreement that</p>

	<p>limits the agency’s ability to remove alleged staff sexual abusers from contact with residents, pending the outcome of an investigation or of a determination as to what extent discipline is warranted. Based on interviews with the Agency Head and the PREA Coordinator, the auditor further confirmed that DJJ is not involved in collective bargaining. The facility had one case involving an allegation against a staff member, but the staff member was unidentified by the reporter, the incident was alleged to have occurred three years prior, and the youth was no longer in DJJ custody.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency have demonstrated compliance with all provisions of this standard.</p>
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<b>115.367</b>	<b>Agency protection against retaliation</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Evidence Reviewed: Policy 23.1; 23.1 Attachment L, PREA Retaliation Monitoring Sheet; Incident Reports and Case Files; Document of any Protective Measures Memo from Director; Observations During Site Visit; Information Obtained from Interviews.</p> <p>115.367(a)(b)(c)(d)(e): Policy 23.1 establishes that facility Directors, PREA Compliance Managers, and other supervisors will take immediate steps to ensure that youth alleging sexual abuse and sexual harassment, or staff reporting, are not victims of any form of retaliation. After a resident claims sexual abuse or sexual harassment, designated staff must complete the Attachment L, PREA Retaliation Monitoring Sheet. The facility treatment team members and shift supervisors will continually review the youth’s adjustment within the facility and document their findings. Monitoring for retaliation starts immediately once an allegation of sexual abuse or sexual harassment has been made. Policy 23.1 further establishes that retaliation monitoring shall last at least 90 days. Monitoring can only be terminated before 90 days if the investigation has determined that the allegation is unfounded, or the person being monitored (youth/staff) is no longer at the site. Monitoring can occur beyond 90 days if there is reason to believe retaliation or fear is an ongoing concern or if there are any extenuating circumstances. The resident being monitored signs the form during the meeting with the staff member at the time of contact.</p> <p>The facility Director has delegated the PREA Compliance Manager to oversee the facility's protection against retaliation and is responsible for monitoring retaliation. An interview with the Retaliation Monitor confirmed that when a youth is being monitored for retaliation, the youth's conduct is monitored as well as their treatment. Items and activities monitored include disciplinary reports or unwarranted housing or program changes; with staff, any negative performance reviews or any reassignment of duties would be reviewed carefully. An interview with the Agency Head and PREA Coordinator confirmed that the PREA Compliance</p>

	<p>Manager is generally the designated staff at each facility responsible for monitoring retaliation; if local staff cannot conduct the monitoring, the agency's PREA Coordinator or Victim Services Director will conduct the monitoring. Furthermore, during the monitoring, if any retaliation is suspected, any party involved in inciting fear among staff or residents will be removed and investigated.</p> <p>There were three allegations reported during the 12 months preceding the audit. The following dispositions were concluded from the investigations: One (1) Youth on Youth Sexual Abuse incident with a finding of substantiation; Two (2) Staff Sexual Harassment incidents, both with a finding of unsubstantiated. Case file reviews found that retaliation monitoring was completed and documented weekly for all cases. The staff monitoring retaliation clearly documented weekly encounters with the youth on the designated form. There was one resident at the facility during the site visit who had reported sexual abuse to be interviewed. There were no reports of retaliation.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency have demonstrated compliance with all provisions of this standard.</p>
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<b>115.368</b>	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed: Policy 8.5, Special Incident Reporting; Policy 8.7, Protective Custody; Policy 8.8, Use of Isolation; Policy 23.1, PREA; Policy 23.2, Sexual Assault; Observations During Site Visit; Information Obtained from Interviews.</p> <p>115.368(a): Policy 23.1 establishes that youth may be isolated from others only as a last resort when less restrictive measures are inadequate to keep them and other youth safe, and then only until an alternative means of keeping all youth safe can be arranged. If a youth is isolated for safety reasons, the facility must clearly document the basis for the facility's concern; the reason(s) why no alternative means of separation can be arranged; and a weekly determination of whether there is a need for continuing separation from the general population. Residents who are placed in isolation because they are alleged to have suffered sexual abuse have access to legally required educational programming, special education services, and daily large muscle exercise, which is documented on the 8.8 Attachment D, Isolation Checks Form. Policy 23.1 establishes that after an allegation of sexual abuse, and upon return from the emergency room, a new Custody and Housing Assessment will be completed in accordance with DJJ 17.3, Custody and Housing Assessment. The facility Director or designee, in consultation with the Designated Health Authority, will make a final decision regarding housing placement for the alleged victim. The safety, security, and well-being of the alleged victim will be primary in these decisions. The alleged victim will not be housed in the same area as the alleged</p>

	<p>perpetrator. Policy 8.8 establishes that before placing a youth in isolation, every least-restrictive measure has been considered. Any time a youth has been placed in isolation, staff must notify the Approving Authority within 30 minutes of placement.</p> <p>The Approving Authority must then authorize placement of the youth within 15 minutes of notification. The facility indicated on the PAQ that there were no incidents where a resident who was placed in isolation, who alleged to have suffered sexual abuse, occurred during the 12 months preceding the audit. Interviews with the Regional Administrator, facility Director, Directors, PREA Compliance Manager, counselors, and random security staff confirmed that the facility does not place youth in segregated housing if they allege a sexual abuse incident has occurred. Interviews with medical and mental health staff confirmed that youth placed in isolation for any reason receive daily visits. An interview with the facility Director and various staff from security, education, counseling, medical, and mental health confirmed that youth placed in isolation for any reason receive daily large-muscle exercise, access to education, daily visits from medical and mental health, and access to other required programs. The auditor’s review of case files and corresponding incident reports confirmed that the youth who alleged sexual abuse were not placed in isolation status.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard.</p>
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<b>115.371</b>	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed: Policy 8.5, Special Incident Reporting; Policy 22.1, Sworn Law Enforcement ID Cards; Policy 22.3, Internal Investigations; Policy 23.1, PREA; Policy 8.42, Crime Scene Preservation; 23.1, Attachment K, Requirements of a PREA Case; NIC Investigating Sexual Abuse in a Confinement Setting Curricula and Certificates; Case Files; Training Records; PREA Accountability Statement; Observations During Site Visit; Information Obtained from Interviews.</p> <p>115.371(a)(c)(d)(k): Policy 22.1 establishes that assigned DJJ Investigators are sworn Peace Officers and as authorized by Georgia Law O.C.G.A § 35-89-2(8) and § 49-4A-8, and by the Commissioner of Juvenile Justice, while in the course of his/her employment duties with the Department is authorized to exercise the power of arrest. Policy 22.3 establishes that trained, qualified, and professional investigators of the Office of Investigations shall conduct administrative and criminal investigations, and specifically all allegations of sexual misconduct on DJJ property. Multiple policies cover the procedures used to effectively ensure investigations are completed promptly, thoroughly, and objectively. Policy 23.1 also establishes that all allegations of sexual abuse on DJJ property, in DJJ custody, or in a residential</p>

program contracted by DJJ, including third-party and anonymous reports, will be administratively and/or criminally investigated by the DJJ Office of Investigations. Investigations will be conducted following the agency's Policy 22.3, Internal Investigations, and Policy 8.42, Crime Scene Preservation. Policy 23.1, Attachment K, outlines the requirements of a PREA case and provides guidance for coding based on descriptions and definitions, and the investigation requirements based on the type of allegation reported. If the employee resigns or is terminated or if the victim/reporter recants the allegation, the Office of Investigations will still complete the investigation.

The auditor conducted interviews with the PREA Unit Chief Investigator, confirming that investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence, and any available electronic monitoring data over the course of their investigation. The investigators conduct interviews with alleged victims, suspected perpetrators, and witnesses and review prior reports and complaints of sexual abuse involving the suspected perpetrators. These interviews also confirmed that criminal investigations are documented and include thorough descriptions of physical, testimonial, and documentary evidence, as well as attached copies of documentary evidence. The investigator's written final report includes a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings. Additionally, investigators review any prior reports and complaints of sexual abuse involving the suspected perpetrator. If, during an investigation, an accused employee resigns or is terminated, or if the victim/reporter recants the allegation, the investigation will still be completed. Also, the investigation will be completed even if the involved youth departs the facility during the investigation. There were three sexual abuse allegations reported during the 12 months preceding the audit. All allegations were investigated by an investigator assigned to the Office of Investigations PREA Unit, who has completed the specialized investigator's training. The auditor's review of these case files confirmed the investigations were prompt, objective, and thorough.

115.371(b): All investigators assigned to the DJJ PREA Investigations Unit have completed specialized training in sexual abuse investigations as evidenced by the auditor's review of training records and noted in Standard 115.334. Interviews with the PREA Unit Chief Investigator confirmed their completion of the agency's extensive training programs and the requirement for all investigators to complete the training before conducting a PREA investigation.

115.371(e)(i): Policy 23.1 establishes that the Office of Investigations will diligently pursue prosecution of any staff who violates the agency's sexual abuse policies. Staff found guilty of sexually assaulting a youth may face imprisonment under federal and/or state laws. When the quality of evidence supports criminal prosecution, the agency shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle to subsequent criminal prosecution. Policy 23.1 establishes that the Director of the Office of Investigations will refer youth for criminal prosecution when appropriate. An interview with the PREA Unit Chief Investigator confirmed that any substantiated allegations of conduct that appear to be criminal are referred to the District Attorney

for prosecution. This interview further confirmed that none of the investigations concluded during the prior 12 months preceding the audit supported sufficient evidence to present for prosecution.

115.371(f): Policy 23.1 establishes that the credibility of an alleged victim, suspect, or witness will be assessed on an individual basis and shall not be determined by the person's status as a resident or staff. The agency will not require a resident who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation. Interviews with two investigators and the review of case files concluded that credibility is assessed on an individual basis and not based on the person's status as a resident or staff. Further, the victim is never required to submit to a polygraph examination or truth-telling device as a condition for proceeding with an investigation. The auditor's review of three case files found that all requirements of provision (f) were met.

115.371(g)(h): Policy 23.1 establishes that the investigator will produce a final investigative report within the established timeframes for the completion of the investigation unless time is extended in writing by the Commissioner, and the final report will determine whether staff actions or failure to act contributed to the abuse. DJJ employees must cooperate with investigative efforts, and compelled interviews will only be conducted after consultation with prosecutors. There were three allegations reported and investigated during the 12 months preceding the audit, and all were reviewed by the auditor. These reports were well-documented and completed timely. Review of these reports confirmed a systematic pattern of documenting violations of PREA policy other than sexual abuse or sexual harassment identified during an investigation. Additionally, the auditor confirmed that the investigative reports contained a description of the testimonial evidence and any physical evidence that was obtained, the reasoning behind credibility assessments, and investigative facts and findings; and files are noted where retrieval of video footage was attempted and obtained, and statements were gathered (or attempted to be gathered) from all parties involved and witnesses.

115.371(j): The agency retains all written reports pertaining to the administrative or criminal investigation of alleged sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years, as established by Policy 23.1 and corroborated during interviews with the Chief Investigator and the agency's PREA Coordinator. These records are retained securely at the central office.

115.371(m): The DJJ Office of Investigations conducts its own investigations of sexual abuse, and outside agencies are not responsible for investigating sexual abuse that occurred within the facility, unless requested by the Agency Head.

A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard.

<b>115.372</b>	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed: Policy 23.1, PREA; 23.1 Attachment K, Requirements of a PREA Case; Investigative Case Files; Information Obtained from Interviews.</p> <p>115.372(a): Policy 23.1 establishes that the Office of Investigations shall impose no standard higher than a preponderance of the evidence in determining whether the allegations of sexual abuse or sexual harassment are substantiated. The facility had three sexual abuse allegations reported and investigated during the 12 months preceding the audit. The auditor's review of these case files and other case files reviewed during this audit year, completed by the DJJ Office of Investigations PREA Unit, and interviews with one investigator, concluded that a preponderance of the evidence is appropriately applied to sexual abuse and sexual harassment investigations and is the standard used to substantiate allegations of sexual abuse.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard.</p>

<b>115.373</b>	<b>Reporting to residents</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed: Policy 23.1, PREA; 23.1 Attachment I, Resident Notification of Investigative Outcome Reports; Case Files; Information Obtained from Interviews.</p> <p>115.373(a)(e): Policy 23.1 establishes that the Office of Victim Services will inform the youth as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded using Attachment I, Resident Notification of Investigative Outcome, to document its reporting to a youth. An interview with the facility Director, the Chief Investigator, and the Agency PREA Coordinator determined that once an investigation has been concluded, the Office of Victim Services is responsible for generating the notification to the resident of the outcome. The auditor interviewed the Office of Victim Services Director and confirmed that a representative from their office prepares the notification to the victim of the outcome of the investigation once they are notified that the case is closed. If the resident is still in DJJ custody, the notification is delivered in person, and if the resident is no longer in custody, the notice is sent by mail to the resident's last known address. The facility had three sexual abuse allegations reported and investigated during the 12 months preceding the audit. At the time of this report, the three incidents had notification letters. Review of the case files confirmed the youth were notified of the result of the investigation as required.</p>

	<p>115.373(b): The DJJ Office of Investigations conducts all investigations; therefore, the facility meets this standard through non-applicability.</p> <p>115.373(c)(d)(f): The Resident Notification of Investigative Outcome, 23.1, Attachment I includes notification to the alleged victim (where applicable) whenever the staff member is no longer posted within the resident’s unit; the staff member is no longer employed at the facility; the agency learns that the staff member has been indicted related to sexual abuse within the facility; or the agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility. An agency's obligation to report under this standard terminates if the resident is released from the agency's custody. Additionally, following a resident’s allegation that he or she has been sexually abused by another resident in an agency facility, the agency subsequently informs the alleged victim whenever the agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or the agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. The agency requires that residents be notified in writing of the outcome of an investigation of sexual harassment, which is above and beyond the requirement of this standard.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard.</p>
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<b>115.376</b>	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed: Policy 3.80, Employee Progressive Discipline; Policy 23.1, PREA; Case Files; Memorandum of Concern and Expectations, and Termination; Information Obtained from Interviews.</p> <p>115.376(a)(b)(c)(d): Policy 23.1 establishes that staff will be subject to disciplinary sanctions up to and including termination and criminal prosecution for violating the agency’s sexual abuse or sexual harassment policies, following Policy 3.80, Employee Progressive Discipline. Termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse. Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than engaging in sexual abuse) will 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. All terminations for violations of agency sexual abuse or sexual harassment policies or resignations by staff that would have been terminated if not for their resignation would be reported to the appropriate law enforcement agency and any relevant licensing bodies, unless the activity was clearly not criminal. Interviews with the Agency Head, PREA Coordinator, Investigator, and the facility Director confirmed</p>

	<p>that violations of the agency's sexual abuse/harassment policies are taken very seriously and are dealt with swiftly. There were two sexual harassment allegations reported and investigated involving staff at this facility during the 12 months preceding the audit. Investigations into the sexual abuse allegation were determined to be unsubstantiated. The sexual harassment allegation was found to be unsubstantiated, resulting in two staff members being disciplined for policy violations.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard.</p>
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115.377	<b>Corrective action for contractors and volunteers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Evidence Reviewed: Policy 14.3, Citizen and Volunteer Involvement; Policy 23.1, PREA; PREA Statement Form; Case Files; Information Obtained from Interviews.</p> <p>115.377(a)(b): Policy 23.1 establishes that any contractor or volunteer who engages in sexual abuse will be prohibited from contact with youth and will be reported to law enforcement agencies and relevant licensing bodies unless the activity was clearly not criminal. In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer following 14.3, Citizen and Volunteer Involvement, the facility will take appropriate remedial measures and consider whether to prohibit further contact with youth. The facility reported on the PAQ that during the 12 months preceding the auditor there were no contractors or volunteers reported to law enforcement for engaging in sexual abuse of residents. The auditor's review of eleven case files for allegations reported during the audit period found there were no substantiated cases involving volunteers or contractors or violations of related policies. Interviews with the Agency Head, PREA Coordinator, Investigators, Regional Administrator, and facility Director confirmed that contractors and volunteers who violate sexual abuse policies would be terminated from access to the facility and reported to law enforcement as applicable, and any relevant licensing body when required.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard.</p>

115.378	<b>Interventions and disciplinary sanctions for residents</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

Evidence Reviewed: Policy 8.8, Use of Isolation; Policy 23.1, PREA; Policy 16.05, Disciplinary Reports and Hearings; 16.5 Attachment B, Behavior Infractions Grid; PREA Statement Form; Memorandum from Director; Case Files; Information Obtained from Interviews.

115.378(a)(d)(f): Policy 23.1 establishes that youth will receive appropriate interventions if they engage in youth-on-youth sexual abuse. Interventions like treatment, counseling, education, or disciplinary action aim to improve youth behavior and ensure the safety of others. Pre-adjudicated youth will not be placed in a treatment program for sexually harmful behavior. The Director of the Office of Investigations refers youth for criminal prosecution when appropriate. The facility does not permit disciplinary action against a youth who reports sexual abuse in good faith based on a reasonable belief that the alleged incident occurred, even if the investigation does not yield sufficient evidence to support the allegation. The facility offers counseling services for youth with sexually abusive behavior, and these are not tied to any rewards-based behavior management system to access treatment. There were one substantiated case to warrant disciplinary actions of a resident during the 12 months preceding the audit. An interview with a mental health counselor confirmed the facility would offer counseling or other intervention services designed to address and correct the underlying reasons or motivations for sexual abuse. Residents are not required to participate in these intervention services to access general programming or education.

115.378(b): Policy 8.8 governs the use of isolation for youth. Before placing a youth in isolation, every least-restrictive measure has been considered, and they cannot be held for more than four hours of continuous isolation. Youth in isolation will be observed, and behaviors documented at irregular 15-minute intervals or following any suicide precautions that are in place for the youth. Medical services staff shall be notified immediately when a youth requires isolation. The notification will include a verbal assessment of the youth to the medical services staff. Behavioral health and medical staff will evaluate the youth for clinical stability following each 4-hour reauthorization, which will be documented in an Isolation Consultation progress note. An interview with the facility Director and various staff from security, education, counseling, medical, and mental health confirmed that youth placed in isolation receive daily large-muscle exercise, access to education, daily visits from medical and mental health, and access to other required programs. The facility provided the Behavioral Infractions Grid used to determine codes and severity ratings of infractions and to determine sanctions appropriate to the offense.

115.378(c): Policy 16.5 establishes that the hearing officer will consider extenuating circumstances when imposing sanctions, such as age, mental condition, prior record of conduct, etc. If the youth is on the mental health caseload, his primary clinician will be present at the hearing to act as an advocate when possible. If it is determined that the youth cannot understand the proceedings or present a defense because of disability, the hearing officer will appoint a staff member to act as an advocate. An interview with the disciplinary hearing officer and a mental health counselor confirmed that this practice is observed and well implemented at the facility.

	<p>115.378(e): The agency uses the disciplinary procedure for sexual conduct with staff only upon finding that the staff member did not consent to such contact. This was confirmed during an interview with the Agency Head, PREA Coordinator, and facility Director. There were no incidents during the 12 months preceding the audit where a resident was disciplined for sexual conduct with a staff member.</p> <p>115.378(g): The agency prohibits consensual sexual behavior between youth. The facility provided the Behavioral Infractions Grid, which is used to apply disciplinary sanctions for youth who violate facility policies and rules. In addition, interviews with 15 youth confirmed they are aware that sexual contact and sexual activity are not permitted. There was one incident during the 12 months preceding the audit where residents were disciplined for consensual sexual behavior.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard.</p>
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<b>115.381</b>	<b>Medical and mental health screenings; history of sexual abuse</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed: Policy 8.5, Incident Reporting; Policy 11.1, Medical Intake Screening; Policy 11.2, Nurse health Assessment and Physical Examination; Policy 12.10, Mental Health Screening; Policy 22.3, Internal Investigations; Policy 23.1, PREA; 23.1 Attachment F, Consent to Disclose Protected and Confidential Information; Policy 20.12 Community Based Services; Policy 20.20 Screening and Placement of Youth; 8.5 Attachment I, SIR Codes; 115.381 PREA Accountability Statement; Sexual Incident Reports (SIR) B6P Codes; Consent to Disclose Protected &amp; Confidential PREA Information forms; Behavioral Health Evaluations (BHE); Victim Services Brochure; Office of Victim Services Card; Observations During Site Visit; Information Obtained from Interviews.</p> <p>115.381(a)(b): Each youth entering a facility, whether a new admission or a transfer from another facility, will receive a medical screening, mental health screening, and PREA risk screening. Policy 23.1 establishes that if a youth discloses prior sexual victimization or sexual abuse during intake, medical/mental health screening, or health history, whether it occurred in a facility setting or the community, staff will ensure the youth receives a referral for medical and mental health services within 72 hours of the screening. Staff must address the youth's prior sexual victimization and document the youth's response in the JTS notes. The auditor interviewed the intake officer and confirmed if a screening indicates that a resident has experienced prior sexual victimization or perpetration, the facility Director and medical is notified, an SIR is completed (coded B6P), and the Department of Family and Children's Services (DFCS) is notified. The auditor interviewed medical and mental health staff and confirmed that the youth will be seen for follow-up meetings with a</p>

medical and/or mental health practitioner.

Based on an interview with the HSA and the mental health counselor, all youth are seen by medical staff within two hours of arrival, and when a youth discloses prior victimization, the healthcare staff makes a referral to mental health, and mental health will meet with the youth within 72 hours for an evaluation. The facility provided the auditor with SIRs and accompanying documentation confirming that the appropriate mental health referrals were made, and assessments were conducted for seven youth who disclosed prior victimization during the intake screening. Additionally, documentation confirmed that mandatory reporting laws were followed for notification to the proper authority when the youth disclosed prior abuse. The auditor interviewed three youth who had reported prior sexual victimization during the intake screening and reviewed the corresponding incident reports. The three residents interviewed confirmed that they met with medical staff within a couple of hours of intake and that a mental health counselor spoke with them within 24 hours. Each youth said they were offered a follow-up meeting with a mental health practitioner. Documentation provided confirmed all requirements were met well within the timeframe.

115.381(c)(d): If a youth discloses prior sexual victimization or abuse during a medical evaluation, mental health assessment, or at any time, the staff will report the abuse according to Policy 8.9, Child Abuse Reporting. For youth over 18, staff obtain informed consent from the youth before reporting the abuse to the Office of Investigations, on-site/off-site medical staff, and others providing care and treatment who need to know. The facility will control the dissemination of the youth's information by complying with all applicable disclosure requirements. The dissemination of information ensures that sensitive information collected from residents is not exploited by staff or another resident. In interviews with the facility Director and intake, mental health, and medical staff, they confirmed that information obtained during the intake and screening process is protected and only disseminated under strict guidelines, within mandatory reporting guidelines, and when needed to further the individual's treatment. Medical records are only accessed by authorized personnel in the password-protected database. Information collected during the risk screening instrument is entered directly into the agency's electronic database and can only be accessed by users with authorized access.

Interviews with medical and mental health staff confirmed that secondary information is maintained in the resident's medical files and not a part of the resident's institutional file. Informal conversations with staff confirmed that the electronic database is password-protected, and only authorized staff have access to the information obtained during screening. Intake staff confirmed during interviews that they have the youth read (or have read to them) the 23.1 Attachment F, Consent to Disclose Protected Confidential PREA Related Information upon arrival at the facility. This consent form explains that any prior abuse disclosed by the youth will be reported to and shared with DFCS, the DJJ Office of Investigations, and other individuals and staff involved in providing care and treatment, and who have a need to know. If the youth is over the age of 18, they may decline consent to release this information. The auditor observed a signed Consent to Disclose Protected and

	<p>Confidential Information form in the files for 35 residents selected for document review. While the auditor was on-site, the auditor reviewed 5 youth files who disclosed prior sexual victimization, all resulting compliance with this standard. Additionally, medical and mental health staff explained that they review the limitations of confidentiality with each youth before providing services.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard.</p>
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115.382	Access to emergency medical and mental health services
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Evidence Reviewed: Policy 2.10, Payment of Youth Medical Expenses; Policy 23.1, PREA; Policy 23.2, Sexual Assault; 23.1 Attachment M, Sexual Abuse Coordinated Team Response; 23.2 Attachment A, Facility Coordinated Response to a Sexual Assault Incident; Information Obtained from Interviews.</p> <p>115.382(a)(b)(c): Policy 23.2 establishes that any youth reported or believed to have been sexually assaulted shall be immediately referred to the on-site health care staff for initial screening. Appropriate first aid or emergency care will be provided, and the youth will be sent to a hospital for further examination, treatment, and collection of forensic evidence. When on-site medical services staff are unavailable, the youth will be transported to the hospital for initial screening. When there is a report of a sexual assault from a youth to a staff member, or there is suspicion of sexual assault, the staff member will immediately refer the youth to the medical services staff. An initial evaluation and determination of the need for an outside medical referral for further testing and evaluation will be performed. The facility Director or Office of Investigations staff may independently decide that a youth must be referred for outside medical testing and evaluation. Medical services staff will provide appropriate follow-up care and treatment. At the follow-up appointment, the youth's physical and emotional status will be assessed. The provider will review the records from the outside medical facility to determine if all medical aspects of the evaluation were completed. Youth who are alleged victims of sexual assault will be treated in a sensitive and non-judgmental manner. Resident victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services.</p> <p>Policy 23.1 establishes that the facility Director will ensure that victims of sexual abuse, while confined, shall be offered timely information and access to emergency contraception and sexually transmitted infections prophylaxis, following professionally accepted standards of care where medically appropriate. Emergency medical care for victims of sexual abuse will be provided at the Altrium Health Floyd Medical Center. Sexually transmitted infections (STI) labs, and emergency</p>

	<p>contraception will be ordered by the attending physician, and follow-up labs and medication will be administered by the facility's medical department. An interview with the PREA Coordinator, Assistant Facility Director, and an RN confirmed that any youth who has experienced sexual abuse/ assault will have received timely access to emergency medical treatment and crisis intervention services.</p> <p>Additional information provided during the interview with the HSA confirmed that youth would be offered information and access to sexually transmitted infection prophylaxis at the local hospital, and then the facility will provide follow-up treatments according to the physician's orders. These services will be provided in a timely and consistent manner with professionally accepted standards of care. No youth received emergency medical treatment resulting from a sexual abuse incident within the 12 months preceding the audit. The auditor interviewed a youth who reported sexual abuse. The youth indicated he was seen by medical and mental health staff immediately after reporting to staff. The youth involved in the second staff sexual harassment refused to give any details regarding the staff sexual harassment incident. After the file review, the auditor observed medical and mental health documents indicating he was seen promptly after the incident was reported to staff. Interviews with 13 random staff confirmed they were knowledgeable of their first responder duties and knew what steps to take to protect a victim of sexual abuse and to preserve evidence. The auditor observed a copy of the medical coordinated response plan in the medical department for easy access when needed for reference.</p> <p>115.382(d): Policy 23.1 and 2.10 collectively establish that forensic medical examinations and treatment services are offered without financial cost to the youth. This was further confirmed through interviews with medical staff.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard.</p>
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<b>115.383</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Evidence Reviewed: Policy 23.1, PREA; Policy 23.2, Sexual Assault; Practitioner Credentials; Case File; Mental Health Staff Licenses; Memo from the Facility Director; Memo Child Advocacy Center; Observations During Site Visit; Information Obtained from Interviews.</p> <p>115.383(a)(b)(c)(f): Collectively, policies 23.1 and 23.2 establish that the facility will offer medical and mental health evaluation and appropriate treatment to all youth who have been victimized by sexual abuse (inside or outside the facility). Any youth</p>

believed to have been sexually assaulted shall be immediately referred to the onsite health care staff for initial screening. Appropriate first aid or emergency care will be provided, and then the youth will be sent to a hospital for further examination, treatment, and forensic evidence collection, as appropriate. Medical services staff will deliver follow-up care and treatment. Medical services staff must request the emergency room staff to evaluate the youth for sexually transmitted infection(s), perform a pregnancy test (if appropriate), and offer pregnancy prophylaxis.

Policy 23.1 establishes that the facility Director will ensure that victims of sexual abuse, while confined, shall be provided with timely information and access to emergency contraception and sexually transmitted infections prophylaxis following professionally accepted standards of care, where medically appropriate. Medical services staff will provide appropriate follow-up care and treatment. The youth's physical and emotional status will be assessed at the follow-up appointment. The provider will review the records from the outside medical facility to determine if all medical aspects of the evaluation were completed. The facility has a staff of Qualified Mental Health Providers (QMHP) who provide ongoing assessments and treatment for victims of sexual abuse or abusers, and practitioner credentials were provided for the auditor's review. Interviews with medical and mental health staff confirmed that evaluations and treatment of sexual abuse victims, including follow-up care, regardless of where the abuse occurred, will be provided to youth at a standard comparable to community service levels; additionally, when necessary, they will make referrals for continued care after the youth leaves the facility.

115.383(d)(e): Agency policy provides that female victims of sexual abuse will be offered a pregnancy test. If pregnancy results from sexual abuse while confined, the victim will receive timely and comprehensive information and access to all lawful, pregnancy-related medical services coordinated by the medical department. These provisions do not apply to Bob Richards RYDC, as the facility does not house female residents.

115.383(g): Policies 23.1 and 2.10 establish that treatment services are provided to sexual abuse victims without financial cost, regardless of whether the victim names the abuser or cooperates with the investigation. No youth required these services during the 12 months preceding the audit.

115.383(h): In accordance with DJJ policies, the facility will conduct a mental health evaluation of all known youth-on-youth abusers within 72 hours of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners, based on policy review and interviews with mental health staff. Interviews with medical and mental health staff also confirmed that evaluations and treatment of sexual abusers, regardless of where the abuse occurred, will be offered and provided to youth at a standard comparable to community service levels. There were no known resident-on-resident abusers at the facility during the 12 months preceding the audit.

A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard.

<b>115.386</b>	<b>Sexual abuse incident reviews</b>
	<p data-bbox="280 188 1015 221"><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p data-bbox="280 266 564 300"><b>Auditor Discussion</b></p> <p data-bbox="280 344 1453 501">Evidence Reviewed: Policy 8.5, Special Incident Reporting; Policy 23.1, PREA; 23.1 Attachment J, Sexual Abuse Incident Review Team Meeting; Bob Richards RYDC Coordinated Response (23.1 Attachment M); Case Files; Information Obtained from Interviews.</p> <p data-bbox="280 546 1469 1072">115.386(a)(b)(c)(d)(e): Policy 23.1 establishes that each facility and community residential provider will treat all instances of sexual abuse as critical incidents to be examined by the PREA Incident Review Team. The PREA Incident Review Team will include upper-level facility management staff, with input from line supervisors, investigators, and medical services staff or mental health practitioners. After every sexual abuse investigation concludes, unless unfounded, an incident review will be conducted. The process allows for input from line supervisors, investigators, and medical or mental health practitioners. A written report is prepared utilizing the agency's template, 23.1 Attachment J, Sexual Abuse Incident Review Team Meeting, which documents the activities of the committee meeting and is signed by all members present. The report also captures any recommendations that the committee makes as a result of the review. The report is then forwarded to the Regional Administrator.</p> <p data-bbox="280 1117 1469 1778">The facility had three allegations of sexual abuse investigated during the 12 months preceding the audit. The number of criminal and or administrative investigations of alleged sexual abuse completed at the facility, excluding only unfounded incidents were three. A breakdown of the total three allegations was as follows: two cases of Staff Sexual Harassment with findings of unsubstantiated, and one case of Youth on Youth Sexual Abuse with the finding of substantiated. The auditor's review of the case files confirmed that an incident review was conducted in accordance with agency policy and this standard for the three cases. The auditor interviewed three incident review team members who explained the incident review process and were aware that an incident review is required for substantiated and unsubstantiated cases at the conclusion of every sexual abuse investigation within 10 days of notification that the case has been closed. These members explained that during a review, the review team considers 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, and/or other group dynamics at the facility.</p> <p data-bbox="280 1823 1469 2058">The Incident Review Team is comprised of members from the Sexual Abuse Response Team indicated in the facility's Coordinated Response Plan and is inclusive of upper-level management officials, line supervisors, investigators, medical practitioners, and mental health practitioners. After reviewing the sexual abuse incident review team meeting minutes, the auditor recommended that agency investigators attend and participate in future incident review meetings. The PREA</p>

	<p>Coordinator was going to take the recommendation under advisement and invite investigators attend future sexual abuse incident team meetings. Interviews with the facility Director and Regional Administrator confirmed that recommendations made by the review team would be implemented when appropriate and feasible; if these recommendations are not implemented, the report will be documented explaining why.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard. and exceeded provision (b) in requiring the review to be completed within ten days after the investigation closes, which the facility demonstrated in practice.</p>
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<b>115.387</b>	<b>Data collection</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Evidence Reviewed: Policy 8.5, Special Incident Reporting; Policy 23.1, PREA; 23.1 Attachment K, Requirements of a PREA Case; PREA Annual Report 2022; PREA Annual Report 2023; Agency's SSV-5, IJ 2022, 2023; DJJ Website; Information Obtained from Interviews.</p> <p>115.387(a)(b)(c)(d)(f): Policy 23.1 establishes that the agency will collect accurate, uniform data for every allegation of sexual abuse at facilities and community residential programs under its control using a standardized Special Incident Report (SIR), following Policy 8.5, Special Incident Reporting, DJJ 23.1, PREA, and Attachment K. The SIR process includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice. The agency will maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. The auditor reviewed the agency's SSV reports and the most recent PREA Annual Report (2023). An interview with the PREA Coordinator confirmed that the data is aggregated annually and published in an annual report. The auditor's review of the most recent annual report confirmed that uniform data for every allegation is collected and published as required. The agency provided the Department of Justice (DOJ) with data from the previous calendar year (2023) as requested. The agency provided the DOJ SSV-5 for 2022 and 2023. DOJ requested that agencies provide 2024 data in January 2026. The PREA Coordinator explained that the SSV-5 is completed by his office and provided to the DOJ upon request. The annual report includes the yearly comparison dating back to FY2013.</p> <p>115.387(e): The agency obtains incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents. Based on an interview with the Commissioner/PREA Coordinator, this provision was not</p>

	<p>applicable until 2023; therefore, reports dated 2022 and prior will not include any contracted facilities.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard.</p>
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<b>115.388</b>	<b>Data review for corrective action</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed: Policy 8.5, Special Incident Reporting; Policy 23.1, PREA; SSV-5 2023; PREA Annual Report 2022, 2023; DJJ Public Website; Information Obtained from Interviews.</p> <p>115.388(a)(b): Policy 23.1 establishes that the Agency PREA Coordinator will review, analyze, and use all sexual abuse data, including incident-based and aggregated data, to assess and improve the effectiveness of the agency sexual abuse prevention, detection, and response policies, practices, and training and maintain a current link on the DJJ website to provide PREA information to the public. The auditor reviewed the most recently published Annual Report and found it included a comparison of the current year's data and corrective actions with those from prior years. Additionally, the Annual Report provides an assessment of the agency's progress in addressing sexual abuse. Interviews with the Agency Head and PREA Coordinator found that the agency is continually assessing the effectiveness of its sexual abuse prevention, detention, and response policies, practices, and training. When a discrepancy is identified, it is addressed on a statewide level. Remedial training is directed when needed to ensure staff understand all aspects of the program.</p> <p>115.388(c)(d): Policy 23.1 establishes that the Agency PREA Coordinator will submit an Annual Report with redacted material to the Director of the Office of Investigations for publication approval for release on the DJJ PREA website. Before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers. During the PREA Coordinator's interview and review of the 2023 Annual Report, the auditor confirmed the report was approved by the Agency Head before publishing. A web search found the 2023 PREA Annual Report published on the agency's public website.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard.</p>

<b>115.389</b>	<b>Data storage, publication, and destruction</b>
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	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Evidence Reviewed: Policy 5.1, Records Management; Policy 23.1, PREA; DJJ Public Website Links; PREA Annual Report 2022; PREA Annual Report 2023; Agency SSV-5 2023 in 115.387; Information Obtained from Interviews.</p> <p>115.389(a)(c)(d): Policy 23.1 establishes that the agency will maintain sexual abuse data collected under 115.387 for at least ten years after the date of its initial collection, following Policy 5.1, Records Management, unless federal, state, or local laws require a different retention schedule. In addition to the required ten years, the agency will maintain data on all staff, contractors, volunteers, and interns who committed sexual abuse or sexual harassment of youth for an additional five years after the staff, contractor, volunteer, and intern no longer work or are involved with the agency. According to the PREA Coordinator and Agency Head, all data collected is securely retained in the agency's computer database with restricted access. Access to this data must be granted through the requester's hierarchy and approved by the Agency's PREA Coordinator. At the local level, the auditor observed the physical storage area of information and documentation collected and maintained in hard copy pursuant to the PREA Standards (e.g., risk screening information, medical records, sexual abuse allegations) and found that all information was stored in a secured location under lock and key with limited access for personnel who need to access the information. Electronic data collected and entered into the JTS (agency's database) is securely retained through user identity profiles and password protection.</p> <p>115.389(b): The requirement for PREA compliance and data collection at the community sites began in 2023; therefore, the community sites are not reflected in the data collection before 2023.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard.</p>

<p><b>115.401</b></p>	<p><b>Frequency and scope of audits</b></p>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Evidence Reviewed: DJJ Website; PREA Audit Reports; Observations During Site Visit; Information Obtained from Interviews.</p> <p>115.401(a)(b): The PREA Coordinator stated 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, which was corroborated by the auditor's review of the agency's public website which contained final reports for all facilities, including</p>

	<p>contract facilities. The last PREA audit for this facility was conducted on February 20, 2023, with a final report issued on May 16, 2023. The prior audit report was viewed at <a href="https://djj.georgia.gov/prea-reports">https://djj.georgia.gov/prea-reports</a>.</p> <p>115.401(h): During the site visit, the auditor was allowed access to all areas of the facility, and all areas of the facility were inspected. 115.401(i): The auditor was permitted to request and receive copies of any relevant documents (including electronically stored information). All information requested by the auditor was promptly delivered.</p> <p>115.401(m): Space was designated for the auditor to conduct interviews and to review documentation while on-site. Staff interviews were held in the administrative conference room or in the staff member’s general work area. Residents were interviewed in an office in the intake area. All interviews were conducted privately.</p> <p>115.401(n): The Audit Notices, in both English and Spanish, were provided to the facility, as required, and were delivered to the agency on October 3, 2025, with instructions for posting. These notices were posted conspicuously, and according to the auditor's instructions six weeks prior to the site review scheduled on December 10-11, 2025. Photos were provided to the auditor by email, confirming the locations of posting. During the site visit, the auditor observed the audit notices posted throughout the facility (at the facility entrance/exit, intake area, counseling, sally port, administration area, dining room/visitation, recreation, medical, education, multi-purpose area, all three housing units. The auditor further verified during interviews with residents and staff that they were aware they could correspond with the auditor confidentially.</p> <p>During an interview with administrative staff who handle outgoing mail and the facility Director, the auditor confirmed that the youth can correspond with the auditor in the same manner as if they were communicating with legal counsel. No confidential information or correspondence was received prior to the site visit nor during the post-audit period. The auditor instructed the facility to allow the notices to remain posted for the duration of the post-audit period.</p> <p>A systematic review and analysis of the evidence concluded that the facility and agency demonstrated compliance with all provisions of this standard.</p>
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<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence Reviewed: DJJ Public Website; Information Obtained from Interviews.</p> <p>115.403(f): The auditor confirmed through a search of the agency's public website and an interview with the PREA Coordinator that Final Audit Reports of all DJJ</p>

facilities, including contract facilities, are posted on the agency's website at <https://djj.georgia.gov/prea-reports>.

Based on the review and analysis of the evidence, the facility and agency demonstrated compliance with all provisions of this standard.

<b>Appendix: Provision Findings</b>		
<b>115.311 (a)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	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
<b>115.311 (b)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
<b>115.311 (c)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	yes
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	yes
<b>115.312 (a)</b>	<b>Contracting with other entities for the confinement of residents</b>	
	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.)	yes
<b>115.312 (b)</b>	<b>Contracting with other entities for the confinement of residents</b>	

	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents OR the response to 115.312(a)-1 is "NO".)	yes
<b>115.313 (a)</b>	<b>Supervision and monitoring</b>	
	Does the agency ensure that each facility has developed a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect residents against sexual abuse?	yes
	Does the agency ensure that each facility has implemented a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect residents against sexual abuse?	yes
	Does the agency ensure that each facility has documented a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect residents against sexual abuse?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Generally accepted juvenile detention and correctional/secure residential practices?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any judicial findings of inadequacy?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any findings of inadequacy from Federal investigative agencies?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate	yes

	staffing levels and determining the need for video monitoring: Any findings of inadequacy from internal or external oversight bodies?	
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: All components of the facility's physical plant (including "blind-spots" or areas where staff or residents may be isolated)?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The composition of the resident population?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The number and placement of supervisory staff?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Institution programs occurring on a particular shift?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any applicable State or local laws, regulations, or standards?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any other relevant factors?	yes
<b>115.313 (b)</b>	<b>Supervision and monitoring</b>	
	Does the agency comply with the staffing plan except during limited and discrete exigent circumstances?	yes
	In circumstances where the staffing plan is not complied with, does the facility fully document all deviations from the plan? (N/A if no deviations from staffing plan.)	yes
<b>115.313 (c)</b>	<b>Supervision and monitoring</b>	
	Does the facility maintain staff ratios of a minimum of 1:8 during resident waking hours, except during limited and discrete exigent circumstances? (N/A only until October 1, 2017.)	yes

	Does the facility maintain staff ratios of a minimum of 1:16 during resident sleeping hours, except during limited and discrete exigent circumstances? (N/A only until October 1, 2017.)	yes
	Does the facility fully document any limited and discrete exigent circumstances during which the facility did not maintain staff ratios? (N/A only until October 1, 2017.)	yes
	Does the facility ensure only security staff are included when calculating these ratios? (N/A only until October 1, 2017.)	yes
	Is the facility obligated by law, regulation, or judicial consent decree to maintain the staffing ratios set forth in this paragraph?	yes
<b>115.313 (d)</b>	<b>Supervision and monitoring</b>	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: Prevailing staffing patterns?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
<b>115.313 (e)</b>	<b>Supervision and monitoring</b>	
	Has the facility implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment? (N/A for non-secure facilities )	yes
	Is this policy and practice implemented for night shifts as well as day shifts? (N/A for non-secure facilities )	yes
	Does the facility have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational	yes

	functions of the facility? (N/A for non-secure facilities )	
<b>115.315 (a)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
<b>115.315 (b)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting cross-gender pat-down searches in non-exigent circumstances?	yes
<b>115.315 (c)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility document and justify all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches?	yes
<b>115.315 (d)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility implement policies and procedures that enable residents to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering a resident housing unit?	yes
	In facilities (such as group homes) that do not contain discrete housing units, does the facility require staff of the opposite gender to announce their presence when entering an area where residents are likely to be showering, performing bodily functions, or changing clothing? (N/A for facilities with discrete housing units)	yes
<b>115.315 (e)</b>	<b>Limits to cross-gender viewing and searches</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na

<b>115.315 (f)</b>	<b>Limits to cross-gender viewing and searches</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<b>115.316 (a)</b>	<b>Residents with disabilities and residents who are limited English proficient</b>	
	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	yes

	communication with residents who are deaf or hard of hearing?	
	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
<b>115.316 (b)</b>	<b>Residents with disabilities and residents who are limited English proficient</b>	
	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
<b>115.316 (c)</b>	<b>Residents with disabilities and residents who are limited English proficient</b>	
	Does the agency always refrain from relying on resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-response duties under §115.364, or the investigation of the resident's allegations?	yes
<b>115.317 (a)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has engaged in sexual	yes

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

	maintained by the State or locality in which the employee would work?	
	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
<b>115.317 (d)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with residents?	yes
	Does the agency consult applicable child abuse registries before enlisting the services of any contractor who may have contact with residents?	yes
<b>115.317 (e)</b>	<b>Hiring and promotion decisions</b>	
	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
<b>115.317 (f)</b>	<b>Hiring and promotion decisions</b>	
	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
<b>115.317 (g)</b>	<b>Hiring and promotion decisions</b>	

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

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

<b>(e)</b>		
	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
<b>115.321 (f)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating entity follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency is responsible for investigating allegations of sexual abuse.)	yes
<b>115.321 (h)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (Check N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.321(d) above.)	yes
<b>115.322 (a)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	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
<b>115.322 (b)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	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
<b>115.322 (c)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	If a separate entity is responsible for conducting criminal investigations, does such publication describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.321(a))	yes
<b>115.331 (a)</b>	<b>Employee training</b>	
	Does the agency train all employees who may have contact with residents on: Its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with residents on: Residents' right to be free from sexual abuse and sexual harassment	yes
	Does the agency train all employees who may have contact with residents on: The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: The dynamics of sexual abuse and sexual harassment in juvenile facilities?	yes
	Does the agency train all employees who may have contact with residents on: The common reactions of juvenile victims of sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: How to detect and respond to signs of threatened and actual sexual abuse and how to distinguish between consensual sexual contact and sexual abuse between residents?	yes
	Does the agency train all employees who may have contact with residents on: How to avoid inappropriate relationships with residents?	yes

	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the agency train all employees who may have contact with residents on: How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
	Does the agency train all employees who may have contact with residents on: Relevant laws regarding the applicable age of consent?	yes
<b>115.331 (b)</b>	<b>Employee training</b>	
	Is such training tailored to the unique needs and attributes of residents of juvenile facilities?	yes
	Is such training tailored to the gender of the residents at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male residents to a facility that houses only female residents, or vice versa?	yes
<b>115.331 (c)</b>	<b>Employee training</b>	
	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
<b>115.331 (d)</b>	<b>Employee training</b>	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
<b>115.332 (a)</b>	<b>Volunteer and contractor training</b>	
	Has the agency ensured that all volunteers and contractors who	yes

	have contact with residents have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	
<b>115.332 (b)</b>	<b>Volunteer and contractor training</b>	
	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
<b>115.332 (c)</b>	<b>Volunteer and contractor training</b>	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
<b>115.333 (a)</b>	<b>Resident education</b>	
	During intake, do residents receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do residents receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
	Is this information presented in an age-appropriate fashion?	yes
<b>115.333 (b)</b>	<b>Resident education</b>	
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through	yes

	video regarding: Agency policies and procedures for responding to such incidents?	
<b>115.333 (c)</b>	<b>Resident education</b>	
	Have all residents received such education?	yes
	Do residents receive education upon transfer to a different facility to the extent that the policies and procedures of the resident's new facility differ from those of the previous facility?	yes
<b>115.333 (d)</b>	<b>Resident education</b>	
	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
<b>115.333 (e)</b>	<b>Resident education</b>	
	Does the agency maintain documentation of resident participation in these education sessions?	yes
<b>115.333 (f)</b>	<b>Resident education</b>	
	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
<b>115.334 (a)</b>	<b>Specialized training: Investigations</b>	
	In addition to the general training provided to all employees pursuant to §115.331, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its	yes

	investigators have received training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	
<b>115.334 (b)</b>	<b>Specialized training: Investigations</b>	
	Does this specialized training include: Techniques for interviewing juvenile sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
	Does this specialized training include: Proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
	Does this specialized training include: Sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
	Does this specialized training include: The criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
<b>115.334 (c)</b>	<b>Specialized training: Investigations</b>	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
<b>115.335 (a)</b>	<b>Specialized training: Medical and mental health care</b>	
	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	yes

	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.)	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to respond effectively and professionally to juvenile victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
<b>115.335 (b)</b>	<b>Specialized training: Medical and mental health care</b>	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na
<b>115.335 (c)</b>	<b>Specialized training: Medical and mental health care</b>	
	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
<b>115.335 (d)</b>	<b>Specialized training: Medical and mental health care</b>	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.331? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Do medical and mental health care practitioners contracted by	yes

	and volunteering for the agency also receive training mandated for contractors and volunteers by §115.332? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	
<b>115.341 (a)</b>	<b>Obtaining information from residents</b>	
	Within 72 hours of the resident's arrival at the facility, does the agency obtain and use information about each resident's personal history and behavior to reduce risk of sexual abuse by or upon a resident?	yes
	Does the agency also obtain this information periodically throughout a resident's confinement?	yes
<b>115.341 (b)</b>	<b>Obtaining information from residents</b>	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes
<b>115.341 (c)</b>	<b>Obtaining information from residents</b>	
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Prior sexual victimization or abusiveness?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Current charges and offense history?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Age?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Level of emotional and cognitive development?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Physical size and stature?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Mental illness or mental disabilities?	yes

	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Intellectual or developmental disabilities?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Physical disabilities?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: The resident's own perception of vulnerability?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Any other specific information about individual residents that may indicate heightened needs for supervision, additional safety precautions, or separation from certain other residents?	yes
<b>115.341 (d)</b>	<b>Obtaining information from residents</b>	
	Is this information ascertained: Through conversations with the resident during the intake process and medical mental health screenings?	yes
	Is this information ascertained: During classification assessments?	yes
	Is this information ascertained: By reviewing court records, case files, facility behavioral records, and other relevant documentation from the resident's files?	yes
<b>115.341 (e)</b>	<b>Obtaining information from residents</b>	
	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
<b>115.342 (a)</b>	<b>Placement of residents</b>	
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Housing Assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Bed assignments?	yes

	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Work Assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Education Assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Program Assignments?	yes
<b>115.342 (b)</b>	<b>Placement of residents</b>	
	Are residents isolated from others only as a last resort when less restrictive measures are inadequate to keep them and other residents safe, and then only until an alternative means of keeping all residents safe can be arranged?	yes
	During any period of isolation, does the agency always refrain from denying residents daily large-muscle exercise?	yes
	During any period of isolation, does the agency always refrain from denying residents any legally required educational programming or special education services?	yes
	Do residents in isolation receive daily visits from a medical or mental health care clinician?	yes
	Do residents also have access to other programs and work opportunities to the extent possible?	yes
<b>115.342 (c)</b>	<b>Placement of residents</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na

<b>115.342 (d)</b>	<b>Placement of residents</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<b>115.342 (e)</b>	<b>Placement of residents</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<b>115.342 (f)</b>	<b>Placement of residents</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<b>115.342 (g)</b>	<b>Placement of residents</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<b>115.342 (h)</b>	<b>Placement of residents</b>	
	If a resident is isolated pursuant to paragraph (b) of this section, does the facility clearly document: The basis for the facility's concern for the resident's safety? (N/A for h and i if facility doesn't use isolation?)	na
	If a resident is isolated pursuant to paragraph (b) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged? (N/A for h and i if facility doesn't use isolation?)	na
<b>115.342 (i)</b>	<b>Placement of residents</b>	
	In the case of each resident who is isolated as a last resort when less restrictive measures are inadequate to keep them and other residents safe, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
<b>115.351</b>	<b>Resident reporting</b>	

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

	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of residents?	yes
<b>115.352 (a)</b>	<b>Exhaustion of administrative remedies</b>	
	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
<b>115.352 (b)</b>	<b>Exhaustion of administrative remedies</b>	
	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.)	na
	Does the agency always refrain from requiring an resident to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	na
<b>115.352 (c)</b>	<b>Exhaustion of administrative remedies</b>	
	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.)	na
	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.)	na
<b>115.352 (d)</b>	<b>Exhaustion of administrative remedies</b>	
	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	na

	standard.)	
	If the agency determines that the 90 day timeframe is insufficient to make an appropriate decision and claims an extension of time (the maximum allowable extension of time to respond is 70 days per 115.352(d)(3)) , does the agency notify the resident in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	na
	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.)	na
<b>115.352 (e)</b>	<b>Exhaustion of administrative remedies</b>	
	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.)	na
	Are those third parties also permitted to file such requests on behalf of residents? (If a third party, other than a parent or legal guardian, files such a request on behalf of a resident, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	na
	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.)	na
	Is a parent or legal guardian of a juvenile allowed to file a grievance regarding allegations of sexual abuse, including appeals, on behalf of such juvenile? (N/A if agency is exempt from this standard.)	na
	If a parent or legal guardian of a juvenile files a grievance (or an appeal) on behalf of a juvenile regarding allegations of sexual abuse, is it the case that those grievances are not conditioned upon the juvenile agreeing to have the request filed on his or her behalf? (N/A if agency is exempt from this standard.)	na
<b>115.352</b>	<b>Exhaustion of administrative remedies</b>	

<b>(f)</b>		
	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.)	na
	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.)	na
	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.)	na
	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.)	na
	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.)	na
	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.)	na
	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.)	na
<b>115.352 (g)</b>	<b>Exhaustion of administrative remedies</b>	
	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.)	na
<b>115.353 (a)</b>	<b>Resident access to outside confidential support services and legal representation</b>	
	Does the facility provide residents with access to outside victim advocates for emotional support services related to sexual abuse by providing, posting, or otherwise making accessible mailing addresses and telephone numbers, including toll-free hotline	yes

	numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies?	yes
	Does the facility enable reasonable communication between residents and these organizations and agencies, in as confidential a manner as possible?	yes
<b>115.353 (b)</b>	<b>Resident access to outside confidential support services and legal representation</b>	
	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
<b>115.353 (c)</b>	<b>Resident access to outside confidential support services and legal representation</b>	
	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
<b>115.353 (d)</b>	<b>Resident access to outside confidential support services and legal representation</b>	
	Does the facility provide residents with reasonable and confidential access to their attorneys or other legal representation?	yes
	Does the facility provide residents with reasonable access to parents or legal guardians?	yes
<b>115.354 (a)</b>	<b>Third-party reporting</b>	
	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

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

<b>115.361 (e)</b>	<b>Staff and agency reporting duties</b>	
	Upon receiving any allegation of sexual abuse, does the facility head or his or her designee promptly report the allegation to the appropriate office?	yes
	Upon receiving any allegation of sexual abuse, does the facility head or his or her designee promptly report the allegation to the alleged victim's parents or legal guardians unless the facility has official documentation showing the parents or legal guardians should not be notified?	yes
	If the alleged victim is under the guardianship of the child welfare system, does the facility head or his or her designee promptly report the allegation to the alleged victim's caseworker instead of the parents or legal guardians? (N/A if the alleged victim is not under the guardianship of the child welfare system.)	yes
	If a juvenile court retains jurisdiction over the alleged victim, does the facility head or designee also report the allegation to the juvenile's attorney or other legal representative of record within 14 days of receiving the allegation?	yes
<b>115.361 (f)</b>	<b>Staff and agency reporting duties</b>	
	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
<b>115.362 (a)</b>	<b>Agency protection duties</b>	
	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
<b>115.363 (a)</b>	<b>Reporting to other confinement facilities</b>	
	Upon receiving an allegation that a resident was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
	Does the head of the facility that received the allegation also notify the appropriate investigative agency?	yes

<b>115.363 (b)</b>	<b>Reporting to other confinement facilities</b>	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
<b>115.363 (c)</b>	<b>Reporting to other confinement facilities</b>	
	Does the agency document that it has provided such notification?	yes
<b>115.363 (d)</b>	<b>Reporting to other confinement facilities</b>	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
<b>115.364 (a)</b>	<b>Staff first responder duties</b>	
	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
<b>115.364 (b)</b>	<b>Staff first responder duties</b>	

	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
<b>115.365 (a)</b>	<b>Coordinated response</b>	
	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
<b>115.366 (a)</b>	<b>Preservation of ability to protect residents from contact with abusers</b>	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
<b>115.367 (a)</b>	<b>Agency protection against retaliation</b>	
	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
<b>115.367 (b)</b>	<b>Agency protection against retaliation</b>	
	Does the agency employ multiple protection measures for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations, such as housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services?	yes
<b>115.367 (c)</b>	<b>Agency protection against retaliation</b>	

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

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

<b>115.371 (d)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency always refrain from terminating an investigation solely because the source of the allegation recants the allegation?	yes
<b>115.371 (e)</b>	<b>Criminal and administrative agency investigations</b>	
	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
<b>115.371 (f)</b>	<b>Criminal and administrative agency investigations</b>	
	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
<b>115.371 (g)</b>	<b>Criminal and administrative agency investigations</b>	
	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
<b>115.371 (h)</b>	<b>Criminal and administrative agency investigations</b>	
	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
<b>115.371 (i)</b>	<b>Criminal and administrative agency investigations</b>	
	Are all substantiated allegations of conduct that appears to be	yes

	criminal referred for prosecution?	
<b>115.371 (j)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency retain all written reports referenced in 115.371(g) and (h) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years unless the abuse was committed by a juvenile resident and applicable law requires a shorter period of retention?	yes
<b>115.371 (k)</b>	<b>Criminal and administrative agency investigations</b>	
	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
<b>115.371 (m)</b>	<b>Criminal and administrative agency investigations</b>	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
<b>115.372 (a)</b>	<b>Evidentiary standard for administrative investigations</b>	
	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
<b>115.373 (a)</b>	<b>Reporting to residents</b>	
	Following an investigation into a resident's allegation of sexual abuse suffered in the facility, does the agency inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
<b>115.373 (b)</b>	<b>Reporting to residents</b>	
	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	yes

	responsible for conducting administrative and criminal investigations.)	
<b>115.373 (c)</b>	<b>Reporting to residents</b>	
	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
<b>115.373 (d)</b>	<b>Reporting to residents</b>	
	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	yes

	within the facility?	
<b>115.373 (e)</b>	<b>Reporting to residents</b>	
	Does the agency document all such notifications or attempted notifications?	yes
<b>115.376 (a)</b>	<b>Disciplinary sanctions for staff</b>	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
<b>115.376 (b)</b>	<b>Disciplinary sanctions for staff</b>	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
<b>115.376 (c)</b>	<b>Disciplinary sanctions for staff</b>	
	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
<b>115.376 (d)</b>	<b>Disciplinary sanctions for staff</b>	
	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
<b>115.377 (a)</b>	<b>Corrective action for contractors and volunteers</b>	
	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
<b>115.377 (b)</b>	<b>Corrective action for contractors and volunteers</b>	
	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
<b>115.378 (a)</b>	<b>Interventions and disciplinary sanctions for residents</b>	
	Following an administrative finding that a resident engaged in resident-on-resident sexual abuse, or following a criminal finding of guilt for resident-on-resident sexual abuse, may residents be subject to disciplinary sanctions only pursuant to a formal disciplinary process?	yes
<b>115.378 (b)</b>	<b>Interventions and disciplinary sanctions for residents</b>	
	Are disciplinary sanctions commensurate with the nature and circumstances of the abuse committed, the resident's disciplinary history, and the sanctions imposed for comparable offenses by other residents with similar histories?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident is not denied daily large-muscle exercise?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident is not denied access to any legally required educational programming or special education services?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident receives daily visits from a medical or mental health care clinician?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the resident also have access to other programs and work opportunities to the extent possible?	yes
<b>115.378</b>	<b>Interventions and disciplinary sanctions for residents</b>	

<b>(c)</b>		
	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
<b>115.378 (d)</b>	<b>Interventions and disciplinary sanctions for residents</b>	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to offer the offending resident participation in such interventions?	yes
	If the agency requires participation in such interventions as a condition of access to any rewards-based behavior management system or other behavior-based incentives, does it always refrain from requiring such participation as a condition to accessing general programming or education?	yes
<b>115.378 (e)</b>	<b>Interventions and disciplinary sanctions for residents</b>	
	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
<b>115.378 (f)</b>	<b>Interventions and disciplinary sanctions for residents</b>	
	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
<b>115.378 (g)</b>	<b>Interventions and disciplinary sanctions for residents</b>	
	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
<b>115.381 (a)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.341 indicates that a resident has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that	yes

	the resident is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening?	
<b>115.381 (b)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.341 indicates that a resident has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the resident is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening?	yes
<b>115.381 (c)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
<b>115.381 (d)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Do medical and mental health practitioners obtain informed consent from residents before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the resident is under the age of 18?	yes
<b>115.382 (a)</b>	<b>Access to emergency medical and mental health services</b>	
	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
<b>115.382 (b)</b>	<b>Access to emergency medical and mental health services</b>	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do staff first responders take preliminary steps to protect the victim pursuant to § 115.362?	yes
	Do staff first responders immediately notify the appropriate	yes

	medical and mental health practitioners?	
<b>115.382 (c)</b>	<b>Access to emergency medical and mental health services</b>	
	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
<b>115.382 (d)</b>	<b>Access to emergency medical and mental health services</b>	
	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
<b>115.383 (a)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	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
<b>115.383 (b)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	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
<b>115.383 (c)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
<b>115.383 (d)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are resident victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if all-male facility.)	yes
<b>115.383 (e)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If pregnancy results from the conduct described in paragraph §	yes

	115.383(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if all-male facility.)	
<b>115.383 (f)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are resident victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
<b>115.383 (g)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	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
<b>115.383 (h)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	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
<b>115.386 (a)</b>	<b>Sexual abuse incident reviews</b>	
	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
<b>115.386 (b)</b>	<b>Sexual abuse incident reviews</b>	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
<b>115.386 (c)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
<b>115.386 (d)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team: Consider whether the allegation or	yes

	investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.386(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
<b>115.386 (e)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
<b>115.387 (a)</b>	<b>Data collection</b>	
	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
<b>115.387 (b)</b>	<b>Data collection</b>	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
<b>115.387 (c)</b>	<b>Data collection</b>	
	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

<b>115.387 (d)</b>	<b>Data collection</b>	
	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
<b>115.387 (e)</b>	<b>Data collection</b>	
	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.)	yes
<b>115.387 (f)</b>	<b>Data collection</b>	
	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
<b>115.388 (a)</b>	<b>Data review for corrective action</b>	
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
<b>115.388 (b)</b>	<b>Data review for corrective action</b>	
	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	yes

	addressing sexual abuse?	
<b>115.388 (c)</b>	<b>Data review for corrective action</b>	
	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
<b>115.388 (d)</b>	<b>Data review for corrective action</b>	
	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
<b>115.389 (a)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency ensure that data collected pursuant to § 115.387 are securely retained?	yes
<b>115.389 (b)</b>	<b>Data storage, publication, and destruction</b>	
	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
<b>115.389 (c)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
<b>115.389 (d)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency maintain sexual abuse data collected pursuant to § 115.387 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
<b>115.401 (a)</b>	<b>Frequency and scope of audits</b>	
	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?	yes

	(Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	
<b>115.401 (b)</b>	<b>Frequency and scope of audits</b>	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	yes
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	na
<b>115.401 (h)</b>	<b>Frequency and scope of audits</b>	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
<b>115.401 (i)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
<b>115.401 (m)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
<b>115.401 (n)</b>	<b>Frequency and scope of audits</b>	
	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
<b>115.403 (f)</b>	<b>Audit contents and findings</b>	
	The agency has published on its agency website, if it has one, or	yes

	<p>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.)</p>	
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