

PREA Facility Audit Report: Final

Name of Facility: Kitsap County Juvenile Detention Facility

Facility Type: Juvenile

Date Interim Report Submitted: NA

Date Final Report Submitted: 01/05/2023

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
Auditor Full Name as Signed: Robert Palmquist	Date of Signature: 01/05/2023

AUDITOR INFORMATION	
Auditor name:	Palmquist, Robert
Email:	robobem@gmail.com
Start Date of On-Site Audit:	12/13/2022
End Date of On-Site Audit:	12/14/2022

FACILITY INFORMATION	
Facility name:	Kitsap County Juvenile Detention Facility
Facility physical address:	1338 Southwest Old Clifton Road, Port Orchard, Washington - 98367
Facility mailing address:	

Primary Contact	
Name:	Tamara Wilson
Email Address:	twilson@kitsap.com
Telephone Number:	253-358-6889

Superintendent/Director/Administrator	
Name:	Michael Merringer
Email Address:	mmeringer@kitsap.gov
Telephone Number:	360-337-5465

Facility PREA Compliance Manager	
Name:	
Email Address:	
Telephone Number:	

Facility Characteristics	
Designed facility capacity:	102
Current population of facility:	2
Average daily population for the past 12 months:	4
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Both females and males
Age range of population:	10-18
Facility security levels/resident custody levels:	N/A
Number of staff currently employed at the facility who may have contact with residents:	52
Number of individual contractors who have contact with residents, currently authorized to enter the facility:	52
Number of volunteers who have contact with residents, currently authorized to enter the facility:	1

AGENCY INFORMATION	
Name of agency:	Kitsap County Juvenile and Family Court Services
Governing authority or parent agency (if applicable):	
Physical Address:	1338 Southwest Old Clifton Road, Port Orchard, Washington - 98367
Mailing Address:	
Telephone number:	

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

Agency-Wide PREA Coordinator Information			
Name:	Tam Wilson	Email Address:	twilson@kitsap.gov

SUMMARY OF AUDIT FINDINGS	
<p>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.</p> <p>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.</p>	
Number of standards exceeded:	
0	
Number of standards met:	
43	
Number of standards not met:	
0	

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2022-12-13
2. End date of the onsite portion of the audit:	2022-12-14

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:	Kitsap Support Advocacy and Counseling Center Kitsap County Erica Rampelberg, Executive Director

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	102
15. Average daily population for the past 12 months:	7
16. Number of inmate/resident/detainee housing units:	8
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

36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	3
38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	0
39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	0
40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	0
41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	0
42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	0

<p>43. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</p>	<p>The Auditor interviewed 100% of the residents in the facility on the first day of the Audit.</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</p>	<p>16</p>

<p>50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>0</p>
<p>51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>6</p>
<p>52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</p>	<p>Volunteers are not allowed into the facility due to Covid-19 restrictions. These restrictions have been in place since February 2020. Only Medical and Education Contractors have access to the facility.</p>

INTERVIEWS

Inmate/Resident/Detainee Interviews

Random Inmate/Resident/Detainee Interviews

<p>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>4</p>
<p>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</p>	<p> <input type="checkbox"/> Age <input type="checkbox"/> Race <input type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input type="checkbox"/> Length of time in the facility <input type="checkbox"/> Housing assignment <input type="checkbox"/> Gender <input type="checkbox"/> Other <input checked="" type="checkbox"/> None </p>

<p>If "None," explain:</p>	<p>The Auditor interviewed 100% of the residents in the facility on the first day of the Audit. The initial roster provided to the Auditor at 8:00 am listed three residents. A fourth resident was detained during the evening on the first audit day.</p>
<p>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p>	<p>The Auditor interviewed 100% of the residents in the facility on the first day of the Audit.</p>
<p>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</p>	<p> <input type="radio"/> Yes <input checked="" type="radio"/> No </p>
<p>a. Explain why it was not possible to conduct the minimum number of random inmate/resident/detainee interviews:</p>	<p>The Auditor interviewed 100% of the residents in the facility on the first day of the Audit. The initial roster provided to the Auditor at 8:00 am listed three residents. A fourth resident was detained during the evening on the first audit day.</p>
<p>57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>The Auditor interviewed 100% of the residents in the facility on the first day of the Audit. The initial roster provided to the Auditor at 8:00 am listed three residents. A fourth resident was detained during the evening on the first audit day.</p>
<p>Targeted Inmate/Resident/Detainee Interviews</p>	
<p>58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>0</p>

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

<p>60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
--	----------

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
---	---

<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The Auditor interviewed 100% of the residents in the facility on the first day of the Audit. No resident interviewed had a physical disability.</p>
--	--

<p>61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
---	----------

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The Auditor interviewed 100% of the residents in the facility on the first day of the Audit. No resident interviewed presented with a cognitive or functional disability.</p>
<p>62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The Auditor interviewed 100% of the residents in the facility on the first day of the Audit. No resident interviewed was Blind or had low vision.</p>
<p>63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The Auditor interviewed 100% of the residents in the facility on the first day of the Audit. No resident was deaf or hard of hearing.</p>
<p>64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The Auditor interviewed 100% of the residents in the facility on the first day of the Audit. No residents were Limited English Proficient.</p>
<p>65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The Auditor interviewed 100% of the residents in the facility on the first day of the Audit. No residents identified as lesbian, gay, or bisexual.</p>
<p>66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The Auditor interviewed 100% of the residents in the facility on the first day of the Audit. No residents identified as transgender.</p>
<p>67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The Auditor interviewed 100% of the residents in the facility on the first day of the Audit. No residents reported sexual abuse in the facility.</p>
<p>68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The Auditor interviewed 100% of the residents in the facility on the first day of the Audit. No residents had disclosed prior sexual victimization during risk screening.</p>

<p>69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The Auditor interviewed 100% of the residents in the facility on the first day of the Audit. No residents were ever placed in segregated housing/isolation for risk of sexual victimization.</p>
<p>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>The Auditor interviewed 100% of the residents who were in the facility on the first day of the Audit.</p>
<p>Staff, Volunteer, and Contractor Interviews</p>	
<p>Random Staff Interviews</p>	
<p>71. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>9</p>

<p>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p><input checked="" type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input type="checkbox"/> Work assignment</p> <p><input checked="" type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<p>a. Select the reason(s) why you were unable to conduct the minimum number of RANDOM STAFF interviews: (select all that apply)</p>	<p><input type="checkbox"/> Too many staff declined to participate in interviews.</p> <p><input type="checkbox"/> Not enough staff employed by the facility to meet the minimum number of random staff interviews (Note: select this option if there were not enough staff employed by the facility or not enough staff employed by the facility to interview for both random and specialized staff roles).</p> <p><input checked="" type="checkbox"/> Not enough staff available in the facility during the onsite portion of the audit to meet the minimum number of random staff interviews.</p> <p><input type="checkbox"/> Other</p>
<p>74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>The Auditor arranged to conduct 12 random staff interviews; three staff were not available on the morning watch shift due to illness.</p>

Specialized Staff, Volunteers, and Contractor Interviews

Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.

75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	16
76. Were you able to interview the Agency Head?	<input checked="" type="radio"/> Yes <input type="radio"/> No
77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	<input checked="" type="radio"/> Yes <input type="radio"/> No
78. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No
79. Were you able to interview the PREA Compliance Manager?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

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

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

	<input checked="" type="checkbox"/> Intake staff <input type="checkbox"/> Other
81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input type="radio"/> Yes <input checked="" type="radio"/> No
82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of CONTRACTORS who were interviewed:	2
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Security/detention <input checked="" type="checkbox"/> Education/programming <input checked="" type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other
83. Provide any additional comments regarding selecting or interviewing specialized staff.	The Kitsap County Juvenile Detention Center is a small facility. The Juvenile Detention Manager is responsible for several key areas concerning the PREA Standards, including Retaliation Monitoring, Incident Reviews, and Investigations. Juvenile Custody Officers and Supervisors conduct both intake screening and Risk Assessments.

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

84. Did you have access to all areas of the facility?

Yes

No

Was the site review an active, inquiring process that included the following:

85. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?

Yes

No

86. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?

Yes

No

87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?

Yes

No

88. Informal conversations with staff during the site review (encouraged, not required)?

Yes

No

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

There are posters informing residents about zero Tolerance. Specifically, Sexual assault is prohibited. Speak up, get help, report the incident, tell someone you trust, and tell the facts. These posters are located throughout the facility, Intake, Housing units, Medical, and Education. Several informational posters have information on the Kitsap Sexual Assault and Advocacy Center. The audit notification signs were visible. The bulletin boards also contained information on mental health organizations. Reporting methods and Advocacy information are available in the housing PODS on the bulletin boards and at the Officer's station. Residents are informed about how to make reports. The information is available in the handbook; all residents are provided a copy. Residents are informed that third-party reports from attorneys, family or probation officers will all be investigated.

There is a confidential, anonymous reporting mechanism available to residents. Showers are always conducted one resident at a time.

There were no issues with the cross-gender announcement. Staff announced their presence. There is video monitoring in all general areas. Video camera placement does not observe residents in their cells. Video cameras do not show residents utilizing the toilet, changing clothes or taking a shower. Mail is received in the Probation Department.

Delivered to the PODS by Custody Staff. Mail is delivered to the resident, opened by Staff to check for contraband and given to the resident. Residents can send sealed mail to attorneys. The Auditor observed a mock intake. All appropriate information was provided. Staff explained Zero Tolerance, reviewed reporting methods, reviewed Advocacy information, and informed residents how to make a confidential phone call.

Residents are informed that attorney calls and Advocacy calls are not recorded.

Comprehensive Education is provided. A video is shown, and the resident is provided the opportunity to ask questions. Upon completion, the resident signs a form

indicating they had received the Education. Kitsap County Juvenile Detention relies on a Language Line for interpretation services. This service provides for many different languages, including American Sign Language. This service is not utilized as bilingual Staff is available in the Detention Center and Probation 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.

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

Yes

No

91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).

The Auditor reviewed the relevant policies, procedures, reports, and accreditations. The Auditor was provided a sampling of relevant documents for the most recent one-year period. The Auditor was permitted access to and observed all the Juvenile Detention Center areas. The Auditor was permitted to request and receive copies of all relevant documents. The Auditor interviewed Staff, supervisors, and administrators. The Auditor was permitted to conduct private interviews with residents. Residents were allowed to send confidential information or correspondence to the Auditor in the same manner as if they were communicating with legal counsel.

SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

Remember the number of allegations should be based on a review of all sources of allegations (e.g., hotline, third-party, grievances) and should not be based solely on the number of investigations conducted. Note: For question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, or detainee sexual abuse allegations and investigations, as applicable to the facility type being audited.

92. Total number of SEXUAL ABUSE allegations and investigations overview during the 12 months preceding the audit, by incident type:

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0
Total	0	0	0	0

93. Total number of SEXUAL HARASSMENT allegations and investigations overview during the 12 months preceding the audit, by incident type:

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	0	0	0	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	0	0	0	0

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

Note: these counts should reflect where the investigation is currently (i.e., if a criminal investigation was referred for prosecution and resulted in a conviction, that investigation outcome should only appear in the count for “convicted.”) Do not double count. Additionally, for question brevity, we use the term “inmate” in the following questions. Auditors should provide information on inmate, resident, and detainee sexual abuse investigation files, as applicable to the facility type being audited.

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0
Total	0	0	0	0

Sexual Harassment Investigation Outcomes

Note: these counts should reflect where the investigation is currently. Do not double count. Additionally, for question brevity, we use the term "inmate" in the following questions. Auditors should provide information on inmate, resident, and detainee sexual harassment investigation files, as applicable to the facility type being audited.

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	0	0	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	0	0	0	0

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

98. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:	0
a. Explain why you were unable to review any sexual abuse investigation files:	The Kitsap County Juvenile Detention Center has not had an incident of sexual abuse or sexual harassment in the past two years.

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

Inmate-on-inmate sexual abuse investigation files

<p>100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>0</p>
--	----------

<p>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
--	---

<p>102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
--	---

Staff-on-inmate sexual abuse investigation files

<p>103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>0</p>
---	----------

<p>104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
---	--

<p>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p> <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files) </p>
---	--

Sexual Harassment Investigation Files Selected for Review

<p>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
--	----------

<p>a. Explain why you were unable to review any sexual harassment investigation files:</p>	<p>The Kitsap County Juvenile Detention Center has not had an incident of sexual abuse or sexual harassment in the past two years.</p>
---	--

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

Inmate-on-inmate sexual harassment investigation files

<p>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
---	----------

<p>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p> <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files) </p>
---	--

<p>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p> <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files) </p>
<p>Staff-on-inmate sexual harassment investigation files</p>	
<p>111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</p>	<p> <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files) </p>
<p>113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p> <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files) </p>
<p>114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</p>	<p>The Kitsap County Juvenile Detention Center has not had an incident of sexual abuse or sexual harassment in the past two years.</p>

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

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

- Yes
- No

Non-certified Support Staff

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

- Yes
- No

AUDITING ARRANGEMENTS AND COMPENSATION

121. Who paid you to conduct this audit?

- The audited facility or its parent agency
- My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)
- A third-party auditing entity (e.g., accreditation body, consulting firm)
- Other

Standards

Auditor Overall Determination Definitions

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

Auditor Discussion Instructions

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

115.311	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents</p> <ol style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act (PREA) 2. Kitsap County Juvenile Detention Center Organization Chart <p>Interviews conducted with</p> <ol style="list-style-type: none"> 1. Juvenile Court Administrator 2. PREA Coordinator/Compliance Manager <p>The following policy was reviewed: Policy 3.20 Prison Rape Elimination Act (PREA). The Organization Chart for the Kitsap County Juvenile Detention Center was also reviewed.</p> <p>Interviews were conducted with the PREA Coordinator and the Juvenile Court Administrator. The PREA Coordinator indicated she had enough time to coordinate the facilities' PREA compliance efforts. The PREA Coordinator Manager and the Juvenile Court Administrator were knowledgeable concerning PREA and articulated the vision of zero tolerance at the Kitsap County Juvenile Detention Center.</p> <p>The following observations were made during the on-site tour of the facility: The housing units (PODS) had signs informing residents of their right to be free of sexual abuse. There were signs in both English and Spanish informing residents about how to report incidents of sexual abuse. Information was available concerning local services provided by the Kitsap County Sexual Assault Center, a Community Services Sexual Assault and Family Trauma Advocacy Program. This program meets victims of sexual trauma in hospitals, police stations, or their homes to provide immediate assistance after a trauma.</p> <p>The Kitsap County Juvenile Detention Center has a zero-tolerance policy and training program that meets the requirements for this standard. The policy provides the facility's approach to preventing, detecting, and responding to sexual abuse and sexual harassment. It has definitions of prohibited behaviors and sanctions for those prohibited behaviors. The policy provides strategies and responses to reduce and prevent sexual abuse. The agency has one facility and one PREA Coordinator.</p> <p>The overriding approach of the Kitsap County Juvenile Detention Center to eliminate or prevent sexual abuse and sexual harassment of its residents is to ensure uniformity of implementation of the agency's zero-tolerance policy in all areas of the facility. Including providing definitions of prohibited behaviors regarding sexual abuse and sexual harassment and prescribing sanctions against staff and residents</p>

who engage in sexual abuse sexual harassment. In the event of an allegation of sexual abuse or sexual harassment, the Kitsap County Juvenile Detention Center has developed a coordinated response plan that ensures the safety and security of the alleged victim while providing for a comprehensive and systematic investigation into the allegation.

The policy applies to all Kitsap County Juvenile Detention Center staff, including employees (full-time, part-time, temporary and on-call), volunteers and contractors, and residents at the Kitsap County Juvenile Detention Center.

Kitsap County Juvenile Detention Center utilizes the following strategies to reduce and prevent sexual abuse and sexual harassment at the facility:

- Designate a staff member as the Kitsap County Juvenile Detention Center PREA Coordinator who will ensure that Kitsap County Juvenile Detention Center complies with all PREA standards.
- Training staff (including contractors and volunteers) to detect sexual abuse and sexual harassment.
- Screening for risk of sexual victimization and abusiveness.
- Requiring all staff (including contractors and volunteers) to report all reported or suspected sexual abuse, sexual harassment, and retaliation incidents promptly.
- Respond promptly and effectively to all reports of sexual abuse, sexual harassment, and retaliation by ensuring that staff (including contractors and volunteers) cooperates fully with any investigation.
- Administer sanctions for those found to have participated in prohibited behavior.
- Providing medical and mental health care to victims and abusers.
- Performing an annual evaluation to assess how Kitsap County Juvenile Detention Center can improve its zero-tolerance policy and procedures.
- Ensuring that Kitsap County Juvenile Detention Center is audited for PREA compliance.

The auditor reviewed the PREA Policy and the Kitsap County Juvenile Detention Center Organizational Chart. Also, interviews were conducted with the PREA Coordinator and the Juvenile Court Administrator. The Juvenile Court Administrator supported the efforts of the PREA Coordinator, and the PREA Coordinator indicated she had enough time to coordinate the facility's PREA compliance efforts.

Kitsap County Juvenile Detention Center Policy Policy 3.20 Prison Rape Elimination Act (PREA) addresses 115.311 (a)-1 - (a)-5.

The Kitsap County Juvenile Detention Center Organizational Chart and the interview with the PREA Coordinator address 115.311(b)-1 - (b)-3.

The Kitsap County Juvenile Detention Center Organizational Chart and the interview with the PREA Coordinator address 115.311(c)-1 - (c)-3.

The Kitsap County Juvenile Detention Center complies with Standard 115.311 Zero

	tolerance of sexual abuse and sexual harassment; PREA Coordinator.
--	--

115.312	Contracting with other entities for the confinement of residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Kitsap County Juvenile Detention Facility is a County Juvenile Detention Facility; The Kitsap County Juvenile Detention Facility does not contract with other agencies for services.

115.313	Supervision and monitoring
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 580 297">Auditor Discussion</p> <p data-bbox="280 340 443 374">Documents</p> <ol data-bbox="341 445 975 602" style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. 2022 Staffing Plan 3. Unannounced Round Samples 2019-2022 4. Shift schedule week ending 12-18-2022 <p data-bbox="280 642 655 676">Interviews conducted with</p> <ol data-bbox="341 745 783 819" style="list-style-type: none"> 1. Juvenile Detention Manager 2. PREA Coordinator <p data-bbox="280 860 1437 976">The following policy and documents were reviewed: Policy 3.20 Prison Rape Elimination Act, Staffing plan 2022, Unannounced Round logs 2019-2022 and the Shift Schedule for the week ending 12-18-2022.</p> <p data-bbox="280 1016 1437 1216">The Juvenile Detention Manager reports that Kitsap County Juvenile Detention Center supervisors and lead staff develop, document, and regularly comply with a staffing plan that provides adequate staffing levels. The Juvenile Detention Manager further reports; the average daily number of offenders is 4. The staffing plan is predicated upon an average daily number of 25 offenders.</p> <p data-bbox="280 1256 1401 1330">The Auditor notes each of the eleven (11) factors identified for consideration in staffing plan development are identified and addressed.</p> <p data-bbox="280 1370 1437 1444">An interview was conducted with the PREA Coordinator and the Juvenile Detention Manager concerning staffing levels and staffing reports.</p> <p data-bbox="280 1485 1481 2063">The Auditor observed appropriate staffing levels throughout the facility. The Kitsap County Juvenile Detention Center implements a staffing plan that provides adequate staffing levels. In addition to staff members, there is video monitoring available to protect residents from sexual abuse. During the facility tour, the Auditor observed direct supervision in housing pods. The Auditor observed staff members moving from room to room in program areas. The Auditor observed adequate staffing patterns during every shift. There was adequate staffing in the housing units and programming/education areas. The Auditor observed the staff's line of sight and assessed whether there were blind spots. There were no issues with line of sight or blind spots. The Auditor observed camera placement. The Control Center Officer monitors cameras; the Control Center is staffed 24/365. The Auditor did not observe any understaffing, overcrowding, or poor line of sight. Informal discussions with Supervisors did not indicate any issues with staffing, overcrowding or poor line of sight. The Kitsap County Juvenile Detention Center maintains a staffing ratio of</p>

1:8 during waking hours and 1:16 during sleeping hours.

The staffing plan is reviewed every year by the PREA Coordinator, the Juvenile Detention Manager and the Juvenile Court Administrator. There have been no deviations from the staffing plan in the past 12 months. The facility staffing plan is reviewed yearly, and this review includes a vulnerability analysis that looks at the physical plant, video monitoring systems, and the overall allocation of resources. Staffing plan review includes a review of any judicial findings (none) or inadequacies from federal investigative or internal/external oversight agencies (none). The plan reviews the facility's architectural weaknesses. The review includes the population statistics for the previous year and an analysis of the population for the day the review took place.

Supervisors monitor the staffing roster daily. The Juvenile Detention Manager receives daily information regarding staffing and population changes.

The Juvenile Detention Manager reports the facility does document and justify all deviations from the staffing plan each time there is non-compliance. The Juvenile Detention Manager asserts that Kitsap County Juvenile Detention Center always complies with the staffing plan. If any deviations from the staffing plan arise, explanations for deviations are documented.

The Juvenile Detention Manager states that during the last twelve (12) months, there were zero (0) instances wherein staffing ratios deviated from the established staffing plan (one staff to eight residents waking hours, one staff to sixteen residents sleeping hours).

The Juvenile Detention Manager states that PREA standards obligate Kitsap County Juvenile Detention Center to maintain security staffing ratios. Supervisors ensure proper ratios are maintained with spot-checking by the Juvenile Detention Manager.

The PREA Coordinator, in collaboration with the Juvenile Detention Manager and Juvenile Court Administrator, reviews the staffing plan to determine whether adjustments are needed; prevailing staffing patterns are considered; the deployment of monitoring technology is considered, and requests for video surveillance upgrades are made.

Intermediate-level or higher-level staff conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment. Rounds are documented and cover all shifts. During the facility tour, the Auditor quired Pod Staff concerning a supervisor's presence in the Pod. The Pod Officer indicated a Supervisor generally makes rounds several times during a shift.

Policy 3.20 Prison Rape Elimination Act, Part A page 3, Staffing Plan 2022 and interviews with the Juvenile Detention Manager and the PREA Coordinator addresses 115.313(a).

Interview with the Juvenile Detention Manager addresses 115.313(b).

A review of the Shift Schedule for the week ending December 18, 2022, and the

interview with the Juvenile Detention Manager addresses 115.313(c).

Staffing Plan 2022 and interviews with the Juvenile Detention Manager and the PREA Coordinator address 115.313(d).

The Unannounced Round Logs address 115.313(e).

The Kitsap County Juvenile Detention Center complies with 115.313 Supervision and monitoring.

115.315	Limits to cross-gender viewing and searches
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documents</p> <ol style="list-style-type: none"> 1. 3.20 Prison Rape Elimination Act 2. 3.08.3 Detention Search and Seizure 3. PREA Policy Hygiene 4. Cross-gender viewing and searches 5. Training Log Cross-gender and Transgender training log <p>Interviews conducted with</p> <ol style="list-style-type: none"> 1. Random Residents 2. Random Staff <p>The PRE-Audit Questionnaire indicates that residents' cross-gender strip or visual body cavity searches are not conducted at Kitsap County Juvenile Detention Center.</p> <p>The policy does not allow cross-gender strip searches and stipulates that medical practitioners only conduct cross-gender body cavity searches. 3.08.3 Detention Search and Seizure states Strip and Body Cavity Searches are performed only in compliance with the Revised Code of Washington (RCW) 10.79. All frisk/pat down and strip searches are conducted by a Detention Officer of the same gender/sex as the detainee searched, and staff shall not conduct cross-gender pat-down searches except in exigent circumstances. In those circumstances, staff will document and justify all cross-gender pat-down searches, cross-gender strip searches, and visual body cavity searches. If warranted, according to the strip search criteria, strip searches are conducted upon admission. The use of strip searches within the admission process is restricted by Washington State law (RCW 10.79), and such searches are conducted by staff of the same sex as the resident.</p> <p>There is no instance at the Kitsap County Juvenile Detention Center where a cross-gender strip search has been undertaken. Additionally, there have been no body cavity searches during the audit period.</p> <p>The PRE-Audit Questionnaire indicates the facility does not permit cross-gender pat-down searches. All nine random staff interviewees assert they are restricted from conducting cross-gender pat-down searches. The PRE-Audit Questionnaire indicates that all cross-gender strip searches, visual body cavity searches, and cross-gender pat-down searches are documented.</p> <p>All three random resident interview participants indicated a staff member of the same sex always searched them.</p> <p>The PRE-Audit Questionnaire indicates policies and procedures have been</p>

implemented at Kitsap County Juvenile Detention Center that enables 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. The Juvenile Detention Manager further relates policies and procedures require a staff of the opposite gender to announce their presence when entering a resident housing unit.

All nine random staff interviewees indicate they verbally announce their presence when entering a housing unit that houses residents of the opposite gender. All random staff interviewees indicated that residents could dress, shower, and use the toilet without being viewed by a staff of the opposite gender.

Three resident interviewees indicated opposite gender staff announces their presence when entering a housing area by verbalizing male or female on the pod. All three resident interviewees stated they and their peers are never naked or in full view of opposite-gender staff when they shower, toilet, or change clothes.

The PRE-Audit Questionnaire indicates staff is prohibited from searching or physically examining a transgender/intersex resident to determine the inmate's genital status. According to the Juvenile Detention Manager, no such searches have been conducted during the audit period.

All nine random staff interviewees indicated the facility prohibits staff from searching or physically examining a transgender/intersex resident to determine the resident's genital status. All interviewees indicated they were well aware of the expectation.

The Auditor observed all areas where residents may be undressed, such as showering, using the toilet, and changing their clothes. Specifically the housing units, medical, intake cells, and shower areas. Staff members could not view confined persons in a state of undress. The Auditor observed the control room cameras. The video monitoring, including pan, tilt, and zoom capabilities, did not allow staff to see a resident undressed.

Kitsap County Juvenile Detention Center Policy 3.08.3 Detention Search and Seizure, page 2, addresses 115.315(a).

Kitsap County Juvenile Detention Center 3.08.3 Detention Search and Seizure page 1 and interviews with Residents and Staff address 115.315(b).

Kitsap County Juvenile Detention Center Policy 3.08.3 Detention Search and Seizure, page 1, addresses 115.315(c).

Kitsap County Juvenile Detention Center Policy Detention-Detainee Hygiene, page 1, and interviews with Residents and Staff, addresses 115.315(d).

Kitsap County Juvenile Detention Center Policy 3.08.3 Detention Search and Seizure, pages 1-2, and interviews with Random staff address 115.315(e).

Kitsap County Training Log Cross-gender and Transgender training log Forms and Random staff interviews address 115.315(f).

The Kitsap County Juvenile Detention Center complies with Standard 115.315: Limits to cross-gender viewing and searches.

115.316	<p data-bbox="277 107 1455 197">Residents with disabilities and residents who are limited English proficient</p> <p data-bbox="277 232 1007 268">Auditor Overall Determination: Meets Standard</p> <p data-bbox="277 309 580 344">Auditor Discussion</p> <p data-bbox="277 385 443 421">Documents</p> <ol data-bbox="341 488 1187 689" style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. Language Assistance Kitsap County Court Services 3. Language Line 4. PREA Brochure Spanish 5. RCW 2.43 Interpreters for Non-English-Speaking Persons <p data-bbox="277 730 655 766">Interviews conducted with</p> <ol data-bbox="341 833 788 945" style="list-style-type: none"> 1. Intake Staff 2. Juvenile Detention Manager 3. Juvenile Court Administrator <p data-bbox="277 990 1422 1146">The following policy was reviewed: Policy 3.20 Prison Rape Elimination Act. Additionally, the Auditor reviewed the Language Assistance Kitsap County Court Services, the Language Line information, RCW 2.43 Interpreters for Non-English-Speaking Persons and the PREA Brochure in Spanish.</p> <p data-bbox="277 1187 1474 1886">The Kitsap County Juvenile Detention Facility has procedures to provide disabled residents with the opportunity to participate in efforts to prevent and respond to sexual abuse and harassment. In addition to written and visual education materials, the Kitsap County Juvenile Detention Facility has agreements with interpreters to assist in communicating effectively with residents with disabilities. Specifically, the Language Line Solutions Company provides on-demand phone interpreting for 240+ languages, including American Sign Language. This service has not been utilized but is available for staff to use. In addition, the Court Interpreters are available for use if necessary while this service has not been used by staff at the Kitsap County Juvenile Detention Facility, the service of court-appointed interpreters is available. If a qualified interpreter for a deaf or hard-of-hearing person is required, the Probation Staff will request a qualified interpreter from the Department of Social and Health Services, Office of Deaf Services, or through any community center for deaf and hard-of-hearing persons. The office of Deaf Services and these community centers maintain an up-to-date list of interpreters certified by the State and by the registry of interpreters for the Deaf. (RCW 2.43 Interpreters for Non-English-Speaking Persons)</p> <p data-bbox="277 1926 1474 2083">Residents with intellectual disabilities are given extra attention during the intake process to ensure they understand the information provided. If necessary, the assigned Probation Officer can assist as they are more familiar with the resident at the time of intake. The Kitsap County Juvenile Detention Facility staff members have</p>
---------	---

not experienced any incarcerated Blind or Deaf residents. However, the intake staff members are prepared to provide information in a format that will allow residents with limited reading skills, hearing disabilities, intellectual disabilities or low vision to know and understand all aspects of the facility's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Staff members will read information to residents with limited reading skills.

The Intake Staff indicated that they not only provided the information to residents but would also ensure the residents understood the material provided. The staff indicated they had never had either a Deaf or Blind resident. However, they were prepared to provide information concerning the entire intake process to residents who were either Blind or Deaf. The intake staff also indicated they had never had to use the Language Line services. During his interview, the Juvenile Court Administrator indicated that procedures are in place to ensure residents with disabilities and those who are limited in the English language have an equal opportunity to participate in the agency's effort to prevent sexual abuse and harassment.

The Auditor reviewed the Language Line information available to the Intake officers. Additionally, the Auditor reviewed the current Revised Codes of Washington about providing interpretation services to individuals with communication difficulties. The Auditor reviewed samples of PREA Posters in both English and Spanish. The PREA information provided to residents is also available in Spanish. Finally, interviews with facility staff indicate a variety of methods are available to ensure residents understand the material as it is presented to them.

The Auditor reviewed the intake procedures, resident printed materials, and reporting mechanisms. At the time of the audit, there were no Deaf or Blind residents in the population.

The Kitsap County Juvenile Detention Center does not utilize resident interpreters. However, random informal staff interviews indicate that resident information provided during an emergent situation (where an extended delay in obtaining a competent interpreter could compromise the resident's safety) brief interpretation of the emergent situation would be allowed. At the same time, the staff indicated that the protection of the victim was the most critical factor.

The Language Assistance Kitsap County Court Services and the interviews conducted with Intake staff and the Juvenile Court Administrator address 115.316(a)

The Language Assistance Kitsap County Court Services and the interview conducted with Intake staff and the Juvenile Court Administrator address 115.316(b)

Policy 3.20 Prison Rape Elimination Act Part A pages 5-6 and interviews with Random staff address 115.316(c).

The Kitsap County Juvenile Detention Center complies with 115.16: Residents with disabilities and residents who are limited English proficient.

115.317	Hiring and promotion decisions
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 297">Auditor Discussion</p> <p data-bbox="280 340 443 374">Documents</p> <ol data-bbox="341 445 1050 685" style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. 1.03 Hiring Policy 3. 1.05 Criminal History Information Check Policy 4. 1.20 Background Checks Contractors Policy 5. 1.10 Volunteer Background Checks Policy 6. Employee/Contractor/Volunteer Records Check <p data-bbox="280 725 655 759">Interviews conducted with</p> <ol data-bbox="341 831 932 947" style="list-style-type: none"> 1. Administrative Staff Human Resources 2. Juvenile Court Administrator 3. Juvenile Detention Manager <p data-bbox="280 987 1465 1104">PRE-Audit Questionnaire indicates agency policy prohibits hiring or promoting anyone who may have contact with residents and prohibits enlisting the services of any contractor who may have contact with residents who:</p> <ul data-bbox="352 1176 1453 1498" style="list-style-type: none"> • A. Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution; • B. 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 • C. Has been civilly or administratively adjudicated to have engaged in the activity described above. <p data-bbox="280 1538 1477 1738">The auditor's review of a Kitsap County Juvenile Detention Center application packet reveals the three questions articulated in 115.317(a) are addressed. The auditor's review of ten staff HR files reveals the three questions identified in 115.317(a) were asked pursuant to the application. The questions were asked before the date of hire.</p> <p data-bbox="280 1778 1445 1935">The PRE-Audit Questionnaire indicates agency policy requires the consideration of any incidents of sexual harassment in determining whether to hire or promote anyone or to enlist the services of any contractor who may have contact with residents.</p> <p data-bbox="280 1975 1481 2051">The Human Resources interviewee asserts the facility considers prior incidents of sexual harassment when determining whether to hire or promote anyone or to enlist</p>

the services of any contractor who may have contact with residents.

The HR interviewee asserts the facility performs criminal background record checks, consults appropriate child registries in the state or locality in which the employee will work, or considers pertinent civil or administrative adjudications for all newly hired employees who may have contact with residents and all employees who may have contact with residents, who are considered for promotions. The same procedure applies to contractors who may have contact with residents.

The entire process for hiring or promoting staff is coordinated through the Juvenile Court Administrator, the Detention Manager and the Administrative staff. The Detention Manager vets all potential staff members. After the initial application, there are two interviews and a physical aptitude test; criminal background record checks and child abuse registry checks are completed. Once the initial phase is completed (interview and physical aptitude test), there is a polygraph exam and a psychological interview.

The polygraph and psychological exam contain questions concerning sexual abuse and sexual harassment. The polygraph questions are specific, "Have you ever been accused of or investigated for a sexual harassment complaint?" "Are you required by any court order in any jurisdiction to register as a sex offender?" "Have you ever committed any physical sex act with any person under the age of sixteen?" "Have you had sexual intercourse with one who expressly did not wish to do so?" "Have you ever had sexual contact with a child under your care or supervision?" The Psychologist interview includes specific questions related to sexual harassment.

Two new employees were hired within the past 12 months, and all criminal background and child registry checks were completed appropriately. Background checks are completed every three years for current employees. The Auditor reviewed ten employee files; initial criminal background checks and three-year criminal background checks were completed. Employees who fail to disclose information concerning misconduct can be terminated from employment. The Administrative Officer confirmed that background checks are completed every three years and that appropriate sanctions are available for staff members who fail to report misconduct. Additionally, as indicated by the Juvenile Court Administrator, any deception, misinformation, or misinformation by omitting information during the application and Employment Screening Process shall disqualify the applicant from employment with the Department.

The Administrative Officer further indicated that when a former employee applies for work at another institution, upon request from that institution, the facility (in most cases, Human Resource staff) provides information on substantiated allegations of sexual abuse or sexual harassment to the requesting agency.

Background investigation includes a review of the following criteria: Criminal History/Activity: Any applicant with the following criminal/traffic conviction history or criminal/illegal activity shall typically be disqualified from employment. Any Conviction of any crime involving engaging or attempting to engage in sexual activity in the community by using force, overt or implied threats of force or

coercion is disqualified from employment. An NCIC/WASIC III criminal history check is completed on every applicant.

Kitsap County Juvenile Detention Center considers any incidents of sexual harassment during the application process.

Policy 3.20 Prison Rape Elimination Act, Part A pages 6-7, Employee/Contractor Records Check, and interviews with the Juvenile Court Administrator and Administrative Staff address 115.317(a), 115.317(a)-1 and 115.317(b) and 115.317(b)-1.

Policy 1.05 Criminal History Information Check Policy pages 1-2 and 6, Policy 1.20 Background Checks Contractors pages 1-5, Policy 1.10 Volunteer Background Checks pages 1-5, and interviews with the Juvenile Court Administrator and Administrative Staff address 115.317(c), 115.317(c)-1 and 115.317(d) and 115.317(d)-1.

Policy 1.05 Criminal History Information Check Policy pages 1-2 and 6, Policy 1.20 Background Checks Contractors pages 1-5, Policy 1.10 Volunteer Background Checks pages 1-5, and interviews with the Juvenile Court Administrator and Administrative Staff address 115.317(e) and 115.317(e)-1.

Policy 3.20 Prison Rape Elimination Act, Part A pages 6-7, Policy 1.03 Hiring Policy page 2, Employee/Contractor Records Check, and interviews with the Juvenile Court Administrator and Administrative Staff address 115.317(f) and (g).

The Kitsap County Juvenile Detention Center complies with Standard 115.317: Hiring and promotion decisions.

115.318	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>There has been no substantial expansion or modifications to the existing facilities since August 20, 2012. Kitsap County Juvenile Detention Center has made minor changes to its video monitoring equipment (fixed inoperable cameras). In his interview, the Juvenile Court Administrator indicated the importance of utilizing technology to protect residents from sexual abuse.</p> <p>The Kitsap County Juvenile Detention Center complies with Standard 115.318: Upgrades to facilities and technologies.</p>

115.321	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents</p> <ol style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. 3.20 Prison Rape Elimination Act Part A Responsive Planning 3. 3.20 Prison Rape Elimination Act Part D Investigation Administrative 4. Kitsap County Special Assault Investigation Protocol 5. Kitsap County Sexual Assault Center Memorandum of Understanding 6. Port Orchard Police Department Memorandum of Understanding 7. Coordinated Response Plan 8. RCW 7.68.170 <p>Interviews conducted with</p> <p>Medical Staff</p> <p>PREA Coordinator</p> <p>Kitsap County Sexual Assault Center Executive Director</p> <p>The following policies and other documentation were reviewed: Policy 3.20 Prison Rape Elimination Act, 3.20 Prison Rape Elimination Act Part A Responsive Planning, 3.20 Prison Rape Elimination Act Part D Investigation Administrative, Kitsap County Special Assault Investigation Protocol, Kitsap County Sexual Assault Center Memorandum of Understanding, Port Orchard Police Department Memorandum of Understanding and the Coordinated Response Plan.</p> <p>The agency is responsible for conducting administrative sexual abuse investigations. The Port Orchard Police Department conducts criminal investigations. The Port Orchard Police Department is responsible for investigating all allegations of criminal sexual abuse at the Kitsap County Juvenile Detention Facility. The Port Orchard Police Department follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for criminal prosecutions and administrative proceedings after the criminal process is completed. The protocol is developmentally appropriate for youth and minimizes the trauma to the child victim. The Kitsap County Special Assault Investigation Protocol sets forth minimum standards and procedures to investigate child death, sexual and physical abuse and criminal neglect allegations. Pursuant to the protocols, the mission of all key participants is to ensure the safety of all victims and the public at large; minimize the secondary trauma of all victims and witnesses who are interviewed during an investigation; consistently follow a framework for coordination and communication among all participants and avoidance of conflicts among participants that may hinder the effectiveness of an investigation; constantly strive for improvement through training, communication and critical review of</p>

current investigative practices; increase the overall quality of the investigation; and protect the rights and interests of victims and their families, witnesses and suspects.

The Detention Manager and the PREA Coordinator indicated they would coordinate criminal investigations of alleged incidents of sexual misconduct in cooperation with the Port Orchard Police Department. The Detention Manager or the PREA Coordinator would coordinate staff interviews and give the Port Orchard Police Department unlimited access to the facility to conduct a criminal investigation. The Kitsap County Juvenile Detention Facility and the Port Orchard Police Department have established a Memorandum of Understanding that meets the requirements to provide criminal investigation services. The Auditor notes that no incidents of sexual assault/harassment have occurred at the Kitsap County Juvenile Detention Facility in the past 12 months. There were no investigative files to review.

The Kitsap County Juvenile Detention Facility offers all residents who experience sexual abuse access to forensic medical examinations at an outside facility, without financial cost, pursuant to RCW 7.68.170 Examination costs of sexual assault victims paid by state. No costs incurred by a hospital or other emergency medical facility for examining the victim of a sexual assault when such examination is performed to gather evidence for possible prosecution shall be billed or charged directly or indirectly to the victim of such assault. Examinations are performed by Sexual Assault Nurse Examiners (SANEs) at the St. Michael Medical Center. The Auditor reviewed the St. Michael Medical Center information concerning Sexual Assault crisis intervention. There have been no incidents at Kitsap County Juvenile Detention Center that required a forensic medical exam in the past 12 months.

The Auditor interviewed the Kitsap Sexual Assault Center Executive Director. During the interview, the Executive Director indicated the Kitsap Sexual Assault Center staff would be available during the forensic medical examination process and investigatory interviews to provide emotional support and crisis support intervention, information, and referrals as necessary. The PREA Coordinator established an appropriate Memorandum of Understanding that meets the requirements to provide services to victims of sexual abuse or harassment.

Policy 3.20 Prison Rape Elimination Act, Part A, page 7-9 Responsive Planning, the Kitsap County Special Assault Investigation Protocol, the Kitsap County Sexual Assault Center Memorandum of Understanding and the Port Orchard Police Department Memorandum of Understanding, address 115.321(a) and 115.321(a)-1.

The Kitsap County Juvenile Detention Center is not responsible for conducting criminal sexual abuse investigations addresses 115.321(a)-2.

The Port Orchard Police Department Memorandum of Understanding addresses 115.321(a)-3.

The Kitsap County Special Assault Investigation Protocol, the Kitsap County Sexual Assault Center Memorandum of Understanding and the Port Orchard Police Department Memorandum of Understanding, address 115.321(a)-4.

The Kitsap County Special Assault Investigation Protocol, and the Port Orchard Police Department Memorandum of Understanding, address 115.321(b)-1 and (b)-2.

3.20 Prison Rape Elimination Act Part A pages 7-9 Responsive Planning, RCW 7.68.170, and SANE availability at the St. Michael Medical Center address 115.321(c) and 115.321(c)-1.

The interview with Medical Staff indicating medical staff does not provide forensic medical examinations onsite addresses 115.321(c)-2.

3.20 Prison Rape Elimination Act Part A, pages 7-9, Responsive Planning, RCW 7.68.170, and SANE availability at the St. Michael Medical Center, addresses 115.321(c)-3 - 115.321(c)7.

The Kitsap County Sexual Assault Center MOU and the interview with the PREA Coordinator address 115.321(d), 115.321(d)-1 - (d)-3.

The Kitsap County Sexual Assault Center MOU and the interview with the PREA Coordinator address 115.321(e) and 115.321(e)-1.

The Kitsap County Special Assault Investigation Protocol, the Kitsap County Sexual Assault Center Memorandum of Understanding and the Port Orchard Police Department Memorandum of Understanding, address 115.321(f) and 115.321(f)-1.

The Kitsap County Sexual Assault Center MOU and the interview with the PREA Coordinator address 115.321(h).

The Kitsap County Juvenile Detention Center complies with Standard 115.321: Evidence protocol and forensic medical examinations.

115.322	Policies to ensure referrals of allegations for investigations
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documents</p> <ol style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. 3.20 PREA Part A 3. Coordinated Response Plan 4. Kitsap County Special Assault Investigation Protocol 5. Port Orchard Police Department Memorandum of Understanding <p>Interviews conducted with</p> <ol style="list-style-type: none"> 1. Juvenile Court Administrator 2. Investigator <p>The following policies were reviewed: Kitsap County Juvenile Detention Center Policy 3.20 Prison Rape Elimination Act and 3.20 PREA Part A. Additionally, the auditor reviewed the Kitsap County Special Assault Investigation Protocol and the Coordinated Response Plan.</p> <p>Interviews were conducted with the Investigator and the Juvenile Court Administrator.</p> <p>The Kitsap County Juvenile Detention Center ensures that administrative and criminal investigations are completed for all sexual abuse and sexual harassment allegations. Appropriate procedures are in place to ensure the investigation will be completed. Kitsap County Juvenile Detention Center has systems in place that require investigations by proper Law Enforcement Agencies, and staff at Kitsap County Juvenile Detention Center have been trained to conduct administrative investigations involving sexual abuse or harassment. If an administrative investigation potentially involves criminal behavior, the investigation is referred to the Port Orchard Police. This agency follows a uniform evidence protocol that maximizes the potential for obtaining good physical evidence for criminal prosecutions and administrative proceedings after the criminal process is completed. Kitsap County Juvenile Detention Center is responsible for conducting administrative sexual abuse investigations.</p> <p>The agency documents all referrals. The Kitsap County Juvenile Detention Center Web site provides information concerning PREA. The information presented indicates an administrative or criminal investigation is completed for all sexual abuse and sexual harassment allegations. (https://www.kitsapgov.com/juv/Pages/Detention.aspx)</p> <p>In the past 12 months, there have been zero administrative investigations for sexual</p>

abuse or sexual harassment and no criminal investigations for sexual abuse.

Policy 3.20 Prison Rape Elimination Act, Part A, page 9, and interviews with the Juvenile Court Administrator and the Investigator, addresses 115.322(a) and (a)-1.

Policy 3.20 Prison Rape Elimination Act, Part A, page 9, interviews with the Juvenile Court Administrator and the Investigator, and the agency website, which provides information concerning investigations and how to obtain copies of policy statements, address 115.322(b), (b)-1, (b)-2 and (b)-3.

Policy 3.20 Prison Rape Elimination Act, Part A, page 9, interviews with the Juvenile Court Administrator and the Investigator, and the Port Orchard Police Department Memorandum of Understanding address 115.322(c).

The Kitsap County Juvenile Detention Center complies with Standard 115.322: Policies to ensure referrals of allegations for investigations.

115.331	Employee training
	<p data-bbox="280 188 1007 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 300">Auditor Discussion</p> <p data-bbox="280 340 443 376">Documents</p> <ol data-bbox="341 443 948 600" style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. Prison Rape Elimination PowerPoint 3. PREA Brochure Staff 4. Staff Training Certificates <p data-bbox="280 640 657 676">Interviews Conducted with</p> <ol data-bbox="341 743 579 779" style="list-style-type: none"> 1. Random Staff <p data-bbox="280 819 1477 2065">The Kitsap County Juvenile Detention Facility trains all employees who may have contact with residents on: the zero-tolerance policy for sexual abuse and sexual harassment; how to fulfill their responsibilities under the Kitsap County Juvenile Detention Facility sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures; residents' right to be free from sexual abuse and sexual harassment; the right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment; the dynamics of sexual abuse and sexual harassment in juvenile facilities; the 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; how to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming residents; and laws related to mandatory reporting of sexual abuse and the age of consent. The training is specifically for the residents of juvenile facilities and covers both male and female residents. The Kitsap County Juvenile Detention Facility provides employees with refresher training every two years. The Kitsap County Juvenile Detention Facility documents that employees understand the training they have received. Employees' Understanding of the training received is documented electronically and monitored by Kitsap County Human Resources and the PREA Coordinator. Kitsap County Human Resources Department utilizes Halogen Learning™ software. Halogen is a cloud-based integrated learning management system (LMS) that tracks all staff training activities. The Auditor reviewed employee training records, and the PREA Coordinator provided copies of training records for the employees. The Training document (PowerPoint) contains appropriate language concerning the employees' understanding of the training received. Specifically, the PowerPoint training that all staff viewed contains a ten-question test embedded into the training. At the end of the training, the following statement is presented "Exiting this training electronically signifies your completion and understanding of the material". The Auditor reviewed</p>

ten staff training records. The training records indicate PREA training occurred in 2020 and 2022. All the staff members interviewed by the Auditor indicated a clear understanding of the Prison Rape Elimination Act. All employees have been trained. All staff interviewed confirmed their participation in PREA training and knowledge of the training curriculum.

Policy 3.20 Prison Rape Elimination Act Part B, Training & Education pages 1-2, the Prison Rape Elimination PowerPoint, Random staff interviews, and the Staff Training Certificates 115.331(a) - 115.331(a)-11.

Policy 3.20 Prison Rape Elimination Act Part B, Training & Education pages 1-2, the Prison Rape Elimination PowerPoint, and Random staff interviews address 115.331(b), (b)-1 and (b)-2.

Policy 3.20 Prison Rape Elimination Act Part B, Training & Education pages 1-2, address 115.331(c), (c)-2 and (c)-3.

Training Records with signatures, including the "I understand caveat," addresses 115.331(d) and (d)-1.

The Kitsap County Juvenile Detention Center complies with Standard 115.331: Employee training.

115.332	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents</p> <ol style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. 3.35 Detention Medical Health Services 3. Volunteer Acknowledgement Form <p>Interviews conducted with</p> <ol style="list-style-type: none"> 1. Contractors <p>The following policies were reviewed: Policy 3.20 Prison Rape Elimination Act and 3.35 Detention Medical Health Services. In addition, the Volunteer/Contractor PREA Training and Acknowledgement form was reviewed.</p> <p>Volunteers and contractors are informed of the resident's right to be free from sexual abuse and to be free from retaliation for reporting incidents of sexual abuse and harassment. The Kitsap County Juvenile Detention Facility maintains documentation confirming that volunteers understand the training they have received. The Kitsap County Juvenile Detention Facility has two contracts for services. Education Services District 114 provides Educational Services to the youth in detention and NaphCare, which provides medical services to the Kitsap County Juvenile Detention Facility. The staff members who represent both entities have participated in PREA Training. Specifically, training records were provided, which indicate staff members from NaphCare, have participated in PREA Training, and their electronic signature indicates they understand the training they received. The PREA training provided by the Kitsap County Juvenile Detention staff to Educational Services staff indicates PREA Training was conducted, and the electronic signature on the training form indicates the contract staff member understood the training provided. The training is well documented, and the facility maintains documentation confirming that contractors understand the training they have received. The Health Care Administrator (contractor) who participated in an interview indicated NaphCare provides training on PREA, such as responding to incidents of sexual assault and working with victims of sexual trauma. The Health Care Administrator electronically retrieved the training records of his staff and showed the Auditor the completed training modules. Those training classes included responding to incidents of sexual assault and working with victims of sexual trauma. During the interview, the contractor indicated an understanding of the Kitsap County Juvenile Detention Facility PREA policy and the appropriate protocols for dealing with incidents involving sexual assault and sexual harassment.</p> <p>School staff representing Educational Service District 114 have also participated in the Kitsap County Juvenile Detention Facility PREA training, and the facility</p>

maintains documentation confirming that education Service District 114 staff understands the training they have received. Additionally, during his interview, the Educational Service District 114 contractor indicated his parent organization provides training in communication skills, crisis prevention and intervention, sexual harassment and mandatory reporting.

Volunteers are informed of the resident's right to be free from sexual abuse and to be free from retaliation for reporting incidents of sexual abuse and harassment. The Kitsap County Juvenile Detention Facility maintains documentation confirming that volunteers understand the training they have received.

The Auditor reviewed the training material and the documentation each contractor or volunteer must complete. The Kitsap County Juvenile Detention Center trains the volunteers and contractors on zero tolerance and responsibilities to prevent, detect, report, and respond to sexual abuse and harassment incidents. Volunteers and Contractors are informed of the resident's right to be free from sexual abuse and to be free from retaliation for reporting sexual abuse and harassment incidents. Volunteers and Contractors are trained on the dynamics of sexual abuse in confinement, the reactions of victims, and how to detect sexual abuse. Standards of Conduct are reviewed, inappropriate relationships with residents, and how to communicate with all residents effectively. The Auditor interviewed two Contractors. Both individuals had received training within the past 12 months. Each was able to recall information from the training, such as responsibilities for recognizing potential sexual harassment issues or sexual assault issues, their responsibility to report any concerns, inappropriate relationships, and zero tolerance.

Policy 3.20 Prison Rape Elimination Act, Part B page 2, 3.35 Detention Medical Health Services, pages 4-5, and the interviews conducted with two Contractors, address 115.332 (a) and (b).

Training Records with signatures, including the "I understand caveat," addresses 115.332(c).

The Kitsap County Juvenile Detention Center complies with Standard 115.332: Volunteer and contractor training.

115.333	Resident education
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 580 297">Auditor Discussion</p> <p data-bbox="280 340 443 374">Documents</p> <ol data-bbox="341 443 1114 808" style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. Orientation Detained Youth 3. Kitsap County Juvenile Detention Center Handbook 4. Juvenile Acknowledgement Statement 5. Posters 1-6 6. PREA Brochure Spanish 7. PREA Brochure English 8. PREA Orientation Training Juvenile Video 9. Detainee PREA Orientation March - November 2022 <p data-bbox="280 851 655 884">Interviews conducted with</p> <ol data-bbox="341 954 703 1070" style="list-style-type: none"> 1. Intake Staff 2. Risk Assessment Staff 3. Random Residents <p data-bbox="280 1113 1477 1395">The following policy and other documentation were reviewed: Policy 3.20, Prison Rape Elimination Act, Orientation Detained Youth, Kitsap County Juvenile Detention Center Handbook, Posters 1-6, PREA Brochure Spanish, PREA Brochure English and the PREA Orientation Training Juvenile Video. The Auditor also reviewed signed documents by staff and residents, indicating participation in comprehensive education. Finally, the Auditor reviewed eight resident files documenting admission, orientation, and comprehensive education dates.</p> <p data-bbox="280 1438 1473 1675">The following observations were made during the on-site tour of the facility: Throughout the facility, there is information posted about PREA, Zero Tolerance, and how to report incidents of sexual abuse. This information is presented in both Spanish and English. This information is visible and readily available. Additionally, information is available to all residents concerning the Kitsap County Sexual Assault Center (community sexual assault advocates center).</p> <p data-bbox="280 1718 1477 2083">The Auditor participated in a mock demonstration of the Intake Process. During the mock demonstration, the Auditor observed the PREA information/zero-tolerance information provided at the point of Intake. The Auditor determined that the facility provides the necessary PREA information to all residents, regardless of ability and language. The information is clear and provided at an appropriate reading level and is accessible for all residents in the facility, including those who are limited English proficient (LEP) (i.e., the facility provides written information in the languages most commonly spoken in the facility and provides translation services on-demand). The Auditor determined the Kitsap County Juvenile Detention Center provides</p>

interpreters, when needed, to assist Deaf and non-English speaking residents. Intake staff members are prepared to read written information aloud, if applicable, to make accommodations for residents who are Blind or have low vision or limited reading skills.

Residents receive information on zero tolerance, how to report sexual abuse and harassment incidents, their right to be free from sexual abuse and harassment, and to be free from retaliation for reporting incidents. In addition, residents are informed about how Kitsap County Juvenile Detention Center will respond to such events.

Intake Staff interviews verify that residents receive the appropriate information. In addition to this information, residents are provided a handbook that includes zero tolerance and how to report sexual abuse and harassment. The Auditor confirmed that all residents received this information. Interviews with residents also confirm that Kitsap County Juvenile Detention Center Staff provide information on reporting incidents of sexual abuse. The facility documents the receipt of this information.

Interpretation services are offered to residents who may not understand the presented material. Resident education is accessible to all residents, including those with limited English proficiency, deaf, visually impaired, or otherwise disabled, and residents with limited reading skills.

Throughout the facility, information is posted about PREA, Zero Tolerance, and how to report incidents of sexual abuse. This information is presented in both Spanish and English. This information is visible and readily available. Residents can receive support services from a sexual assault advocate, who is someone from a community sexual assault program that provides confidential information, medical or legal advocacy, counseling, or support to victims of sexual assault. A pre-designated victim advocate will also be available to support victims at the hospital whenever a forensic medical examination is done. The victim advocacy service for the Kitsap County Juvenile Detention Center is Kitsap County Sexual Assault Center. Resident interviews confirm that this information is available.

The Auditor also reviewed a random sample of resident files. Each file contained documentation to support a resident's initial Intake, the information concerning PREA that was provided during Intake, and the resident's participation in the comprehensive PREA education. During the random resident interviews, all residents indicated they had received a handbook and information concerning PREA.

The Juvenile Detention Manager reports all residents received within the last 12 months have been educated within ten days of Intake.

Kitsap County Juvenile Detention Center Policy 3.20, Part B page 2, Orientation Detained Youth, Posters 1-6, KCJDC Handbook, page 6, the PREA Orientation Training Juvenile Video and interviews with Intake Staff, Risk Assessment staff and Random residents address 115.333(a) (b) (c) and (d).

The Kitsap County Juvenile Detention Center PREA Education Acknowledgement

forms, the Mock Intake Process and the Site Review, address 115.333(e) and (f).

The Kitsap County Juvenile Detention Center complies with Standard 115.333:
Resident education.

115.334	Specialized training: Investigations
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 297">Auditor Discussion</p> <p data-bbox="280 340 443 374">Documents</p> <ol data-bbox="341 443 1182 600" style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. 3.20 PREA Part D Investigation Administrative 3. The Kitsap County Special Assault Investigation Protocol 4. Investigator Training Certificates <p data-bbox="280 642 655 676">Interviews conducted with</p> <ol data-bbox="341 745 560 779" style="list-style-type: none"> 1. Investigator <p data-bbox="280 822 1476 1189">The following policy and documentation were reviewed: Policy 3.20 Prison Rape Elimination Act, 3.20 PREA Part D Investigation Administrative, the Kitsap County Special Assault Investigation Protocol and Investigator Training Certificates. The Auditor notes the curriculum Specialized Training: Investigating Sexual Abuse in Confinement Settings is designed to address the requirements outlined in the Prison Rape Elimination Act (PREA) standard 115.334, requiring specialized training for individuals tasked with investigating alleged incidents of sexual abuse in confinement settings. Additionally, this curriculum contains the information fundamental to understanding the concepts required by PREA standard 115.334.</p> <p data-bbox="280 1229 1342 1301">Interviews were conducted with one Investigator for Kitsap County Juvenile Detention Center.</p> <p data-bbox="280 1341 1476 2085">The Kitsap County Juvenile Detention Center conducts administrative investigations involving sexual abuse and sexual harassment. The Investigator has received training in conducting investigations in confinement settings. This training was online. The training title is "Investigating Sexual Abuse in a Confinement Setting." That training includes the proper use of Miranda and Garrity warnings, evidence collection, and the criteria and evidence required to substantiate a case for administrative action or criminal referral. The Auditor reviewed the training certificate and interviewed the Investigator. The Investigator is aware of his responsibilities during an investigation; he indicated that the investigation would begin immediately upon notification of an allegation. Any allegation that potentially involved criminal behavior would require police involvement. The training he took covered all areas of the investigative process, interviewing techniques, evidence collection, evidence protection, victim advocacy, securing and processing the scene for evidence, securing all evidence maintaining the integrity of the evidence and seeing to the needs of the victim, providing advocacy support from the Mental Health Staff. The Investigator stated he would review memorandums, collect as much data as possible, and write a report. The training reviewed good interpersonal communication skills with resident victims, assailants, and witnesses, understanding</p>

the dynamics of resident sexual violence, and establishing good working relationships with outside agencies, hospitals, prosecutors, and other investigators.

The Investigator noted that Anonymous or third-party reports would be thoroughly investigated as soon as possible. A third party or an anonymous tip would be treated the same as a direct report. The Investigator indicated that if the incident were criminal, he would not collect specific physical and DNA evidence, he would aid the investigating agency by providing victim and perpetrator information such as any pertinent central file information, information concerning prior complaints and reports of previous sexual abuse and he would provide any information on prior investigations involving either the victim or the perpetrator.

Policy 3.20 Prison Rape Elimination Act Part B page 3, Training certificates and an interview with the Investigator address 115.334(a).

Training certificates and an interview with the Investigator address 115.334(b).

Training certificates address 115.333(c).

The Kitsap County Juvenile Detention Center complies with Standard 115.334: Specialized training: Investigations.

115.335	Specialized training: Medical and mental health care
	<p data-bbox="280 188 1007 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 300">Auditor Discussion</p> <p data-bbox="280 340 443 376">Documents</p> <ol data-bbox="341 443 995 560" style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. 3.35 Detention Medical Health Services 3. PREA Training for Contractors signed forms <p data-bbox="280 600 655 636">Interviews conducted with</p> <ol data-bbox="341 703 576 739" style="list-style-type: none"> 1. Medical Staff <p data-bbox="280 779 1445 891">The Auditor reviewed Policy 3.20 Prison Rape Elimination Act, 3.35 Detention Medical Health Services and interviewed the Mental Health Counselor and Medical Staff.</p> <p data-bbox="280 931 1461 1424">The Kitsap County Juvenile Detention Center provides PREA training to medical and mental health practitioners. The training includes detecting signs of sexual abuse/harassment, preventing the destruction of evidence, responding to victims, and reporting allegations or suspicions of sexual abuse and sexual harassment. Facility medical staff do not conduct forensic examinations. The Auditor confirmed that training was provided to the Medical and Mental Health staff. Interviews with the Mental Health and Medical staff confirmed the practice. The contractor (Medical) who participated in an interview indicated their respective organization provides training on PREA and, more specifically, responding to incidents of sexual assault. During that interview, the contractor clearly stated an understanding of the Kitsap County Juvenile Detention Center Zero Tolerance policy and the appropriate protocols for dealing with sexual assault and sexual harassment incidents.</p> <p data-bbox="280 1464 1445 1666">Mental Health Staff has received specialized training on detecting signs of sexual abuse and how to respond effectively to victims of sexual abuse. Only qualified staff provide clinical services and operate within their professional scope of practice. Specialized training also includes victim identification, interviewing, and interventions.</p> <p data-bbox="280 1706 1469 1989">Medical staff are Contract Employees and receive training through NaphCare. In addition to the PREA Training provided by Kitsap County, all medical staff has received training through NaphCare in trauma care for victims of sexual assault. Mental Health staff are employed by Kitsap County. Kitsap County Mental Health staff participate in continuing education as required by their licenses. Continuing Education requirements for the State of Washington require 45 hours of training every three years. Courses offered for CEU credits include sexual assault protocols.</p> <p data-bbox="280 2029 1437 2065">Policy 3.20 Prison Rape Elimination Act, Part B, pages 3-4, 3.35 Detention Medical</p>

Health Services, pages 2-4, and interviews with Medical staff addresses 115.335(a) (b) (c) and (d).

The Kitsap County Juvenile Detention Center complies with Standard 115.335: Specialized training: Medical and mental health care.

115.341	Obtaining information from residents
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 297">Auditor Discussion</p> <p data-bbox="280 340 443 374">Documents</p> <ol data-bbox="341 443 948 517" style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. Juvenile Acknowledgement Statement <p data-bbox="280 560 655 593">Interviews conducted with</p> <ol data-bbox="341 663 903 777" style="list-style-type: none"> 1. Staff who conduct Risk Assessments 2. Intake staff 3. Random Residents <p data-bbox="280 819 1449 936">Policy 3.20 Prison Rape Elimination Act was reviewed. Interviews were conducted with Intake Staff and Staff who do screening for risk of victimization and abusiveness. In addition, interviews were conducted with residents.</p> <p data-bbox="280 978 1436 1050">The Auditor observed the intake area and was provided an overview of the intake process by the Intake Officer.</p> <p data-bbox="280 1093 1476 2000">All residents are provided Risk Assessments upon intake. Policy 3.20 Prison Rape Elimination Act, pages 5-6, provides that assessments are conducted within the first 72 hours; however, the Auditor notes that these assessments are done immediately after the initial intake. The assessment includes an assessment of the mental, physical and developmental disability of the resident, the age of the resident, the physical build of the resident, previous incarcerations, criminal history, prior sex offenses, whether the resident is or is perceived to be gay, lesbian, bisexual, transgender, intersex or gender non-conforming, prior sexual victimization and the resident's perception of their vulnerability. Residents are not disciplined for failing to answer any questions. All information gathered during intake is shared with only those Staff that needs to know. Sensitive information is not shared unnecessarily. Resident interviews indicated the use of the assessment tool. Residents at the Kitsap County Juvenile Detention Facility indicated they had been queried on questions concerning whether they had been victims of sexual abuse or sexual harassment or if they had been arrested or charged with a sex offense. Residents further indicated that the Nurse also asked them the same questions. Interviews with Intake staff confirmed the use of the assessment tool. The Intake staff indicated their responsibilities included assessing all residents, especially those with special needs or those who may be vulnerable or express feelings of vulnerability. The Intake officers indicated the need to provide safe housing and program resources that ensured a safe environment for all residents. The Auditor reviewed the files of several residents. The files contained the appropriate Intake forms.</p> <p data-bbox="280 2042 1366 2076">The Auditor was provided with a Mock walk-through of the intake process. A</p>

resident would be brought into the facility through the sally port. The resident would be provided verbal information about the intake process, including how a pat search would be conducted. Upon completion, that resident would sit at the intake desk, and a lengthy question and answer period would begin. A Health Screening intake form would be completed that included information previously provided by the guardian or parent. The Kitsap County Juvenile Detention Center utilizes a case management software program that requires input detailing the residents' biographical information, behavior summary, prior victimization including sexual assault and whether or not the alleged crime was reported to Law Enforcement, a criminal history review, drug and alcohol usage summary, a medical summary, a security status determination (low, medium or high based on current offense) and a Mental Health Assessment (Mental Health Juvenile Detention Assessment Tool - MH-JDAT). The MH-JDAT was developed in 2000 and is a standardized 31 - item questionnaire. Results from this instrument are used to identify signs of mental/emotional disturbance or distress, including suicide risk. Scores from the MH-JDAT are used to inform decisions regarding access to programming, crisis intervention, and housing arrangements in detention. Upon completing this process, the resident would receive a document reviewing the Prison Rape Elimination Act. This document discusses the Kitsap County Juvenile Detention's zero-tolerance regarding sexual abuse and sexual harassment, how to report incidents of sexual assault or sexual harassment, whether or not the resident had any disabilities, whether or not the resident self-identified as lesbian, gay, bisexual, transgender, questioning or intersex, whether or not the resident has been the victim or prior sexual abuse or sexual assault and whether or not the resident has ever sexually assaulted or sexually abused another person. Finally, the resident would be asked if they had any issues or concerns about detention safety, specifically whether they felt vulnerable or unsafe. Upon completing this interview/intake process, the resident would be seen by the Registered Nurse. The Auditor notes that if a resident identifies as transgender, the intake staff includes another form that indicates the resident's preferred gender identification, name preference, where they would prefer to be housed (male or female pod) and if they prefer a male or female officer to conduct pat searches. The Registered Nurse would collect specific information from the resident concerning their health. Those questions included whether or not the resident was concerned about being sexually abused or assaulted while at the detention center, whether or not the resident had been the victim of sexual abuse, whether or not they would sexually abuse another resident while at the detention center and whether or not they had sexually abuse someone in the past. Finally, the resident was provided a brochure entitled "What you need to Know about Sexual Assault, Abuse and Harassment". This brochure provides information about sexual assault, tips for avoiding sexual assault, and how to report sexual assault.

Residents are not disciplined for failing to answer any questions. All information gathered during intake is shared with only those Staff that need to know. Sensitive information is not shared unnecessarily.

Interviews with the Intake officer and Staff who perform risk assessments confirmed the assessment tools' use and the information's confidentiality. In addition, resident

interviews indicated the use of the assessment tools.

The screening process occurs in a setting that ensures as much privacy as possible. During the tour, the Intake officer indicated that residents could answer questions in a private area away from other Staff and residents. Intake and risk assessment staff ask screening questions to foster comfort and elicit responses. Screening staff affirmatively ask persons confined in the facility about their sexual orientation and gender identity by directly inquiring if they identify as LGBTI. Additional sources of information are used to complete the risk screen, such as information provided by Probation Officers and Law Enforcement.

The Intake Officers noted the need to provide safe housing and program resources that ensured a safe environment for all residents. The Auditor reviewed the files of several residents. The files contained the appropriate Intake forms and Assessment forms.

The Auditor interviewed the Intake Officer, who indicated any indication of mental health issues requires additional follow-up to determine what type of services can be provided to the resident at the facility and upon release. Each staff member was aware of their responsibilities in conducting risk assessments. Informal checks with every resident are conducted daily. As noted, the average stay of a resident at Kitsap County Juvenile Detention Center is less than seven days, staff document daily behavior and encounters on a daily resident log.

Random resident interviewees assert when they first came to Kitsap County Juvenile Detention Center, they were asked questions like whether they had ever been sexually abused, whether they identified as being lesbian/gay/bisexual/transgender (LGBTI), whether they have any disabilities, and whether they think they might be in danger of sexual abuse at Kitsap County Juvenile Detention Center. Interviewees related they were asked these questions during intake.

Policy 3.20 Prison Rape Elimination Act, Part C, pages 1-2, a review of the Intake Screening forms and interviews conducted with Intake staff and Staff who conduct risk assessments, address the requirements of 115.341(a) (b) (c) (d) and (e).

The Kitsap County Juvenile Detention Center complies with Standard 115.341: Screening for risk of victimization and abusiveness.

115.342	Placement of residents
	<p data-bbox="280 188 1007 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 300">Auditor Discussion</p> <p data-bbox="280 340 443 376">Documents</p> <ol data-bbox="341 443 995 519" style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. 3.17 Detention Non-Discriminatory LGBTQI <p data-bbox="280 560 655 595">Interviews conducted with</p> <ol data-bbox="341 663 903 784" style="list-style-type: none"> 1. Juvenile Detention Manager 2. PREA Coordinator 3. Staff who conduct Risk Assessments <p data-bbox="280 819 1437 976">The following policies were reviewed: Policy 3.20 Prison Rape Elimination Act and 3.17 Detention Non-Discrimination LGBTQI. Interviews were conducted with the Juvenile Detention Manager, PREA Coordinator and staff who conduct risk assessments.</p> <p data-bbox="280 1016 1378 1137">The Kitsap County Juvenile Detention Center utilizes the intake information to decide housing assignments. The needs of each resident are taken into consideration.</p> <p data-bbox="280 1178 1437 1420">The PREA Coordinator indicated that all transgender or intersex housing would be determined on a case-by-case basis. The PREA Coordinator indicated there were appropriate housing opportunities available to ensure the safety of all residents. The PREA Coordinator stated the facility would consider a transgender or intersex resident's views concerning safety. Transgender or intersex residents would be involved in decisions concerning housing placement.</p> <p data-bbox="280 1460 1437 1783">The Kitsap County Juvenile Detention Center utilizes the intake information to decide housing assignments. The needs of each resident are taken into consideration. Detention staff indicated they would determine housing on a case-by-case basis and have appropriate facilities available to ensure the safety of all residents. The PREA Coordinator stated during her interview that staff would consider a transgender or intersex resident's views concerning safety. The Kitsap County Juvenile Detention Center does not have an administrative/disciplinary segregation unit. All residents are placed in general housing units.</p> <p data-bbox="280 1823 1437 2024">Preferences concerning housing assignments for LGBTQI youth are always considered. LGBTQI youth receive fair and equal treatment without bias. Any issues concerning residents who may be vulnerable due to their sexual orientation are documented so that supervisors, if necessary, can adjust assignments. All residents are provided the opportunity to shower separately from other residents.</p> <p data-bbox="280 2065 1406 2101">Policy 3.20 Prison Rape Elimination Act, Part C, pages 2-3, 3.17 Detention Non-</p>

Discriminatory LGBTQI, pages 1-10 and interviews conducted with the Juvenile Detention Manager, PREA Coordinator and staff who conduct risk assessments address the requirements of 115.342(a), (c) (d) and (f).

There are no isolation cells at Kitsap County Juvenile Detention Center. All residents are placed in appropriate housing units 115.342(b) (h) and (l) are not applicable.

No resident has been incarcerated at Kitsap County Juvenile Detention Center for one year. The applicability of 115.34(e), "Placement and programming assignments for each transgender or intersex resident shall be reassessed at least twice each year to review any threats to safety experienced by the resident," could not be accurately assessed. The average stay at Kitsap County Juvenile Detention Center is less than seven days. Resident behavior is documented daily in addition to informal and formal meetings with Custody staff and Mental Health Staff.

3.17 Detention Non-Discriminatory LGBTQI, page 7 and interviews with the PREA Coordinator and Staff who conduct risk assessments, addresses 115.342 (g).

The Kitsap County Juvenile Detention Center complies with Standard 115.342: Use of screening information.

115.351	Resident reporting
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 580 297">Auditor Discussion</p> <p data-bbox="280 340 453 374">Documents:</p> <ol data-bbox="341 443 1390 645" style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. 3.20 PREA Part C Reporting and Exhaustion of administrative remedies 3. 3.37 Grievance Policy for Detained Youth 4. Various Posters 5. Resident Handbook <p data-bbox="280 685 655 719">Interviews conducted with</p> <ol data-bbox="341 786 652 902" style="list-style-type: none"> 1. Random Residents 2. Random Staff 3. PREA Coordinator <p data-bbox="280 943 1469 1227">The following policies and other documentation were reviewed: Policy 3.20 Prison Rape Elimination Act, 3.20 PREA Part C Reporting and Exhaustion of administrative remedies, 3.37 Grievance Policy for Detained Youth and Posters available in PODS and throughout the Kitsap County Juvenile Detention Center. The auditor also reviewed the Kitsap County Juvenile Detention Center website, the Third-party reporting information, and the Resident Handbook. Interviews were conducted with random staff, residents and the PREA Coordinator.</p> <p data-bbox="280 1267 1469 1509">The following observations were made during the on-site tour of the facility: The housing units had signs informing residents of their right to be free of sexual abuse. There were signs informing residents about how to report incidents of sexual abuse. The signs were posted in both English and Spanish. In addition, there was information concerning local services provided by the Kitsap Sexual Assault Center, a community services advocacy center.</p> <p data-bbox="280 1550 1469 2085">Residents have multiple ways to report allegations of sexual abuse and sexual harassment. Residents may use an external phone number for Child Protective Services. The Kitsap Sexual Assault Center's phone number is also provided; residents can call the Kitsap Sexual Assault Center and report issues concerning sexual assault or sexual harassment. They can report verbally to a staff member or in writing to a staff member. Third-party reports can be made to any staff, Detention Manger, or Juvenile Court Administrator. The Kitsap County Juvenile Detention Center website provides the following information concerning reporting: "If you have information regarding a juvenile who has been sexually assaulted while in detention, report this directly to the Detention Manager. You may also call the Kitsap County Sexual Assault Center. Please provide as many details as possible". Residents may write a note and place it in a secure mailbox in each pod. These secure mailboxes are checked daily and can only be opened by a Supervisor. These</p>

multiple reporting methods are posted throughout the facility, available in the handbook, and reviewed with the resident during intake.

Resident interviews confirm knowledge of the reporting procedures, including having a third party file a report. Staff can privately report to a supervisor, the Detention Manager or, if necessary, to Human Resources. Staff interviews confirm knowledge of reporting procedures for both residents and staff.

Third-party reports can be made to any staff, including the Juvenile Detention Manager. The Kitsap County Juvenile Detention Center website provides information concerning reporting (<https://www.kitsapgov.com/juv/Pages/Detention.aspx>).

These multiple reporting methods are posted throughout the facility, available in the resident brochure, and reviewed with the resident during intake. Resident interviews confirm knowledge of the reporting procedures. Staff can privately report to a supervisor, the Juvenile Detention Manager, the Juvenile Court Administrator, or Human Resources. Staff interviews confirm knowledge of reporting procedures.

Policy 3.20 Prison Rape Elimination Act, Part C, pages 3-5, 3.20 PREA Part C Reporting and Exhaustion of administrative remedies, 3.37 Grievance Policy for Detained Youth, various posters and brochures for staff and residents, and interviews with Random Residents, Random Staff and the PREA Coordinator address the requirements of 115.351(a) and (b)

Policy 3.20 Prison Rape Elimination Act, Part C, pages 3-5, 3.20 PREA Part C Reporting and Exhaustion of administrative remedies, 3.37 Grievance Policy for Detained Youth, various posters and brochures for staff and residents, interviews with Random Residents and Random Staff and the Kitsap County Juvenile Detention Center website addresses 115.351(c)

3.37 Grievance Policy for Detained Youth page 3 (writing materials provided to juveniles) and the interview with the PREA Coordinator, addresses 115.351(d).

Interviews with Random Staff addresses 115.351(e).

The Kitsap County Juvenile Detention Center complies with Standard 115.351: Resident reporting.

115.352	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents</p> <ol style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. 3.20 PREA Part C Reporting and Exhaustion of Administrative remedies 3. 3.37 Grievance Policy for Detained Youth <p>The Kitsap County Juvenile Detention Center has an administrative procedure to address sexual abuse grievances. The Kitsap County Juvenile Detention Center does not impose a time limit; no informal grievance process is required. If an allegation is made against a staff member, that staff member is not involved in the grievance process. A final agency decision is made within 90 days. Third parties can submit and, if necessary, assist the resident in filing a grievance. There is an established procedure for emergency grievances and an initial response within 48 hours, with a final decision within five days. The Auditor reviewed Policy 3.20 PREA pages 7-8 and Policy 3.37 Grievance Policy for Detained Youth. The Grievance Policy distinguishes between general grievances concerning conditions of confinement, procedures, or decisions made by staff and sexual misconduct or sexual abuse grievances. The policy guides residents concerning how to file a grievance for sexual abuse. The Auditor notes that each pod has a large color poster that defines the residents' grievance procedures. The poster provides information on how to submit a general grievance and the procedures related to internal grievances pertaining to any aspect of the resident's confinement. The poster also provides specific information on the procedures for filing a grievance pertaining to sexual misconduct, sexual assault or sexual harassment. Finally, the posters provide specific information concerning filing an emergency grievance for sexual assault, sexual harassment or sexual misconduct. These posters are very visible and accessible to all residents in the facility. The Auditor notes the Kitsap County Juvenile Detention Center follows exactly the codified language in the Code of Federal Regulations concerning the administrative procedure to address sexual abuse grievances.</p> <p>The Auditor notes that because there have been no grievances filed concerning sexual assault or sexual harassment, it is difficult to determine if the Kitsap County Juvenile Detention Center will respond to an emergency grievance or a non-emergency grievance within the time frames allotted. However, during an informal discussion with the Juvenile Detention Manager, the grievance procedures were reviewed. The Juvenile Detention Manager indicated an investigation would immediately ensue if a resident filed a grievance concerning sexual assault or sexual harassment. The Juvenile Detention Manager stated staff would refer to their first responder duties and effectively manage the situation. The Juvenile Detention Manager indicated a response to the grievance would be provided after the initial steps to ensure the resident's safety had been taken.</p>

During the site review, the Auditor observed posted and printed signage throughout the facility. Signage included audit notices, how to report sexual abuse and sexual harassment, access to outside victim emotional support services, how to file a grievance and other relevant PREA information. The Auditor reviewed the information provided on signage. The signage was readable and accessible, and consistent. The signage was placed in all the living units and the facility hallways. The signage was visible in the Intake area and the Education area. The signage was easy to understand and appropriate for youth. The signage provided information concerning emotional support services and external reporting, including third-party reporting methods.

In the past 12 months, zero grievances have been filed that alleged sexual abuse or sexual harassment. No third-party claims on behalf of residents have been filed in the last 12 months.

3.20 PREA Part C Reporting and Exhaustion of Administrative Remedies, page 3 and 3.37 Grievance Policy for Detained Youth, addresses 115.352(a).

3.20 PREA Part C Reporting and Exhaustion of Administrative Remedies, page 3, states Kitsap County Juvenile Detention Center does not have a time limit on when a resident can submit a grievance regarding sexual abuse. 115.352(b).

3.37 Grievance Policy for Detained Youth, page 5, E. 1 and 2, states if a resident submits a grievance alleging sexual abuse towards a staff member, that resident will not have to submit a grievance to the staff member who is the subject of the complaint. A resident submitting a grievance alleging sexual abuse from a staff member will not be referred to the staff member who is the subject of the complaint.115.352(c)

3.37 Grievance Policy for Detained Youth, page 5, F states The agency shall issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance. 115.352 (d)

3.37 Grievance Policy for Detained Youth page 6, J – L. states third parties, including fellow detained youth, staff members, family members, attorneys, and outside advocates, shall be permitted to assist detained youth in filing requests for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of detained youth. If a third-party file such a request on behalf of a detained youth, the facility may require as a condition of processing the request that the alleged victim agrees to have the request filed on their behalf and may also require the alleged victim to pursue any subsequent steps in the administrative remedy process personally. If the detained youth declines to have the request processed on their behalf, the agency shall document the detained youth's decision. 115.352(e)

3.37 Grievance Policy for Detained Youth page 6 states if a resident has a substantial risk of imminent sexual abuse, staff will contact the Supervisor immediately. The Detention Manager will ensure action is taken as a result of this process and follow emergency grievance procedure requirements by making the

initial response within 48 hours. The final agency decision must be issued within five days. 115.352(f)

3.37 Grievance Policy for Detained Youth, page 7, states the agency may discipline a resident for filing a grievance related to alleged sexual abuse only where the agency demonstrates that the resident filed the grievance in bad faith. 115.352(g)

The Kitsap County Juvenile Detention Center complies with Standard 115.352: Exhaustion of administrative remedies.

115.353	Resident access to outside confidential support services and legal representation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents</p> <ol style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. 3.20 PREA Part C 3. 3.22 Telephone Access for Detained Youth 4. Kitsap Sexual Assault Center MOU 5. PREA Brochures Youth <p>Interviews conducted with</p> <ol style="list-style-type: none"> 1. Random Residents 2. Detention Manager 3. PREA Coordinator 4. Kitsap County Sexual Assault Center Advocate <p>The following policies were reviewed: Policy 3.20 Prison Rape Elimination Act, 3.20 PREA Part C and 3.22 Telephone Access for Detained Youth. The Telephone policy provides information concerning resident access to outside confidential support services. In addition, the Auditor reviewed the MOU between Kitsap County Sexual Assault Center and Kitsap County Juvenile Detention Center and the Resident Brochures.</p> <p>Interviews were conducted with a sexual assault advocate from the Kitsap County Sexual Assault Center and random residents who had received and recalled information concerning Kitsap County Sexual Assault Center Services.</p> <p>During the site review, the Auditor observed posted and printed signage throughout the facility. Signage included audit notices, how to report sexual abuse and sexual harassment, access to outside victim emotional support services, and other relevant PREA information. The Auditor reviewed the information provided on signage. The signage was readable and accessible, and consistent. The signage was placed in all the living units and the facility hallways. The signage was visible in the Intake area and the Education area. The signage was easy to understand and appropriate for youth. The signage provided information concerning emotional support services and external reporting, including third-party reporting methods. The Auditor tested the access to outside emotional support services by calling the Kitsap County Sexual Assault Center in the same manner that a resident would be expected to call. The call was successful; a live person answered the phone and informed the Auditor of the services available to residents at the Kitsap County Juvenile Detention Center.</p>

The Kitsap County Juvenile Detention Center has established a Memorandum of Understanding with the Kitsap County Sexual Assault Center, the Kitsap County community sexual assault advocacy, and family trauma resource center. The role of the Community Based Advocate at the Kitsap County Sexual Assault Center is to provide 24-hour advocacy, support and referral services to child abuse victims and their families during medical and criminal justice procedures and throughout the healing process, regardless of the level of legal or medical intervention. Community Base Advocates work collaboratively with Law Enforcement, CPS, and the Prosecutor's Office during the criminal justice process. The information gained during Community-based advocacy services is confidential. The advocates are mandatory reporters. Advocates are a component of the standard response to a report of sexual abuse/sexual harassment within the facility. They facilitate follow-up, whenever possible, between the resident and an advocate by mail, telephone, or in person while the victim resides at the Kitsap County Juvenile Detention Center. The Kitsap County Juvenile Detention Center provides residents with confidential access to advocates via phone. The Kitsap County Juvenile Detention Center respects the sensitive nature of communication between the advocates and their clients. Advocates are cleared to enter the Kitsap County Juvenile Detention Center for meetings and training sessions or to meet with clients. Advocates are provided private meeting spaces for counseling sessions.

Advocates offer follow-up services and crisis intervention contacts to victims of sexual assault at the Kitsap County Juvenile Detention Center. Advocates maintain the confidentiality of communications with clients residing at the Kitsap County Juvenile Detention Center. Residents have access to the mailing address and telephone numbers, including a toll-free number that provides confidential communication between residents and the Advocate.

The Auditor interviewed a staff member from the Kitsap County Sexual Assault Center. During the interview, the Staff member indicated that an MOU was in place with the Kitsap County Juvenile Detention Center and that Victim Advocates were available to assist victims and would initially meet victims at the hospital. Victim Advocates have received Sexual Assault Advocacy Training. The training included: How to detect and assess signs of sexual abuse and sexual harassment; How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and How and to whom to report allegations or suspicions of sexual abuse and sexual harassment. The staff member indicated that at the initiation of services to a resident, Advocates would disclose the limitations of confidentiality. Victims of sexual abuse would receive timely and unimpeded access to emergency medical treatment and crisis intervention services, and the nature and scope of the services would be determined according to the professional judgment of the hospital staff and Advocacy staff. Finally, follow-up services would be provided as necessary, and the level of care was consistent with community standards.

The Kitsap County Juvenile Detention Center provides residents with reasonable and confidential access to their attorneys or other legal representation and reasonable access to parents or legal guardians. Attorney phone calls and Attorney visits are allowed daily. Attorneys are provided with private meeting spaces as needed.

Family visitation (via Zoom) and phone calls are allowed.

The MOU between the Kitsap County Sexual Assault Center and the Kitsap County Juvenile Detention Center, informational brochures provided to residents and posted and printed signage throughout the facility detailing how to report sexual abuse and sexual harassment, access to outside victim emotional support services, and interviews with Residents, address 115.353(a), (a)-1, (a)-2 and (a)-4. 115.353(a)-3 is not applicable. Kitsap County Juvenile Detention Center does not detain residents solely for civil immigration purposes.

3.22 Telephone Access for Detainees, page 3, B. and C., and interviews with Residents, address 115.353(b), (b)-1 and (b)-2.

The MOU between the Kitsap County Sexual Assault Center and the Kitsap County Juvenile Detention Center, address 115.353(c), (c)-1 and (c)-2.

3.20 PREA Part C, page 5, A. - D., 3.22 Telephone Access for Detainees, page 3, B. and C. interviews with the Detention Manager, PREA Coordinator and Residents, address 115.353(d), (d)-1 and (d)-2.

The Kitsap County Juvenile Detention Center complies with Standard 115.353: Resident access to outside confidential support services.

115.354	Third-party reporting
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 297">Auditor Discussion</p> <p data-bbox="280 340 451 374">Documents:</p> <ol data-bbox="341 443 1075 645" style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. 3.20 PREA Part C 3. 3.22 Telephone Access for Detained Youth 4. Kitsap County Juvenile Detention Center website 5. PREA Brochure <p data-bbox="280 685 655 719">Interviews conducted with</p> <ol data-bbox="341 786 651 819" style="list-style-type: none"> 1. Random Residents <p data-bbox="280 860 1461 976">The Auditor reviewed the Kitsap County Juvenile Detention Center website, which provides information to the public on how to report resident sexual abuse or sexual harassment on behalf of a resident.</p> <p data-bbox="280 1016 1481 1093">Interviews were conducted with random residents who confirmed their knowledge of third-party reporting capabilities.</p> <p data-bbox="280 1133 1461 1373">The Kitsap County Juvenile Detention Center has established a method to receive third-party reports of sexual abuse. This information is available on the Kitsap County Juvenile Detention Center website. Information is available to the public on how to report resident sexual abuse or sexual harassment on behalf of the residents. Individuals making a report may call the Juvenile Detention Manager directly; this direct line is posted on the website.</p> <p data-bbox="280 1413 1481 1780">During the site review, the Auditor observed posted and printed signage throughout the facility. Signage included audit notices, how to report sexual abuse and sexual harassment, access to outside victim emotional support services, and other relevant PREA information. The Auditor reviewed the information provided on signage. The signage was readable and accessible, and consistent. The signage was placed in all the living units and the facility hallways. The signage was visible in the Intake area and the Education area. The signage was easy to understand and appropriate for youth. The signage provided information concerning emotional support services and external reporting, including third-party reporting methods.</p> <p data-bbox="280 1821 1426 2018">The Kitsap County Juvenile Detention Center provides residents with a PREA Brochure. This brochure includes specific information about PREA, contact information, and reporting information. The Auditor examined the pamphlet and website. Resident interviews confirm awareness of the third-party reporting capabilities.</p> <p data-bbox="280 2058 1433 2092">The Kitsap County Juvenile Detention Center website and signage throughout the</p>

facility informing residents on how to report sexual abuse and sexual harassment and access to outside victim emotional support services address the requirements of 115.354(a) (a)-1 and (a)-2.

The Kitsap County Juvenile Detention Center complies with Standard 115.354: Third-party reporting.

115.361	Staff and agency reporting duties
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 580 297">Auditor Discussion</p> <p data-bbox="280 340 443 374">Documents</p> <ol data-bbox="341 443 1353 645" style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. 3.20 PREA Part C 3. Kitsap County Juvenile Detention Center Coordinated Response Plan 4. RCW 26.44.030 5. Final Prison Rape Elimination Powerpoint <p data-bbox="280 685 655 719">Interviews conducted with</p> <ol data-bbox="341 786 783 943" style="list-style-type: none"> 1. Random Staff 2. Medical Health staff 3. Juvenile Detention Manager 4. PREA Coordinator <p data-bbox="280 985 1445 1104">The following policies and other documentation were reviewed: Policy 3.20 Prison Rape Elimination Act, 3.20 PREA Part C, Kitsap County Juvenile Detention Center Coordinated Response Plan and RCW 26.44.030.</p> <p data-bbox="280 1144 1469 1216">The auditor interviewed the Juvenile Detention Manager, PREA Coordinator, Medical staff, and random staff.</p> <p data-bbox="280 1256 1469 1709">The Kitsap County Juvenile Detention Center requires all staff to immediately report any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment in a facility. All staff members are also required to report any retaliation against residents or staff who have reported an incident of sexual assault or sexual harassment. Regardless of its source, Kitsap County Juvenile Detention Center employees who receive information concerning resident-on-resident sexual misconduct at Kitsap County Juvenile Detention Center or who observe an incident of resident-on-resident sexual misconduct or have reasonable cause to suspect a resident is a victim of sexual misconduct must: Immediately report the information or incident directly to their immediate Supervisor. If necessary (alleged criminal behavior), Law Enforcement will be notified.</p> <p data-bbox="280 1749 1469 2074">Any Kitsap County Juvenile Detention Center employee who fails to report an allegation or coerces or threatens another person to submit inaccurate, incomplete, or untruthful information with the intent to alter a report may face disciplinary action, up to and including termination of employment. Staff members must report any violation of responsibilities that may have contributed to an incident or retaliation. All Kitsap County Juvenile Detention Center staff have a duty to report any allegation of sexual abuse as required by mandatory reporting laws (RCW 26.44.030). Residents are informed of the limitations of confidentiality between</p>

residents and staff.

Aside from reporting to the designated supervisors or officials and designated State or local service agencies, Kitsap County Juvenile Detention Center prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and additional security and management decisions.

Although no complaints have been received from a member of the public, a procedure has been established for third-party reports to be sent to the Juvenile Detention Manager. This reporting will result in an immediate investigation into the allegations.

Kitsap County Juvenile Detention Center Policy requires immediate action to protect residents from sexual abuse. The staff interviewed are aware of their reporting requirements and the steps that need to be taken to ensure the safety of the resident. All random staff interviewees assert they received training in reporting sexual abuse/harassment and reporting to comply with applicable child abuse reporting laws.

The Juvenile Detention Manager indicated notifications would be made to the probation officer and parents/guardian upon receipt of an allegation of sexual assault or sexual harassment. If the victim is under the guardianship of the child welfare system, the report would be provided to the social worker or guardian. The probation officer handles the report if a juvenile court retains jurisdiction over the victim.

3.20 PREA Part C pages 5-7, and random staff interviews address the requirements of 115.361(a) (a)-1, (a)-2 and (a)-3.

3.20 PREA Part C, pages 5-7, RCW 26.44.030, Final Prison Rape Elimination Powerpoint, page 23, and random staff interviews address the requirements of 115.361(b) and (b)-1.

3.20 PREA Part C, page 5-7., and random staff interviews address the requirements of 115.361(c) and (c)-1.

Interviews with Medical staff, RCW 26.44.030 and 3.20 PREA Part C, page 6. F. addresses the requirements of 115.361(d).

Interviews with the PREA Coordinator, the Juvenile Detention Manager, and 3.20 PREA Part C, page 7. H. I. and J. address the requirements of 115.361(e).

3.20 PREA Part C, page 7. K., and the interview with the Juvenile Detention Manager addresses the requirements of 115.361(f).

The Kitsap County Juvenile Detention Center complies with Standard 115.361: Staff and agency reporting duties.

115.362	Agency protection duties
	<p data-bbox="280 188 1007 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 300">Auditor Discussion</p> <p data-bbox="280 340 443 376">Documents</p> <ol data-bbox="341 443 991 600" style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. 3.20 PREA Part C Agency Protection Duties 3. KCJDC Coordinated Response Plan 4. Final Prison Rape Elimination Powerpoint <p data-bbox="280 640 655 676">Interviews conducted with</p> <ol data-bbox="341 743 788 864" style="list-style-type: none"> 1. Random Staff 2. Juvenile Detention Manager 3. Juvenile Court Administrator <p data-bbox="280 904 1437 1025">The following policies were reviewed: Policy 3.20 Prison Rape Elimination Act and 3.20 PREA Part C Agency Protection Duties. The Auditor also reviewed the Coordinated Response Plan and the Final Prison Rape Elimination Powerpoint.</p> <p data-bbox="280 1057 1390 1133">The Auditor interviewed random staff, the Juvenile Detention Manager and the Juvenile Court Administrator.</p> <p data-bbox="280 1173 1477 1375">A review of policy and interviews with the PREA Coordinator, the Detention Manager and Random Staff demonstrated the appropriate protective measures that would be taken if a resident was at imminent risk of sexual abuse. Additionally, all staff interviewed indicated specific knowledge of the protective measures that should be taken if a resident is subject to a substantial risk of imminent sexual abuse.</p> <p data-bbox="280 1415 1453 1783">Policy 3.20; outlines how staff members respond to any allegation of sexual misconduct. As stated, in the procedures, upon learning that a resident was subjected to sexual abuse, the Kitsap County Juvenile Detention Center staff shall take immediate action to protect the resident by separating the victim from the perpetrator and attending to the needs of the victim while not impeding in the investigation. Staff who receive an initial report of sexual misconduct are required to promptly intervene on the alleged victim's behalf to ensure the victim gets prompt medical and mental health, as appropriate to their needs and the circumstances of the alleged offense.</p> <p data-bbox="280 1823 1477 2065">Staff interviews revealed that staff members were formally trained on and understand how to ensure residents are kept safe in the event they are at risk for imminent sexual abuse. Upon receipt of information that a resident is subject to a substantial risk of imminent sexual abuse, the Kitsap County Juvenile Detention Center staff indicated immediate action would be taken. Specifically, at a minimum, housing and programming changes would be initiated to separate or limit a threat</p>

between residents. All the random staff interviews indicated a similar answer.

Kitsap County Juvenile Detention Center policy requires immediate action to protect residents from sexual abuse. Although there have been no incidents in the past 12 months at the Kitsap County Juvenile Detention Center, the staff interviewed are aware of their reporting requirements and the steps that need to be taken to ensure the resident's safety.

The Juvenile Detention Manager asserts when it is learned a resident is subject to a substantial risk of imminent sexual abuse, the potential victim is immediately removed from the danger zone and placed in the Medical or the Supervisor's Office.

Random staff interviewees assert if they learn a resident is at risk of imminent sexual abuse, they immediately remove the resident from the danger zone and place the potential victim under direct staff supervision to ensure safety.

Policy 3.20 PREA Part C, page 7 Agency Protection Duties, Final Prison Rape Elimination Powerpoint pages 19-21, the Kitsap County Juvenile Detention Center Coordinated Response Plan and interviews with the Juvenile Court Administrator, Detention Manager and random staff addresses 115.362(a).

The Kitsap County Juvenile Detention Center complies with Standard 115.362: Agency protection duties.

115.363	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents</p> <ol style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act <p>Interviews conducted with</p> <ol style="list-style-type: none"> 1. Juvenile Court Administrator 2. Juvenile Detention Manager <p>The following policy was reviewed: Policy 3.20 Prison Rape Elimination Act. In addition, interviews were conducted with the Juvenile Court Administrator and the Juvenile Detention Manager.</p> <p>Upon receiving an allegation that a resident was sexually abused while confined at another facility, the Kitsap County Juvenile Detention Center policy requires notification to the head of the facility and appropriate Law Enforcement authorities within 72 hours. This notification is documented. There have been zero reports from a resident that they were sexually abused at another facility in the past 12 months. The Kitsap County Juvenile Detention Center has received zero allegations of sexual abuse from other facilities in the past 12 months. Interviews with the Juvenile Detention Manager and the Juvenile Court Administrator indicate compliance with this procedure.</p> <p>Policy 3.20 Prison Rape Elimination Act Part C, page 7, and interviews with the Juvenile Court Administrator and the Juvenile Detention Manager address 115.363(a) (b) (c) and (d).</p> <p>The Kitsap County Juvenile Detention Center complies with Standard 115.363: Reporting to other confinement facilities.</p>

115.364	Staff first responder duties
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 297">Auditor Discussion</p> <p data-bbox="280 340 443 374">Documents</p> <ol data-bbox="341 443 1353 562" style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. Kitsap County Juvenile Detention Center Coordinated Response Plan 3. Final Prison Rape Elimination Powerpoint <p data-bbox="280 600 659 633">Interviews Conducted with</p> <ol data-bbox="341 703 584 736" style="list-style-type: none"> 1. Random Staff <p data-bbox="280 775 1422 896">The following policy and other documentation were reviewed: Policy 3.20 Prison Rape Elimination Act, the Coordinated Response Plan, and the Final Prison Rape Elimination Powerpoint.</p> <p data-bbox="280 934 887 967">The auditor interviewed nine random staff.</p> <p data-bbox="280 1005 1474 1249">During the tour, informal discussions were conducted by the Auditor with Kitsap County Juvenile Detention Center custody staff concerning how they would respond to different situations involving allegations of sexual assault or sexual harassment. In each of these informal discussions, staff indicated the most crucial step was to keep the victim safe, believe what the victim had stated, and proceed to take action necessary to ensure the victim's safety.</p> <p data-bbox="280 1288 1481 1615">The Kitsap County Juvenile Detention Center staff members were interviewed concerning first responder responsibilities. Staff members are aware of their duty in this area. The staff members interviewed indicated a need to separate the victim from the abuser, preserve and protect the crime scene, advise the victim not to take any action that would compromise the evidence, and, if possible, ensure the alleged abuser did not take any action that would compromise any evidence. In addition, staff members were aware that they needed to contact their supervisor, who would contact the Juvenile Detention Manager.</p> <p data-bbox="280 1653 1477 2018">The staff interviewed indicated they had received training that included the duties of a first responder. A first responder is required to: Separate the alleged victim and abuser; Preserve and protect the crime scene; request the alleged victim not to destroy evidence, and ensure the alleged abuser does not destroy evidence. A non-security staff responder must first request the victim not to destroy evidence and then notify a detention staff member. The Juvenile Detention Manager indicated: the term "Staff" refers to custody staff and supervisors as well as probation officers, teachers, institutional education program staff, extra help custody staff, volunteers, and contractors.</p> <p data-bbox="280 2056 1329 2089">Interviews with random staff indicate they understand the duties of a first</p>

responder. Additionally, the policy describes the steps to be taken in response to an allegation of sexual abuse, assault, or harassment. Those steps include separating the parties, cell reassignment, securing the scene, following evidentiary practices, medical evaluation, notification of Mental Health for follow-up and the need to monitor those who reported the incident for a minimum of 90 days to ensure no retaliation has occurred due to reporting or cooperation. During the past 12 months, Kitsap County Juvenile Detention Center has not had any incidents of sexual assault.

Policy 3.20 Prison Rape Elimination Act, Part D, page 1, Kitsap County Juvenile Detention Center Coordinated Response Plan and Final Prison Rape Elimination Powerpoint, pages 19-20, address 115.364(a) and (b).

The Kitsap County Juvenile Detention Center complies with Standard 115.364: Staff first responder duties.

115.365	Coordinated response
	<p data-bbox="280 188 1007 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 300">Auditor Discussion</p> <p data-bbox="280 340 443 376">Documents</p> <ol data-bbox="341 443 1353 564" style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. 3.20 Part D Response and Investigation 3. Kitsap County Juvenile Detention Center Coordinated Response Plan <p data-bbox="280 600 655 636">Interviews conducted with</p> <ol data-bbox="341 703 783 739" style="list-style-type: none"> 1. Juvenile Detention Manager <p data-bbox="280 775 1481 896">The following policy and other documentation were reviewed: Policy 3.20, Prison Rape Elimination Act, 3.20 Part D Response and Investigation and the Kitsap County Juvenile Detention Center Coordinated Response plan.</p> <p data-bbox="280 931 1082 967">The Auditor interviewed the Juvenile Detention Manager.</p> <p data-bbox="280 1003 1474 1290">The following observations were made during the on-site tour of the facility: During the tour, informal discussions were conducted by the Auditor with Kitsap County Juvenile Detention Center Custody staff concerning how they would respond to different situations involving allegations of sexual assault or sexual harassment. In each of these informal discussions, staff indicated the most crucial step was to keep the victim safe, believe what the victim had stated, and proceed to take action necessary to ensure the victim's safety.</p> <p data-bbox="280 1326 1481 1612">The Kitsap County Juvenile Detention Center has a written plan that includes immediate notification to the Juvenile Detention Manager, law enforcement, and sexual assault advocates. During his interview, the Juvenile Detention Manager stated that staff is trained to follow the Coordinated Response Guide, which includes but is not limited to separating the involved individuals, contacting law enforcement, maintaining evidence integrity, contacting the PREA Coordinator, Community Partners, and assisting in transport if necessary.</p> <p data-bbox="280 1648 1474 2060">The Coordinated Response plan delineates specific responsibilities for both First Responders and Supervisors. First Responders are expected to ensure that the alleged victim and abuser are separated. All security staff and potential first responders shall take preliminary steps to protect the victim and immediately notify the appropriate medical and mental health practitioners. Notify 911 if emergent. Notify Juvenile Detention Manager. Ensure that evidence (crime scene) is preserved and protected for collection. Request that the alleged victim does not take actions that could destroy physical evidence. This may include washing, brushing teeth, changing clothes, urinating, defecating, eating, or drinking. Ensure that the alleged perpetrator is monitored. Ensure that the alleged perpetrator does not destroy</p>

physical evidence. This may include washing, brushing teeth, changing clothes, urination, defecating, eating or drinking. Offer sexual assault victim advocate services, communicate pertinent information to Medical staff, and transport the victim if necessary.

Interviews with random staff, the Juvenile Detention Manager, 3.20 Part D, page 1 (Coordinated Response, A.), the Kitsap County Juvenile Detention Center Coordinated Response Guide, and the interview with the Juvenile Detention Manager address 115.365 (a).

The Kitsap County Juvenile Detention Center complies with Standard 115.365: Coordinated response.

115.366	Preservation of ability to protect residents from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents</p> <ol style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. Agreement between Kitsap County, Kitsap County Superior Court and Juvenile Detention Officer’s Guild KC-283-22 <p>Interviews conducted with</p> <ol style="list-style-type: none"> 1. Juvenile Court Administrator 2. Juvenile Detention Manager <p>The Auditor interviewed the Juvenile Court Administrator and the Juvenile Detention Manager. Additionally, the Auditor reviewed the Labor agreements between Kitsap County and the Juvenile Officer’s Guild.</p> <p>Kitsap County Juvenile Detention Center has no limit on its ability to remove alleged sexual abusers from contact with any residents pending the outcome of an investigation. There is no collective bargaining agreement that would prohibit immediate action for the protection of residents. The Juvenile Court Administrator confirms there is no prohibition against removing alleged staff sexual abusers from contact with residents.</p> <p>Policy 3.20 Prison Rape Elimination Act, Part D, Preservation of ability to protect residents from abusers, A and B., the Agreement between Kitsap County, Kitsap County Superior Court and Juvenile Detention Officer’s Guild KC-283-22, article 4. A and Article 7. A. and interviews with the Juvenile Court Administrator and Juvenile Detention Manager address 115.366 (a) and (a)-1.</p> <p>The Kitsap County Juvenile Detention Center complies with Standard 115.366: Preservation of ability to protect residents from contact with abusers.</p>

115.367	Agency protection against retaliation
	<p data-bbox="280 188 1007 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 580 300">Auditor Discussion</p> <p data-bbox="280 340 443 376">Documents</p> <ol data-bbox="341 443 951 479" style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act <p data-bbox="280 519 655 555">Interviews conducted with</p> <ol data-bbox="341 622 1257 739" style="list-style-type: none"> 1. Designated staff member charged with monitoring retaliation 2. Detention Manager 3. Agency Head <p data-bbox="280 779 1350 815">The following policy was reviewed: Policy 3.20 Prison Rape Elimination Act.</p> <p data-bbox="280 855 1378 927">The auditor interviewed the Juvenile Detention Manager, the designated staff member who monitors retaliation and the Juvenile Court Administrator.</p> <p data-bbox="280 967 1471 1290">The Kitsap County Juvenile Detention Center prohibits retaliation against residents and staff who report sexual abuse or sexual harassment or cooperate with investigations. The Juvenile Detention Manager is one of the designated staff members who monitor retaliation. Multiple measures are available to manage retaliation situations. Such as removing alleged staff and resident abusers, housing changes, and advocate support. Monitoring can last for at least 90 days and includes periodic status checks. The Juvenile Detention Manager was aware of his requirements for monitoring.</p> <p data-bbox="280 1330 1471 1653">The Juvenile Detention Manager indicates the facility monitors the conduct and treatment of resident(s) or staff who reported sexual abuse and of resident(s) who were reported to have suffered sexual abuse to see if any changes may suggest possible retaliation by residents or staff. The Juvenile Detention Manager further stated that the facility monitors the conduct or treatment for as long as necessary and acts promptly to remedy such retaliation. The facility continues monitoring beyond 90 days if the initial monitoring indicates a continuing need. There were no incidents of retaliation during the last 12 months.</p> <p data-bbox="280 1693 1417 1809">Interviews with the Detention Manager, Policy 3.20 Prison Rape Elimination Act, Part D, page 2, Agency protection against retaliation A., and the Retaliation Log addresses 115.367(a) (a)-1 and (a)-2</p> <p data-bbox="280 1850 1452 2007">Policy 3.20 Prison Rape Elimination Act, Part D, page 2, Agency protection against retaliation B., the interviews with the Detention Manager, Agency Head, and Designated staff member Charged with Monitoring Retaliation addresses 115.367(b).</p> <p data-bbox="280 2047 1452 2083">Policy 3.20 Prison Rape Elimination Act, Part D, page 2, Agency protection against</p>

retaliation C., the interviews with the Detention Manager, Agency Head, and Designated staff member Charged with Monitoring Retaliation addresses 115.367(c), (c)-1 - (c)-4.

Policy 3.20 Prison Rape Elimination Act, Part D, page 2, Agency protection against retaliation D., the interview with the Designated staff member Charged with Monitoring Retaliation addresses 115.367(d).

Policy 3.20 Prison Rape Elimination Act, Part D, page 2, Agency protection against retaliation E., the interviews with the Detention Manager, Agency Head, and Designated staff member Charged with Monitoring Retaliation address 115.367(e).

The Kitsap County Juvenile Detention Center complies with Standard 115.367: Agency protection against retaliation.

115.368	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents</p> <ol style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act <p>Interviews conducted with</p> <ol style="list-style-type: none"> 1. Juvenile Detention Manager <p>The following Policy was reviewed: Policy 3.20, Prison Rape Elimination Act.</p> <p>The Juvenile Detention Manager asserts there were no circumstances within the last 12 months wherein isolation was used to protect a resident who was alleged to have suffered sexual abuse.</p> <p>The language in the Policy (3.20) states that any use of segregated housing to protect a resident alleged to have suffered sexual abuse shall be subject to the requirements of §115.342.</p> <p>The Kitsap County Juvenile Detention Center does not have a segregated housing unit. Information gathered during intake is utilized to make housing, bed, program, and education assignments for residents to keep all residents safe and free from sexual abuse. Residents may be isolated from others in the intake area for asserting suicidal ideations. Residents who indicate suicidal ideations are monitored and subsequently seen by mental health practitioners to determine their level of safety. The evaluation by mental health practitioners is conducted within hours of the staff's determination that a resident is expressing suicidal ideations, and a staff member constantly monitors the resident until a Mental Health staff member arrives.</p> <p>There have been no residents who were placed in isolation for alleging to have suffered sexual abuse. The Kitsap Juvenile Detention Center does not have a segregated housing unit; all residents are housed in one of the available Pods except as noted above. The auditor notes that no isolation cells are available at Kitsap County Juvenile Detention Center. All residents are housed in the general population, and segregation cells are unavailable.</p> <p>Policy 3.20 Prison Rape Elimination Act, Part D, Post-allegation protective custody A., and the interview with the Detention Manager, addresses 115.368(a).</p> <p>The Kitsap County Juvenile Detention Center complies with Standard 115.368: Post-allegation protective custody.</p>

115.371	Criminal and administrative agency investigations
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 580 297">Auditor Discussion</p> <p data-bbox="280 340 443 374">Documents</p> <ol data-bbox="341 445 1091 517" style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. Kitsap County Child Abuse Investigation Protocols <p data-bbox="280 560 655 593">Interviews conducted with</p> <ol data-bbox="341 665 783 777" style="list-style-type: none"> 1. Investigator 2. Juvenile Detention Manager 3. PREA Coordinator <p data-bbox="280 819 1465 976">The following policy was reviewed: Policy 3.20 Prison Rape Elimination Act. The Auditor reviewed the Kitsap County Child Abuse Investigation Protocols and the NIC curriculum, Specialized Training: Investigating Sexual Abuse in Confinement Settings.</p> <p data-bbox="280 1019 1437 1090">The Auditor interviewed the Kitsap County Juvenile Detention Center investigator, the Juvenile Detention Manager and the PREA Coordinator.</p> <p data-bbox="280 1133 1469 1413">The Kitsap County Juvenile Detention Center conducts administrative investigations of sexual abuse and sexual harassment allegations. The investigations begin upon staff notification. Third-party reports, if received, are investigated in the same manner as a direct report. Any report of sexual abuse that appears to be criminal is referred to the Port Orchard Police Department. The Kitsap County Juvenile Detention Center investigator has received training from the NIC, specifically, "Investigating Sexual Abuse in a Confinement Setting."</p> <p data-bbox="280 1456 1477 1821">Investigators gather and preserve direct and circumstantial evidence; however, crime scenes are secured to prevent contamination, and the lead Law Enforcement agency collects physical and DNA evidence. The Kitsap County Juvenile Detention Center investigator collects all electronic monitoring data, records, resident files, and staff memorandums and provides that information to the lead Law Enforcement agency. The Kitsap County Juvenile Detention Center Investigators would interview alleged victims, suspected perpetrators, and witnesses for administrative investigations. Under normal circumstances, the lead Law Enforcement agency will conduct interviews during a criminal investigation.</p> <p data-bbox="280 1863 1481 1975">The Kitsap County Juvenile Detention Center Investigators do not conduct compelled interviews; if necessary, those interviews would be conducted by the lead Law Enforcement agency in consultation with the lead Prosecutors office.</p> <p data-bbox="280 2018 1477 2089">During his interview, the Kitsap County Juvenile Detention Center Investigator stated that the credibility of an alleged victim, suspect, or witness was based on the</p>

individual and not on their status as a resident or staff.

Residents are not subject to a polygraph examination or other truth-telling devices.

Criminal investigations are documented and maintained by the lead Law Enforcement agency. The Kitsap County Juvenile Detention Center Investigator would provide a summary of the case and the disposition. The lead Law Enforcement agency maintains all evidence collected during a criminal investigation. The lead Law Enforcement agency will refer cases for criminal prosecution based on their investigations.

Substantiated allegations of conduct that appear to be criminal are referred for prosecution.

The Kitsap County Juvenile Detention Center retains all written investigative reports for as long as the alleged abuser is incarcerated or employed by the agency, plus five years. An investigation is never terminated due to the departure of the alleged abuser or victim. If a staff member is terminated or resigns, the investigation continues until resolution.

The Kitsap County Juvenile Detention Center Investigator works with the lead Law Enforcement agency and fully cooperates with that agency during the investigation.

The Kitsap County Juvenile Detention Center has two (2) individuals who have received specialized training for conducting sexual abuse investigations as required by PREA standard 115.234. Upon completing an administrative or criminal investigation, the Kitsap County Juvenile Detention Center will do a follow-up investigation for Human Resource action as necessary.

The Kitsap County Juvenile Detention Center Investigator indicated during his interview that his training included good interpersonal communication skills with resident victims, assailants, and witnesses. Understanding of the dynamics of resident sexual violence. Establishing good working relationships with outside agencies, hospitals, prosecutors, and investigators and establishing procedures for evidence collection. He indicated the training also included information on the proper use of the Miranda and Garrity warnings.

The Auditor reviewed the NIC curriculum, Specialized Training: Investigating Sexual Abuse in Confinement Settings. This training is designed to address the requirements outlined in the Prison Rape Elimination Act (PREA) standard 115.334, requiring specialized training for individuals tasked with investigating alleged incidents of sexual abuse in confinement settings. Additionally, this curriculum contains the information fundamental to understanding the concepts required by PREA standard 115.334 and best practices in investigating incidents of sexual abuse. The course provides legal issues liability training, trauma and victim response, medical and mental health care, first response and evidence collection, adult and juvenile interviewing, and report writing.

The Auditor notes that the above information is based on interviews and policy/

documentation review, as there were no criminal or administrative investigations to review. No sexual assault or sexual harassment incidents have occurred at Kitsap County Juvenile Detention Center in the past 12 months.

Policy 3.20, Prison Rape Elimination Act, Part D, Criminal and administrative agency investigations, A-K., Kitsap County Child Abuse Investigation Protocols and the interview with the investigator address 115.371(a) - 115.371(k)

Interviews with the Juvenile Detention Manager, PREA Coordinator and Investigative Staff address 115.371(m).

The Kitsap County Juvenile Detention Center complies with Standard 115.371: Criminal and administrative agency investigations.

115.372	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents</p> <ol style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act <p>Interviews conducted with</p> <ol style="list-style-type: none"> 1. Investigator <p>The following policies were reviewed: Policy 3.20, Prison Rape Elimination Act.</p> <p>The Auditor interviewed the Kitsap County Juvenile Detention Center investigator.</p> <p>The Investigative Officer was interviewed concerning the evidential standard for administrative investigation. Her response to the evidential standard for an administrative investigation was, "The evidence standard for administrative investigation is a "preponderance of the evidence." The Investigative Officer received specialized training relevant to PREA. Specifically, "Investigating Sexual Abuse in a Confinement Setting." The Investigative Officer was interviewed and explained to the Auditor in detail the steps to be taken during a PREA-related investigation. Policy 3.20, Part D, page 4, states that the Kitsap County Juvenile Detention Center cannot establish any higher than a preponderance of evidence to determine substantiation of sexual abuse allegations.</p> <p>The agency will impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or harassment of a juvenile are substantiated.</p> <p>Policy 3.20, Prison Rape Elimination Act, Part D, Evidentiary standard for administrative investigations A., and the interview with the Investigator address 115.372(a) and (a)-1.</p> <p>The Kitsap County Juvenile Detention Center complies with Standard 115.372: Evidentiary standard for administrative investigations.</p>

115.373	Reporting to residents
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 297">Auditor Discussion</p> <p data-bbox="280 340 443 374">Documents</p> <ol data-bbox="341 443 948 477" style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act <p data-bbox="280 517 655 551">Interviews conducted with</p> <ol data-bbox="341 620 783 696" style="list-style-type: none"> 1. Juvenile Detention Manager 2. Investigator <p data-bbox="280 734 1347 768">The following policy was reviewed: Policy 3.20 Prison Rape Elimination Act.</p> <p data-bbox="280 806 1477 1048">Residents are informed of the results of the investigation. That information includes whether the staff member is or is not allowed to work in the resident's unit; whether the staff member is or is not employed; whether the staff member has been indicted, or whether the staff member has been convicted. In addition, if the alleged abuser is a resident, the resident victim would be informed if the alleged abuser was indicted or convicted. All notifications are documented.</p> <p data-bbox="280 1086 1369 1162">The Kitsap County Juvenile Detention Center Policy 3.20 Part D, Reporting to residents, pages 4-5, states:</p> <ol data-bbox="341 1232 1458 1559" style="list-style-type: none"> 1. Following an investigation of sexual abuse suffered in KCJDF, KCJFCS shall inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. 2. If KCJFCS did not conduct the investigation, it shall request the relevant information from the investigative agency to inform the resident. 3. Following a resident's allegation that a staff member has committed sexual abuse against the resident, KCJDF shall subsequently inform the youth (unless KCJDF has determined that the allegation is unfounded) whenever: <ul data-bbox="352 1599 1469 1841" style="list-style-type: none"> • The staff member is no longer posted within the youth's living unit; • The staff member is no longer employed at the facility; • KCJFCS learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or, • KCJFCS learns that the staff member has been convicted on a charge related to sexual abuse within the facility. <ol data-bbox="341 1881 1433 1995" style="list-style-type: none"> 1. Following a youth's allegation that he or she has been sexually abused by another resident, KCJFCS shall subsequently inform the alleged victim whenever: <ul data-bbox="352 2036 1466 2069" style="list-style-type: none"> • KCJFCS learns that the alleged abuser has been indicted on a charge related

to sexual abuse within the facility; or,

- KCJFCS learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.

1. All such notifications or attempted notifications shall be documented.
2. An agency's obligation to report under this standard shall terminate if the youth is released from KCJDF's custody.

The auditor notes that no sexual assault or sexual harassment incidents have occurred at the Kitsap County Juvenile Detention Center in the past 12 months. As a result, there was no resident notification to review.

Policy 3.20 Prison Rape Elimination Act, Part D, Reporting to residents A - F., and interviews with the Juvenile Detention Manager and the Investigator, addresses 115.373(a-f).

The Kitsap County Juvenile Detention Center complies with Standard 115.373: Reporting to residents.

115.376	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents</p> <ol style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act <p>Interviews Conducted with</p> <ol style="list-style-type: none"> 1. Juvenile Court Administrator 2. Juvenile Detention Manager <p>The following policy was reviewed: Policy 3.20 Prison Rape Elimination Act. In addition, the auditor interviewed the Juvenile Detention Manager and the Juvenile Court Administrator.</p> <p>The Kitsap County Juvenile Detention Center staff are subject to disciplinary sanctions, including termination for violating agency sexual abuse or sexual harassment policies. Disciplinary sanctions for violations of Kitsap County Juvenile Detention Center policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be commensurate with the nature and circumstances of the acts committed, the staff member’s disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. All terminations for violations of the PREA policy, or resignations by staff who would have been terminated if not for their resignation, shall be reported to law enforcement agencies, unless the activity was not criminal, and to any relevant licensing bodies. The Kitsap County Juvenile Detention Center will track all staff terminations and licensing notifications.</p> <p>The Juvenile Court Administrator indicated there had been no staff terminations for violations of agency sexual abuse or sexual harassment policies at Kitsap County Juvenile Detention Center in the past 12 months. The Juvenile Court Administrator stated appropriate notifications would be made to licensing boards or other agencies.</p> <p>Policy 3.20, Prison Rape Elimination Act, Part D, Disciplinary sanctions for staff A - D., and interviews with the Juvenile Court Administrator and the Juvenile Detention Manager address 115.376 (a-d).</p> <p>The Kitsap County Juvenile Detention Center complies with Standard 115.376: Disciplinary sanctions for staff.</p>

115.377	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents</p> <ol style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act <p>Interviews Conducted with</p> <ol style="list-style-type: none"> 1. Juvenile Court Administrator 2. Juvenile Detention Manager <p>The following policy was reviewed: Policy 3.20 Prison Rape Elimination Act. In addition, the auditor interviewed the Juvenile Detention Manager and the Juvenile Court Administrator.</p> <p>The Kitsap County Juvenile Detention Center Policy 3.20, Part D, page 8, indicates if allegations of sexual abuse or harassment are found to be substantiated, contractors or volunteers would be subject to corrective action or prohibited from contact with the residents. The policy further indicates all terminations for violations of agency abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies unless the activity was not criminal and to any relevant licensing bodies.</p> <p>All volunteers and contractors must comply with all facility policies, procedures, rules and regulations. Unlawful or illegal conduct or breach of facility policies, rules or regulations will result in the removal of volunteers or contractors.</p> <p>There have been no incidents of contractors or volunteers violating Kitsap County Juvenile Detention Center PREA policies within the past 12 months.</p> <p>Policy 3.20 Prison Rape Elimination Act Part D, Corrective action for contractors and volunteers A - B and interviews with the Juvenile Detention Manager and the Juvenile Court Administrator, address 115.377(a-b).</p> <p>The Kitsap County Juvenile Detention Center complies with Standard 115.377: Corrective action for contractors and volunteers.</p>

115.378	Interventions and disciplinary sanctions for residents
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Documents</p> <ol style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. Resident Handbook <p>Interviews Conducted with</p> <ol style="list-style-type: none"> 1. Juvenile Detention Manager <p>The following policy and other documentation were reviewed: 3.20 Prison Rape Elimination Act and the Kitsap County Juvenile Detention Center Resident Handbook.</p> <p>The Kitsap County Juvenile Detention Center procedures for managing Rule Violations are administered in ways that create a positive learning experience. Penalties or consequences for misbehavior are proportionate to the rule or regulation's importance and the violation's severity. Temporary restriction to a resident's room for a short period (usually from 15 minutes to one hour) is utilized to defuse a resident's escalating misconduct or confrontation with staff. Detention staff utilizes progressive discipline to manage a resident's behavior.</p> <p>Non-compliance and rule infractions are considered major violations when a resident's actions or acts constitute a chargeable offense. All major rule violations are referred to the proper authority for a determination regarding the filing of charges. When a resident commits an act that allegedly violates criminal laws, an Incident Report will be used to record such allegations. In situations where resident-on-resident sexual abuse has allegedly occurred, the Kitsap County Juvenile Detention Center staff would document the incident and refer the case to Law Enforcement.</p> <p>Policy 3.20 Prison Rape Elimination Act, Part D, page 8, C. states individualized disciplinary action for residents who engage in sexual abuse will consider the resident's mental disabilities or illness that may contribute to their behavior. Additionally, therapy or counseling will be offered for residents who have sexually abused other residents, although they are not required to participate.</p> <p>In the past 12 months, there have been zero administrative findings of resident-on-resident sexual abuse and zero criminal findings of guilt for resident-on-resident sexual abuse at the Kitsap County Juvenile Detention Center.</p> <p>Policy 3.20 Prison Rape Elimination Act Part D, Interventions and Disciplinary sanctions for residents, A., and the Resident Handbook address 115.378(a) and (a)-1 - (a)-2.</p>

Policy 3.20 Prison Rape Elimination Act Part D, Interventions and Disciplinary sanctions for residents, B., and the Resident Handbook address 115.378 (b) - (b)-3.

Policy 3.20 Prison Rape Elimination Act Part D, Interventions and Disciplinary sanctions for residents, C., the interview with the Juvenile Detention Manager and the Resident Handbook address 115.378 (c).

Policy 3.20 Prison Rape Elimination Act Part D, Interventions and Disciplinary sanctions for residents, D., the interview with the Juvenile Detention Manager and the Resident Handbook address 115.378(d) - (d)3.

Policy 3.20 Prison Rape Elimination Act Part D, Interventions and Disciplinary sanctions for residents, E., the interview with the Juvenile Detention Manager and the Resident Handbook address 115.378(e) and (e)-1.

Policy 3.20 Prison Rape Elimination Act Part D, Interventions and Disciplinary sanctions for residents, F., the interview with the Juvenile Detention Manager and the Resident Handbook address 115.378(f) and (f)-1.

Policy 3.20 Prison Rape Elimination Act Part D, Interventions and Disciplinary sanctions for residents, G., the interview with the Juvenile Detention Manager and the Resident Handbook address 115.378(g), (g)-1 and (g)-2.

The Kitsap County Juvenile Detention Center complies with Standard 115.378: Interventions and Disciplinary sanctions for residents.

115.381	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents</p> <ol style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act <p>Interviews conducted with</p> <ol style="list-style-type: none"> 1. Medical Staff <p>The following policy was reviewed: 3.20 Prison Rape Elimination Act.</p> <p>The Kitsap County Juvenile Detention Center staff (Intake Officers) make arrangements for a follow-up meeting with a mental health practitioner.</p> <p>The Kitsap County Juvenile Detention Center staff (Intake Officers) and Mental Health staff members work together to collect and monitor information that indicates prior sexual victimization. In addition, if the resident reports being a predator, that information is appropriately documented. Follow-up by Mental Health staff and re-assessment would be provided as needed. Any information pertaining to victimization or predatory behavior is limited to a need-to-know basis. Custodial staff members are informed of the information for housing placement. Interviews with staff confirm compliance with this standard.</p> <p>Appropriate Child Protective Agencies would be notified about prior sexual victimization that did not occur at Kitsap County Juvenile Detention Center. Mental Health clinical notes are maintained separately from the resident files. The Mental Health Specialist works with the Kitsap County Sexual Assault Center and WISE. WISE (Wraparound with Intensive Services) is an approach to helping children, youth, and their families with intensive mental health care. Services are available in home and community settings and offer a system of care based on the individualized need of the child or youth. If a resident is already working with a WISE team, the Mental Health Specialist will coordinate with the WISE team and provide the team access to the resident while they are in detention.</p> <p>Policy 3.20 Prison Rape Elimination Act, Part E, Medical/ mental health screenings; history of sexual abuse, A., addresses 115.381(a) and (a)-1- (a)-4.</p> <p>Policy 3.20 Prison Rape Elimination Act, Part E, Medical/ mental health screenings; history of sexual abuse, B., addresses 115.381(b) and (b)-1 - (b)-2.</p> <p>Policy 3.20 Prison Rape Elimination Act, Part E, Medical/ mental health screenings; history of sexual abuse, C., addresses 115.381(c) and (c)-1 and (c)-2.</p> <p>Policy 3.20 Prison Rape Elimination Act, Part E, Medical/ mental health screenings;</p>

history of sexual abuse, D., and the interview with Medical staff, address 115.381(d) and (d)-1.

The Kitsap County Juvenile Detention Center complies with Standard 115.381: Medical and mental health screenings; history of sexual abuse.

115.382	Access to emergency medical and mental health services
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 297">Auditor Discussion</p> <p data-bbox="280 340 443 374">Documents</p> <ol data-bbox="341 443 1374 562" style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. RCW 7.68.170 3. Kitsap County Juvenile Detention Center Coordinated Response Guide <p data-bbox="280 600 655 633">Interviews conducted with</p> <ol data-bbox="341 703 1171 822" style="list-style-type: none"> 1. PREA Coordinator 2. Medical Staff 3. Kitsap County Sexual Assault Center Executive Director <p data-bbox="280 860 1437 978">The following policy and other documentation were reviewed: Policy 3.20 Prison Rape Elimination Act, the Kitsap County Juvenile Detention Coordinated Response Plan and the RCW 7.68.170.</p> <p data-bbox="280 1016 1394 1095">The Auditor interviewed the PREA Coordinator, Medical staff and the Executive Director of the Kitsap County Sexual Assault Center.</p> <p data-bbox="280 1133 1445 1290">The following observations were made during the on-site tour of the facility: The Auditor observed the information provided to the residents concerning the Kitsap County Sexual Assault Center and the phone number to contact the Kitsap County Sexual Assault Center.</p> <p data-bbox="280 1328 1477 1738">In the event of an incident, all victims are provided access to forensic medical examinations at a healthcare facility (St. Michael Medical Center). Examinations are performed by Sexual Assault Nurse Examiners (SANEs) at the St. Michael Medical Center. The Auditor reviewed the St. Michael Medical Center information concerning Sexual Assault crisis intervention. All residents who experience sexual abuse have access to forensic medical examinations at an outside facility without financial cost, pursuant to RCW 7.68.170. No costs incurred by a hospital or other emergency medical facility for examining the victim of a sexual assault when such examination is performed to gather evidence for possible prosecution shall be billed or charged directly or indirectly to the victim of such assault.</p> <p data-bbox="280 1776 1477 1977">The Auditor interviewed the Kitsap Sexual Assault Center Executive Director. During the interview, the Executive Director indicated the Kitsap Sexual Assault Center staff would be available during the forensic medical examination process and investigatory interviews to provide emotional support and crisis support intervention, information, and referrals as necessary.</p> <p data-bbox="280 2016 1469 2094">Access to information about emergency contraception and sexually transmitted infections prophylaxis would be provided by the hospital and followed up by nursing</p>

staff at the Kitsap County Juvenile Detention Center.

Policy 3.20 Prison Rape Elimination Act, Part E, Access to emergency medical and mental health services, A., and interviews with Medical Staff address 115.382 (a) and (a)-1 - (a)-3.

Policy 3.20 Prison Rape Elimination Act, Part E, Access to emergency medical and mental health services, B., and the Kitsap County Juvenile Detention Center, Coordinated Response Plan, addresses 115.382(b).

Policy 3.20 Prison Rape Elimination Act, Part E, Access to emergency medical and mental health services, C., and interviews with Medical Staff address 115.382(c) and (c)-1.

Policy 3.20 Prison Rape Elimination Act, Part E, page 2 D, RCW 7.68.170 and interviews with Medical staff and the Executive Director of the Kitsap County Sexual Assault Center address 115.382(d) and (d)-1.

The Kitsap County Juvenile Detention Center complies with Standard 115.382: Access to emergency medical and mental health services.

115.383	<p>Ongoing medical and mental health care for sexual abuse victims and abusers</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Documents</p> <ol style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act 2. RCW 7.68.170 <p>Interviews conducted with</p> <ol style="list-style-type: none"> 1. PREA Coordinator 2. Medical Staff 3. Kitsap County Sexual Assault Center Advocate <p>The following policy was reviewed: Policy 3.20 Prison Rape Elimination Act. The Auditor interviewed the PREA Coordinator, Medical Staff, and a sexual assault advocate from the Kitsap County Sexual Assault Center.</p> <p>The following observations were made during the on-site tour of the facility: The Auditor observed the information provided to the residents concerning the Kitsap County Sexual Assault Center and the phone number to contact the Kitsap County Sexual Assault Center.</p> <p>The Kitsap County Juvenile Detention Center provides ongoing medical and mental health care for sexual abuse victims and abusers through community providers, specifically St Michael Medical Center and the Kitsap County Sexual Assault Center. Appropriate follow-up services, treatment plans, and continuing care upon release from custody are available. Community providers provide all treatment; if necessary, pregnancy tests and follow-up care would be provided. Appropriate STD tests, as medically indicated, would be provided. There would be no cost to the resident for this care. The Kitsap County Juvenile Detention Center policy and applicable MOUs are in place to meet the victim's needs.</p> <p>Policy 3.20 Prison Rape Elimination Act, Part E Medical/Mental health care for sexual abuse victims/abusers, A., interviews with Medical Staff and the Kitsap County Sexual Assault Center Executive Director address 115.383 (a) and (a)-1.</p> <p>Policy 3.20 Prison Rape Elimination Act, Part E Medical/Mental health care for sexual abuse victims/abusers, B., interviews with Medical Staff and the Kitsap County Sexual Assault Center Executive Director address 115.383(b).</p> <p>Policy 3.20 Prison Rape Elimination Act, Part E Medical/Mental health care for sexual abuse victims/abusers, C., and interviews with Medical Staff address 115.383(c).</p> <p>Policy 3.20 Prison Rape Elimination Act, Part E Medical/Mental health care for sexual</p>
---------	---

abuse victims/abusers, D., and interviews with Medical Staff address 115.383(d) and (d)-1.

Policy 3.20 Prison Rape Elimination Act, Part E Medical/Mental health care for sexual abuse victims/abusers, E., and interviews with Medical Staff address 115.383(e) and (e)-1.

Policy 3.20 Prison Rape Elimination Act, Part E Medical/Mental health care for sexual abuse victims/abusers, F., and interviews with Medical Staff address 115.383(f) and (f)-1.

Policy 3.20 Prison Rape Elimination Act, Part E Medical/Mental health care for sexual abuse victims/abusers, G., and RCW 7.68.170 addresses 115.383(g) and (g)-1.

Policy 3.20 Prison Rape Elimination Act, Part E Medical/Mental health care for sexual abuse victims/abusers, H., addresses 115.383(h) and (h)-1.

The Kitsap County Juvenile Detention Center complies with Standard 115.383: Ongoing medical and mental health care for sexual abuse victims and abusers.

115.386	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents</p> <ol style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act <p>Interviews conducted with</p> <ol style="list-style-type: none"> 1. Incident Review Team Member 2. Juvenile Detention Manager 3. PREA Coordinator 4. Juvenile Court Administrator <p>The following policy was reviewed: Policy 3.20 Prison Rape Elimination Act. Additionally, interviews were conducted with an Incident Review Team Member, the Juvenile Detention Manager and the PREA Coordinator.</p> <p>After the investigative process, the Kitsap County Juvenile Detention Center staff would review the incident. The review would be scheduled within 30 days of the conclusion of the investigation. The review team consists of the Juvenile Detention Manager, the PREA Coordinator, and the Juvenile Court Administrator. The review would include input from line supervisors, investigators, and medical or mental health practitioners. The review team would determine if a change in procedure was necessary if the incident was motivated by any class affiliation, sexual orientation, or other group dynamics. A review of the monitoring technology would be conducted to assess its effectiveness. The physical barriers of the facility and the staffing pattern would also be evaluated.</p> <p>There would be a final report of the incident with appropriate recommendations.</p> <p>The Kitsap County Juvenile Detention Center reports that in the past 12 months, there have been zero investigations for sexual abuse or harassment. As a result, no incident reviews have been conducted.</p> <p>Policy 3.20 Prison Rape Elimination Act, Part F, Sexual abuse incident reviews, A., addresses 115.386(a) and (a)-1.</p> <p>Policy 3.20 Prison Rape Elimination Act, Part F, Sexual abuse incident reviews, B., addresses 115.386(b) and (b)-1.</p> <p>Policy 3.20 Prison Rape Elimination Act, Part F, Sexual abuse incident reviews, C., and the interview with the Juvenile Detention Manager addresses 115.386(c) and (c)-1.</p> <p>Policy 3.20 Prison Rape Elimination Act, Part F, Sexual abuse incident reviews, D.,</p>

and interviews with the Juvenile Detention Manager, PREA Coordinator and the Incident Review Team Member address 115.386(d) and (d)-1.

Policy 3.20 Prison Rape Elimination Act, Part F, Sexual abuse incident reviews, E., and interviews with the Juvenile Detention Manager, PREA Coordinator and the Incident Review Team Member address 115.386(e) and (e)-1.

The Kitsap County Juvenile Detention Center complies with Standard 115.386: Sexual abuse incident reviews.

115.387	Data collection
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 580 297">Auditor Discussion</p> <hr/> <p data-bbox="280 340 443 374">Documents</p> <ol data-bbox="341 443 948 517" style="list-style-type: none"> <li data-bbox="341 443 948 477">1. Policy 3.20 Prison Rape Elimination Act <li data-bbox="341 483 783 517">2. Annual Reports 2019 - 2021 <p data-bbox="280 560 1469 719">The following policy was reviewed: Policy 3.20 Prison Rape Elimination Act. In addition, the Auditor reviewed the Kitsap County Juvenile Detention Center PREA definitions and the Kitsap County Juvenile Detention Center annual PREA reports for the past several years.</p> <p data-bbox="280 757 1469 1039">Uniform data is collected, which accurately tracks allegations of sexual abuse. The information is aggregated annually. The PREA Coordinator is responsible for collecting the data necessary to answer all questions from the U.S. Department of Justice Bureau of Justice Statistics Survey of Sexual Violence. The data collection currently conducted by the staff at the Detention Center would answer all questions from the Survey of Sexual Violence. The annual review is posted online and was reviewed by the Auditor.</p> <p data-bbox="280 1077 1461 1196">Kitsap County Juvenile Detention Center provides access to its annual report on the web at https://www.kitsapgov.com/juv/Pages/Detention.aspx. The most recent annual report is available on the website.</p> <p data-bbox="280 1234 1477 1308">Policy 3.20 Prison Rape Elimination Act in Detention Part F, Data Collection, A, and a review of the Annual Reports from 2019-2021 address 115.387(a) and (a)-1.</p> <p data-bbox="280 1346 1477 1420">Policy 3.20 Prison Rape Elimination Act in Detention Part F, Data Collection, B, and a review of the Annual Reports from 2019-2021 address 115.387(b) and (b)-1.</p> <p data-bbox="280 1458 1477 1532">Policy 3.20 Prison Rape Elimination Act in Detention Part F, Data Collection, C, and a review of the Annual Reports from 2019-2021 address 115.387(c) and (c)-1.</p> <p data-bbox="280 1570 1453 1644">Policy 3.20 Prison Rape Elimination Act in Detention Part F, Data Collection, D, and a review of the Annual Reports from 2019-2021 address 115.387(d) and (d)-1.</p> <p data-bbox="280 1682 1437 1845">Kitsap County Juvenile Detention Center does not contract with any other private facilities for the confinement of residents designated to their care, custody, and control. Accordingly, the Auditor finds 115.387(e) not applicable to Kitsap County Juvenile Detention Center.</p> <p data-bbox="280 1883 1430 2047">The Juvenile Detention Manager indicated the agency did not provide the Department of Justice with data from the previous calendar year upon request. Accordingly, the Auditor finds 115.387(f) not applicable to Kitsap County Juvenile Detention Center.</p> <p data-bbox="280 2085 1461 2119">The Kitsap County Juvenile Detention Center complies with Standard 115.387: Data</p>

	collection.
--	-------------

115.388	Data review for corrective action
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 297">Auditor Discussion</p> <p data-bbox="280 340 443 374">Documents</p> <ol data-bbox="341 443 924 517" style="list-style-type: none"> 1. 3.20 Prison Rape Elimination Act 2. 2019, 2020 and 2021 Annual Reviews <p data-bbox="280 560 667 593">Interviews Conducted with:</p> <ol data-bbox="341 663 788 736" style="list-style-type: none"> 1. Juvenile Court Administrator 2. PREA Coordinator <p data-bbox="280 779 1474 893">The Auditor reviewed the Kitsap County Juvenile Detention Center's annual PREA review for 2019, 2020 and 2021. Interviews were conducted with the Juvenile Court Administrator and the PREA Coordinator.</p> <p data-bbox="280 936 1458 1133">The Kitsap County Juvenile Detention Center reviews the data, identifies problem areas, takes corrective action, and prepares a final report. The report assesses the Agency's progress in addressing sexual abuse. The Agency Head reviews the report, which is available online at https://www.cowlitzsuperiorcourt.us/detention/prea.</p> <p data-bbox="280 1176 1469 1373">The reports are reviewed and signed by the Juvenile Court Administrator, Juvenile Detention Manager and the PREA Coordinator before publishing online. The reports capture the Kitsap County Juvenile Detention Center's strategies for establishing a healthy staff and resident sexual safety culture, including zero tolerance for sexual abuse and sexual harassment.</p> <p data-bbox="280 1415 1445 1570">The Juvenile Court Administrator indicated that incident-based sexual abuse data statistics are evaluated to identify and assess any patterns. Adjustments to staff training, resident education, the staffing plan, policies and programming, and operations routines are considered for implementation based on the assessments.</p> <p data-bbox="280 1612 1477 1767">The Juvenile Detention Manager reports that demographics are maintained regarding allegations and investigations. The documentation is securely maintained in the Juvenile Detention Manager's Office. The documentation and data are used to compile the Kitsap County Juvenile Detention Center Annual Report.</p> <p data-bbox="280 1809 1482 1924">The annual report compares the current year's data and corrective actions with prior years. The Juvenile Detention Manager further reports that the annual report assesses the facility's progress in addressing sexual abuse.</p> <p data-bbox="280 1966 1458 2080">The Juvenile Detention Manager reports when the Agency redacts material from an annual report for publication, the redactions are limited to specific materials where publication would present a clear and specific threat to the safety and security of</p>

the facility. It is noted that the annual reports previously referenced contain no redactions.

Interviews with the Juvenile Court Administrator, the PREA Coordinator, and Policy 3.20 Prison Rape Elimination Act, Part F, Data Review for corrective action, A., address 115.388(a) and (a)-1.

2019, 2020 and 2021 Annual Reviews and Policy 3.20 Prison Rape Elimination Act, Part F, page 2 Data Review for corrective action, B., address 115.388(b), (b)1 and (b)-2.

The interview with the Juvenile Court Administrator, Policy 3.20 Prison Rape Elimination Act, Part F, page 2 Data Review for corrective action, C., and the Agency's website address 115.388(c), (c)-1, (c)-2 and (c)-3.

The interview with the PREA Coordinator and Policy 3.20 Prison Rape Elimination Act, Part F, page 2 Data Review for corrective action, D., addresses 115.388(d), (d)-1 and (d)-2.

The Kitsap County Juvenile Detention Center complies with Standard 115.388: Data review for corrective action.

115.389	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Documents</p> <ol style="list-style-type: none"> 1. Policy 3.20 Prison Rape Elimination Act. 2. Fire and emergency medical records retention schedule 3. County clerks and superior court records retention schedule 4. Local government common records retention schedule 5. 2021 Annual Report <p>Policy 3.20 Prison Rape Elimination Act was reviewed. Additionally, the Auditor reviewed the retention schedules for medical, court, and local government common records.</p> <p>The Kitsap County Juvenile Detention Center PREA Coordinator strictly controls data. The PREA Coordinator and the Juvenile Court Administrator have the authority to view the files and data. The data provided to the Public does not contain any personal identifiers. The Kitsap County Juvenile Detention Center maintains this data for ten years after the initial collection date. The data collected is securely retained in the Juvenile Detention Manager's locked and secure office.</p> <p>Policy 3.20 Prison Rape Elimination Act, Part F, page 2, Data storage, publication, and destruction, A., addresses 115.389 (a) and (a)-1</p> <p>The Kitsap County Juvenile Detention Center does not contract with other private facilities 115.389 (b) does not apply.</p> <p>Policy 3.20 Prison Rape Elimination Act, Part F, page 2, Data storage, publication, and destruction, C., addresses 115.389 (c) and (c)-1.</p> <p>Policy 3.20 Prison Rape Elimination Act, Part F, page 2, Data storage, publication, and destruction, D., addresses 115.389 (d) and (d)-1.</p> <p>The Kitsap County Juvenile Detention Center complies with Standard 115.89: Data storage, publication, and destruction.</p>

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>This is the Kitsap County Juvenile Detention Center’s second PREA audit. The initial PREA Audit was conducted in October 2017.</p> <p>Kitsap County did not conduct an audit during the first cycle (August 2013 - August 2016). Kitsap County conducted an audit during the second year of the second cycle (October 2017). This current Audit was scheduled for October 2020 (the second year of the third cycle). It was postponed due to the Covid-19 pandemic. The Audit was rescheduled for December 2022, the first year of the fourth audit cycle.</p> <p>Kitsap County has only one facility.</p> <p>The Auditor reviewed the relevant policies, procedures, reports, and accreditations. The Auditor was provided a sampling of relevant documents for the most recent one-year period. The Auditor was permitted access to and observed all the Juvenile Detention Center areas. The Auditor was permitted to request and receive copies of all relevant documents. The Auditor interviewed Staff, supervisors, and administrators. The Auditor was permitted to conduct private interviews with residents. Residents were allowed to send confidential information or correspondence to the Auditor in the same manner as if they were communicating with legal counsel.</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>This is the Kitsap County Juvenile Detention Center’s second PREA audit. The Covid-19 pandemic disrupted the audit schedule.</p> <p>Upon completing the final report in 2018, the Kitsap County Juvenile Detention Center published the audit results on its website. This task was completed within 90 days of the completion of the audit.</p>

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

115.331 (b)	Employee training	
	Is such training tailored to the unique needs and attributes of residents of juvenile facilities?	yes
	Is such training tailored to the gender of the residents at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male residents to a facility that houses only female residents, or vice versa?	yes
115.331 (c)	Employee training	
	Have all current employees who may have contact with residents received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.331 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.332 (a)	Volunteer and contractor training	
	Has the agency ensured that all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes

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

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

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

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

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

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

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

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

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

115.342 (h)	Placement of residents	
	If a resident is isolated pursuant to paragraph (b) of this section, does the facility clearly document: The basis for the facility's concern for the resident's safety? (N/A for h and i if facility doesn't use isolation?)	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
115.342 (i)	Placement of residents	
	In the case of each resident who is isolated as a last resort when less restrictive measures are inadequate to keep them and other residents safe, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
115.351 (a)	Resident reporting	
	Does the agency provide multiple internal ways for residents to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: 2. Retaliation by other residents or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes

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

115.352 (a)	Exhaustion of administrative remedies	
	<p>Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address resident grievances regarding sexual abuse. This does not mean the agency is exempt simply because a resident does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.</p>	no
115.352 (b)	Exhaustion of administrative remedies	
	<p>Does the agency permit residents to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)</p>	yes
	<p>Does the agency always refrain from requiring an resident to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)</p>	yes
115.352 (c)	Exhaustion of administrative remedies	
	<p>Does the agency ensure that: A resident who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)</p>	yes
	<p>Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)</p>	yes

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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