

# PREA Facility Audit Report: Final

**Name of Facility:** Michael Prenger Family Center

**Facility Type:** Juvenile

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 04/13/2022

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
<b>Auditor Full Name as Signed:</b> Karen d. Murray	<b>Date of Signature:</b> 04/13/2022

AUDITOR INFORMATION	
<b>Auditor name:</b>	Murray, Karen
<b>Email:</b>	kdmconsults1@gmail.com
<b>Start Date of On-Site Audit:</b>	03/10/2022
<b>End Date of On-Site Audit:</b>	03/10/2022

FACILITY INFORMATION	
<b>Facility name:</b>	Michael Prenger Family Center
<b>Facility physical address:</b>	400 Stadium Boulevard, Jefferson City, Missouri - 65101
<b>Facility Phone</b>	
<b>Facility mailing address:</b>	

Primary Contact	
<b>Name:</b>	Matt Klumper
<b>Email Address:</b>	matt.klumper@courts.mo.gov
<b>Telephone Number:</b>	573-636-5177

Superintendent/Director/Administrator	
<b>Name:</b>	Matt Klumper
<b>Email Address:</b>	matt.klumper@courts.mo.gov
<b>Telephone Number:</b>	5736365177

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

Facility Characteristics	
Designed facility capacity:	3
Current population of facility:	0
Average daily population for the past 12 months:	2
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:	12-17
Facility security levels/resident custody levels:	Maximum
Number of staff currently employed at the facility who may have contact with residents:	13
Number of individual contractors who have contact with residents, currently authorized to enter the facility:	0
Number of volunteers who have contact with residents, currently authorized to enter the facility:	0

AGENCY INFORMATION	
Name of agency:	19th Judicial Circuit of Missouri
Governing authority or parent agency (if applicable):	
Physical Address:	400 Stadium Boulevard , Jefferson City, Missouri - 65101
Mailing Address:	
Telephone number:	5736365177

Agency Chief Executive Officer Information:	
Name:	Tobie Meyer
Email Address:	Tobie.Meyer@courts.mo.gov
Telephone Number:	(573) 636-5177

**Agency-Wide PREA Coordinator Information**

<b>Name:</b>	Matt Klumper	<b>Email Address:</b>	matt.klumper@courts.mo.gov
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**SUMMARY OF AUDIT FINDINGS**

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

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

**Number of standards exceeded:**

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:	2022-03-10
2. End date of the onsite portion of the audit:	2022-03-10

### 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:	<p>On 2.13.2022, at 2:48 pm, this Auditor telephoned the hotline number at 1.800.392.3738. The message stated, "Welcome to the State of Missouri child abuse hotline. Press 2 if an adult. Press 1 if mandated reporter. Calling to report type of abuse about emergency issues, press 1, non-emergent situation, press 4. (Online reporting instructions were heard while waiting for an operator.) The holding line offered a call back; however, if the person receiving the call back could not answer the message states the importance of calling back. While on hold, the message continually states hang up and call 911 and then call us back. After waiting on hold for 60 minutes, this Auditor ended the call. Upon the online report being answered as is described in the next paragraph, the Auditor explained being on hold for one hour as the Auditor did not want to press the option for emergency reports. The worker explained calls go into a que and are answered by type of report and the emergency call would have been answered before non-emergent calls.</p> <p>On 2.13.2022, at 2:30 pm, this Auditor completed a lengthy child abuse report via <a href="https://apps.dss.mo.gov/OnlineCanReporting/default.aspx">https://apps.dss.mo.gov/OnlineCanReporting/default.aspx</a>. This reporting form requested the reporter set up an account, provide email, phone and address information in addition to three pages of information for those receiving the report. 4:05 pm Diana Worker #27262 responded to the online report. Upon asking Worker 27262 how she would respond to a juvenile and or third party report, she stated the following:</p> <ul style="list-style-type: none"><li>· This is a State hotline for any report of abuse</li><li>· If the child was minor, under 18, she would screen for sexual abuse,</li><li>· 18 or older and would verify if they are in CDC custody.</li><li>· Ask for reporting concerns for children under 18</li><li>· Would gather the names related to the concern</li><li>· Would possibly redirect to law enforcement</li><li>· Would ask for identifying information</li><li>· Ask if the care takers are active members of military</li><li>· Screen the concerns of the reporter, what the allegation consisted of</li><li>· If the report meets the criteria of a concern, the report would be forwarded to the Out of Home Investigation Unit and or local law enforcement</li><li>· This online option is for Mandatory Reporting only</li><li>· This website is currently not an option for third party reporters.</li></ul>

On 2.13.2022 at 3:59 pm, the Auditor received the following email from the Child Abuse/Neglect Online Submission Details:

"Thank you for reporting your concern to the Hotline. Based on State of Missouri law and regulations:  
The information you provided does not meet the statutory criteria of a child abuse and neglect report or referral, so it will not be sent to field staff. We have documented your information. If you get additional information, please call the Hotline at 1-800-392-3738 or make a new on-line report. The reference number is 20220440115 for the report submitted through OSCR on 02/13/2022 at 03:39PM"

On 2.20.2022 at 5:38 pm, MST, this Auditor phoned the Rainbow House Regional Child Advocacy Center at 1611 Towne Drive, Columbia, MO 65202 at phone number. 573.474.6600. After the Auditor introduced herself and the reason for the call, the operator stated my questions would be better answered by a supervisor. The operator took down contact information and stated I would get a call back during normal business hours. On March 15, 2022 at 11:38 am, 'Brenda' from the Rainbow House phoned and explained the center would assist in providing advocacy services to youth through a forensic exam and provide advocacy services to the youth as long as those services were needed.

## AUDITED FACILITY INFORMATION

14. Designated facility capacity:	3
15. Average daily population for the past 12 months:	2
16. Number of inmate/resident/detainee housing units:	3
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

## Audited Facility Population Characteristics on Day One of the Onsite Portion of the Audit

### Inmates/Residents/Detainees Population Characteristics on Day One of the Onsite Portion of the Audit

36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	0
37. Enter the total number of youthful inmates or youthful/juvenile detainees in the facility as of the first day of the onsite portion of the audit:	0
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
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:	0
44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	0
45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	0
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:	0
47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	Upon arriving to the facility there were zero residents. At mid-day, four intakes arrived. by 2:00 pm three of the four intakes had been released. Intakes attend court within 72 hours. Once intakes return from court the risk assessment is then completed.
<b>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</b>	
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:	13
50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	0
51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	0

52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	No text provided.
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## INTERVIEWS

### Inmate/Resident/Detainee Interviews

#### Random Inmate/Resident/Detainee Interviews

53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	0
54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	<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
If "None," explain:	Upon arriving to the facility there were zero residents. At mid-day, four intakes arrived. by 2:00 pm three of the four intakes had been released.
55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	Upon arriving to the facility there were zero residents. At mid-day, four intakes arrived. by 2:00 pm three of the four intakes had been released.
56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<input type="radio"/> Yes <input checked="" type="radio"/> No
a. Explain why it was not possible to conduct the minimum number of random inmate/resident/detainee interviews:	Upon arriving to the facility there were zero residents. At mid-day, four intakes arrived. by 2:00 pm three of the four intakes had been released.
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):	No text provided.
<b>Targeted Inmate/Resident/Detainee Interviews</b>	
58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	0

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".

<b>59. Enter the total number of interviews conducted with youthful inmates or youthful/juvenile detainees using the "Youthful Inmates" protocol:</b>	0
<b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/detainees in this category:</b>	<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/detainees.  <input type="checkbox"/> The inmates/detainees in this targeted category declined to be interviewed.
<b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/detainees).</b>	Upon arriving to the facility there were zero residents. At mid-day, four intakes arrived. by 2:00 pm three of the four intakes had been released.
<b>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:</b>	0
<b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b>	<input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.  <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.
<b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b>	Upon arriving to the facility there were zero residents. At mid-day, four intakes arrived. by 2:00 pm three of the four intakes had been released.
<b>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:</b>	0
<b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b>	<input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.  <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.

<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Upon arriving to the facility there were zero residents. At mid-day, four intakes arrived. by 2:00 pm three of the four intakes had been released.</p>
<p><b>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:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Upon arriving to the facility there were zero residents. At mid-day, four intakes arrived. by 2:00 pm three of the four intakes had been released.</p>
<p><b>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:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Upon arriving to the facility there were zero residents. At mid-day, four intakes arrived. by 2:00 pm three of the four intakes had been released.</p>
<p><b>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:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>

<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Upon arriving to the facility there were zero residents. At mid-day, four intakes arrived. by 2:00 pm three of the four intakes had been released.</p>
<p><b>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:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Upon arriving to the facility there were zero residents. At mid-day, four intakes arrived. by 2:00 pm three of the four intakes had been released.</p>
<p><b>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:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Upon arriving to the facility there were zero residents. At mid-day, four intakes arrived. by 2:00 pm three of the four intakes had been released.</p>
<p><b>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:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>

<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Upon arriving to the facility there were zero residents. At mid-day, four intakes arrived. by 2:00 pm three of the four intakes had been released.</p>
<p><b>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:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Upon arriving to the facility there were zero residents. At mid-day, four intakes arrived. by 2:00 pm three of the four intakes had been released.</p>
<p><b>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:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Upon arriving to the facility there were zero residents. At mid-day, four intakes arrived. by 2:00 pm three of the four intakes had been released.</p>
<p><b>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</b></p>	<p>No text provided.</p>
<p><b>Staff, Volunteer, and Contractor Interviews</b></p>	
<p><b>Random Staff Interviews</b></p>	
<p><b>71. Enter the total number of RANDOM STAFF who were interviewed:</b></p>	<p>3</p>

<b>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</b>	<input type="checkbox"/> Length of tenure in the facility <input type="checkbox"/> Shift assignment <input type="checkbox"/> Work assignment <input type="checkbox"/> Rank (or equivalent) <input checked="" type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken) <input type="checkbox"/> None
<b>If "Other," describe:</b>	There were three random staff on all three shifts, and each were interviewed.
<b>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No
<b>a. Select the reason(s) why you were unable to conduct the minimum number of RANDOM STAFF interviews: (select all that apply)</b>	<input type="checkbox"/> Too many staff declined to participate in interviews. <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). <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. <input type="checkbox"/> Other
<b>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):</b>	No text provided.
<b>Specialized Staff, Volunteers, and Contractor Interviews</b>	
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.	
<b>75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</b>	4
<b>76. Were you able to interview the Agency Head?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No

<p><b>78. Were you able to interview the PREA Coordinator?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>79. Were you able to interview the PREA Compliance Manager?</b></p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)</p>
<p><b>80. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)</b></p>	<p><input checked="" type="checkbox"/> Agency contract administrator</p> <p><input checked="" type="checkbox"/> Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment</p> <p><input checked="" type="checkbox"/> Line staff who supervise youthful inmates (if applicable)</p> <p><input type="checkbox"/> Education and program staff who work with youthful inmates (if applicable)</p> <p><input checked="" type="checkbox"/> Medical staff</p> <p><input type="checkbox"/> Mental health staff</p> <p><input type="checkbox"/> Non-medical staff involved in cross-gender strip or visual searches</p> <p><input checked="" type="checkbox"/> Administrative (human resources) staff</p> <p><input type="checkbox"/> Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff</p> <p><input type="checkbox"/> Investigative staff responsible for conducting administrative investigations</p> <p><input type="checkbox"/> Investigative staff responsible for conducting criminal investigations</p> <p><input checked="" type="checkbox"/> Staff who perform screening for risk of victimization and abusiveness</p> <p><input type="checkbox"/> Staff who supervise inmates in segregated housing/residents in isolation</p> <p><input checked="" type="checkbox"/> Staff on the sexual abuse incident review team</p> <p><input checked="" type="checkbox"/> Designated staff member charged with monitoring retaliation</p> <p><input type="checkbox"/> First responders, both security and non-security staff</p> <p><input checked="" type="checkbox"/> Intake staff</p> <p><input type="checkbox"/> Other</p>

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 type="radio"/> Yes <input checked="" type="radio"/> No
83. Provide any additional comments regarding selecting or interviewing specialized staff.	The facility does not have any contractors or volunteers.

## SITE REVIEW AND DOCUMENTATION SAMPLING

### Site Review

PREA Standard 115.401 (h) states, "The auditor shall have access to, and shall observe, all areas of the audited facilities." In order to meet the requirements in this Standard, the site review portion of the onsite audit must include a thorough examination of the entire facility. The site review is not a casual tour of the facility. It is an active, inquiring process that includes talking with staff and inmates to determine whether, and the extent to which, the audited facility's practices demonstrate compliance with the Standards. Note: discussions related to testing critical functions are expected to be included in the relevant Standard-specific overall determination narratives.

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

85. Reviewing/examining all areas of the facility in accordance with the site review component of the audit instrument?	<input checked="" type="radio"/> Yes <input type="radio"/> No
86. Testing and/or observing all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., intake process, risk screening process, PREA education)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?	<input type="radio"/> Yes <input checked="" type="radio"/> No
88. Informal conversations with staff during the site review (encouraged, not required)?	<input type="radio"/> Yes <input checked="" type="radio"/> No
89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).	During the onsite tour there were no residents present and only one two staff on shift. Both staff were interviewed.

### Documentation Sampling

Where there is a collection of records to review-such as staff, contractor, and volunteer training records; background check records; supervisory rounds logs; risk screening and intake processing records; inmate education records; medical files; and investigative files-auditors must self-select for review a representative sample of each type of record.

90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?	<input checked="" type="radio"/> Yes <input type="radio"/> No
91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).	File reviews were conducted using the PREA Audit File Review for Juvenile facilities.

## SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

### Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

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

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

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

### Sexual Abuse and Sexual Harassment Investigation Outcomes

#### Sexual Abuse Investigation Outcomes

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

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

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

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

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

**Sexual Harassment Investigation Outcomes**

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

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

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

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

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

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

**Sexual Abuse Investigation Files Selected for Review**

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

0

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

107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)
<b>Inmate-on-inmate sexual harassment investigation files</b>	
108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0
109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
<b>Staff-on-inmate sexual harassment investigation files</b>	
111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0
112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	The facility has not experienced an allegation of sexual harassment since the last audit cycle.
<b>SUPPORT STAFF INFORMATION</b>	
<b>DOJ-certified PREA Auditors Support Staff</b>	

<p>115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<p><b>Non-certified Support Staff</b></p>	
<p>116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<p><b>AUDITING ARRANGEMENTS AND COMPENSATION</b></p>	
<p>121. Who paid you to conduct this audit?</p>	<p><input type="radio"/> The audited facility or its parent agency</p> <p><input type="radio"/> My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)</p> <p><input checked="" type="radio"/> A third-party auditing entity (e.g., accreditation body, consulting firm)</p> <p><input type="radio"/> Other</p>
<p>Identify the name of the third-party auditing entity</p>	<p>CMG Management Group</p>

Standards
<b>Auditor Overall Determination Definitions</b>
<ul style="list-style-type: none"> <li>Exceeds Standard (Substantially exceeds requirement of standard)</li> <li>Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period)</li> <li>Does Not Meet Standard (requires corrective actions)</li> </ul>
<b>Auditor Discussion Instructions</b>
<p>Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.</p>

115.311	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Document Review:

1. Michael Prenger Family Center PAQ
2. Michael Prenger Family Center PREA Policy, not dated
3. 19th Judicial Circuit of Missouri Cole County Juvenile Court Organizational Chart, not dated

Interviews:

1. Random staff
2. Supervisor
3. Detention Superintendent/PREA Coordinator

Through interviews staff and review of staff files, it was evident that this facility interweaves requirements for this standard in their daily protocol. Staff could speak to the facility PREA practices and protocols being used as is described in the Michael Prenger Family Center PREA Policy.

Site Review Observation:

During the tour of the facility, this Auditor noticed Zero Tolerance, Advocate and PREA Audit postings throughout the facility. The facility has three cameras in the interior building. The building has three secure wet cells and one interview room that can be used to hold an extra youth, if necessary, one shared shower-staff bathroom with a door that closes and a day room. At the onset of the onsite review there were no residents present. Midmorning on the day of the onsite four intakes arrived of which three were released by midday and one remained.

The Auditor strongly recommends the facility date their PREA policy and subsequent documents to ensure staff and residents are referencing current policy and or subsequent document information.

(a) The Michael Prenger Family Center PAQ states the Michael Prenger Family Center PREA Policy mandates zero tolerance toward all forms of sexual abuse and sexual harassment in the facility it operates and those directly under contract.

Michael Prenger Family Center PREA Policy, page 1, section 1., states, "It is the mission of the Michael Prenger Family Center (MPFC) to provide a safe, humane, and secure environment for juveniles. One of the MPFC's prime objectives is to ensure a program of education, prevention, detection and investigation of any allegation of a sexual offense that occurs within the detention center." Section II Definitions outlines definitions of prohibited behaviors regarding sexual abuse and sexual harassment.

Page 35, Section 1, Disciplinary Sanctions for Staff, states, ":

1. Staff shall be subject to disciplinary sanctions up to and including termination for violating sexual abuse or sexual harassment policies. Disciplinary actions relating to sexual abuse or sexual harassment will be commensurate with the seriousness of the offense and other considerations such as staff disciplinary history and actions taken in similar situations.
2. Termination shall be the presumptive disciplinary sanction for staff who are found as a result of the investigation, to have engaged in sexual abuse.
3. Staff terminated or who resign due to sexual abuse or sexual harassment violations shall be reported to the DSS Child Abuse and Neglect Hotline and/or the Jefferson City Police Department (unless the action was clearly not criminal) and relevant licensing bodies.

Page 37, Section 1, Interventions and Disciplinary Sanctions for Juveniles, states, "A juvenile is only subject to disciplinary action regarding sexual abuse after a legal and administrative finding. Said finding shall be issued by the Superintendent after reviewing the investigative report."

(b) The agency employs an upper-level, agency wide PREA Coordinator. The PREA Coordinator demonstrates he has sufficient time and authority to develop, implement and oversee agency efforts to comply with the PREA standards in all of its facilities. The PREA Coordinator is in the agency organization chart, who reports to the Chief Juvenile Officer.

Michael Prenger Family Center PREA Policy, page 1, section 1., second bullet, states, "A PREA Coordinator responsible for overseeing the MPFC's efforts to comply with the PREA Standards will be appointed, as well as a Deputy Coordinator as needed."

The facility provided the Agency organizational chart. The organizational chart demonstrates the PREA Coordinator is an upper-level, agency wide PREA Coordinator who also functions as the Superintendent. The Superintendent reports to the Juvenile Court Administrator/Juvenile Officer.

(c) The Michael Prenger Family Center PAQ states the facility does not have a PREA Manager. The agency has only one facility.

Through such reviews, the facility meets this standards requirements.

115.312	<b>Contracting with other entities for the confinement of residents</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. Contract for Services, Missouri Department of Social Services, dated 7.1.2021</li> </ol> <p>(a-b) The Michael Prenger Family Center PAQ states the State of Missouri, Department of Youth Services contracts with the Michael Prenger Family Center.</p> <p>The facility provided a Contract for Services, Missouri Department of Social Services. The Contract for Services, Missouri Department of Social Services, page 3, section 3.4.1, states, "The contractor shall comply with the Prison Rape Elimination Act of 2003 (34 United States Code 30301, et seq.) and with all applicable PREA National Standards (28 Code of Federal Regulations 115, et seq.), state agency policies related to preventing, detecting, monitoring, investigating, and eradicating any form of sexual abuse within state agency facilities, programs, or offices owned, operated, or contracted by state agency."</p> <p>Through such reviews, the facility meets this standards requirements.</p>

115.313	Supervision and monitoring
	<p data-bbox="244 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 208 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 271 435 300">Document Review:</p> <ol data-bbox="244 304 914 600" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. Michael Prenger Family Direct Care Staffing Pattern, dated 2021</li> <li>4. Michael Prenger Family Staffing Plan, dated 2021</li> <li>5. Staffing Plan Annual Evaluation, dated 10.16.2018</li> <li>6. Staffing Plan Annual Evaluation, dated 8.14.2020</li> <li>7. Staffing Plan Annual Evaluation, dated 8.20.2021</li> <li>8. Staffing Plan Annual Evaluation, dated 9.13.2021</li> <li>9. Unannounced Program Visits, dated 2019-2021</li> </ol> <p data-bbox="244 629 352 658">Interviews:</p> <ol data-bbox="244 663 716 757" style="list-style-type: none"> <li>1. Random staff</li> <li>2. Detention Supervisor</li> <li>3. Detention Superintendent/PREA Coordinator</li> </ol> <p data-bbox="244 763 1457 857">Staff interviewed could attest to supervisory staff conducting unannounced rounds on a monthly basis. Staff interviewed stated staying in ratio was not an issue as the facility holds can hold only three residents in total. The supervisor stated he often does surprise visits on his off shifts to catch staff off guard, demonstrating rounds are done unannounced.</p> <p data-bbox="244 887 483 916">Site review observation:</p> <p data-bbox="244 920 1485 1084">The facility is quite small with three secure wet cells that have two bunks each; however, the facility does not use both bunks in one cell any longer. The facility has a shower-staff restroom where the bathroom door is closed when youth take their 15-minute shower. The facility has a small day room where residents are allowed television time and or a place to read, a supervisor office and a Control desk area. There are no blind spots and limited furnishing ensuring the cameras in the hall and day room provide optimal camera coverage.</p> <p data-bbox="244 1113 1473 1240">(a) The Michael Prenger Family Center PAQ states the agency requires the facility to develop, document and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect residents against abuse. The daily number of residents is 2.79 and the staffing plan was predicated on two residents.</p> <p data-bbox="244 1270 1485 1332">The facility provided a Michael Prenger Family Center Staffing Plan. The plan is signed and dated on 9.13.2021. The staffing plan encompasses the following:</p> <ol data-bbox="244 1337 1485 1834" style="list-style-type: none"> <li>1. Generally accepted juvenile detention and correctional/secure residential practices with minimal staff to resident ratios of 1:8 during waking hours and 1:16 during sleeping hours.</li> <li>2. Any judicial finding of inadequacy – which of none have been founded.</li> <li>3. Any findings of inadequacy from federal investigative bodies – which of none have been found.</li> <li>4. Any findings of inadequacy from internal or external oversight bodies – which of none have been found.</li> <li>5. All components of the program's physical plant to include a comprehensive table of all camera placement.</li> <li>6. The composition of the resident population</li> <li>7. The number and placement of supervisory staff</li> <li>8. Programs occurring on a particular shift: Michael Prenger Family Center has adequate staff to monitor all programming at the facility and four cameras for additional monitoring.</li> <li>9. Any applicable State or local laws, regulations or standards of which requirements mirror PREA ratios.</li> <li>10. The prevalence of substantiated and unsubstantiated incidents of sexual abuse: in the past 12 months Michael Prenger Family Center has had zero allegations of sexual abuse.</li> <li>11. Any other relevant factors: At this time, there have been no other relevant factors identified to effect adequate supervision and monitoring of residents at Michael Prenger Family Center.</li> </ol> <p data-bbox="244 1863 1457 1926">The facility provided a Direct Care Staffing Pattern. This pattern demonstrates staff to youth ratios to be 1:3 during waking hours and 1:3 during sleeping hours.</p> <p data-bbox="244 1964 1457 2027">(b) The Michael Prenger Family Center PAQ states each time the staffing plan is not complied with, the facility documents and justifies deviations. The facility did not have any deviations from the required ratios of their staffing plan.</p> <p data-bbox="244 2056 1485 2119">(c) The Michael Prenger Family Center PAQ states the facility is mandated by regulation to maintain 1:8 waking hour and 1:6 sleeping hour ratios.</p>

Michael Prenger Family Center PREA Policy, page 5, section Supervision and Monitoring, states, “

1. The MPFC maintains a staffing plan that meets or exceeds the staffing requirements as set out in PREA Standards which specify a 1:8 staff ration during waking hours and a 1:6 STAFF RATIO DURING SLEEPING HOURS. The control room operator is not counted when computing the staff ratio. The MPFC's staffing ratio is never less than 1:8 as at least three (3) staff (two (2) direct care and one (1) control detention) are scheduled for each shift.
2. The MPFC secure detention unit shall maintain at least one direct care staff person at all times.”

(d) The Michael Prenger Family Center PAQ states the staffing plan is reviewed annually, in collaboration with the PREA Coordinator.

Michael Prenger Family Center PREA Policy, page 5, section Supervision and Monitoring, states, “

3. “When developing and doing annual reviews of the staffing plan, the Superintendent and PREA Coordinator will assess each point as listed under this section in the Policy and Guidelines document.
4. Any deviation from said standards may be only for “limited and discrete exigent circumstances” and shall be fully documented in Shift Notes. The Superintendent shall be the only person to authorize said deviation.
5. Video monitoring expansion inside the MPFC will be utilized when funds become available.”

The facility provided staffing plan annual evaluations from 2018, 2020 and 2021. Annual evaluations demonstrate the following areas are considered:

Step 1: Obtain current staffing plan.

Step 2: Consider the following:

- (a) Generally accepted juvenile detention and correctional/secure residential practices.
- (b) Any judicial findings of inadequacy.
- (c) Any findings of inadequacy from Federal investigative agencies.
- (d) Any findings of inadequacy from internal or external oversight bodies.
- (e) All components of the facility's physical plant.
- (f) The composition of the resident population.
- (g) The number and placement of supervisory staff.
- (h) Institution programs occurring on a particular shift.
- (i) Any applicable State or local laws, regulations or standards.
- (j) The prevalence of substantiated and unsubstantiated incidents of sexual abuse
- (k) Any other relevant factors.

Step 3: Is staffing plan being followed/met regularly?

Step 4: Are safety/security problems occurring due to staffing plan?

Step 5: Are safety/security problems occurring due to deviations from staffing plan?

Step 6: Would video cameras or other technology be of assistance in these problems?

Step 7: What resources are needed to adhere to original staffing plan?

Step 8: Changes recommended, if any.

Step 9: Names of staff participating in evaluation.

Signed and dated by the Facility Manager

(e) The Michael Prenger Family Center PAQ states unannounced rounds are conducted by intermediate or higher level staff to identify and deter staff sexual abuse and sexual harassment.

Michael Prenger Family Center PREA Policy, page 5, section Supervision and Monitoring, states, “Supervisors and Superintendent shall make unannounced rounds in the MPFC to identify and deter staff sexual abuse and sexual harassment.”

The facility provided Unannounced Program Visit documentation. Each visit appears to occur monthly from 11.28.2019 through 10.31.2021. Each round includes observation of:

1. Youth routines are being followed.
2. Groups are in appropriate locations based on the group routine and time of day.
3. Youth interaction with staff is appropriate.
4. Are youth/groups split up on the unit or different areas of the building?
5. Youth hygiene is appropriate.
6. Staff requirements are being followed.
7. Staff positioning within the group is appropriate, and there is visible use of awareness supervision.
8. Check made for blind spots and/or areas outside of security camera.
9. The physical plant is safe, clean, and organized.
10. Appropriate staff/youth relationships and healthy boundaries are evident.
11. Are there sudden changes in youth mood or behavior?
12. Summary of visit.
13. Follow up needed.

Through such reviews, the facility met the standards requirements.

115.315	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. Fundamental Practices Outline and Trainer Acknowledgment, not dated</li> <li>4. Training Documentation and Verification Examples, dated within 2021</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Random staff</li> <li>2. Detention Supervisor</li> <li>3. Detention Superintendent/PREA Coordinator</li> </ol> <p>This facility did not have any residents at the onset of the onsite review. When looking at data over the last 12 months with the Detention Superintendent averages demonstrated of the targeted categories only two gay residents had been in the program during the last year. Each staff interviewed stated they had been trained on cross-gender searches; however, this was not a practice at the facility. Each stated if the opposite gender staff was not on shift law enforcement would conduct the search. Staff stated if the search was to be conducted on a transgender resident the facility would consider the transgender wished to be searched by the gender of choice.</p> <p>Site Review Observation:</p> <ol style="list-style-type: none"> <li>1. Intake area</li> <li>2. Search area</li> </ol> <p>During the tour of the facility the Auditor observed the Intake and search area of the facility. Searches would take place in the restroom where the youth would shower. This area is conducive to ensuring searches were conducted in a private secured area, outside of camera view. Training files revealed 100% of staff had been trained in cross gender strip searches.</p> <p>(a) Michael Prenger Family Center PAQ states the facility does not conduct cross-gender strip or cross-gender visual body cavity searches of their residents. In the past 12 months the facility has conducted zero cross-gender strip or cross-gender visual body cavity searches of residents.</p> <p>Michael Prenger Family Center PREA Policy, page 6, section I. Policy, states, "Detention and residential staff shall not conduct cross-gender strip (visual) searches or visual body cavity searches, nor will staff conduct cross-gender pat searches. Exigent circumstances (an emergency or immediate situation that impacts the safety and security of the staff or detained juveniles) may require this rule to be repealed, if so the circumstances shall be fully documented in Shift Notes."</p> <p>(b) Michael Prenger Family Center PAQ states the facility does not conduct cross-gender strip or cross-gender visual body cavity searches absent exigent circumstances. Policy compliance can be found in provision (a) of this standard.</p> <p>(c) Michael Prenger Family Center PAQ states the facility policy requires that all cross-gender strip searches, cross-gender visual body cavity searches, and cross-gender pat-down searches be documented and justified. Documentation of cross-gender searches will be documented in shift notes as is stated in provision (a) of this standard.</p> <p>(d) Michael Prenger Family Center PAQ states the facility has implemented policies and procedures that enable residents to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks (this includes viewing via video camera). Policy compliance can be found in provision (a) of this standard.</p> <p>Michael Prenger Family Center PREA Policy, page 6, section I.A., last bullet, states, "It is the policy of this facility to enable residents to shower, perform bodily functions and change clothing without non-medical staff of the opposite gender viewing their breasts, buttock, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks (this includes viewing via video camera)."</p> <p>Michael Prenger Family Center PREA Policy, page 6, section I.A., first bullet, states, "Detention and residential staff entering an area where juveniles of the opposite gender are housed shall announce their presence when entering the area. This policy does not apply when the juveniles are sleeping and staff are doing regular bed checks."</p> <p>(e) The Michael Prenger Family Center PAQ states the facility has a policy prohibiting staff from searching or physically examining a transgender or intersex resident for the sole purpose of determining the resident's genital status. There have zero such searches in the last 12 months.</p> <p>Michael Prenger Family Center PREA Policy, page 6, section I.A., second bullet, states, "Transgender or intersex juveniles</p>

shall not be strip searched or physically examined for the sole purpose of determining the juvenile's genital status (physical gender identification). Normal intake procedures will be used. If the juvenile refuses to identify his/her actual physical gender and it is discovered during the searching/ showering process that the juvenile is of the opposite physical gender of the staff, then the staff shall immediately stop those activities, have the juvenile cover himself/herself and call for a staff of the appropriate gender to complete the intake process; document this fully in Shift Notes. "

(f) The Michael Prenger Family Center PAQ states 100% of security staff receive training on conducting cross-gender pat-down searches and searches of transgender and intersex residents in a professional and respectful manner.

The facility provided Fundamental Practices Outline and Trainer Acknowledgment. The fundamentals include: Practicing all health and safety expectations, preserving the rights of every youth to live in a physically and emotionally safe environment (free from any abuse or harassment including maltreatment, neglect, physical, emotional, and sexual. The acknowledgment states, "I have read and understand the materials provided." Each includes a printed name, signature, date and supervisor signature.

The facility provided completed PREA training acknowledgments and training verification documentation.

Through such reviews, the facility meets this standards requirements. Example documents demonstrate staff have completed 3.5 hours of training for the Prison Rape Elimination Act by watching the State of Missouri PREA video. Each training verification form states, "I, \_\_\_\_\_, have been trained regarding the following subject matter, have reviewed and understand the information provided, and have had the opportunity to ask questions and receive answers about the material and instructions. Title of training: PREA Training Video, Disc 1 and 2, 3.5 hours."

Through such reviews, the facility met the standards requirements.

115.316	<b>Residents with disabilities and residents who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. Foreign Language Certified Court Interpreters Listing, dated 9.30.2015</li> <li>4. Juvenile Spanish PREA Safety First Acknowledgment, not dated</li> <li>5. Office of State Courts Administrator, Foreign Language Interpreters Contract, dated 6.8.2021</li> <li>6. Sexual Abuse-Harassment Notice in Spanish, not dated</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Random staff</li> <li>2. Detention Supervisor</li> <li>3. Detention Superintendent/PREA Coordinator</li> </ol> <p>During interviews with random and specialized staff, each stated residents were not used for translation services. Staff interviewed demonstrated each would contact a supervisory staff or contact the number posted for language services.</p> <p>(a) The Michael Prenger Family Center PAQ states the agency has established procedures to provide disabled residents equal opportunities to be provided with and learn about the agency's efforts to prevent, detect and respond to sexual abuse and sexual harassment.</p> <p>Michael Prenger Family Center PREA Policy, page 13, section Juvenile Education, states,</p> <ol style="list-style-type: none"> <li>1. "During the intake process, juveniles shall receive information explaining, in an age-appropriate fashion, the MPFC's zero tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of such incidents.</li> <li>2. Within 10 days of admission, juveniles will receive comprehensive age-appropriate education regarding their rights to be free from sexual abuse and sexual harassment and retaliation due to reporting such incidents. Included will be MPFC procedures for reporting such incidents.</li> <li>3. The above information shall be made available, by an effective communication method, to juveniles who are limited English proficient, deaf, visually impaired, limited reading skills, or otherwise disabled.</li> <li>4. All such education shall be documented.</li> <li>5. Key information on these subjects will be continuously and readily available to juveniles through video presentations and discussion."</li> </ol> <p>The facility provided Foreign Language Certified Court Interpreters Listing. This listing provides names, county, contact information availability and fees for certified interpreter services in Missouri and Kansas.</p> <p>The facility provided an Office of State Courts Administrator, Foreign Language Interpreters Contract. This contract is with International Language Center in St. Louis Missouri and is in effect from 8.6.2021 through 7.31.2022.</p> <p>The facility provided a Juvenile Spanish PREA Safety First Acknowledgment. This is an intake packet for Spanish speaking juveniles.</p> <p>The facility provided a Sexual Abuse-Harassment Notice in Spanish. The notice speaks to who to contact in an emergency, use of telephones, emergency contacts, Missouri child abuse hotline reporting number, a national hotline number and the address and phone number of the Rainbow House Regional Child Advocacy Center.</p> <p>(b) The Michael Prenger Family Center PAQ states the agency has established procedures to provide residents with limited English equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Policy compliance can be found in provision (a) of this standard.</p> <p>(c) The Michael Prenger Family Center PAQ states the agency prohibits the use of resident interpreters. In the last 12 months the facility has had zero instances where residents were used for interpreters.</p> <p>Michael Prenger Family Center PREA Policy, page 7, section Juveniles with Disabilities and Juveniles Who Have Limited English Proficiency, states,</p> <ol style="list-style-type: none"> <li>1. When a juvenile is admitted to the MPFC with a disability or has a limited English proficiency, staff will immediately contact the Superintendent. The Superintendent will then take whatever steps are necessary to meet the needs of the juvenile and ensure an effective means of communication between the juvenile and staff is available.</li> <li>2. An English-to-Spanish Phrasebook is available in the control room for staff to use in communicating with a Spanish speaking youth until other arrangements can be made.</li> </ol>

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| <p>3. Further measures approved by the Office of State Courts Administrator will be reviewed to procure interpreter services for effective communication between the juvenile staff court services employees and the administration to participate in or benefit from P.R.E.A. standards.</p> <p>4. Residents with limited reading skills shall have PREA documents read to them by a designated staff member and a determination of the residents understanding ascertained.</p> <p>5. Resident interpreters shall not be used nor shall they be used as reader except in the limited circumstances of medical or facility emergency.</p> <p>Through such reviews, the facility meets this standards requirements.</p> |
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115.317	<b>Hiring and promotion decisions</b>
	<p data-bbox="244 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 208 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 271 435 300">Document Review:</p> <ol data-bbox="244 304 1086 398" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. Missouri Department of Social Services Application for Employment, dated 7.2013</li> </ol> <p data-bbox="244 432 352 461">Interviews:</p> <ol data-bbox="244 465 718 524" style="list-style-type: none"> <li>1. Human Resource Manager</li> <li>2. Detention Superintendent/PREA Coordinator</li> </ol> <p data-bbox="244 528 1481 692">Interviews with the Detention Superintendent/PREA Coordinator and Human Resource Manager demonstrated applicants determined to have been convicted of sexual abuse or sexual harassment charges were screened out during the application review process. Additionally, applicants who were terminated in past institutions for sexual abuse and or sexual harassment were not considered for employment or promotion. The Human Resource Manager stated criminal background checks and child registries were conducted annually and upon receipt of a promotion application.</p> <p data-bbox="244 725 499 754">Site Review Observation:</p> <p data-bbox="244 759 1445 882">Review of the four staff personnel files demonstrated 100% compliance with each area of the PREA Audit – Juvenile Facilities Documentation Review – Employee File/Records. Employees who had not answered Administrative Adjunction Checks and or had Institutional Reference checks were those staff who had been employed at the facility prior to PREA implementation.</p> <p data-bbox="244 916 1457 1039">(a) The Michael Prenger Family Center PAQ states the agency policy prohibits hiring or promoting anyone who may have contact with residents, and prohibits enlisting the services of any contractor who may have contact with residents who has engaged in or been convicted in or administratively adjudicated in sexual activity described in paragraph (a)(2) of this standard.</p> <p data-bbox="244 1081 1485 1176">Michael Prenger Family Center PREA Policy, page 8, section Hiring and Promotion Decisions, first bullet, states, “The MPFC will not hire anyone who has been criminally convicted of sexual abuse or attempting to commit sexual abuse, or has been civilly or administratively adjudicated to have done those things.”</p> <p data-bbox="244 1209 1474 1332">Michael Prenger Family Center PREA Policy, page 35, section I., states, “Any contractor or volunteer who has engaged in sexual abuse or sexual harassment shall not enter the MPFC, and if such action occurred in the MPFC said person shall be reported to the DSS Child Abuse and Neglect Hotline and/or the Jefferson City Police Department (unless the activity was clearly not criminal) and any relevant licensing bodies.”</p> <p data-bbox="244 1366 1473 1460">(b) The Michael Prenger Family Center PAQ states agency policy requires the consideration of any incidents of sexual harassment when determining to hire and or promote anyone, or to enlist services of any contractor, who may have contact with residents.</p> <p data-bbox="244 1503 1489 1666">(c) The Michael Prenger Family Center PAQ states Agency policy requires background checks are conducted with all new hires who have contact with residents, consults child abuse registries and makes its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. In the past 12 months’ persons hired may have contact with resident who have had criminal background checks was 24.</p> <p data-bbox="244 1700 1477 2018">Michael Prenger Family Center PREA Policy, page 8, section Hiring and Promotion Decisions, third bullet, states, “Before a person is hired by the MPFC the Superintendent shall: perform a criminal background records check; check the abuse registry, make an effort to contact any prior institutional employers of the prospective employee to inquire into any sexually related incidents; follow the same procedures for any proposed contractor; conduct criminal history records checks for all employees and contractors through records checks or any other means that could be related to any type of sexual incident; inform the potential employee of his/her duty to immediately report any sexually related misconduct involving himself, any resident juvenile, or any staff member; inform the potential employee that any material omission regarding any sexual misconduct or false information shall be grounds for termination of employment; and, if allowed by state law, the MPFC will provide information on substantiated sexual abuse or sexual harassment by a former employee to any institutional employer as requested.”</p> <p data-bbox="244 2051 1457 2145">Michael Prenger Family Center PREA Policy, page 8, section Hiring and Promotion Decisions, fifth bullet, states “Criminal background and Child Abuse Registry checks are completed by the MPFC Business Manager on both prospective employees before interviews are offered as well as annually on current employees.”</p>

(d) The Michael Prenger Family Center PAQ states the agency policy requires that a criminal background records check be completed and applicable child abuse registries consulted before enlisting the services of any contractor who may have contact with residents. In the past 12 months there were zero contracts for services where criminal background record checks were conducted on all staff covered in the contract who might have contact with residents.

Michael Prenger Family Center PREA Policy, page 8, section Hiring and Promotion Decisions, sixth bullet, states, "All contract employees shall be subject to the same above mentioned checks."

(e) The Michael Prenger Family Center PAQ states the agency requires background checks to be completed every five years. Compliance of this standard is substantiated in provision (b) of this standard.

Michael Prenger Family Center PREA Policy, page 8, section Hiring and Promotion Decisions, fifth bullet, states, "Criminal background and Child Abuse Registry checks are completed by the MPFC Business Manager on both prospective employees before interviews are offered as well as annually on current employees."

(f) The facility provided a Missouri Department of Social Services Application for Employment. At the bottom of page one and top of page two, the following questions are asked:

- "While working or volunteering at any facility, were you terminated or otherwise disciplined or counseled for sexual abuse, sexual contact with or sexual harassment of any inmate, detainee, client or resident of the facility?"
- Have you been found by a civil or administrative body to have engaged in sexual activity or attempted sexual activity facilitated by force, over or implied threats of force or coercion or if the victim did not consent or was unable to consent or refuse? This includes any actions taken upon a professional license or a professional registry and any internal administrative investigative results."

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

The facility provided a Missouri Department of Social Services Application for Employment. The last portion of the application has applicants certify the information contained in the application is true, to include the following language. "including information pertaining to any report of sexual abuse, sexual contact with or sexual harassment of an inmate, detainee or resident of a prison, jail, lockup or other correctional facility, (public or private) or report of engaging in sexual activity or attempting sexual activity involving force or inflicted upon a person unable to consent."

(h) Michael Prenger Family Center PREA Policy, page 8, section Policy, states, "MPFC will not hire, employ, or promote, anyone who has been criminally convicted of sexual abuse or attempting to commit sexual abuse, or has been civilly or administratively adjudicated to have done those things. MPFC will consider any incidents of sexual harassment of a prospective employee before a decision is made to hire that person."

Through such reviews the facility meets this standards requirements.

<b>115.318</b>	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <p>1. Michael Prenger Family Center PAQ</p> <p>(a) The Michael Prenger Family Center PAQ states the facility has not acquired a new facility or made substantial expansions or modifications to existing facilities since the last PREA audit.</p> <p>(b) The Michael Prenger Family Center PAQ states the facility has not installed electronic surveillance system since the last PREA audit.</p> <p>Through such reviews, the facility meets this standards requirements.</p>

115.321	<b>Evidence protocol and forensic medical examinations</b>
	<p data-bbox="244 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 273 435 300">Document Review:</p> <ol data-bbox="244 304 1398 533" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. Memorandum from Statewide PEA Coordinator, RE: PREA Standard DYS External Investigation Agencies, dated 2.16.2022</li> <li>4. Memorandum of Agreement, The Rainbow House, dated 2.28.2022</li> <li>5. Cole County Child Advocacy Listing, not dated</li> <li>6. Critical Incident Report, Detention Corrective Action Report, not dated</li> </ol> <p data-bbox="244 564 352 591">Interviews:</p> <ol data-bbox="244 595 716 725" style="list-style-type: none"> <li>1. Random staff</li> <li>2. LPN</li> <li>3. Detention Supervisor</li> <li>4. Detention Superintendent/PREA Coordinator</li> </ol> <p data-bbox="244 730 1449 824">Interviews with all staff interviewed demonstrated all were clearly aware of reporting protocols for sexual harassment and sexual abuse. Each staff stated alleged victims and perpetrators and area of allegation would be preserved until law enforcement arrived any possible collect evidence.</p> <p data-bbox="244 855 497 882">Site Review Observation:</p> <p data-bbox="244 887 842 913">There were no criminal investigations in the past 12 months.</p> <p data-bbox="244 945 1477 1039">(a) The Michael Prenger Family Center PAQ states the facility is not responsible for conducting Administrative sexual abuse investigations. The agency/facility is not responsible for conducting criminal sexual abuse investigations (including resident-on-resident sexual abuse or staff sexual misconduct).</p> <p data-bbox="244 1070 1449 1133">Michael Prenger Family Center PREA Policy, page 9, first bullet, states, "The MPFC shall not conduct the formal criminal investigation regarding reports of sexual abuse or any sexual offenses occurring at this facility. "</p> <p data-bbox="244 1164 1449 1258">Michael Prenger Family Center PREA Policy, page 9, first bullet, states, "The Jefferson City Police Department and Child Abuse Hotline shall be immediately contacted and that agency shall conduct the investigation. The Superintendent of Detention will also be contacted immediately."</p> <p data-bbox="244 1290 1465 1384">Administrative Investigations are completed by the Court Services Administrator from the Out of Home Placement Investigations Unit which is under the umbrella of the Children's Division through the Department of Social Services for the State of Missouri.</p> <p data-bbox="244 1415 1437 1478">The facility provided a memorandum for the Statewide PREA Coordinator, regarding investigations. The letter states the following:</p> <p data-bbox="244 1482 1485 1608">"Missouri Division of Youth Services (DYS) Contracted Detention Centers do not conduct their own investigation of sexual abuse and harassment. These are referred to the Missouri Children's Division Out of Home Investigation Unit (CD-OHI). CD-OHI contacts appropriate local law enforcement to co-investigate and arranges for the necessary SAFE/SANNE exams and victim advocacy services."</p> <p data-bbox="244 1639 1458 1702">(b) The Michael Prenger Family Center PAQ states this provision is not applicable as the facility does not conduct criminal and or administrative investigations.</p> <p data-bbox="244 1733 1474 1926">(c) The Michael Prenger Family Center PAQ states the facility offers all residents who experience sexual abuse access to forensic medical examinations. Forensic examinations are offered at no cost to the victim. Where possible, all examinations are conducted by SAFE or SANE examiners. There have been zero medical exams, SAFE/SANE exams performed in the last 12 months. If a juvenile required a forensic exam, the incident would be documented on a critical incident form – Detention Action Report, after all aspects of the facilities coordinated response were followed. (reference coordinated response in standard 115.365.)</p> <p data-bbox="244 1957 1477 2083">Michael Prenger Family Center PREA Policy, page 9, fourth bullet, states, "Each victim will be examined by a SAFE (Sexual Assault Forensic Examiner) or SANE (Sexual Assault Nurse Examiner) as soon as possible; immediately if the sexual offense happened within 24 hours of being reported. The law enforcement investigator will make arrangements for said examination."</p> <p data-bbox="244 2114 1422 2141">Michael Prenger Family Center PREA Policy, page 9, last bullet, states, "Forensic medical examinations are offered to</p>

victims without financial cost.”

Michael Prenger Family Center PREA Policy, page 9, seventh bullet, states, The Rainbow House provides SAFE examinations and forensic interviews, plus victim advocacy, counseling, and case management.”

The facility provided a Rainbow House Regional Children's Advocacy Center (CAC) Multidisciplinary (MDT) Protocols and Interagency Agreement. This agreement states the following services are available:

1. Family/Victim Advocates
2. Forensic Interviewers
3. Law Enforcement
4. SAFE-CARE Network (Medical)
5. Mental Health Providers
6. Victim Advocate
7. Co-Investigation
8. Mandated Reporting
9. Sexual Assault Forensic Exams (SAFE) and Child Abuse Resource Education
10. Case Reviews
11. Investigative Collaborative Meetings (Case Specific Meetings)

The facility provided a Cole County Child Advocate Listing. This listing includes address and phone number information for the Rainbow House Regional Children's Advocacy Center.

(d) The Michael Prenger Family Center PAQ states the facility attempts to make a victim advocate from a rape crisis center available to the victim, in person or by other means. All efforts are documented. The facility does not have a qualified staff and depends on the Rainbow House for all victim services.

Michael Prenger Family Center PREA Policy, page 9, fifth bullet, states, “Our area SAFE agency is The Rainbow House; 1611 Towne Drive, Columbia, MO 65202. Phone 573-474-6600.”

(e) The Michael Prenger Family Center PAQ states a qualified staff or community member accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provides emotional support, crisis intervention, information and referrals.

Michael Prenger Family Center PREA Policy, page 9, seventh bullet, states, “The Rainbow House provides SAFE examinations and forensic interviews, plus victim advocacy, counseling, and case management. “

(f) The Michael Prenger Family Center PAQ states the agency is not responsible for Administrative investigations and relies on another agency to conduct criminal investigations. The agency does request provision a-e of this standard are considered when conducting all investigations. The facility states, criminal investigations are conducted by Jefferson City Police Department and administrative investigations are completed by the Court Services Administrator from the Out of Home Placement Investigations Unit which is under the umbrella of the Children's Division through the Department of Social Services for the State of Missouri.

The facility provided a Rainbow House Regional Children's Advocacy Center Memorandum of Agreement. The agreement clearly articulates the Rainbow House will provide victim advocacy services to Michael Prenger Family Center youth. The agreement is signed on 2.28.2022 and does not have an expiration date.

(h) Rainbow House employees are qualified community-based staff members for the purposes of this section.

Through such reviews, the facility meets this standards requirements.

115.322	<b>Policies to ensure referrals of allegations for investigations</b>
	<p data-bbox="244 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 273 435 300">Document Review:</p> <ol data-bbox="244 304 1193 434" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. Sexual Abuse/Harassment Places to Report Notice, English and Spanish versions, not dated</li> <li>4. Detention Corrective Action Report, (Critical Incident Report), not dated</li> </ol> <p data-bbox="244 465 352 492">Interviews:</p> <ol data-bbox="244 497 716 591" style="list-style-type: none"> <li>1. Random staff</li> <li>2. Detention Supervisor</li> <li>3. Detention Superintendent/PREA Coordinator</li> </ol> <p data-bbox="244 595 1437 658">Staff interviews demonstrated residents can report incidents by telling a staff member, utilizing the grievance process or calling the hotline. Staff reported they can privately report allegations through the hotline or by reporting to a supervisor.</p> <p data-bbox="244 689 499 716">Site Review Observation:</p> <p data-bbox="244 721 1474 784">PREA Zero Tolerance and flyers with internal and external reporting numbers were observed in the facility day room in both English and Spanish.</p> <p data-bbox="244 815 1461 909">(a) The Michael Prenger Family Center PAQ states the agency insures that an administrative or criminal investigations are completed for all allegations of sexual abuse and sexual harassment. In the past 12 months the facility has had zero allegations of sexual abuse and sexual harassment that was received.</p> <p data-bbox="244 940 1474 1097">Michael Prenger Family Center PREA Policy, page 11, section Policies to Ensure Referrals of Allegations for Investigations, first bullet states," A Child Abuse and Neglect Hotline or criminal investigation will be completed for all allegations of sexual abuse, sexual offenses, and sexual harassment. Jefferson City Police Department will investigate all of said allegations if there is a potential for criminal charges. The Missouri DSS Child Abuse Hotline shall be notified to investigate initial allegations. "</p> <p data-bbox="244 1128 1422 1223">Criminal investigations are conducted by Jefferson County Police Department and Administrative Investigations are completed by the Court Services Administrator from the Out of Home Placement Investigations Unit which is under the umbrella of the Children's Division through the Department of Social Services for the State of Missouri.</p> <p data-bbox="244 1254 1414 1317">(b) The Michael Prenger Family Center PAQ states the agency has policy that requires allegations of sexual abuse or harassment to be referred for investigation to an agency with the legal authority to conduct criminal investigations.</p> <p data-bbox="244 1348 1482 1442">Michael Prenger Family Center PREA Policy, page 11, section Policies to Ensure Referrals of Allegations for Investigations, last bullet states," The number for the Missouri Child Abuse and Neglect hotline is 1-800-392-3738. An online referral can be made in non-emergency situations at <a href="https://dss.mo.gov/cd/keeping-kids-safe/can.htm">https://dss.mo.gov/cd/keeping-kids-safe/can.htm</a>."</p> <p data-bbox="244 1473 1482 1536">The facility provided a Detention Corrective Action Report, (Critical Incident Report). The incident report is used for all facility critical incidents and would use this report to document investigation referrals.</p> <p data-bbox="244 1568 1482 1630">The facility provided a Sexual Abuse/Harassment Places to Report Notice, English and Spanish versions. The notice speaks to the following options:</p> <ol data-bbox="244 1635 759 1890" style="list-style-type: none"> <li>1. Grievance Box location</li> <li>2. MPFC Case Manager</li> <li>3. Parents</li> <li>4. Teachers</li> <li>5. Attorneys</li> <li>6. Missouri Child Abuse Hotline</li> <li>7. National Reporting</li> <li>8. Rainbow House Regional Child Advocacy Center</li> </ol> <p data-bbox="244 1921 943 1948">(c) Standard compliance can be found in provision (a) of this standard.</p> <p data-bbox="244 1980 935 2007">Through such reviews, the facility meets this standards requirements.</p>

115.331	Employee training
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. Michael Prenger Family Center PREA Policy Statement, not dated</li> <li>4. Michael Prenger Family Center Fundamental Practices, not dated</li> <li>5. Training Documentation and Verification Examples, dated within 2021</li> <li>6. Training Curriculum, NIC and Greene County Juvenile Detention PREA Videos</li> <li>7. Memorandum RE: PREA Training, from Detention Superintendent, dated 3.10.2022</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Random staff</li> <li>2. LPN</li> <li>3. Detention Supervisor</li> <li>4. Detention Superintendent/PREA Coordinator</li> </ol> <p>Interviews with staff demonstrated all were aware of and received initial and annual PREA training as of last year.</p> <p>Site Observation:</p> <p>During the onsite review of the four employee files we recognized in years past annual PREA training was not a practice. In May of 2021 the facility recognized this error and has since incorporated PREA training every six months. During the onsite review, the facility Detention Superintendent provided a training memo to staff stating, "Effective today, all staff will be required to do annual PREA training."</p> <p>(a) The Michael Prenger Family Center PAQ states the agency trains all employees who may have contact with residents in all required provisions of this standard.</p> <p>Michael Prenger Family Center PREA Policy, page 12, section Employee Training, states, "All MPFC staff shall be trained in the following:</p> <ol style="list-style-type: none"> <li>1. Zero Tolerance police for sexual abuse and sexual harassment;</li> <li>2. Responsibilities for prevention, detection, reporting and response to sexual abuse and sexual harassment;</li> <li>3. The juveniles' right to be free from sexual abuse and sexual harassment;</li> <li>4. The right of juveniles and staff to be free from retaliation for reporting sexual abuse and sexual harassment;</li> <li>5. The dynamics of sexual abuse and sexual harassment in juvenile facilities;</li> <li>6. The common reaction of juvenile sexual abuse and sexual harassment;</li> <li>7. Detection and response to threatened or actual sexual abuse and how to distinguish between consensual sexual contact and sexual abuse between juveniles in detention;</li> <li>8. How to avoid inappropriate relationships with juveniles;</li> <li>9. Effective and professional communication with juveniles, including heterosexual, gay, lesbian, bisexual, transgender, intersex, or gender non-conforming juveniles, and on the attributes and unique needs of said classes of juveniles; and</li> <li>10. Compliance with relevant laws regarding applicable age of consent.</li> </ol> <p>The facility provided a Michael Prenger Family Center PREA Policy Statement. The statement's first paragraph states, "It is the policy of Michael W. Prenger Family Center to provide a safe, humane, and secure environment for all detained juveniles. One objective is to ensure a program of prevention, detection and investigation of any allegations of sexual offense that occurs within the detention facility." This document is signed and dated by both staff and juveniles.</p> <p>The facility provided Fundamental Practices Outline and Trainer Acknowledgment. The fundamentals include: Practicing all health and safety expectations, preserving the rights of every youth to live in a physically and emotionally safe environment (free from any abuse or harassment including maltreatment, neglect, physical, emotional, and sexual. The acknowledgment states, "I have read and understand the materials provided." Each includes a printed name, signature, date and supervisor signature.</p> <p>The facility provided completed PREA training acknowledgments and training verification documentation.</p> <p>The facility provided a curriculum statement, stating employees:</p> <ol style="list-style-type: none"> <li>1. View the PREA Video from the National Institute of Corrections;</li> <li>2. View the PREA Video from Greene County Juvenile Detention</li> <li>3. Read through all PREA Standards</li> </ol> <p>(b) The Michael Prenger Family Center PAQ states training is tailored to the unique needs and attributes and gender of</p>

residents at the facility. Policy compliance can be found in provision (a) of this standard.

(c) The Michael Prenger Family Center PAQ states between trainings the agency provides employees who may have contact with residents with refresher information about current policies regarding sexual abuse and harassment.

Michael Prenger Family Center PREA Policy, page 12, section Employee Training, second bullet states, "All MPFC staff shall be trained on the sexual abuse and sexual harassment policies and procedures at the time of hiring with refresher training every two years thereafter."

(d) The Michael Prenger Family Center PAQ states the agency documents that employees who may have contact with residents, understand the training they have received through employee signature or electronic verification.

Michael Prenger Family Center PREA Policy, page 12, section Employee Training, last bullet states, "All training will be documented by staff signature. Training is conducted by operation supervisors, staff leads, via video, handouts, and/or web based approved PREA training."

Through such reviews, the facility meets this standards requirements.

115.332	<b>Volunteer and contractor training</b>
	<p data-bbox="244 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 273 435 300">Document Review:</p> <ol data-bbox="244 304 1054 434" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. Michael Prenger Family Center Fundamental Practices, not dated</li> <li>4. Training Curriculum, NIC and Greene County Juvenile Detention PREA Videos</li> </ol> <p data-bbox="244 465 352 492">Interviews:</p> <p data-bbox="244 497 802 524">The facility does not have any contractors or volunteers.</p> <p data-bbox="244 555 1493 649">(a) The Michael Prenger Family Center PAQ states all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and harassment prevention, detection, and response. Zero contractors and volunteers, now have contact with residents.</p> <p data-bbox="244 680 1461 775">Michael Prenger Family Center PREA Policy, page 13, Section Volunteer and Contractor Training, first bullet, states, "All volunteers and contractors working in the MPFC shall have the same training on MPFC policies and procedures regarding sexual abuse and sexual harassment as MPFC staff."</p> <p data-bbox="244 806 1474 967">The facility provided Fundamental Practices Outline and Trainer Acknowledgment. The fundamentals include: Practicing all health and safety expectations, preserving the rights of every youth to live in a physically and emotionally safe environment (free from any abuse or harassment including maltreatment, neglect, physical, emotional, and sexual. The acknowledgment states, "I have read and understand the materials provided." Each includes a printed name, signature, date and supervisor signature.</p> <p data-bbox="244 999 879 1025">The facility provided a curriculum statement, stating employees:</p> <ol data-bbox="244 1030 903 1124" style="list-style-type: none"> <li>4. View the PREA Video from the National Institute of Corrections;</li> <li>5. View the PREA Video from Greene County Juvenile Detention</li> <li>6. Read through all PREA Standards</li> </ol> <p data-bbox="244 1155 1461 1317">(b) The Michael Prenger Family Center PAQ states the level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with residents. All volunteers and contractors who have contact with residents have been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents. The facility states volunteers and contractors receive the same training as employees.</p> <p data-bbox="244 1348 1474 1406">(c) The Michael Prenger Family Center PAQ states the agency maintains documentation confirming that the volunteers and contractors understand the training they have received.</p> <p data-bbox="244 1438 1461 1496">Michael Prenger Family Center PREA Policy, page 13, Section Volunteer and Contractor Training, last bullet, states, "This training shall be documented."</p> <p data-bbox="244 1527 1474 1688">The facility provided Fundamental Practices Outline and Trainer Acknowledgment. The fundamentals include: Practicing all health and safety expectations, preserving the rights of every youth to live in a physically and emotionally safe environment (free from any abuse or harassment including maltreatment, neglect, physical, emotional, and sexual. The acknowledgment states, "I have read and understand the materials provided." Each includes a printed name, signature, date and supervisor signature.</p> <p data-bbox="244 1720 935 1747">Through such reviews, the facility meets this standards requirements.</p>

115.333	<b>Resident education</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. Safety First Handbook, English and Spanish versions, not dated</li> <li>4. Office of State Courts Administrator, Contract Award with International Language Center, dated 7.8.2021</li> <li>5. Preventing Sexual Assault Brochure, not dated</li> <li>6. Sexual Abuse/Harassment Places to Report Flyer, not dated</li> <li>7. Child Abuse and Neglect Hotline Flyer, English and Spanish versions, not dated</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Detention Supervisor/Intake Staff</li> <li>2. Detention Superintendent/PREA Coordinator</li> </ol> <p>The facility Detention Supervisor stated resident education is included in the intake packet, which explains the facility zero tolerance policy, no touching policy and how residents can report allegations of harassment or abuse.</p> <p>The Detention Superintendent/PREA Coordinator explained the intake process is not explained to residents until they come back from court as many will not stay in the facility past 72 hours.</p> <p>Site Observation:</p> <p>No juvenile records were reviewed during the onsite as there were no juveniles in the facility.</p> <p>(a) The Michael Prenger Family Center PAQ states Residents receive information at time of intake about the zero-tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment. 22 residents admitted in the past 12 months were given information at intake.</p> <p>Michael Prenger Family Center PREA Policy, page 14, section Juvenile Education, first bullet, states, "During the intake process, juveniles shall receive information explaining, in an age-appropriate fashion, the MPFC's zero tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of such incidents."</p> <p>The facility provided Safety First Handbooks in English and Spanish. Page 6 of the handbook includes the following areas for youth to "Remember":</p> <ul style="list-style-type: none"> <li>• "You have the right to say "NO" if someone wants to touch you in any way that makes you feel uncomfortable, afraid or confused.</li> <li>• You have the right and the responsibility to take care of yourself. You can set limits for yourself and others, trust your feelings, and not let others pressure you.</li> <li>• True consent means both partners have equal power. Equal power means equal knowledge and equal freedom to make decisions, without pressure.</li> <li>• Forcing or pressuring someone to have sex is never okay. Force may be physical. It can also be non-physical, as in deception, trickery, threats, and verbal pressured.</li> <li>• Remember if you are sexually harassed or forced into sexual contact let your staff know.</li> <li>• You will not be blamed if someone touches you in a way that does not seem right, it is not your fault.</li> <li>• You will not be hurt or blamed if you tell staff or other trusted adults about any abuse you report."</li> </ul> <p>The last page of the handbook states, "I have read and/or covered the material in this workbook. Date:/Signature/Staff Signature"</p> <p>(b) The Michael Prenger Family Center PAQ states within the past 12 months, 22 residents received age appropriate PREA education within 10 days of intake.</p> <p>Michael Prenger Family Center PREA Policy, page 14, section Juvenile Education, second bullet, states, "Within 10 days of admission, juveniles will receive comprehensive age-appropriate education regarding their rights to be free from sexual abuse and sexual harassment and retaliation due to reporting such incidents. Included will be MPFC procedures for reporting such incidents. "</p> <p>(c) The Michael Prenger Family Center PAQ states the facility residents have not been transferred to the facility. Agency policy requires that residents who are transferred from one facility to another be educated regarding their rights. The facility states "when a juvenile is transferred from one facility to another, they are considered a new admission at the new facility." During the pre-audit phase, discussions between the facility, agency staff and the Auditor demonstrated the facility is a three</p>

bed facility and residents are never transferred to this facility.

(d) Michael Prenger Family Center PREA Policy, page 14, section Juvenile Education, third bullet, states, "The above information shall be made available, by an effective communication method, to juveniles who are limited English proficient, deaf, visually impaired, limited reading skills, or otherwise disabled."

The facility provided an Office of State Courts Administrator, Contract Award with International Language Center. This contract is for language specialties to include Arabic, Bosnian, Farsi, Mandarin, Russian, Spanish, Tigrinya, Vietnamese or any additional languages upon request. Services also include family support therapy services, mental health interpreter services, client outreach services – educational outreach, and court room services, when needed. This contract is in place for one year.

(e) The Michael Prenger Family Center PAQ states the facility maintains documentation of resident participation in PREA education sessions. Residents sign and date the last page of the Safety First Handbook.

Michael Prenger Family Center PREA Policy, page 14, section Juvenile Education, fourth bullet, states, "All such education shall be documented."

(f) The Michael Prenger Family Center PAQ states The agency ensures that key information about the agency's PREA policies is continuously and readily available or visible through posters, resident handbooks, or other written formats.

Michael Prenger Family Center PREA Policy, page 14, section Juvenile Education, fifth bullet, states, "Key information on these subjects will be continuously and readily available to juveniles through video presentations and discussion."

The facility provided a Preventing Sexual Assault Brochure. The brochure speaks to the following:

1. Know the answer to these questions:
  - a. What is Sexual Assault/Abuse?
  - b. What is Sexual Harassment?
  - c. What does Zero Tolerance Mean?
2. Know what to do about sexual assault/abuse
3. Know what to do if you become a victim
4. Facts Related to Sexual Assault/Abuse & Harassment
5. Rights and Responsibilities

The facility provided a Sexual Abuse-Harassment Place to Report Notice, in English and Spanish. The notice speaks to the following options for reporting:

1. Grievance Box
2. MPFC Case Manager or youth specialist
3. Parents
4. Teachers
5. Attorneys (Court appointed, Guardian ad Litem, Private Attorney)
6. Missouri Child Abuse and Neglect Hotline with toll free number 27 hours a day, 365 days a year
7. Rainbow House Regional Child Advocacy Center address and telephone number.

The facility provided a Child Abuse and Neglect Hotline Flyer in English and Spanish. The flyer has the number of 1.844.CAN-TELL for resident reporting.

Through such reviews, the facility meets this standards requirements.

<b>115.334</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <p>1. Michael Prenger Family Center PAQ</p> <p>Interviews:</p> <p>1. Detention Superintendent/PREA Coordinator</p> <p>Interviews with the Detention Superintendent/PREA Coordinator state criminal investigations are conducted by Jefferson City Police Department and administrative investigations are completed by the Court Services Administrator from the Out of Home Placement Investigations Unit which is under the umbrella of the Children's Division through the Department of Social Services for the State of Missouri.</p> <p>(a) The Michael Prenger Family Center PAQ states this standard is not applicable as external investigators are used for both criminal and administrative investigations. The facility states, criminal investigations are conducted by Jefferson City Police Department and administrative investigations are completed by the Court Services Administrator from the Out of Home Placement Investigations Unit which is under the umbrella of the Children's Division through the Department of Social Services for the State of Missouri.</p> <p>Through such reviews, the facility meets standard.</p>

115.335	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. Facility Training Verification Form, PREA Medical and Mental Care Standards, dated 3.9.2022</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. LPN</li> </ol> <p>During interviews the facility Nurse, she was able to demonstrate procedural steps to follow during a sexual abuse allegation. The Nurse could articulate how she would ensure the resident understood the processes, how to notify the proper authorities, the Rainbow House or SANE/SAFE hospital being used and that she would report and document incidents.</p> <p>Site Observation:</p> <p>Medical and mental health services are through contracted services in the community.</p> <p>(a) The Michael Prenger Family Center PAQ states the agency has a policy related to the training of medical and mental health practitioners who work regularly in its facilities. The number of all medical and mental health care practitioners who work regularly at this facility who received the training required by agency policy is one.</p> <p>Michael Prenger Family Center PREA Policy, page 19, section Policy A-C, states,</p> <p>A. "Training shall include a review and understanding of the MPFC PREA Policy, the MPFC Fundamental Practices statement, MPFC/PREA training video presentations and a DSS Child Abuse and Neglect training handout.</p> <p>B. The above mentioned employees do not conduct investigations, forensic interviews, or forensic medical examinations but provide support for residents as required to meet any trauma needs or for reporting purposes.</p> <p>C. Both positions are Mandated Reporters under RSMo.210.115.1."</p> <p>(b) The Michael Prenger Family Center PAQ states the agency medical staff at this facility do not conduct forensic medical exams.</p> <p>(c) The Michael Prenger Family Center PAQ states the agency maintains documentation showing that medical and mental health practitioners have completed the required training. Policy compliance and be found in provision (a) of this standard.</p> <p>The facility provided a Training Verification Form, PREA Medical and Mental Care Standards completed by the LPN.</p> <p>Through such reviews facility meets this standards requirements.</p>

115.341	<b>Obtaining information from residents</b>
	<p data-bbox="244 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 208 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 271 435 300">Document Review:</p> <ol data-bbox="244 304 1190 398" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. Missouri Secure Detention SAVAC Sexual Assault Victim/Assailant Checklist - computerized</li> </ol> <p data-bbox="244 432 352 461">Interviews:</p> <ol data-bbox="244 465 600 495" style="list-style-type: none"> <li>1. Detention Supervisor/Intake staff</li> </ol> <p data-bbox="244 499 1445 528">The interview with the Detention Supervisor demonstrated he completes a risk assessment within 72 hours of admission.</p> <p data-bbox="244 533 1477 562">The Detention Supervisor stated although resident risk is communicated to facility staff, the reason for the risk is not shared.</p> <p data-bbox="244 595 416 624">Site Observation:</p> <p data-bbox="244 629 1485 752">The facility did not have any residents at the facility during the onset of the onsite review. All though four residents arrived during the day, the facility does not complete the risk screening until after the youth had attended court as many residents do not stay at the facility past 72 hours. Of the four residents who arrived during the onsite review, three were released within three hours of arrival.</p> <p data-bbox="244 786 1485 909">(a) The Michael Prenger Family Center PAQ states the facility has a policy that requires screening, upon admission or transfer, for risk of sexual abuse victimization or sexual abusiveness toward other residents. In the past 12 months 21, 100% of residents whose length of stay was longer than 72 hours, were screened for risk of sexual victimization or risk of sexually abusing other residents within 72 hours of their entry into the facility.</p> <p data-bbox="244 943 1477 1066">Michael Prenger Family Center PREA Policy, page 17, section Screening for Risk of Victimization and Abusiveness, Policy, states, "Within 72 hours of admission and periodically during the juvenile's stay in detention, the MPFC shall obtain and utilize information about each juvenile's personal history and behavior to reduce the risk of sexual abuse by or upon a juvenile."</p> <p data-bbox="244 1099 1457 1155">(b) The Michael Prenger Family Center PAQ states the facility conducts risk assessments by using an objective screening instrument.</p> <p data-bbox="244 1189 1469 1245">Michael Prenger Family Center PREA Policy, page 17, section Screening for Risk of Victimization and Abusiveness, Policy, states,</p> <ol data-bbox="244 1279 1469 1771" style="list-style-type: none"> <li>1. An objective screening tool shall be used for this assessment.</li> <li>2. As a minimum, the MPFC will collect information about a juvenile's: <ol data-bbox="244 1346 1469 1771" style="list-style-type: none"> <li>a. Prior victimization of abusiveness.</li> <li>b. Gender nonconforming appearance or manner or identification as a lesbian, gay, bisexual, transgender, heterosexual, or intersex, and whether the juvenile may therefore be vulnerable to sexual abuse;</li> <li>c. Current charges and offense history;</li> <li>d. Age;</li> <li>e. Level of emotional and cognitive development;</li> <li>f. Physical size and stature;</li> <li>g. Mental illness or mental disabilities;</li> <li>h. Intellectual or developmental disabilities;</li> <li>i. Physical disabilities</li> <li>j. The juvenile's personal perception of vulnerability; and</li> <li>k. Any other specific information about a juvenile that may indicate heightened needs for supervision, additional safety precautions, or separation from certain other juveniles."</li> </ol> </li> </ol> <p data-bbox="244 1805 1469 1895">The facility provided a computerized version of the Missouri Secure Detention SAVAC Sexual Assault Victim/Assailant. The screening instrument includes the date of assessment, juvenile name, DOB, Date of Reassessment, gender, race, date of additional reassessment, facility name and reason for referral/detention.</p> <p data-bbox="244 1928 467 1957">Possible victim status:</p> <ol data-bbox="244 1962 1453 2157" style="list-style-type: none"> <li>1. Age 15 or under/comments</li> <li>2. Small physical stature (under 5'5" and or LT 125 lbs.) or lacking physical maturity/comments</li> <li>3. Physical or developmental disability or mental illness/comments</li> <li>4. First secure confinement of any kind/comments</li> <li>5. Juvenile is or is perceived to be gay, lesbian, bisexual, transgender, intersex or gender nonconforming/comments</li> <li>6. History as victim of sexual abuse or exposure to sexual exploitation or violence (If yes then a meeting with a medical or</li> </ol>

<p>mental health practitioner must be offered within 14 days) (Information must be reported if not done so previously)/comments</p> <p>7. History of facility consensual sex/comments</p> <p>8. History of protective custody/comments</p> <p>9. Reports concern over ability to define oneself/comments</p> <p>10. Lacks facility social support/comments</p> <p>Possible Predatory Status:</p> <p>1. Pending sexual assault allegation or prior sexual assault referral/comments</p> <p>2. History of Institutional predatory behavior/comments</p> <p>3. History as perpetrator of sexual abuse/comments</p> <p>4. History as perpetrator of physical abuse/comments</p> <p>5. Gang affiliation/comments</p> <p>The screening includes instructions for scoring both potential victim and predatory factors.</p> <p>(c) The last page of the resident screening tool instructs the following: "Fill in all JIS information including Demographic Information in CPAPERS, assigned the resident to a room and ensuring the Admission Time is correct in CSAROOM."</p> <p>Michael Prenger Family Center PREA Policy, page 17, section Screening for Risk of Victimization and Abusiveness, third bullet, states, "This information may be gathered through conversations with the juvenile during the intake process, medical/health screenings, or classification assessments; and by reviewing court records, case files, facility behavioral records, and other relevant documentation from the juvenile's files."</p> <p>(d-e) Michael Prenger Family Center PREA Policy, page 17, section Screening for Risk of Victimization and Abusiveness, fourth and fifth bullets, state, "Gathered information shall not be shared with other juveniles or anyone else not employed by the MPFC or the juvenile court without a need to know. The screening/risk assessment, including the use of the assessment/screening tool, shall be completed by the Program Director or Case Managers under his/her supervision."</p> <p>Through such reviews, the facility meets this standards requirements.</p>
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115.342	<b>Placement of residents</b>
	<p data-bbox="244 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 273 435 300">Document Review:</p> <ol data-bbox="244 304 1190 398" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. Missouri Secure Detention SAVAC Sexual Assault Victim/Assailant Checklist - computerized</li> </ol> <p data-bbox="244 434 352 461">Interviews:</p> <ol data-bbox="244 465 603 524" style="list-style-type: none"> <li>1. Random staff</li> <li>2. Detention Supervisor/Intake Staff</li> </ol> <p data-bbox="244 528 1490 591">Interviews with facility staff demonstrated resident risk level is communicated to facility staff; however, the reason for resident risk is shared with supervisory staff, only.</p> <p data-bbox="244 622 1490 712">(a) The Michael Prenger Family Center PAQ states the facility uses information from the risk screening required by §115.341 to inform housing, bed, work, education, and program assignments with the goal of keeping all residents safe and free from sexual abuse.</p> <p data-bbox="244 743 1490 837">Michael Prenger Family Center PREA Policy, page 18, section Use of Screening Information, first bullet states, "The MPFC will use all information obtained about a juvenile to make housing, education, and programming assignments with the goal of keeping all juveniles safe and free from sexual exploitation."</p> <p data-bbox="244 869 1417 931">The last page of the resident screening tool instructs the following: "Fill in all JIS information including Demographic Information in CPAPERS, assigned the resident to a room and ensuring the Admission Time is correct in CSAROOM."</p> <p data-bbox="244 963 1481 1088">(b) The Michael Prenger Family Center PAQ states the residents may only be placed in isolation as a last resort to keep them safe from other residents, until other arrangements can be made. The facility requires residents in isolation continue to have access to the same programming offerings as all other residents outside of isolation. In the last 12 months there have been zero residents placed in isolation at risk of sexual victimization or who were in need of protection from sexual victimization.</p> <p data-bbox="244 1120 1490 1312">Michael Prenger Family Center PREA Policy, page 18, section Use of Screening Information, second bullet states, "A juvenile will not be isolated from others except as a last resort to keep them and other juveniles safe. Alternatives to isolation shall be sought and implemented as soon as possible. Juveniles in isolation will not be denied large muscle exercise or education. Juveniles in isolation will receive daily visits from medical or mental health clinicians and have access to other programs to the extent possible. A juvenile will be considered in "isolation" if confined exclusively to his/her sleeping room for a period of 24 hours."</p> <p data-bbox="244 1344 1490 1438">(c) The Michael Prenger Family Center PAQ states the facility prohibits placing and considering lesbian, gay, bisexual, transgender, or intersex residents in particular housing, bed, or other assignments solely on the basis of such identification or status.</p> <p data-bbox="244 1469 1453 1563">Michael Prenger Family Center PREA Policy, page 18, section Use of Screening Information, third bullet states, "Lesbian, gay, bisexual, heterosexual, transgender, or intersex juveniles shall not be placed in particular cell, bed, or other assignments, nor will this identification be an indicator of being sexually abusive."</p> <p data-bbox="244 1594 1473 1657">(d) The Michael Prenger Family Center PAQ states the facility makes housing and program assignments for transgender or intersex residents in a facility on a case-by case basis.</p> <p data-bbox="244 1688 1473 1814">Michael Prenger Family Center PREA Policy, page 18, section Use of Screening Information, fourth bullet states, "The MPFC, on a case-by-case basis, shall consider whether placement on a male or female housing unit or programming group would ensure the juvenile's health and safety, and/or whether this placement would present management of security problems."</p> <p data-bbox="244 1845 1380 1908">(e) Michael Prenger Family Center PREA Policy, page 18, section Use of Screening Information, fifth bullet states, "Placement of all juveniles will be reviewed at least twice monthly to ensure their safety."</p> <p data-bbox="244 1939 1414 2002">(f) Michael Prenger Family Center PREA Policy, page 18, section Use of Screening Information, sixth bullet states, "A juvenile's own views on his/her personal safety will be given serious consideration."</p> <p data-bbox="244 2033 1461 2096">(g) Michael Prenger Family Center PREA Policy, page 18, section Use of Screening Information, seventh bullet states, "All juveniles in the MPFC shall shower individually."</p> <p data-bbox="244 2128 1398 2154">(h) The Michael Prenger Family Center PAQ states in the last 12 months, there were zero residents at risk of sexual</p>

victimization who were held in isolation.

Michael Prenger Family Center PREA Policy, page 18, section Use of Screening Information, eighth bullet states, "If a juvenile is placed in "isolation" the MPFC shall document:

1. The basis of concern for the juvenile's safety;
2. Why no alternative to isolation is being used; and
3. Every thirty days that a juvenile has been in isolation the MPFC shall review the reasons any juvenile is in isolation and whether there is continuing need for it.

(i) The Michael Prenger Family Center PAQ states if residents were held in isolation, such resident would be afforded a review every 30 days to determine whether the continuation for separation was needed. This provision is found compliant in provision (h) of this standard.

Through such reviews, the facility meets this standards requirements.

115.351	<b>Resident reporting</b>
	<p data-bbox="244 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 208 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 271 435 300">Document Review:</p> <ol data-bbox="244 304 1101 600" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. Safety First Handbook, not dated</li> <li>4. Detention Resident Rulebook, not dated</li> <li>5. Preventing Sexual Assault Brochure, not dated</li> <li>6. Sexual Abuse/Harassment Places to Report Flyer, not dated</li> <li>7. M.P.F.C, Youth Grievance or Compliant Form, not dated</li> <li>8. Detention Corrective Action Report (Critical Incident Report), not dated</li> <li>9. Michael Prenger Family Center Fundamental Practices Acknowledgment, not dated</li> </ol> <p data-bbox="244 629 352 658">Interviews:</p> <ol data-bbox="244 663 716 757" style="list-style-type: none"> <li>1. Random staff</li> <li>2. Detention Supervisor</li> <li>3. Detention Superintendent/PREA Coordinator</li> </ol> <p data-bbox="244 763 1490 824">Interviews with staff demonstrated each are aware residents may report allegation through telling a staff member, utilizing the grievance process or calling one of the hotline numbers posted in the facility.</p> <p data-bbox="244 853 429 882">Site Observations:</p> <p data-bbox="244 887 933 916">Flyers with hotline numbers were witnessed in the facilities day room.</p> <p data-bbox="244 945 1445 1039">(a) The Michael Prenger Family Center PAQ states The agency has established procedures allowing for multiple internal ways for residents to report privately to agency officials about sexual harassment, abuse, retaliation and or any type of neglect.</p> <p data-bbox="244 1068 1490 1164">Michael Prenger Family Center PREA Policy, page 18, section Resident Reporting, first bullet, states, "The MPFC shall have multiple ways for staff and/or juveniles to report sexual abuse, sexual harassment, retaliation for making any such report, and staff neglect or violations of responsibilities which may have contributed to such incidents."</p> <p data-bbox="244 1193 1476 1288">The facility provided a Resident Rule Book. Page 6, section PREA Policy Statement, states, "It is the policy of Michael W. Prenger Family Center to provide a safe, humane, and secure environment for you. One objective is to ensure a program of prevention, detection and investigation of any allegations of sexual offense that occurs within the detention facility.</p> <p data-bbox="244 1317 1460 1447">It is the Detention policy to ensure that sexual activity between staff and juveniles, volunteers or contract personnel and juveniles regardless of consensual status is prohibited and subjected to administrative disciplinary and criminal charges. Sexual assault is a crime. All sexual assaults that are reported in this facility will be referred to the proper law enforcement and child protection authorities.</p> <p data-bbox="244 1476 1482 1570">Michael W. Prenger Family Center has a zero tolerance for juvenile on juvenile sexual offenses, staff sexual misconduct and sexual harassment towards juveniles. Every allegation of a sexual offense, misconduct and harassment shall be thoroughly investigated."</p> <p data-bbox="244 1599 1490 1659">The facility provided Safety First Handbooks in English and Spanish. Page 6 of the handbook includes the following areas for youth to "Remember":</p> <ul data-bbox="244 1688 1455 2056" style="list-style-type: none"> <li>• "You have the right to say "NO" if someone wants to touch you in any way that makes you feel uncomfortable, afraid or confused.</li> <li>• You have the right and the responsibility to take care of yourself. You can set limits for yourself and others, trust your feelings, and not let others pressure you.</li> <li>• True consent means both partners have equal power. Equal power means equal knowledge and equal freedom to make decisions, without pressure.</li> <li>• Forcing or pressuring someone to have sex is never okay. Force may be physical. It can also be non-physical, as in deception, trickery, threats, and verbal pressured.</li> <li>• Remember if you are sexually harassed or forced into sexual contact let your staff know.</li> <li>• You will not be blamed if someone touches you in a way that does not seem right, it is not your fault.</li> <li>• You will not be hurt or blamed if you tell staff or other trusted adults about any abuse you report."</li> </ul> <p data-bbox="244 2085 1418 2145">The last page of the handbook states, "I have read and/or covered the material in this workbook. Date:/Signature/Staff Signature"</p>

(b) The Michael Prenger Family Center PAQ states facility provides at least one way for residents to report abuse or harassment to a public or private entity or office that is not part of the agency. The agency does not have a policy requiring residents detained solely for civil immigration purposes be provided information on how to contact relevant consular officials and relevant officials of the Department of Homeland Security.

Michael Prenger Family Center PREA Policy, page 18, section Resident Reporting, second bullet, states, "Juveniles detained solely for civil immigration purposes will be given information on contacting their relevant consular official and the Department of Homeland Security."

The facility provided a Preventing Sexual Assault PREA brochure. The second page of the brochure provides a Hotline number: 1.800.392.3738.

On 2.13.2022, at 2:48 pm, this Auditor telephoned the hotline number at 1.800.392.3738. The message stated, "Welcome to the State of Missouri child abuse hotline. Press 2 if an adult. Press 1 if mandated reporter. Calling to report type of abuse about emergency issues, press 1, non-emergent situation, press 4. (Online reporting instructions were heard while waiting for an operator.) The holding line offered a call back; however, if the person receiving the call back could not answer the message states the importance of calling back. While on hold, the message continually states hang up and call 911 and then call us back. After waiting on hold for 60 minutes, this Auditor ended the call. Upon the online report being answered as is described in the next paragraph, the Auditor explained being on hold for one hour as the Auditor did not want to press the option for emergency reports. The worker explained calls go into a queue and are answered by type of report and the emergency call would have been answered before non-emergent calls.

On 2.13.2022, at 2:30 pm, this Auditor completed a lengthy child abuse report via <https://apps.dss.mo.gov/OnlineCanReporting/default.aspx>. This reporting form requested the reporter set up an account, provide email, phone and address information in addition to three pages of information for those receiving the report. 4:05 pm Diana Worker #27262 responded to the online report. Upon asking Worker 27262 how she would respond to a juvenile and or third party report, she stated the following:

- This is a State hotline for any report of abuse
- If the child was minor, under 18, she would screen for sexual abuse,
- 18 or older and would verify if they are in CDC custody.
- Ask for reporting concerns for children under 18
- Would gather the names related to the concern
- Would possibly redirect to law enforcement
- Would ask for identifying information
- Ask if the care takers are active members of military
- Screen the concerns of the reporter, what the allegation consisted of
- If the report meets the criteria of a concern, the report would be forwarded to the Out of Home Investigation Unit and or local law enforcement
- This online option is for Mandatory Reporting only
- This website is currently not an option for third party reporters.

On 2.13.2022 at 3:59 pm, the Auditor received the following email from the Child Abuse/Neglect Online Submission Details:

"Thank you for reporting your concern to the Hotline. Based on State of Missouri law and regulations:

The information you provided does not meet the statutory criteria of a child abuse and neglect report or referral, so it will not be sent to field staff. We have documented your information. If you get additional information, please call the Hotline at 1-800-392-3738 or make a new on-line report.

The reference number is 20220440115 for the report submitted through OSCAR on 02/13/2022 at 03:39PM"

(c) The Michael Prenger Family Center PAQ states the agency has a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously and from third parties. The agency has a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously and from third parties. The PAQ states staff are required to document verbal reports, immediately.

Michael Prenger Family Center PREA Policy, page 18, section Resident Reporting, third bullet, states, "MPFC staff shall accept reports of a sexual nature made in person, in writing, anonymously, or by third parties; staff will promptly document all verbal reports in a critical incident report as well as the daily log."

(d) The Michael Prenger Family Center PAQ states the facility provides residents with access to tools to make written reports of sexual abuse or sexual harassment, retaliation by other residents or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.

Michael Prenger Family Center PREA Policy, page 18, section Resident Reporting, third bullet, states, "Residents shall be allowed to use the "Grievance" Box located at the control desk as a means by which to report. The box is locked and accessible only to the MPFC Clinical Supervisor, his/her assigned Case Managers, and the Superintendent. If a report is found, then contact with the Child Abuse and Neglect Hotline will be made and the information communicated to the Superintendent and/or the Juvenile Court Administrator."

M.P.F.C, Youth Grievance or Compliant Form. Page one of the grievance form has a Sexual Abuse/Sexual Harassment box to be checked. The following paragraph states, "Please provide information below regarding your complaint. Allegations of sexual abuse/sexual harassment are not required to follow the grievance process. Your concerns will be investigated immediately by the appropriate external agency. You will be notified of the outcome of the investigation."

(e) The Michael Prenger Family Center PAQ states the agency has established procedures for staff to privately report sexual abuse and sexual harassment of residents. Staff have been informed of these procedures through initial and annual training as is described in provision 115.331(a) (1-11).

Michael Prenger Family Center PREA Policy, page 18, section Resident Reporting, fourth bullet, states, "MPFC staff may report, privately, allegations of sexual abuse or sexual harassment of any juvenile to the Superintendent, or if the Superintendent is the alleged perpetrator staff shall contact the Chief Juvenile Officer of the 19th Circuit. This reporting may be done in person, in writing, by e-mail or by phone."

The facility provided Fundamental Practices Outline and Trainer Acknowledgment. The fundamentals include: Practicing all health and safety expectations, preserving the rights of every youth to live in a physically and emotionally safe environment (free from any abuse or harassment including maltreatment, neglect, physical, emotional, and sexual. The acknowledgment states, "I have read and understand the materials provided." Each includes a printed name, signature, date and supervisor signature.

Through such reviews, the facility meets this standards requirements.

115.352	Exhaustion of administrative remedies
	<p data-bbox="244 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 208 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 271 435 300">Document Review:</p> <ol data-bbox="244 304 820 365" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> </ol> <p data-bbox="244 398 352 427">Interviews:</p> <ol data-bbox="244 432 716 461" style="list-style-type: none"> <li>1. Detention Superintendent/PREA Coordinator</li> </ol> <p data-bbox="244 465 815 495">There were no grievances reported in the last 12 months.</p> <p data-bbox="244 528 416 557">Site Observation:</p> <p data-bbox="244 562 687 591">A grievance box was observed in the facility.</p> <p data-bbox="244 624 1394 685">(a) The Michael Prenger Family Center PAQ states the agency is exempt from this standard as they do not have an administrative procedure for dealing with resident grievances regarding sexual abuse.</p> <p data-bbox="244 707 1445 768">Michael Prenger Family Center PREA Policy, page 20, section Exhaustion of Administrative Remedies, policy, states the following:</p> <p data-bbox="244 801 331 831">"I. Policy</p> <ul data-bbox="244 835 1474 896" style="list-style-type: none"> <li>• The MPFC is exempt from the requirements of this section because it does not have administrative procedures to address juvenile grievances regarding sexual abuse.</li> </ul> <p data-bbox="244 929 392 958">II. Procedures:</p> <ol data-bbox="244 981 1474 1211" style="list-style-type: none"> <li>A. All grievances alleging sexual abuse shall be reported to the DSS Child Abuse and Neglect Hotline.</li> <li>B. Hotline Reports shall be documented on a 109 Form and entered into the Hotline folder/binder.</li> <li>C. Residents/staff who are filing an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse shall be allowed immediate access to report and such reports shall be immediately communicated to the Superintendent or the Juvenile Court Administrator.</li> <li>D. Disciplinary actions for a resident shall be limited to occasions where investigation and reports to the MPFC demonstrate that the resident filed the report/grievance in bad faith.</li> </ol> <p data-bbox="244 1245 1490 1305">Although there is a grievance procedure available for the youth, policy dictates that PREA allegations are not officially utilized by the youth in this capacity."</p> <p data-bbox="244 1339 935 1368">Through such reviews, the facility meets this standards requirements.</p>

115.353	Resident access to outside confidential support services and legal representation
	<p data-bbox="244 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 273 432 295">Document Review:</p> <ol data-bbox="244 304 943 432" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. Memorandum of Agreement, The Rainbow House, dated 2.28.2022</li> <li>4. Cole County Child Advocacy SAFE Listing, not dated</li> </ol> <p data-bbox="244 463 352 486">Interviews:</p> <ol data-bbox="244 495 480 555" style="list-style-type: none"> <li>1. Random Staff</li> <li>2. Detention Supervisor</li> </ol> <p data-bbox="244 564 1481 622">Staff interviewed demonstrated residents may contact the hotline or the Rainbow House advocate contact number posted or by verbally telling a staff and the staff will take them to a private area for private calls.</p> <p data-bbox="244 654 416 676">Site Observation:</p> <p data-bbox="244 685 1425 743">Flyers were observed in the dayroom in both English and Spanish with hotline and Rainbow House contact information available.</p> <p data-bbox="244 775 1481 833">(a) The Michael Prenger Family Center PAQ states the facility provides residents with access to outside victim advocates for emotional support services related to sexual abuse by doing the following:</p> <ul data-bbox="244 842 1489 1037" style="list-style-type: none"> <li>• Gives residents (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.</li> <li>• Does not give immigrant residents (by providing, posting, or otherwise making accessible) mailing addresses and telephone numbers (including toll-free hotline numbers where available) of immigrant service agencies for persons detained solely for civil immigration purposes.</li> <li>• Enables reasonable communication between residents and these organizations, in as confidential manner as possible.</li> </ul> <p data-bbox="244 1068 1481 1193">Michael Prenger Family Center PREA Policy, page 21, section Resident Access to Outside Confidential Support Services, first bullet, states, "The MPFC shall provide, upon the request of a juvenile, access to outside victim advocates for emotional support services related to sexual abuse. Communication between the juvenile and this advocate or agency shall be as confidential as possible."</p> <p data-bbox="244 1225 1425 1283">The facility provided a Preventing Sexual Assault PREA brochure. The second page of the brochure provides a Hotline number: 1.800.392.3738.</p> <p data-bbox="244 1314 1366 1341">The facility provided a Cole County – Child Advocacy SAFE flyer. This flyer has address and phone numbers for:</p> <ol data-bbox="244 1350 836 1512" style="list-style-type: none"> <li>3. Prosecuting Attorney</li> <li>4. Sheriff's Department</li> <li>5. Compass Health Network</li> <li>6. Jefferson County Rape and Abuse Crisis Services</li> <li>7. Rainbow House Regional Child Advocacy Center/Shelter</li> </ol> <p data-bbox="244 1543 1477 1702">(b) The Michael Prenger Family Center PAQ states the facility informs residents, prior to giving them access to outside support services, the extent to which such communications will be monitored. The facility informs residents, prior to giving them access to outside support services, of the mandatory reporting rules governing privacy, confidentiality, and/or privilege that apply for disclosures of sexual abuse made to outside victim advocates, including any limits to confidentiality under relevant Federal, State, or local law.</p> <p data-bbox="244 1733 1460 1859">Michael Prenger Family Center PREA Policy, page 21, section Resident Access to Outside Confidential Support Services, second bullet, states, "Juveniles will be informed of the extent which these communications will be monitored and that all MPFC staff are mandated by state law to report any possible child abuse or neglect that they are aware of to the CA/N Hotline/800-392-3738."</p> <p data-bbox="244 1890 1425 1948">(c) The Michael Prenger Family Center PAQ states the facility maintains memoranda of understanding with community service providers that are able to provide residents with emotional support services related to sexual abuse.</p> <p data-bbox="244 1980 1477 2139">The facility provided a Rainbow House Regional Children's Advocacy Center (CAC) Multidisciplinary (MDT) Protocols and Interagency Agreement. Page one, section Mission, states, "Utilizing best practices which are constantly evolving, the Multi-Disciplinary Team (MDT) approach strives to coordinate the efforts of all agencies involved to administer the most effective, efficient, child friendly, and trauma aware investigative practices available and intends to achieve proper adjudication, prosecution, treatment, and prevention of child abuse. The protocols shall adhere to the Child First doctrine which strives to</p>

heal and protect children and families from the devastating effects of trauma and chronic stress fostering the development of strong, nurturing, caregiver-child relationships, promoting adult capacity, and connecting families with needed services.”

On 2.20.2022 at 5:38 pm, MST, this Auditor phoned the Rainbow House Regional Child Advocacy Center at 1611 Towne Drive, Columbia, MO 65202 at phone number. 573.474.6600. After the Auditor introduced herself and the reason for the call, the operator stated my questions would be better answered by a supervisor. The operator took down contact information and stated I would get a call back during normal business hours. On March 15, 2022, at 11:38 am, 'Brenda' from the Rainbow House phoned and explained the center would assist in providing advocacy services to youth through a forensic exam and provide advocacy services to the youth as long as those services were needed.

(d) The Michael Prenger Family Center PAQ states the facility provides residents with reasonable and confidential access to their attorneys or other legal representation. The facility provides residents with reasonable access to parents or legal guardians. Policy compliance can be found in provision (b) of this standard.

Michael Prenger Family Center PREA Policy, page 21, section Resident Access to Outside Confidential Support Services, fourth and fifth bullet, state, “The MPFC shall allow juveniles to meet with their attorneys or other legal representation in a reasonable and confidential setting. Juveniles shall also have reasonable access to their parents or legal guardians. Residents shall have the opportunity to meet with approved outside support services, parents, legal guardians and attorneys in a reasonable and confidential setting possible (e.g. Secure detention booking room, observation room and/or classroom).”

Through such reviews, the facility meets this standards requirements.

115.354	<b>Third-party reporting</b>
	<p data-bbox="244 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 273 435 300">Document Review:</p> <ol data-bbox="244 304 821 434" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. Preventing Sexual Assault Brochure, not dated</li> <li>4. Sexual Abuse-Harassment Notice, dated 2018</li> </ol> <p data-bbox="244 465 352 492">Interviews:</p> <ol data-bbox="244 497 440 555" style="list-style-type: none"> <li>1. Random staff</li> <li>2. Supervisory staff</li> </ol> <p data-bbox="244 564 1476 622">Staff interviewed demonstrated their reporting knowledge of third party reporting by contacting the hotline or telling a trusted adult.</p> <p data-bbox="244 654 1460 748">(a) The Michael Prenger Family Center PAQ states the facility provides a method to receive third-party reports of resident sexual abuse or sexual harassment. The agency publicly distributes information on how to report resident sexual abuse or sexual harassment on behalf of residents.</p> <p data-bbox="244 779 1481 873">Michael Prenger Family Center PREA Policy, page 22, section Third Party Reporting, states, "Anyone may report sexual abuse and sexual harassment by any means of communication. Staff shall accept such reports, document them Shift Notes and forward them to the Superintendent."</p> <p data-bbox="244 904 1388 963">The facility provided a Preventing Sexual Assault Brochure. Page 2 of the brochure has a contact: Hotline Number: 1.800.392.3738.</p> <p data-bbox="244 994 1471 1088">The facility provided a Sexual Abuse-Harassment Notice in Spanish. The notice speaks to who to contact in an emergency, use of telephones, emergency contacts, Missouri child abuse hotline reporting number, a national hotline number and the address and phone number of the Rainbow House Regional Child Advocacy Center.</p> <p data-bbox="244 1120 1492 1415">On 2.13.2022, at 2:48 pm, this Auditor telephoned the hotline number at 1.800.392.3738. The message stated, "Welcome to the State of Missouri child abuse hotline. Press 2 if an adult. Press 1 if mandated reporter. Calling to report type of abuse about emergency issues, press 1, non-emergent situation, press 4. (Online reporting instructions were heard while waiting for an operator.) The holding line offered a call back; however, if the person receiving the call back could not answer the message states the importance of calling back. While on hold, the message continually states hang up and call 911 and then call us back. After waiting on hold for 60 minutes, this Auditor ended the call. Upon the online report being answered as is described in the next paragraph, the Auditor explained being on hold for one hour as the Auditor did not want to press the option for emergency reports. The worker explained calls go into a que and are answered by type of report and the emergency call would have been answered before non-emergent calls.</p> <p data-bbox="244 1447 935 1473">Through such reviews, the facility meets this standards requirements.</p>

115.361	<b>Staff and agency reporting duties</b>
	<p data-bbox="244 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 208 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 271 435 300">Document Review:</p> <ol data-bbox="244 304 820 365" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> </ol> <p data-bbox="244 398 352 427">Interviews:</p> <ol data-bbox="244 432 716 589" style="list-style-type: none"> <li>1. Random Staff</li> <li>2. LPN</li> <li>3. Detention Supervisor</li> <li>4. Detention Superintendent/PREA Coordinator</li> <li>5. Juvenile Officer Court Administrator</li> </ol> <p data-bbox="244 593 1485 723">Interviews with staff demonstrated each actively practices and understood the importance of immediately reporting all allegations of sexual abuse and sexual harassment. Supervisory staff stated the agency expectation is reports were made to them and outside reporting agencies immediately upon having knowledge of a suspicion or report of allegations of harassment, retaliation or abuse.</p> <p data-bbox="244 757 429 786">Site Observations:</p> <p data-bbox="244 790 1077 819">This facility has never experienced a sexual harassment or sexual abuse allegation.</p> <p data-bbox="244 846 1481 1039">(a) The Michael Prenger Family Center PAQ states the agency requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency. The agency requires all staff to report immediately and according to agency policy any retaliation against residents or staff who reported such an incident. The agency requires all staff to report immediately and according to agency policy any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.</p> <p data-bbox="244 1070 1481 1232">Michael Prenger Family Center PREA Policy, page 23, section Staff and Agency Reporting Duties, first bullet states, "MPFC staff have the duty and responsibility to report any sexual abuse or sexual harassment. The Superintendent will be notified when a report is received. Mandated reporter procedures will be followed as required. All information applicable to said reports will be kept confidential and shared with only those agencies with a need to know for treatment and investigative purposes."</p> <p data-bbox="244 1263 1449 1355">(b) The Michael Prenger Family Center PAQ states the agency requires all staff to comply with any applicable mandatory child abuse reporting laws. Compliance can be found in provision (a) of this standard. Policy compliance can be found in provision (a) of this standard.</p> <p data-bbox="244 1386 1481 1516">(c) Michael Prenger Family Center PAQ states apart from reporting to the designated supervisors or officials and designated State or local service agencies, agency policy prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions. Policy compliance can be found in provision (a) of this standard.</p> <p data-bbox="244 1547 1485 1639">(d) Michael Prenger Family Center PREA Policy, page 23, section Staff and Agency Reporting Duties, second bullet states, "Medical and mental health practitioners shall have the same responsibility as stated above. These practitioners shall inform a juvenile of these duties at the outset of treatment."</p> <p data-bbox="244 1671 1485 1863">(e) Michael Prenger Family Center PREA Policy, page 23, section Staff and Agency Reporting Duties, last bullet states, "When a report of sexual abuse or sexual harassment is received, the Superintendent or designee shall be contacted. The Superintendent will then contact the Child Abuse and Neglect Hotline and/or the Jefferson City Police Department to report and/or request an investigation. The Superintendent will then contact the alleged victim's parents, legal custodian, and/or social services caseworker, whichever is appropriate. The Superintendent will notify the juvenile's attorney of the allegations as soon as reasonably possible."</p> <p data-bbox="244 1895 1461 1986">Michael Prenger Family Center PREA Policy, page 23, section Staff and Agency Reporting Duties, section F., states, "The Superintendent will notify the juvenile's attorney of the allegations as soon as reasonably possible, but within fourteen (14) days of receiving the allegation."</p> <p data-bbox="244 2018 914 2047">(f) Policy compliance can be found in provision (e) of this standard.</p> <p data-bbox="244 2078 935 2107">Through such reviews, the facility meets this standards requirements.</p>

115.362	Agency protection duties
	<p data-bbox="244 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 273 435 295">Document Review:</p> <ol data-bbox="244 304 820 365" style="list-style-type: none"> <li data-bbox="244 304 635 331">1. Michael Prenger Family Center PAQ</li> <li data-bbox="244 336 820 365">2. Michael Prenger Family Center PREA Policy, not dated</li> </ol> <p data-bbox="244 398 352 421">Interviews:</p> <ol data-bbox="244 430 716 490" style="list-style-type: none"> <li data-bbox="244 430 716 456">1. Detention Superintendent/PREA Coordinator</li> <li data-bbox="244 461 625 490">2. Juvenile Officer Court Administrator</li> </ol> <p data-bbox="244 499 1469 589">Interviews with the Detention Superintendent/PREA Coordinator and the Juvenile Officer Court Administrator demonstrated the facility staff would act promptly and responds properly at the discovery of any incident of harassment, retaliation and abuse.</p> <p data-bbox="244 622 416 645">Site Observation:</p> <p data-bbox="244 654 895 680">The facility did not have any investigations in the past 12 months.</p> <p data-bbox="244 714 1481 806">(a) The Michael Prenger Family Center PAQ states when the agency or facility learns that a resident is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the resident. In the past 12 months, the facility reports zero residents were subject to substantial risk of imminent sexual abuse.</p> <p data-bbox="244 840 1437 898">Michael Prenger Family Center PREA Policy, page 24, section Agency Protection Duties, states, "The MPFC shall take immediate action to protect the juvenile when it is learned that a juvenile is at substantial risk of imminent sexual abuse."</p> <p data-bbox="244 931 876 958">Through such reviews the facility meets standard requirements.</p>

115.363	<b>Reporting to other confinement facilities</b>
	<p data-bbox="244 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 273 435 300">Document Review:</p> <ol data-bbox="244 304 821 365" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> </ol> <p data-bbox="244 400 352 427">Interviews:</p> <ol data-bbox="244 432 627 459" style="list-style-type: none"> <li>1. Juvenile Officer Court Administrator</li> </ol> <p data-bbox="244 463 1489 591">The interview with the Juvenile Officer Court Administrator demonstrated that she was aware that upon receiving an allegation that a resident was sexually abused while confined at another facility, she had the responsibility to notify the head of the facility where the allegation occurred within 72 hours; however, she stated the notification to the receiving facility would be made immediately. This instance had not occurred in the past 12 months.</p> <p data-bbox="244 622 1489 781">(a) The Michael Prenger Family Center PAQ states the agency has a policy requiring that, upon receiving an allegation that a resident was sexually abused while confined at another facility, the head of the facility must notify the head of the facility or appropriate office of the agency or facility where sexual abuse is alleged to have occurred. The agency's policy also requires that the head of the facility notify the appropriate investigative agency. In the past 12 months, the facility has received zero allegations that a resident was abused while in confinement at another facility.</p> <p data-bbox="244 813 1441 940">Michael Prenger Family Center PREA Policy, page 26, section Reporting to Other Confinement Facilities, section 1.A., states, "Upon receiving an allegation that a resident was sexually abused while confined at another facility, the Superintendent shall notify the head of the other facility where the allegation was to have occurred. The Superintendent shall also notify local law enforcement for investigation. "</p> <p data-bbox="244 972 1481 1032">(b) The Michael Prenger Family Center PAQ states agency policy requires that the facility head provides such notification as soon as possible, but no later than 72 hours after receiving the allegation.</p> <p data-bbox="244 1064 1425 1124">Michael Prenger Family Center PREA Policy, page 26, section Reporting to Other Confinement Facilities, section 1.B., states, "The Superintendent or his designee shall notify the other facility within 72 hours of being notified."</p> <p data-bbox="244 1155 1433 1216">(c) The Michael Prenger Family Center PAQ states the facility documents that it has provided such notification within 72 hours of receiving the allegation.</p> <p data-bbox="244 1247 1425 1308">Michael Prenger Family Center PREA Policy, page 26, section Reporting to Other Confinement Facilities, section 1.C., states, "Documentation shall be made in the Detention Manager program and in the resident's file of such notification."</p> <p data-bbox="244 1339 1481 1431">(d) The Michael Prenger Family Center PAQ states facility policy requires that allegations received from other agencies or facilities are investigated in accordance with the PREA standards. In the last 12 months, there have been zero allegations of sexual abuse the facility received from other facilities.</p> <p data-bbox="244 1462 1433 1523">Michael Prenger Family Center PREA Policy, page 26, section Reporting to Other Confinement Facilities, section 1. D., states, "The Superintendent shall ensure that the allegation is investigated in accordance with these PREA standards."</p> <p data-bbox="244 1554 935 1581">Through such reviews, the facility meets this standards requirements.</p>

115.364	<b>Staff first responder duties</b>
	<p data-bbox="244 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 273 435 300">Document Review:</p> <ol data-bbox="244 304 820 365" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> </ol> <p data-bbox="244 400 352 427">Interviews:</p> <ol data-bbox="244 432 716 555" style="list-style-type: none"> <li>1. Random staff</li> <li>2. LPN</li> <li>3. Detention Supervisor</li> <li>4. Detention Superintendent/PREA Coordinator</li> </ol> <p data-bbox="244 560 1394 586">Interviews with random and supervisory staff demonstrated each were aware of their first responder responsibilities.</p> <p data-bbox="244 622 416 649">Site Observation:</p> <p data-bbox="244 654 1046 680">This facility has not had any reports of sexual harassment or sexual abuse, ever.</p> <p data-bbox="244 716 1490 1039">(a) The Michael Prenger Family Center PAQ states the facility has a first responder policy for allegations of sexual abuse. The policy requires that, upon learning of an allegation that a resident was sexually abused, the first security staff member to respond to the report shall be required to separate, preserve, protect, collect physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. In the past 12 months, one allegation occurred where a resident was sexually abused. During the one allegation, the security staff member immediately responded, separated and reported the alleged victim and abuser. In the past 12 months, there were zero allegations where staff were not notified within a time period that still allowed for the collection of evidence.</p> <p data-bbox="244 1070 1449 1131">Michael Prenger Family Center PREA Policy, page 27, section Staff First Responder duties, states, "The first MPFC staff member responding to an alleged incident of sexual abuse within 72 hours or less shall:</p> <ul data-bbox="244 1135 1474 1565" style="list-style-type: none"> <li>o Separate the victim and perpetrator;</li> <li>o Preserve and protect any crime scene until the investigative agency arrives;</li> <li>o If the alleged incident took place within the preceding 72 hours, staff will ensure the alleged victim and alleged perpetrator DO NOT do anything that could damage or destroy any physical evidence, such as: <ul data-bbox="244 1270 469 1498" style="list-style-type: none"> <li><input type="checkbox"/> Washing their body,</li> <li><input type="checkbox"/> Brushing their teeth,</li> <li><input type="checkbox"/> Changing clothes,</li> <li><input type="checkbox"/> Urinating,</li> <li><input type="checkbox"/> Defecating,</li> <li><input type="checkbox"/> Smoking or</li> <li><input type="checkbox"/> Eating.</li> </ul> </li> <li>o If the first person responding is not a MPFC employee, that person shall inform the juvenile not to do anything that could destroy physical evidence and then immediately contact a MPFC staff member.</li> </ul> <p data-bbox="244 1597 1485 1756">(b) The Michael Prenger Family Center PAQ states the facility's policy requires that if the first staff responder is not a security staff member, that responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and notify security staff. There have been zero allegations that a resident was sexually abused in the past 12 months where a non-security staff was the first responder. Policy compliance can be found in provision (a) of this standard.</p> <p data-bbox="244 1787 935 1814">Through such reviews, the facility meets this standards requirements.</p>

115.365	<b>Coordinated response</b>
	<p data-bbox="244 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 208 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 271 435 300">Document Review:</p> <ol data-bbox="244 304 820 432" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. Coordinated Response Institutional Plan, not dated</li> <li>4. First Responder Protocols for Sexual Abuse, not dated</li> </ol> <p data-bbox="244 461 352 490">Interviews:</p> <ol data-bbox="244 495 716 622" style="list-style-type: none"> <li>1. Random Staff</li> <li>2. Detention Supervisor</li> <li>3. Detention Superintendent/PREA Coordinator</li> <li>4. Program Director</li> </ol> <p data-bbox="244 627 1430 689">Interviews with staff demonstrated the response to allegations of sexual assault is written to coordinate actions taken in response to the facility's First Responder Protocols or Sexual Abuse.</p> <p data-bbox="244 719 1445 815">(a) The Michael Prenger Family Center PAQ states the facility developed a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership.</p> <p data-bbox="244 844 1171 873">Michael Prenger Family Center PREA Policy, page 28, section Coordinated Response, state:</p> <ul data-bbox="244 878 1406 1039" style="list-style-type: none"> <li>• "The MPFC coordination of action plan for incident response is simple, MPFC staff will immediately follow their first responder duties, contact the Superintendent and DSS Child Abuse and Neglect Hotline and/or Jefferson City Police Department to initiate the investigation, and assist the investigating agency upon any such request.</li> <li>• The MPFC staff shall also notify the MPFC Program Coordinator to assist with any immediate trauma/mental health emergency need pending transfer to Child Advocacy and/or other mental health providers."</li> </ul> <p data-bbox="244 1068 1461 1162">The facility provided Coordinated Response to Reports of Sexual Abuse (Institutional Plan). The plan is laid out in three columns. The first column designates responsible staff. The second column designates timeframes for duties and the third column speaks to individual responsibilities for each staff in the first column.</p> <p data-bbox="244 1191 1474 1288">The facility provided a First Responder Protocols for Sexual Abuse flow chart. This flow is a visual for staff to ensure designated instruction is followed depending on when the abuse occurred within the last 72 hours; if the youth is 18 or older and or did the staff intervene when the abuse was occurring.</p> <p data-bbox="244 1317 935 1346">Through such reviews, the facility meets this standards requirements.</p>

<b>115.366</b>	<b>Preservation of ability to protect residents from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <p>1. Michael Prenger Family Center PAQ</p> <p>Interviews:</p> <p>1. Detention Superintendent/PREA Coordinator</p> <p>Interviews with the staff determined the facility has not entered into collective bargaining agreements.</p> <p>(a) The Michael Prenger Family Center PAQ states the agency has not entered into or renewed any collective bargaining agreements since the last PREA audit.</p> <p>Through such reviews, the facility meets this standards requirements.</p>

115.367	<b>Agency protection against retaliation</b>
	<p data-bbox="244 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 208 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 271 435 300">Document Review:</p> <ol data-bbox="244 304 1078 398" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. Michael W. Prenger Family Center, Retaliation Monitoring Form, dated 2.25.2022</li> </ol> <p data-bbox="244 432 352 461">Interviews:</p> <ol data-bbox="244 465 716 524" style="list-style-type: none"> <li>1. Detention Superintendent/PREA Coordinator</li> <li>2. Juvenile Officer Court Administrator</li> </ol> <p data-bbox="244 528 1390 589">Interviews with facility administrators demonstrated they would complete all retaliation monitoring and on the facility Retaliation Monitoring form for up to 90 days or as long is necessary.</p> <p data-bbox="244 622 416 651">Site Observation:</p> <p data-bbox="244 656 967 685">A need for retaliation monitoring had not occurred in the past 12 months.</p> <p data-bbox="244 712 1469 840">(a) The Michael Prenger Family Center PAQ states the agency has a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff. The facility designates the Clinical and Operations Supervisor assigned to each shift to monitor and report to the Superintendent any retaliation.</p> <p data-bbox="244 869 1490 965">Michael Prenger Family Center PREA Policy, page 30, section Agency Protection Against Retaliation, first bullet, states, "The MPFC will not tolerate any retaliation directed to anyone who has reports or cooperates in an investigation of an allegation of sexual abuse or sexual harassment."</p> <p data-bbox="244 992 1477 1120">(b) Michael Prenger Family Center PREA Policy, page 30, section Agency Protection Against Retaliation, third bullet, states, "Juveniles who have reported sexual abuse or sexual harassment who fear retaliation may be moved to a different room, transferred to another detention facility, have the alleged perpetrator have no contact with the alleged victim, or and/or be provided emotional support services from Rainbow House of other MOU agreement provider."</p> <p data-bbox="244 1149 1477 1312">(c-e) The Michael Prenger Family Center PAQ states the facility monitors the conduct or treatment of residents or staff who reported sexual abuse and of residents who were reported to have suffered sexual abuse to ascertain if there are any changes that may suggest possible retaliation by residents or staff. The facility will monitor conduct or treatment for 90 days. The facility acts promptly to remedy any such retaliation. In the past 12 months, the facility has had zero incidents of retaliation.</p> <p data-bbox="244 1341 1484 1469">Michael Prenger Family Center PREA Policy, page 30, section Agency Protection Against Retaliation, last bullet, states, "The MPFC shall constantly monitor and watch for retaliation of any kind at all times. Although the Shift Supervisor is tasked with this responsibility, it is also every staff member's ethical duty to refrain from any form of retaliation and to report any suspected act of retaliation."</p> <p data-bbox="244 1498 1469 1559">The facility provided a Michael W. Prenger Family Center, Retaliation Monitoring Form. The form instructs staff to complete the following:</p> <ol data-bbox="244 1563 663 1727" style="list-style-type: none"> <li>1. Name of Juvenile</li> <li>2. Date of Incident</li> <li>3. What is the safety plan for the juvenile?</li> <li>4. Name of staff checking on juvenile?</li> <li>5. Date of staff checking on juvenile?</li> </ol> <p data-bbox="244 1731 1369 1792">The facility program manager states retaliation monitoring checks would be documented every 15 minutes during unannounced rounds.</p> <p data-bbox="244 1821 935 1850">Through such reviews, the facility meets this standards requirements.</p>

115.368	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Detention Supervisor</li> <li>2. Detention Superintendent/PREA Coordinator</li> </ol> <p>Interviews with staff demonstrated because each cell is a single use cell, cells are not utilized for protective custody.</p> <p>Site Observation:</p> <p>All cells are single cells, each with a toilet and sink.</p> <p>(a) The Michael Prenger Family Center PAQ states the facility has a policy that residents who allege to have suffered sexual abuse may only be placed in isolation as a last resort if less restrictive measures are inadequate to keep them and other residents safe, and only until an alternative means of keeping all residents safe can be arranged. The facility policy requires that residents who are placed in isolation because they allege to have suffered sexual abuse have access to legally required educational programming, special education services, and daily large-muscle exercise." In the last 12 months there have been zero residents who allege to have suffered sexual abuse, who were placed in isolation.</p> <p>Michael Prenger Family Center PREA Policy, page 31, section Post Allegation Protective Custody, states, "A juvenile who is alleged to have suffered sexual abuse may be placed in a segregated cell if the requirement of the above section entitled "Placement of juveniles in housing, bed, program, education, and work assignments." A review of the circumstances may warrant movement to another detention facility if additional protections are needed for additional safety. All efforts to maintain the alleged juvenile resident will be made to maintain a safe environment at the MPFC secure detention unit. Documentation of reviews and monitoring shall be maintained in a file or binder. Documentation shall include:</p> <ol style="list-style-type: none"> <li>A. Length of placement;</li> <li>B. Access to large muscle exercise (dates/times);</li> <li>C. Required educational services (dates/times);</li> <li>D. Daily visits from nurse or Clinical Supervisor;</li> <li>E. 30 day reviews;</li> <li>F. Instances when segregation in rooms was used to protect a resident who is alleged to have suffered sexual abuse."</li> </ol> <p>Through such reviews, the facility meets this standards requirements.</p>

115.371	<b>Criminal and administrative agency investigations</b>
	<p data-bbox="244 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 273 435 300">Document Review:</p> <ol data-bbox="244 304 1398 434" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. Memorandum from Statewide PEA Coordinator, RE: PREA Standard DYS External Investigation Agencies, dated 2.16.2022</li> </ol> <p data-bbox="244 465 352 492">Interviews:</p> <ol data-bbox="244 497 716 524" style="list-style-type: none"> <li>1. Detention Superintendent/PREA Coordinator</li> </ol> <p data-bbox="244 528 1473 591">Interviews with the Detention Superintendent demonstrated all investigations are completed by the Out of Home Placement Investigator Unit and or the local Jefferson City Police Department. The facility does not utilize their own investigations.</p> <p data-bbox="244 622 416 649">Site Observation:</p> <p data-bbox="244 654 895 680">The facility did not have any investigations in the past 12 months.</p> <p data-bbox="244 712 1437 775">(a) The Michael Prenger Family Center PAQ states the agency/facility has a policy related to criminal and administrative agency investigations.</p> <p data-bbox="244 801 1437 896">Michael Prenger Family Center PREA Policy, page 33, section Criminal and Administrative Agency Investigation, states, "The MPFC does not conduct investigations of sexual abuse or sexual harassment; an MOU with DSS Child Abuse and Neglect Hotline and the Jefferson City Police Department tasks these agencies with these investigations.</p> <ul data-bbox="244 900 1410 1200" style="list-style-type: none"> <li>• Staff shall only be responsible for first responder duties.</li> <li>• The attorney for the 19th Circuit Juvenile Office will handle all court-related filings and hearings, as well as follow-up investigative instructions for said purposes.</li> <li>• The MPFC shall complete an administrative investigation as follows: <ul style="list-style-type: none"> <li>o To determine, if possible, whether staff actions or failures to act contributed to the abuse;</li> <li>o A written report of the administrative investigation shall be completed to include: <ul style="list-style-type: none"> <li><input type="checkbox"/> Description of physical and testimonial evidence;</li> <li><input type="checkbox"/> Reasoning behind credibility assessments; and</li> <li><input type="checkbox"/> Investigative facts and findings.</li> </ul> </li> </ul> </li> </ul> <p data-bbox="244 1227 1382 1254">(b) This standard is not applicable as the facility or agency do not conduct administrative or criminal investigations.</p> <p data-bbox="244 1285 1382 1312">(c) This standard is not applicable as the facility or agency do not conduct administrative or criminal investigations.</p> <p data-bbox="244 1339 1493 1402">(d) The Michael Prenger Family Center PAQ states the agency does not terminate an investigation solely because the source of the allegation recants the allegation.</p> <p data-bbox="244 1429 1382 1456">(e) This standard is not applicable as the facility or agency do not conduct administrative or criminal investigations.</p> <p data-bbox="244 1487 1377 1514">(f) This standard is not applicable as the facility or agency do not conduct administrative or criminal investigations.</p> <p data-bbox="244 1545 1382 1572">(g) This standard is not applicable as the facility or agency do not conduct administrative or criminal investigations.</p> <p data-bbox="244 1603 1437 1666">Michael Prenger Family Center PREA Policy, page 33, section Criminal and Administrative Agency Investigation, states, "The MPFC shall complete an administrative investigation as follows:</p> <ul data-bbox="244 1671 1147 1836" style="list-style-type: none"> <li>o To determine, if possible, whether staff actions or failures to act contributed to the abuse;</li> <li>o A written report of the administrative investigation shall be completed to include: <ul style="list-style-type: none"> <li><input type="checkbox"/> Description of physical and testimonial evidence;</li> <li><input type="checkbox"/> Reasoning behind credibility assessments; and</li> <li><input type="checkbox"/> Investigative facts and findings.</li> </ul> </li> </ul> <p data-bbox="244 1863 1382 1890">(h) This standard is not applicable as the facility or agency do not conduct administrative or criminal investigations.</p> <p data-bbox="244 1921 1457 2011">(i) The Michael Prenger Family Center PAQ states there has been zero sustained allegation of conduct that appears to be criminal that was referred for prosecution, since the last audit date. Policy compliance can be found in provision (a) of this standard.</p> <p data-bbox="244 2042 1430 2136">(j) The Michael Prenger Family Center PAQ states the agency retains all written reports pertaining to administrative or criminal investigation of alleged sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years. The facility does not conduct administrative or criminal investigations.</p>

Michael Prenger Family Center PREA Policy, page 33, section Criminal and Administrative Agency Investigation, last bullet, states, "The MPFC shall place a copy of all reports in the juvenile's file where they will be retained according to the laws of this state."

(k) This standard is not applicable as the facility or agency do not conduct administrative or criminal investigations.

The facility provided a memorandum for the Statewide PREA Coordinator, regarding investigations. The first paragraph of the letter states the following:

"Missouri Division of Youth Services (DYS) Contracted Detention Centers do not conduct their own investigation of sexual abuse and harassment. These are referred to the Missouri Children's Division Out of Home Investigation Unit (CD-OHI). CD-OHI contacts appropriate local law enforcement to co-investigate and arranges for the necessary SAFE/SANNE exams and victim advocacy services.

The last paragraph of the letter states, "On February 16, 2022, we spoke to Mr. Harris and provided him a copy of the PREA Juvenile Standards. We discussed areas of the standards related to external investigator's areas of responsibility. This included: Response Planning (115.321-115.322), 115.334 Specialized training: Investigations, Investigation Standards (115.371-115.373) and 115.386: Sexual abuse incident reviews."

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

Through such reviews, the facility meets this standards requirements.

115.372	<b>Evidentiary standard for administrative investigations</b>
	<p data-bbox="244 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 273 435 300">Document Review:</p> <ol data-bbox="244 304 821 367" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> </ol> <p data-bbox="244 398 352 425">Interviews:</p> <ol data-bbox="244 430 718 456" style="list-style-type: none"> <li>1. Detention Superintendent/PREA Coordinator</li> </ol> <p data-bbox="244 461 1473 524">Interviews with the Detention Superintendent demonstrated all investigations are completed by the Out of Home Placement Investigator Unit and or the local Jefferson City Police Department. The facility does not utilize their own investigations.</p> <p data-bbox="244 555 1485 680">(a) The Michael Prenger Family Center PAQ states the agency does impose a standard of a preponderance of the evidence or a lower standard of proof for determining whether allegations of sexual abuse or sexual harassment are substantiated. The facility does not determine whether allegations of sexual abuse or sexual harassment are substantiated. All investigative outcomes are decided by outside agencies.</p> <p data-bbox="244 712 1485 837">Michael Prenger Family Center PREA Policy, page 33, section Evidentiary Standard for Administrative Investigations, first bullet, states, "The MPFC shall impose no standard higher than a preponderance of the evidence in determining whether the allegations of sexual abuse or sexual harassment are substantiated. The MPFC shall notice the evidentiary standard used by DSS Child Abuse and Neglect investigations 210.110*13 RSMo"</p> <p data-bbox="244 869 935 896">Through such reviews, the facility meets this standards requirements.</p>

115.373	<b>Reporting to residents</b>
	<p data-bbox="244 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 208 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 271 435 300">Document Review:</p> <ol data-bbox="244 304 973 398" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. Detention Corrective Action Report - Critical Incident Report, not dated</li> </ol> <p data-bbox="244 432 352 461">Interviews:</p> <ol data-bbox="244 465 718 495" style="list-style-type: none"> <li>1. Detention Superintendent/PREA Coordinator</li> </ol> <p data-bbox="244 499 1489 593">Interviews with the Detention Superintendent demonstrated all investigations are completed by the Out of Home Placement Investigator Unit and or the local Jefferson City Police Department. The Out of Home Investigators would notify the Detention Superintendent who would then notify residents throughout the investigation process.</p> <p data-bbox="244 622 1489 784">(a) The Michael Prenger Family Center PAQ states the agency has a policy requiring that any resident who makes an allegation that he or she suffered sexual abuse in an agency facility is informed, verbally or in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation by the agency. In the last 12 months there have been zero criminal and or administrative investigations and zero residents were notified of outcomes.</p> <p data-bbox="244 813 1489 1010">Michael Prenger Family Center PREA Policy, page 34, section Reporting to Juveniles, second bullet, states, "Following a juvenile's allegation that a staff member committed sexual abuse against the juvenile, the MPFC shall inform the juvenile (unless the allegation is unfounded):</p> <ul data-bbox="244 913 1489 1010" style="list-style-type: none"> <li>o When the staff member is working (said staff member may be suspended with pay while investigation is being conducted);</li> <li>o When the staff member is no longer employed at the MPFC, and</li> <li>o If the staff member is charged and/or convicted of the allegation.</li> </ul> <p data-bbox="244 1039 1489 1133">(b) The Michael Prenger Family Center PAQ states if an outside entity conducts such investigations, the agency requests the relevant information from the investigative entity in order to inform the resident as to the outcome of the investigation. In the past 12 months, there has been zero investigations of alleged resident sexual abuse.</p> <p data-bbox="244 1162 1489 1256">Michael Prenger Family Center PREA Policy, page 34, section Reporting to Juveniles, first bullet, states, "The MPFC will request a report of the investigation from the investigating agency and shall share the results of said report with the juvenile, including whether the allegation is substantiated, unsubstantiated, or unfounded."</p> <p data-bbox="244 1285 1489 1552">(c) The Michael Prenger Family Center PAQ states following a resident's allegation that a staff member has committed sexual abuse against the resident, the agency/facility subsequently informs the resident (unless the agency has determined that the allegation is unfounded) whenever:</p> <ul data-bbox="244 1388 1489 1518" style="list-style-type: none"> <li>• The staff member is no longer posted within the resident's unit;</li> <li>• The staff member is no longer employed at the facility;</li> <li>• The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or</li> <li>• The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility."</li> </ul> <p data-bbox="244 1523 882 1552">Policy compliance can be found in provision (a) of this standard.</p> <p data-bbox="244 1581 1489 1709">(d) The Michael Prenger Family Center PAQ states following a resident's allegation that he or she has been sexually abused by another resident in an agency facility, the agency subsequently informs the alleged victim whenever: the agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or the agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.</p> <p data-bbox="244 1738 1489 1832">Michael Prenger Family Center PREA Policy, page 34, section Reporting to Juveniles, third bullet, states, "Following a juvenile's allegation that another juvenile committed sexual abuse against the juvenile, the MPFC shall inform the juvenile the alleged abuser has been charged with an offense and/or convicted of an offense."</p> <p data-bbox="244 1861 1489 2157">The facility provided a Detention Corrective Action Report, Critical Incident Form. All facility incidents are recorded on this incident report. The report has areas for:</p> <ol data-bbox="244 1928 686 2157" style="list-style-type: none"> <li>1. Sexual Aggression/Abuse;</li> <li>2. Report/Allegation of Abuse/Neglect</li> <li>3. Hotline Called</li> <li>4. Reporting parties to be notified to include: <ol data-bbox="244 2063 553 2157" style="list-style-type: none"> <li>a. Juvenile Court Administrator</li> <li>b. MPFC Superintendent</li> <li>c. MPFC Program Director</li> </ol> </li> </ol>

- d. Detention Supervisor
- e. Child Abuse/Neglect Hotline
- f. Law Enforcement
- g. Parent/Legal Guardian

(e) The Michael Prenger Family Center PAQ states the agency has a policy that all notifications to residents described under this standard are documented. In the past 12 months, there has been zero notifications to a resident, pursuant to this standard.

Michael Prenger Family Center PREA Policy, page 34, section Reporting to Juveniles, fourth bullet, states, "All notification shall be documented in the residents file by a MPFC Case Manager."

Through such reviews, the facility meets this standards requirements.

115.376	<b>Disciplinary sanctions for staff</b>
	<p data-bbox="244 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 273 435 300">Document Review:</p> <ol data-bbox="244 304 821 367" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> </ol> <p data-bbox="244 398 352 425">Interviews:</p> <ol data-bbox="244 430 718 456" style="list-style-type: none"> <li>1. Detention Superintendent/PREA Coordinator</li> </ol> <p data-bbox="244 461 1477 524">Interviews demonstrated in the last 12 months, the facility had zero staff who had been disciplined for violation of an agency sexual abuse or sexual harassment policy.</p> <p data-bbox="244 555 1493 618">(a) The Michael Prenger Family Center PAQ states staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.</p> <p data-bbox="244 645 1485 707">Michael Prenger Family Center PREA Policy, page 35, section Disciplinary Sanctions for Staff, first bullet, states, "Staff shall be subject to disciplinary sanctions up to and including termination for violating sexual abuse or sexual harassment policies. Disciplinary actions relating to sexual abuse or sexual harassment will be commensurate with the seriousness of the offense and other considerations such as staff disciplinary history and actions taken in similar situations."</p> <p data-bbox="244 801 1477 864">(b) The Michael Prenger Family Center PAQ states in the last 12 months, there has been zero staff from the facility that had violated agency sexual abuse or sexual harassment policies.</p> <p data-bbox="244 891 1477 1052">(c) The Michael Prenger Family Center PAQ states disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. In the past 12 months there have zero staff requiring discipline for sexual abuse or sexual harassment.</p> <p data-bbox="244 1084 1453 1178">Michael Prenger Family Center PREA Policy, page 35, section Disciplinary Sanctions for Staff, second bullet, states, "Termination shall be the presumptive disciplinary sanction for staff who are found as a result of the investigation, to have engaged in sexual abuse."</p> <p data-bbox="244 1209 1477 1335">(d) The Michael Prenger Family Center PAQ states all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies. In the past 12 months, zero staff have been terminated for sexual abuse or harassment.</p> <p data-bbox="244 1366 1493 1491">Michael Prenger Family Center PREA Policy, page 35, section Disciplinary Sanctions for Staff, third bullet, states, "Staff terminated or who resign due to sexual abuse or sexual harassment violations shall be reported to the DSS Child Abuse and Neglect Hotline and/or the Jefferson City Police Department (unless the action was clearly not criminal) and relevant licensing bodies."</p> <p data-bbox="244 1523 935 1550">Through such reviews, the facility meets this standards requirements.</p>

115.377	<b>Corrective action for contractors and volunteers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p data-bbox="244 208 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 271 432 300">Document Review:</p> <ol data-bbox="244 304 820 365" style="list-style-type: none"> <li data-bbox="244 304 635 333">1. Michael Prenger Family Center PAQ</li> <li data-bbox="244 336 820 365">2. Michael Prenger Family Center PREA Policy, not dated</li> </ol> <p data-bbox="244 398 352 427">Interviews:</p> <ol data-bbox="244 432 716 461" style="list-style-type: none"> <li data-bbox="244 432 716 461">1. Detention Superintendent/PREA Coordinator</li> </ol> <p data-bbox="244 465 1469 560">The interview with the Detention Superintendent/PREA Coordinator demonstrated during the last audit cycle, the facility did not have any volunteers or contractors subject to disciplinary action due to violating sexual abuse or sexual harassment policies.</p> <p data-bbox="244 589 1481 750">(a) The Michael Prenger Family Center PAQ states agency policy requires that any contractor or volunteer who engages in sexual abuse be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. agency policy requires that any contractor or volunteer who engages in sexual abuse be prohibited from contact with residents. In the past 12 months, there have been zero contractors or volunteers reported to law enforcement or relevant licensing bodies for engaging in sexual abuse of residents.</p> <p data-bbox="244 779 1481 909">Michael Prenger Family Center PREA Policy, page 36, section Corrective Action for Contractors and Volunteers, states, "Any contractor or volunteer who has engaged in sexual abuse or sexual harassment shall not enter the MPFC, and if such action occurred in the MPFC said person shall be reported to the DSS Child Abuse and Neglect Hotline and/or the Jefferson City Police Department (unless the activity was clearly not criminal) and any relevant licensing bodies."</p> <p data-bbox="244 938 1481 1099">(b) The Michael Prenger Family Center PAQ states the facility takes appropriate remedial measures and considers whether to prohibit further contact with residents in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. The Micheal Prenger Family Center has not experienced an incident where a volunteer or contractor has engaged in sexual abuse or harassment; however, removal from facility premises and restricting access and possible termination of access would be the remedial measures. Contractors and or Volunteers would be terminated.</p> <p data-bbox="244 1128 935 1158">Through such reviews, the facility meets this standards requirements.</p>

115.378	<b>Interventions and disciplinary sanctions for residents</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Detention Superintendent/PREA Coordinator/Sexual Abuse Incident Team Member</li> </ol> <p>The interview with the Detention Superintendent demonstrated residents who falsely reported PREA allegations would be disciplined if the opportunity presented.</p> <p>(a) The Michael Prenger Family Center PAQ states residents are subject to disciplinary sanctions only pursuant to a formal disciplinary process following an administrative finding that the resident engaged in resident-on-resident sexual abuse. Residents are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for resident-on-resident sexual abuse. In the past 12 months there have been zero administrative findings of resident-on-resident sexual abuse have occurred at the facility. In the past 12 months there have no criminal findings of guilt for resident-on-resident sexual abuse, occurring at the facility.</p> <p>Michael Prenger Family Center PREA Policy, page 37, section Interventions and Disciplinary Sanctions for Juveniles, first bullet states, "A juvenile is only subject to disciplinary action regarding sexual abuse after a legal and administrative finding. Said finding shall be issued by the Superintendent after reviewing the investigative report."</p> <p>(b) The Michael Prenger Family Center PAQ states in the event a disciplinary sanction for resident-on resident sexual abuse results in the isolation of a resident, the facility policy requires that residents in isolation have daily access to large muscle exercise, legally required educational programming, and special education services. In the event a disciplinary sanction for resident-on resident sexual abuse results in the isolation of a resident, residents in isolation receive daily visits from a medical or mental health care clinician. In the event a disciplinary sanction for resident-on resident sexual abuse results in the isolation of a resident, residents in isolation have access to other programs and work opportunities to the extent possible. In the past 12 months, zero residents were placed in isolation as a disciplinary sanction for resident on resident sexual abuse.</p> <p>Michael Prenger Family Center PREA Policy, page 37, section Interventions and Disciplinary Sanctions for Juveniles, second bullet states, "Any disciplinary action imposed will be commensurate with the seriousness of the offense and other considerations such as disciplinary history and actions taken in similar situations. If the discipline imposed is isolation for a period of time, the procedures for isolation shall be followed as stated in the section titled "Placement of juveniles in housing, bed, program, education and work assignments".</p> <p>(c) The Michael Prenger Family Center PREA Policy, page 37, section Interventions and Disciplinary Sanctions for Juveniles, third bullet states, "The disciplinary process shall consider if the juvenile's mental disabilities or mental illness contributed to the sexual offense when determining what, if any, sanction should be imposed."</p> <p>(d) The Michael Prenger Family Center PAQ states the facility offers therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse. Although the facility offers therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse, the facility does not mandate whether to require the offending resident to participate in such interventions as a condition of access to any rewards-based behavior management system or other behavior-based incentives. Access to general programming or education is not conditional on participation in such interventions.</p> <p>Michael Prenger Family Center PREA Policy, page 37, section Interventions and Disciplinary Sanctions for Juveniles, fourth bullet states, "Sanctions may include report to the Jefferson City Police Department and hospitalization to address issues or other services as appropriate to the offense."</p> <p>(e) The Michael Prenger Family Center PAQ states the agency disciplines residents for sexual contact with staff only upon finding that the staff member did not consent to such contact.</p> <p>Michael Prenger Family Center PREA Policy, page 37, section Interventions and Disciplinary Sanctions for Juveniles, fifth bullet states, "A juvenile may be disciplined for sexual contact with a staff member ONLY upon a finding the staff member did not consent to such contact. Such finding shall be issued by the Superintendent after review of a law enforcement/hotline investigative report, a preliminary finding may be issued prior to receiving the investigative report based on interviews with staff members present at the time of the incident."</p>

(f) The Michael Prenger Family Center PAQ states the agency prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation.

Michael Prenger Family Center PREA Policy, page 37, section Interventions and Disciplinary Sanctions for Juveniles, sixth bullet states, "An allegation of sexual abuse made in good faith shall not be subject to disciplinary sanctions."

(g) The Michael Prenger Family Center PAQ states the agency prohibits all sexual activity between residents.

Michael Prenger Family Center PREA Policy, page 37, section Interventions and Disciplinary Sanctions for Juveniles, seventh bullet states, "All sexual activity of any kind, including sexual harassment, is prohibited between any persons and/or juveniles in the MPFC or its environs. The MPFC shall not deem sexual activity between juveniles as sexual abuse IF the activity was not coerced. This type of incident, like any incident of alleged sexual abuse or sexual harassment, shall be investigated by a DSS Child Abuse and Neglect Hotline and/or the Jefferson City Police Department."

Through such reviews, the facility meets this standards requirements.

115.381	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	<div data-bbox="240 203 453 237">Auditor Discussion</div>

Document Review:

1. Michael Prenger Family Center PAQ
2. Michael Prenger Family Center PREA Policy, not dated
3. Nurse Assessment – Medical Screening, not dated
4. Michael Prenger Family Center 18+ Consent Reporting Form, not dated

Interviews:

1. Detention Superintendent/PREA Coordinator

The interview with the Detention Superintendent/PREA Coordinator demonstrated residents requiring mental health services or those disclosing prior sexual abuse and or those of an abuser would be taken to an offsite local mental health provider for follow up services.

(a) The Michael Prenger Family Center PAQ states all residents at this facility who have disclosed any prior sexual victimization during a screening pursuant to §115.341 are offered a follow-up meeting with a medical or mental health practitioner. Follow up meetings are offered within 14 days of the intake screening. In the past 12 months there has been 21 residents who disclosed prior victimization during the intake screening. Medical and mental health staff maintain secondary materials, documenting compliance with the above required services.

Michael Prenger Family Center PREA Policy, page 38, section Medical and Mental Health Screenings, History of Sexual Abuse, first bullet, states, “Any juvenile at the MPFC who reports they have been a victim or perpetrator of sexual abuse AT ANY TIME shall be given the opportunity to meet with a medical or mental health practitioner within 14 days of the report.”

(b) The Michael Prenger Family Center PAQ states all residents who have previously perpetrated sexual abuse, as indicated during the screening pursuant to § 115.341, are offered a follow-up meeting with a mental health practitioner. All residents are allowed a follow-up meeting offered within 14 days of the intake screening. In the past 12 months zero residents disclosed previously perpetrated sexual abuse, as indicated during the screening process.

Policy compliance can be found in provision (a) of this standard. The facility provided a Nurses Assessment – Medical Screening. This form is used to document necessary follow up appointments.

The facility provided a Prenger Family Health Care Services note, which states, “Michael Prenger Family Center provides juveniles with medical services in accordance with commonly accepted medical practices of the community. Juveniles have 24-hour access to emergency medical, dental and mental health services, as needed. Medical procedures for emergency and non-emergency are implemented through the facility’s nurse via the Cole County Community Health Center, Capital Regional Medical Center, St. Mary’s Health Center, Cole County Health and other medical professionals. Our facility nurse will administer a medical screening upon arrival of the juvenile within five (5) days of admission.”

(c) The Michael Prenger Family Center PAQ states the information shared with other staff is strictly limited to informing security and management decisions, including treatment plans, housing, bed, work, education, and program assignments, or as otherwise required by federal, state, or local law.

Michael Prenger Family Center PREA Policy, page 38, section Medical and Mental Health Screenings, History of Sexual Abuse, third bullet, states, “Information related to sexual victimization or abusiveness shall not be given to any person without a need to know, examples of these individuals are MPFC staff, DJO and/or caseworker and medical/mental health practitioners.”

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

Michael Prenger Family Center PREA Policy, page 38, section Medical and Mental Health Screenings, History of Sexual Abuse, section C, states, “Mandated reporting requirements for child abuse or neglect must be followed for children under the age of 18.”

The facility provided a Michael Prenger Family Center 18+ Consent Reporting Form. This form documents:

1. A juveniles’ consent statement.
2. If services were offered.
3. Juvenile printed name/signature/date
4. Staff printed name/signature/date

Through such reviews, the facility meets this standards requirements.

115.382	<b>Access to emergency medical and mental health services</b>
	<p data-bbox="244 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 208 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 271 435 300">Document Review:</p> <ol data-bbox="244 304 820 398" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. Nurses Assessment, not dated</li> </ol> <p data-bbox="244 432 352 461">Interviews:</p> <ol data-bbox="244 465 316 495" style="list-style-type: none"> <li>1. LPN</li> </ol> <p data-bbox="244 499 1490 593">The LPN staff state resident victims of sexual abuse would receive timely and unimpeded access to emergency medical treatment and crisis intervention services if a resident were victimized at the facility. The LPN stated this detention center has not had an incident reported in her tenure.</p> <p data-bbox="244 622 1458 748">(a) The Michael Prenger Family Center PAQ states resident victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. The nature and scope of such services are determined by medical and mental health practitioners according to their professional judgment. Medical and mental health staff maintain secondary materials used in such occurrences.</p> <p data-bbox="244 777 1490 873">Michael Prenger Family Center PREA Policy, page 38, section Access to Emergency Medical and Mental Health Services, first bullet, states, "Juvenile victims of sexual abuse shall receive timely medical and crisis services as determined by medical and mental health practitioners (eg. Child Advocacy Center, Rainbow House)."</p> <p data-bbox="244 902 1469 1097">The facility provided a Prenger Family Health Care Services note, which states, "Michael Prenger Family Center provides juveniles with medical services in accordance with commonly accepted medical practices of the community. Juveniles have 24-hour access to emergency medical, dental and mental health services, as needed. Medical procedures for emergency and non-emergency are implemented through the facility's nurse via the Cole County Community Health Center, Capital Regional Medical Center, St. Mary's Health Center, Cole County Health and other medical professionals. Our facility nurse will administer a medical screening upon arrival of the juvenile within five (5) days of admission."</p> <p data-bbox="244 1126 1463 1254">Michael Prenger Family Center PREA Policy, page 38, section Access to Emergency Medical and Mental Health Services, sixth bullet, states, "A log shall be created documenting the referral date, time and location of all sexual abuse treatment services accessed and provided to any alleged resident involved in a sexual abuse incident. This documentation will be maintained with all investigatory information and secured in the Clinical Supervisor's office."</p> <p data-bbox="244 1283 1482 1346">(b) If qualified medical or mental health staff are not on duty, staff would follow the coordinated response checklist directives, which includes instruction to contact mental health practitioners.</p> <p data-bbox="244 1375 1469 1471">Michael Prenger Family Center PREA Policy, page 38, section Access to Emergency Medical and Mental Health Services, second bullet, states, "When a juvenile report being a recent victim of sexual abuse while in the MPFC, staff will follow their duties as a first responder and then contact Jefferson City Police Department for investigation."</p> <p data-bbox="244 1500 1477 1628">(c) The Michael Prenger Family Center PAQ states resident victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. Policy compliance can be found in provision (a) of this standard.</p> <p data-bbox="244 1657 1463 1821">Michael Prenger Family Center PREA Policy, page 38, section Access to Emergency Medical and Mental Health Services, fourth bullet, states, "Juveniles who are victims of sexual abuse while residing at the MPFC shall be offered timely information about and timely access to emergency contraception and sexually transmitted infection prophylaxis when medically appropriate in accordance with state law. The Juvenile/Adult Court shall make a ruling on any emergency contraception prior to any procedure or other treatment is begun."</p> <p data-bbox="244 1850 1485 1912">(d) The Michael Prenger Family Center PAQ states treatment services are provided to every victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p data-bbox="244 1942 1477 2036">Michael Prenger Family Center PREA Policy, page 38, section Access to Emergency Medical and Mental Health Services, fifth bullet, states, "Treatment services provided to the victim shall be without cost to the victim whether the victim names the abuser or not or cooperates with any investigation."</p> <p data-bbox="244 2065 935 2094">Through such reviews, the facility meets this standards requirements.</p>

115.383	Ongoing medical and mental health care for sexual abuse victims and abusers
	<p data-bbox="244 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 208 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 271 435 300">Document Review:</p> <ol data-bbox="244 304 820 365" style="list-style-type: none"> <li data-bbox="244 304 635 333">1. Michael Prenger Family Center PAQ</li> <li data-bbox="244 336 820 365">2. Michael Prenger Family Center PREA Policy, not dated</li> </ol> <p data-bbox="244 396 352 425">Interviews:</p> <ol data-bbox="244 430 316 459" style="list-style-type: none"> <li data-bbox="244 430 316 459">1. LPN</li> </ol> <p data-bbox="244 463 1473 524">The LPN demonstrated that residents are aware of access to emergency medical and mental health services. In the past of 12 months' residents have not reported sexual abuse.</p> <p data-bbox="244 555 416 584">Site Observation:</p> <p data-bbox="244 589 1406 649">Throughout the facility, there is a multitude of sexual abuse community providers, pamphlets for students available to residents in the multipurpose room.</p> <p data-bbox="244 678 1417 775">(a) The Michael Prenger Family Center PAQ states the facility offers medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.</p> <p data-bbox="244 804 1469 900">Michael Prenger Family Center PREA Policy, page 40, section, Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers, first bullet, states, "All juveniles placed in the MPFC will have a medical evaluation by a qualified medical practitioner within five business days of admission, and a mental health assessment completed at admission."</p> <p data-bbox="244 929 1477 1025">(b) Michael Prenger Family Center PREA Policy, page 40, section, Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers, second bullet, states, "Follow-up medical and mental health care for all juveniles is coordinated with their deputy juvenile officer, caseworker or service coordinator."</p> <p data-bbox="244 1055 1461 1151">(c) Michael Prenger Family Center PREA Policy, page 40, section, Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers, section C., states, "The MPFC will provide all victims with medical and mental health services consistent with the community level of care."</p> <p data-bbox="244 1180 1485 1240">(d) The Michael Prenger Family Center PAQ states female victims of sexually abusive vaginal penetration while incarcerated are offered pregnancy tests is applicable.</p> <p data-bbox="244 1270 1465 1366">(e) The Michael Prenger Family Center PAQ states if pregnancy results from sexual abuse while incarcerated, victims receive timely and comprehensive information about, and timely access to, all lawful pregnancy-related medical services is applicable.</p> <p data-bbox="244 1395 1469 1523">Michael Prenger Family Center PREA Policy, page 40, section, Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers, section E., states, "A female victim of sexual abuse with vaginal penetration while incarcerated will be offered pregnancy tests. If pregnancy results from sexual abuse while incarcerated, the victims will receive timely and comprehensive information about, and timely access to, all lawful pregnancy related medical services."</p> <p data-bbox="244 1552 1474 1612">(f) They Michael Prenger Family Center PAQ states resident victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate.</p> <p data-bbox="244 1641 1461 1805">Michael Prenger Family Center PREA Policy, page 38, section Access to Emergency Medical and Mental Health Services, fourth bullet, states, "Juveniles who are victims of sexual abuse while residing at the MPFC shall be offered timely information about and timely access to emergency contraception and sexually transmitted infection prophylaxis when medically appropriate in accordance with state law. The Juvenile/Adult Court shall make a ruling on any emergency contraception prior to any procedure or other treatment is begun."</p> <p data-bbox="244 1834 1422 1895">(g) Michael Prenger Family Center PAQ states, treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p data-bbox="244 1924 1485 2020">Michael Prenger Family Center PREA Policy, page 40, section, Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers, fifth bullet, states, "Treatment services provided to the victim shall be without cost to the victim whether the victim names the abuser or not, or cooperates with any investigation."</p> <p data-bbox="244 2049 1485 2145">(h) The Michael Prenger Family Center PAQ states the facility attempts to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offers treatment when deemed appropriate by mental health practitioners.</p>

Michael Prenger Family Center PREA Policy, page 40, section, Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers, fourth and fifth bullet, state, "A juvenile who has sexually abused another juvenile while in the MPFC shall have a mental health evaluation conducted within 60 days of the incident or when the incident was reported. The MPFC Clinical Supervisor shall assess residents for mental health issues, needs and stability within five business days of the residents' admission and document such as necessary. Documentation shall be maintained in the Clinical Supervisor's office in a secure file location."

Through such reviews, the facility meets this standards requirements.

115.386	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Document Review:

1. Michael Prenger Family Center PAQ
2. Michael Prenger Family Center PREA Policy, not dated
3. Michael Prenger Family Center Sexual Abuse Incident Review Form, dated 2.25.2022

Interviews:

1. Detention Superintendent/PREA Coordinator
2. Juvenile Officer Court Administrator

Interviews with facility administration demonstrated sexual abuse incident reviews take place after each Administrative Investigation. Administrators stated any information from the review would result in a recommendation of policy and or procedure change if needed.

(a) The Michael Prenger Family Center PAQ states the facility conducts a sexual abuse incident review at the conclusion of every criminal or administrative sexual abuse investigation, unless the allegation has been determined to be unfounded. In the past 12 months there has been zero criminal and zero administrative investigation of alleged sexual abuse completed at the facility.

Michael Prenger Family Center PREA Policy, page 41, section Sexual Abuse Incident Reviews, first bullet, states, "The Juvenile Court Administrator, Superintendent, Clinical Supervisor and Operations Supervisors shall conduct a sexual abuse incident review within 30 days of the conclusion of every sexual abuse investigation."

The facility provided a Michael Prenger Family Center Sexual Abuse Incident Review Form. This form documents the following:

1. Should a change in policy or procedure be warranted to better prevent, detect, or respond to sexual abuse?
2. Was the incident or allegation motivated by race, ethnicity, LGBTQ status, gang affiliation, or was otherwise motivated by other group dynamics at MPFC?
3. Examine areas where incident took place. Does the physical plant enable sexual abuse?
4. Where staffing levels adequate for the number of juveniles in detention?
5. Would a camera monitor help to enhance supervision where incident took place?
6. Prepare a report of findings, along with any recommendations and provide to Superintendent/PREA Compliance Manager.

(b) The Michael Prenger Family Center PAQ states sexual abuse incident reviews are ordinarily conducted within 30 days of concluding the criminal or administrative investigation. In the past 12 months, there were zero criminal and one administrative investigations of alleged sexual abuse completed at the facility that were followed by a sexual abuse incident review within 30 days. Policy compliance can be found in provision (a) of this standard.

(c) The Michael Prenger Family Center PAQ states the sexual abuse incident review team includes upper-level management officials and allows for input from line supervisors, investigators, and medical or mental health practitioners. Policy compliance can be found in provision (a) of this standard.

(d) The Michael Prenger Family Center PAQ states the facility prepares a report of its findings from sexual abuse incident reviews, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1) -(d)(5) of this section, and any recommendations for improvement and submits such report to the facility head and PREA compliance manager.

Michael Prenger Family Center PREA Policy, page 41, section Sexual Abuse Incident Reviews, third bullet, states, "The review team shall:

- Consider whether a change in policy or procedure is warranted in order to better prevent, detect, or respond to sexual abuse;
- Consider whether the incident or allegation was motivated by race, ethnicity, LGBTQ status, gang affiliation, or was otherwise motivated by other group dynamics at the MPFC;
- Examine the area where the incident took place to assess whether the physical plant enables sexual abuse;
- Assess staffing levels during all shifts;
- Assess whether monitoring systems could enhance supervision; and
- Prepare a report on the team's finding, along with any recommendations, to the Superintendent and PREA compliance manager.

(e) The Michael Prenger Family Center PAQ states the facility implements the recommendations for improvement or documents its reasons for not doing so.

Michael Prenger Family Center PREA Policy, page 41, section Sexual Abuse Incident Reviews, last bullet, states, "The MPFC will implement the recommendations made by the review team or document why the recommendations were not implemented."

Through such reviews, the facility meets this standards requirements.

115.387	<b>Data collection</b>
	<p data-bbox="244 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 273 435 300">Document Review:</p> <ol data-bbox="244 304 1042 434" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. Missouri Department of Social Services Data Collection Instrument, not dated</li> <li>4. Data Collection – OSCA – PREA Data, dated 9.2021</li> </ol> <p data-bbox="244 461 347 488">(a)/(c)-1,2</p> <p data-bbox="244 497 1485 622">The Michael Prenger Family Center PAQ states the agency collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions. The standardized instrument includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice.</p> <p data-bbox="244 654 1485 712">The facility provided a Missouri Department of Social Services Data Collection Instrument. This instrument requires “all state agencies to collect data for every allegation of sexual abuse at facilities under its direct control.</p> <p data-bbox="244 743 1414 801">(b) The Michael Prenger Family Center PAQ states the agency aggregates incident-based sexual abuse data at least annually.</p> <p data-bbox="244 833 1461 927">Michael Prenger Family Center PREA Policy, page 41, section Data Collection, first bullet, states, “The MPFC shall collect accurate information for every allegation of sexual abuse at the facility using a standardized form with directions, and aggregate this data at lease annually.”</p> <p data-bbox="244 958 1107 985">The agency website is: <a href="https://dss.mo.gov/reports/prison-rape-elimination-act-reports/">https://dss.mo.gov/reports/prison-rape-elimination-act-reports/</a>.</p> <p data-bbox="244 994 1437 1088">(d) The Michael Prenger Family Center PAQ states the agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. Policy compliance can be found in provision (b) of this standard.</p> <p data-bbox="244 1120 1477 1178">The facility provided a Data Collection – OSCA – PREA Data for September of 2021. The data answers questions regarding the following:</p> <ol data-bbox="244 1182 1182 1344" style="list-style-type: none"> <li>1. Facility Information</li> <li>2. Youth on Youth Incidents Section</li> <li>3. Staff Incidents Section</li> <li>4. Total allegations, for Substantiated, Unsubstantiated, Unfounded, and Investigative ongoing</li> <li>5. Total incidents for 2021 was zero</li> </ol> <p data-bbox="244 1375 1377 1402">(e) The Michael Prenger Family Center PAQ states the agency does not contract for the confinement of residents.</p> <p data-bbox="244 1433 1469 1460">(f) The Michael Prenger Family Center PAQ states the Department of Justice has requested agency data for the year 2021.</p> <p data-bbox="244 1491 935 1518">Through such reviews, the facility meets this standards requirements.</p>

115.388	<b>Data review for corrective action</b>
	<p data-bbox="244 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 273 435 300">Document Review:</p> <ol data-bbox="244 304 1249 434" style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> <li>3. OSCA – PREA Data for Calendar Year 2020</li> <li>4. The Annual Report can be found at: <a href="https://dss.mo.gov/reports/prison-rape-elimination-act-reports/">https://dss.mo.gov/reports/prison-rape-elimination-act-reports/</a></li> </ol> <p data-bbox="244 461 515 488">Interview/Site Observation:</p> <ol data-bbox="244 492 718 519" style="list-style-type: none"> <li>1. Detention Superintendent/PREA Coordinator</li> </ol> <p data-bbox="244 524 1485 591">An interview conducted with the Detention Superintendent/PREA Coordinator and review of the 2020 Agency Annual Report demonstrated the report is developed annually with a comparison of annual numbers from previous years.</p> <p data-bbox="244 618 1485 712">(a) The Michael Prenger Family Center PAQ states the agency reviews data collected and aggregated pursuant to §115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, and training, including:</p> <ul data-bbox="244 716 1441 846" style="list-style-type: none"> <li>• Identifying problem areas;</li> <li>• Taking corrective action on an ongoing basis; and</li> <li>• Preparing an annual report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole.</li> </ul> <p data-bbox="244 873 1465 967">Michael Prenger Family Center PREA Policy, page 43, section Data Review for Corrective Action, first bullet, states, “The MPFC shall review data collected on sexual abuse incidents/allegations in order to assess and improve effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including:</p> <ul data-bbox="244 972 718 1070" style="list-style-type: none"> <li>• Identifying problem areas;</li> <li>• Taking corrective action on an on-going basis;</li> <li>• Preparing an annual report.</li> </ul> <p data-bbox="244 1097 1469 1191">(b) The Michael Prenger Family Center PAQ states the annual report includes a comparison of the current year's data and corrective actions to those from prior years. The annual report provides an assessment of the agency's progress in addressing sexual abuse.</p> <p data-bbox="244 1218 1490 1312">Michael Prenger Family Center PREA Policy, page 43, section Data Review for Corrective Action, second bullet, states, “The report shall compare the current year's data and corrective actions with previous years and provide an assessment of progress in addressing sexual abuse.”</p> <p data-bbox="244 1348 1449 1415">The facility provided the OSCA – PREA Data for Calendar Year 2020 for the Missouri Secure Detention DYS Contractual Sites CY20. This data reports:</p> <ol data-bbox="244 1420 1390 1550" style="list-style-type: none"> <li>3. The number OSCA PREA Data – aggregate data for all facilities</li> <li>4. Facility individual information</li> <li>5. Staff Incidents Section</li> <li>6. Facility comparison data for years 2018, 2019, and 2020 (this grid is on a separate chart from the annual report.)</li> </ol> <p data-bbox="244 1576 1495 1671">(c) The Michael Prenger Family Center PAQ states the agency makes its annual report readily available to the public, at least annually, through its website. The Annual Report can be found at: <a href="https://dss.mo.gov/reports/prison-rape-elimination-act-reports/">https://dss.mo.gov/reports/prison-rape-elimination-act-reports/</a></p> <p data-bbox="244 1697 1461 1765">Michael Prenger Family Center PREA Policy, page 43, section Data Review for Corrective Action, third bullet, states, “The annual report will be presented to the Chief Juvenile Officer and made available to the public.”</p> <p data-bbox="244 1792 1473 1886">(d) The Michael Prenger Family Center PAQ states when the agency redacts material from an annual report for publication, the redactions are limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility.</p> <p data-bbox="244 1912 1474 2007">Michael Prenger Family Center PREA Policy, page 43, section Data Review for Corrective Action, fourth bullet, states, “The MPFC may redact specific information from the public report that would present a clear and specific threat to the safety and security of the facility, but must indicate the nature of the material redacted.”</p> <p data-bbox="244 2033 935 2060">Through such reviews, the facility meets this standards requirements.</p>

115.389	<b>Data storage, publication, and destruction</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Michael Prenger Family Center PAQ</li> <li>2. Michael Prenger Family Center PREA Policy, not dated</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Detention Superintendent/PREA Coordinator</li> </ol> <p>Through interviews with the Detention Superintendent/PREA Coordinator he demonstrated the data is secured on the Agency's secure intranet with limited access to Department Supervisory staff. Aggregate, redacted data is available on the agency website.</p> <p>(a) The Michael Prenger Family Center PAQ states the agency ensures that incident-based and aggregate data are securely retained.</p> <p>Michael Prenger Family Center PREA Policy, page 44, section Data Storage, Publication and Destruction, first bullet, states, "The MPFC shall keep all data retained secured in the administration area file cabinets."</p> <p>(b) The Michael Prenger Family Center PAQ states agency policy requires that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public at least annually through its website.</p> <p>Michael Prenger Family Center PREA Policy, page 44, section Data Storage, Publication and Destruction, second bullet, states, "The MPFC shall make all aggregated data collected on sexual abuse available to the public at least on an annual basis."</p> <p>(c) The Michael Prenger Family Center PAQ states before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers. The agency maintains sexual abuse data collected pursuant to §115.387 for at least 10 years after the date of initial collection, unless Federal, State or local law requires otherwise.</p> <p>Michael Prenger Family Center PREA Policy, page 44, section Data Storage, Publication and Destruction, third and fourth bullet, states, "No personal identifiers will be contained in the publicly released date. "The MPFC will maintain sexual abuse data collected for at least 10 years unless Federal, State, or local law requires otherwise. "</p> <p>Through such reviews, the facility meets this standards requirements.</p>

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

<b>115.403</b>	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>(b) The agency has posted the current 2017 PREA audit report, on their website.</p> <p>Through such reviews, the facility meets this standards requirements.</p>

Appendix: Provision Findings		
<b>115.311 (a)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
<b>115.311 (b)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
<b>115.311 (c)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	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
<b>115.312 (a)</b>	<b>Contracting with other entities for the confinement of residents</b>	
	If this agency is public and it contracts for the confinement of its residents with private agencies or other entities including other government agencies, has the agency included the entity's obligation to adopt and comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents.)	yes
<b>115.312 (b)</b>	<b>Contracting with other entities for the confinement of residents</b>	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents OR the response to 115.312(a)-1 is "NO".)	yes

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" or areas where staff or residents may be isolated)?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The composition of the resident population?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The number and placement of supervisory staff?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Institution programs occurring on a particular shift?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any applicable State or local laws, regulations, or standards?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any other relevant factors?	yes

<b>115.313 (b)</b>	<b>Supervision and monitoring</b>	
	Does the agency comply with the staffing plan except during limited and discrete exigent circumstances?	yes
	In circumstances where the staffing plan is not complied with, does the facility fully document all deviations from the plan? (N/A if no deviations from staffing plan.)	na
<b>115.313 (c)</b>	<b>Supervision and monitoring</b>	
	Does the facility maintain staff ratios of a minimum of 1:8 during resident waking hours, except during limited and discrete exigent circumstances? (N/A only until October 1, 2017.)	yes
	Does the facility maintain staff ratios of a minimum of 1:16 during resident sleeping hours, except during limited and discrete exigent circumstances? (N/A only until October 1, 2017.)	yes
	Does the facility fully document any limited and discrete exigent circumstances during which the facility did not maintain staff ratios? (N/A only until October 1, 2017.)	yes
	Does the facility ensure only security staff are included when calculating these ratios? (N/A only until October 1, 2017.)	yes
	Is the facility obligated by law, regulation, or judicial consent decree to maintain the staffing ratios set forth in this paragraph?	yes
<b>115.313 (d)</b>	<b>Supervision and monitoring</b>	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: Prevailing staffing patterns?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
<b>115.313 (e)</b>	<b>Supervision and monitoring</b>	
	Has the facility implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment? (N/A for non-secure facilities )	yes
	Is this policy and practice implemented for night shifts as well as day shifts? (N/A for non-secure facilities )	yes
	Does the facility have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility? (N/A for non-secure facilities )	yes
<b>115.315 (a)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
<b>115.315 (b)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting cross-gender pat-down searches in non-exigent circumstances?	yes

<b>115.315 (c)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility document and justify all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches?	yes
<b>115.315 (d)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility implement policies and procedures that enable residents to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering a resident housing unit?	yes
	In facilities (such as group homes) that do not contain discrete housing units, does the facility require staff of the opposite gender to announce their presence when entering an area where residents are likely to be showering, performing bodily functions, or changing clothing? (N/A for facilities with discrete housing units)	yes
<b>115.315 (e)</b>	<b>Limits to cross-gender viewing and searches</b>	
	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
<b>115.315 (f)</b>	<b>Limits to cross-gender viewing and searches</b>	
	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 with residents with disabilities including residents who: Have intellectual disabilities?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Who are blind or have low vision?	yes
115.316 (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

<b>115.316 (c)</b>	<b>Residents with disabilities and residents who are limited English proficient</b>	
	Does the agency always refrain from relying on resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-response duties under §115.364, or the investigation of the resident's allegations?	yes
<b>115.317 (a)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has engaged in sexual 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
<b>115.317 (b)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with residents?	yes
<b>115.317 (c)</b>	<b>Hiring and promotion decisions</b>	
	Before hiring new employees who may have contact with residents, does the agency: Perform a criminal background records check?	yes
	Before hiring new employees who may have contact with residents, does the agency: Consult any child abuse registry 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
<b>115.317 (d)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with residents?	yes
	Does the agency consult applicable child abuse registries before enlisting the services of any contractor who may have contact with residents?	yes

<b>115.317 (e)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with residents or have in place a system for otherwise capturing such information for current employees?	yes
<b>115.317 (f)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
<b>115.317 (g)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
<b>115.317 (h)</b>	<b>Hiring and promotion decisions</b>	
	Unless prohibited by law, does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
<b>115.318 (a)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect residents from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	na
<b>115.318 (b)</b>	<b>Upgrades to facilities and technologies</b>	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect residents from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	na
<b>115.321 (a)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes

<b>115.321 (b)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Is this protocol developmentally appropriate for youth? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	na
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. )	na
<b>115.321 (c)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency offer all residents who experience sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
<b>115.321 (d)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member?	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
<b>115.321 (e)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
<b>115.321 (f)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating entity follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	no
<b>115.321 (h)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (Check N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.321(d) above.)	yes

<b>115.322 (a)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
<b>115.322 (b)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency have a policy in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
<b>115.322 (c)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	If a separate entity is responsible for conducting criminal investigations, does such publication describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.321(a))	yes
<b>115.331 (a)</b>	<b>Employee training</b>	
	Does the agency train all employees who may have contact with residents on: Its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with residents on: Residents' right to be free from sexual abuse and sexual harassment	yes
	Does the agency train all employees who may have contact with residents on: The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: The dynamics of sexual abuse and sexual harassment in juvenile facilities?	yes
	Does the agency train all employees who may have contact with residents on: The common reactions of juvenile victims of sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: How to detect and respond to signs of threatened and actual sexual abuse and how to distinguish between consensual sexual contact and sexual abuse between residents?	yes
	Does the agency train all employees who may have contact with residents on: How to avoid inappropriate relationships with residents?	yes
	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

<b>115.331 (b)</b>	<b>Employee training</b>	
	Is such training tailored to the unique needs and attributes of residents of juvenile facilities?	yes
	Is such training tailored to the gender of the residents at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male residents to a facility that houses only female residents, or vice versa?	yes
<b>115.331 (c)</b>	<b>Employee training</b>	
	Have all current employees who may have contact with residents received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
<b>115.331 (d)</b>	<b>Employee training</b>	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
<b>115.332 (a)</b>	<b>Volunteer and contractor training</b>	
	Has the agency ensured that all volunteers and contractors who 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
<b>115.332 (b)</b>	<b>Volunteer and contractor training</b>	
	Have all volunteers and contractors who have contact with residents been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with residents)?	yes
<b>115.332 (c)</b>	<b>Volunteer and contractor training</b>	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
<b>115.333 (a)</b>	<b>Resident education</b>	
	During intake, do residents receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do residents receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
	Is this information presented in an age-appropriate fashion?	yes

<b>115.333 (b)</b>	<b>Resident education</b>	
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
<b>115.333 (c)</b>	<b>Resident education</b>	
	Have all residents received such education?	yes
	Do residents receive education upon transfer to a different facility to the extent that the policies and procedures of the resident's new facility differ from those of the previous facility?	yes
<b>115.333 (d)</b>	<b>Resident education</b>	
	Does the agency provide resident education in formats accessible to all residents including those who: Are limited English proficient?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are deaf?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are visually impaired?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are otherwise disabled?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Have limited reading skills?	yes
<b>115.333 (e)</b>	<b>Resident education</b>	
	Does the agency maintain documentation of resident participation in these education sessions?	yes
<b>115.333 (f)</b>	<b>Resident education</b>	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to residents through posters, resident handbooks, or other written formats?	yes
<b>115.334 (a)</b>	<b>Specialized training: Investigations</b>	
	In addition to the general training provided to all employees pursuant to §115.331, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its 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).)	na

<b>115.334 (b)</b>	<b>Specialized training: Investigations</b>	
	Does this specialized training include: Techniques for interviewing juvenile sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	na
	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).)	na
	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).)	na
	Does this specialized training include: The criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	na
<b>115.334 (c)</b>	<b>Specialized training: Investigations</b>	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	na
<b>115.335 (a)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	na
	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.)	na
	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.)	na
	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.)	na
<b>115.335 (b)</b>	<b>Specialized training: Medical and mental health care</b>	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na
<b>115.335 (c)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	na

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

<b>115.341 (d)</b>	<b>Obtaining information from residents</b>	
	Is this information ascertained: Through conversations with the resident during the intake process and medical mental health screenings?	yes
	Is this information ascertained: During classification assessments?	yes
	Is this information ascertained: By reviewing court records, case files, facility behavioral records, and other relevant documentation from the resident's files?	yes
<b>115.341 (e)</b>	<b>Obtaining information from residents</b>	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the resident's detriment by staff or other residents?	yes
<b>115.342 (a)</b>	<b>Placement of residents</b>	
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Housing Assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Bed assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Work Assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Education Assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Program Assignments?	yes
<b>115.342 (b)</b>	<b>Placement of residents</b>	
	Are residents isolated from others only as a last resort when less restrictive measures are inadequate to keep them and other residents safe, and then only until an alternative means of keeping all residents safe can be arranged?	yes
	During any period of isolation, does the agency always refrain from denying residents daily large-muscle exercise?	yes
	During any period of isolation, does the agency always refrain from denying residents any legally required educational programming or special education services?	yes
	Do residents in isolation receive daily visits from a medical or mental health care clinician?	yes
	Do residents also have access to other programs and work opportunities to the extent possible?	yes

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

<b>115.351 (a)</b>	<b>Resident reporting</b>	
	Does the agency provide multiple internal ways for residents to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: 2. Retaliation by other residents or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
<b>115.351 (b)</b>	<b>Resident reporting</b>	
	Does the agency also provide at least one way for residents to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the resident to remain anonymous upon request?	yes
	Are residents detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security to report sexual abuse or harassment?	yes
<b>115.351 (c)</b>	<b>Resident reporting</b>	
	Do staff members accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Do staff members promptly document any verbal reports of sexual abuse and sexual harassment?	yes
<b>115.351 (d)</b>	<b>Resident reporting</b>	
	Does the facility provide residents with access to tools necessary to make a written report?	yes
<b>115.351 (e)</b>	<b>Resident reporting</b>	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of residents?	yes
<b>115.352 (a)</b>	<b>Exhaustion of administrative remedies</b>	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address resident grievances regarding sexual abuse. This does not mean the agency is exempt simply because a resident does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
<b>115.352 (b)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency permit residents to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	na
	Does the agency always refrain from requiring an resident to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	na

<b>115.352 (c)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency ensure that: A resident who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	na
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	na
<b>115.352 (d)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by residents in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	na
	If the agency determines that the 90 day timeframe is insufficient to make an appropriate decision and claims an extension of time (the maximum allowable extension of time to respond is 70 days per 115.352(d)(3)) , does the agency notify the resident in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	na
	At any level of the administrative process, including the final level, if the resident does not receive a response within the time allotted for reply, including any properly noticed extension, may a resident consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	na
<b>115.352 (e)</b>	<b>Exhaustion of administrative remedies</b>	
	Are third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, permitted to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	na
	Are those third parties also permitted to file such requests on behalf of residents? (If a third party, other than a parent or legal guardian, files such a request on behalf of a resident, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	na
	If the resident declines to have the request processed on his or her behalf, does the agency document the resident's decision? (N/A if agency is exempt from this standard.)	na
	Is a parent or legal guardian of a juvenile allowed to file a grievance regarding allegations of sexual abuse, including appeals, on behalf of such juvenile? (N/A if agency is exempt from this standard.)	na
	If a parent or legal guardian of a juvenile files a grievance (or an appeal) on behalf of a juvenile regarding allegations of sexual abuse, is it the case that those grievances are not conditioned upon the juvenile agreeing to have the request filed on his or her behalf? (N/A if agency is exempt from this standard.)	na

<b>115.352 (f)</b>	<b>Exhaustion of administrative remedies</b>	
	Has the agency established procedures for the filing of an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	na
	After receiving an emergency grievance alleging a resident is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	na
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	na
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	na
	Does the initial response and final agency decision document the agency's determination whether the resident is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	na
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	na
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	na
<b>115.352 (g)</b>	<b>Exhaustion of administrative remedies</b>	
	If the agency disciplines a resident for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the resident filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	na
<b>115.353 (a)</b>	<b>Resident access to outside confidential support services and legal representation</b>	
	Does the facility provide residents with access to outside victim advocates for emotional support services related to sexual abuse by providing, posting, or otherwise making accessible mailing addresses and telephone numbers, including toll-free hotline 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?	yes
	Does the facility enable reasonable communication between residents and these organizations and agencies, in as confidential a manner as possible?	yes
<b>115.353 (b)</b>	<b>Resident access to outside confidential support services and legal representation</b>	
	Does the facility inform residents, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
<b>115.353 (c)</b>	<b>Resident access to outside confidential support services and legal representation</b>	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide residents with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes

<b>115.353 (d)</b>	<b>Resident access to outside confidential support services and legal representation</b>	
	Does the facility provide residents with reasonable and confidential access to their attorneys or other legal representation?	yes
	Does the facility provide residents with reasonable access to parents or legal guardians?	yes
<b>115.354 (a)</b>	<b>Third-party reporting</b>	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of a resident?	yes
<b>115.361 (a)</b>	<b>Staff and agency reporting duties</b>	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding retaliation against residents or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
<b>115.361 (b)</b>	<b>Staff and agency reporting duties</b>	
	Does the agency require all staff to comply with any applicable mandatory child abuse reporting laws?	yes
<b>115.361 (c)</b>	<b>Staff and agency reporting duties</b>	
	Apart from reporting to designated supervisors or officials and designated State or local services agencies, are staff prohibited from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
<b>115.361 (d)</b>	<b>Staff and agency reporting duties</b>	
	Are medical and mental health practitioners required to report sexual abuse to designated supervisors and officials pursuant to paragraph (a) of this section as well as to the designated State or local services agency where required by mandatory reporting laws?	yes
	Are medical and mental health practitioners required to inform residents of their duty to report, and the limitations of confidentiality, at the initiation of services?	yes

<b>115.361 (e)</b>	<b>Staff and agency reporting duties</b>	
	Upon receiving any allegation of sexual abuse, does the facility head or his or her designee promptly report the allegation to the appropriate office?	yes
	Upon receiving any allegation of sexual abuse, does the facility head or his or her designee promptly report the allegation to the alleged victim's parents or legal guardians unless the facility has official documentation showing the parents or legal guardians should not be notified?	yes
	If the alleged victim is under the guardianship of the child welfare system, does the facility head or his or her designee promptly report the allegation to the alleged victim's caseworker instead of the parents or legal guardians? (N/A if the alleged victim is not under the guardianship of the child welfare system.)	yes
	If a juvenile court retains jurisdiction over the alleged victim, does the facility head or designee also report the allegation to the juvenile's attorney or other legal representative of record within 14 days of receiving the allegation?	yes
<b>115.361 (f)</b>	<b>Staff and agency reporting duties</b>	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
<b>115.362 (a)</b>	<b>Agency protection duties</b>	
	When the agency learns that a resident is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the resident?	yes
<b>115.363 (a)</b>	<b>Reporting to other confinement facilities</b>	
	Upon receiving an allegation that a resident was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
	Does the head of the facility that received the allegation also notify the appropriate investigative agency?	yes
<b>115.363 (b)</b>	<b>Reporting to other confinement facilities</b>	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
<b>115.363 (c)</b>	<b>Reporting to other confinement facilities</b>	
	Does the agency document that it has provided such notification?	yes
<b>115.363 (d)</b>	<b>Reporting to other confinement facilities</b>	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes

<b>115.364 (a)</b>	<b>Staff first responder duties</b>	
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
<b>115.364 (b)</b>	<b>Staff first responder duties</b>	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
<b>115.365 (a)</b>	<b>Coordinated response</b>	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes
<b>115.366 (a)</b>	<b>Preservation of ability to protect residents from contact with abusers</b>	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
<b>115.367 (a)</b>	<b>Agency protection against retaliation</b>	
	Has the agency established a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
<b>115.367 (b)</b>	<b>Agency protection against retaliation</b>	
	Does the agency employ multiple protection measures for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations, such as housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services?	yes

<b>115.367 (c)</b>	<b>Agency protection against retaliation</b>	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Any resident disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Resident housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Resident program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
<b>115.367 (d)</b>	<b>Agency protection against retaliation</b>	
	In the case of residents, does such monitoring also include periodic status checks?	yes
<b>115.367 (e)</b>	<b>Agency protection against retaliation</b>	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
<b>115.368 (a)</b>	<b>Post-allegation protective custody</b>	
	Is any and all use of segregated housing to protect a resident who is alleged to have suffered sexual abuse subject to the requirements of § 115.342?	yes
<b>115.371 (a)</b>	<b>Criminal and administrative agency investigations</b>	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency does not conduct any form of administrative or criminal investigations of sexual abuse or harassment. See 115.321(a).)	na
	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).)	na

<b>115.371 (b)</b>	<b>Criminal and administrative agency investigations</b>	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations involving juvenile victims as required by 115.334?	no
<b>115.371 (c)</b>	<b>Criminal and administrative agency investigations</b>	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	no
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	no
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	no
<b>115.371 (d)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency always refrain from terminating an investigation solely because the source of the allegation recants the allegation?	no
<b>115.371 (e)</b>	<b>Criminal and administrative agency investigations</b>	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	no
<b>115.371 (f)</b>	<b>Criminal and administrative agency investigations</b>	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as resident or staff?	no
	Does the agency investigate allegations of sexual abuse without requiring a resident who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	no
<b>115.371 (g)</b>	<b>Criminal and administrative agency investigations</b>	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
<b>115.371 (h)</b>	<b>Criminal and administrative agency investigations</b>	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
<b>115.371 (i)</b>	<b>Criminal and administrative agency investigations</b>	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
<b>115.371 (j)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency retain all written reports referenced in 115.371(g) and (h) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years unless the abuse was committed by a juvenile resident and applicable law requires a shorter period of retention?	yes
<b>115.371 (k)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the facility or agency does not provide a basis for terminating an investigation?	yes

<b>115.371 (m)</b>	<b>Criminal and administrative agency investigations</b>	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
<b>115.372 (a)</b>	<b>Evidentiary standard for administrative investigations</b>	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
<b>115.373 (a)</b>	<b>Reporting to residents</b>	
	Following an investigation into a resident's allegation of sexual abuse suffered in the facility, does the agency inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
<b>115.373 (b)</b>	<b>Reporting to residents</b>	
	If the agency did not conduct the investigation into a resident's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the resident? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes
<b>115.373 (c)</b>	<b>Reporting to residents</b>	
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the resident's unit?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
<b>115.373 (d)</b>	<b>Reporting to residents</b>	
	Following a resident's allegation that he or she has been sexually abused by another resident, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following a resident's allegation that he or she has been sexually abused by another resident, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes
<b>115.373 (e)</b>	<b>Reporting to residents</b>	
	Does the agency document all such notifications or attempted notifications?	yes

<b>115.376 (a)</b>	<b>Disciplinary sanctions for staff</b>	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
<b>115.376 (b)</b>	<b>Disciplinary sanctions for staff</b>	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
<b>115.376 (c)</b>	<b>Disciplinary sanctions for staff</b>	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
<b>115.376 (d)</b>	<b>Disciplinary sanctions for staff</b>	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies, unless the activity was clearly not criminal?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
<b>115.377 (a)</b>	<b>Corrective action for contractors and volunteers</b>	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with residents?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
<b>115.377 (b)</b>	<b>Corrective action for contractors and volunteers</b>	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with residents?	yes
<b>115.378 (a)</b>	<b>Interventions and disciplinary sanctions for residents</b>	
	Following an administrative finding that a resident engaged in resident-on-resident sexual abuse, or following a criminal finding of guilt for resident-on-resident sexual abuse, may residents be subject to disciplinary sanctions only pursuant to a formal disciplinary process?	yes

<b>115.378 (b)</b>	<b>Interventions and disciplinary sanctions for residents</b>	
	Are disciplinary sanctions commensurate with the nature and circumstances of the abuse committed, the resident's disciplinary history, and the sanctions imposed for comparable offenses by other residents with similar histories?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident is not denied daily large-muscle exercise?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident is not denied access to any legally required educational programming or special education services?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident receives daily visits from a medical or mental health care clinician?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the resident also have access to other programs and work opportunities to the extent possible?	yes
<b>115.378 (c)</b>	<b>Interventions and disciplinary sanctions for residents</b>	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether a resident's mental disabilities or mental illness contributed to his or her behavior?	yes
<b>115.378 (d)</b>	<b>Interventions and disciplinary sanctions for residents</b>	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to offer the offending resident participation in such interventions?	yes
	If the agency requires participation in such interventions as a condition of access to any rewards-based behavior management system or other behavior-based incentives, does it always refrain from requiring such participation as a condition to accessing general programming or education?	yes
<b>115.378 (e)</b>	<b>Interventions and disciplinary sanctions for residents</b>	
	Does the agency discipline a resident for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
<b>115.378 (f)</b>	<b>Interventions and disciplinary sanctions for residents</b>	
	For the purpose of disciplinary action, does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
<b>115.378 (g)</b>	<b>Interventions and disciplinary sanctions for residents</b>	
	Does the agency always refrain from considering non-coercive sexual activity between residents to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between residents.)	yes
<b>115.381 (a)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.341 indicates that a resident has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the resident is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening?	yes
<b>115.381 (b)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.341 indicates that a resident has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the resident is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening?	yes

<b>115.381 (c)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
<b>115.381 (d)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Do medical and mental health practitioners obtain informed consent from residents before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the resident is under the age of 18?	yes
<b>115.382 (a)</b>	<b>Access to emergency medical and mental health services</b>	
	Do resident victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
<b>115.382 (b)</b>	<b>Access to emergency medical and mental health services</b>	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do staff first responders take preliminary steps to protect the victim pursuant to § 115.362?	yes
	Do staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
<b>115.382 (c)</b>	<b>Access to emergency medical and mental health services</b>	
	Are resident victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
<b>115.382 (d)</b>	<b>Access to emergency medical and mental health services</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.383 (a)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
<b>115.383 (b)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
<b>115.383 (c)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
<b>115.383 (d)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are resident victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if all-male facility.)	yes
<b>115.383 (e)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If pregnancy results from the conduct described in paragraph § 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

<b>115.383 (f)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are resident victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
<b>115.383 (g)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.383 (h)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility attempt to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners?	yes
<b>115.386 (a)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
<b>115.386 (b)</b>	<b>Sexual abuse incident reviews</b>	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
<b>115.386 (c)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
<b>115.386 (d)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team: Consider whether the allegation or 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
<b>115.386 (e)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
<b>115.387 (a)</b>	<b>Data collection</b>	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
<b>115.387 (b)</b>	<b>Data collection</b>	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes

<b>115.387 (c)</b>	<b>Data collection</b>	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
<b>115.387 (d)</b>	<b>Data collection</b>	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
<b>115.387 (e)</b>	<b>Data collection</b>	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents? (N/A if agency does not contract for the confinement of its residents.)	na
<b>115.387 (f)</b>	<b>Data collection</b>	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
<b>115.388 (a)</b>	<b>Data review for corrective action</b>	
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
<b>115.388 (b)</b>	<b>Data review for corrective action</b>	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
<b>115.388 (c)</b>	<b>Data review for corrective action</b>	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
<b>115.388 (d)</b>	<b>Data review for corrective action</b>	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
<b>115.389 (a)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency ensure that data collected pursuant to § 115.387 are securely retained?	yes
<b>115.389 (b)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes

<b>115.389 (c)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
<b>115.389 (d)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency maintain sexual abuse data collected pursuant to § 115.387 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
<b>115.401 (a)</b>	<b>Frequency and scope of audits</b>	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes
<b>115.401 (b)</b>	<b>Frequency and scope of audits</b>	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	yes
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	yes
<b>115.401 (h)</b>	<b>Frequency and scope of audits</b>	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
<b>115.401 (i)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
<b>115.401 (m)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
<b>115.401 (n)</b>	<b>Frequency and scope of audits</b>	
	Were inmates, residents, and detainees permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
<b>115.403 (f)</b>	<b>Audit contents and findings</b>	
	The agency has published on its agency website, if it has one, or 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