

PREA Facility Audit Report: Final

Name of Facility: Michael Prenger Family Center

Facility Type: Juvenile

Date Interim Report Submitted: NA

Date Final Report Submitted: 05/22/2025

Auditor Certification

The contents of this report are accurate to the best of my knowledge.



No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.



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.



Auditor Full Name as Signed: Mable P. Wheeler

Date of Signature: 05/22/2025

AUDITOR INFORMATION

Auditor name: Wheeler, Mable

Email: wheeler5p@hotmail.com

Start Date of On-Site Audit: 03/12/2025

End Date of On-Site Audit: 03/13/2025

FACILITY INFORMATION

Facility name: Michael Prenger Family Center

Facility physical address: 400 Stadium Boulevard, Jefferson City, Missouri - 65101

Facility mailing address: 400 Stadium Blvd, Jefferson City, Missouri - 65101

Primary Contact

Name:	Melissa Wilkinson
Email Address:	melissa.wilkinson@courts.mo.gov
Telephone Number:	5732981996

Superintendent/Director/Administrator	
Name:	Dr. Melissa Wilkinson
Email Address:	Melissa.Wilkinson@courts.mo.gov
Telephone Number:	5736365177

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

Facility Characteristics	
Designed facility capacity:	3
Current population of facility:	2
Average daily population for the past 12 months:	2
Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Both women/girls and men/boys
In the past 12 months, which population(s) has the facility held? Select all that apply (Nonbinary describes a person who does not identify exclusively as a boy/man or a girl/woman. Some people also use this term to describe their gender expression. For	

definitions of “intersex” and “transgender,” please see https://www.prearesourcecenter.org/standard/115-5)	
Age range of population:	12-17
Facility security levels/resident custody levels:	Secure
Number of staff currently employed at the facility who may have contact with residents:	26
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:	301 East High Street, 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

Name:	Melissa Wilkinson	Email Address:	melissa.wilkinson@courts.mo.gov
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Facility AUDIT FINDINGS

Summary of Audit Findings

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

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

Number of standards exceeded:

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:	2025-03-12
2. End date of the onsite portion of the audit:	2025-03-13

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:	The Auditor placed calls to the following reporting entities: Missouri Child Abuse and Neglect Hotline at 1.800.392.3738 Jefferson City Police Department at 573.634.6400 National Sexual Assault Hotline at 1.800.656.4673 National Center for Missing and Exploited Children at 1.800.843.5673 Child Help at 1.800.422.4423 Written inquiry to Just Detention

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:	1

17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)
Audited Facility Population Characteristics on Day One of the Onsite Portion of the Audit	
Inmates/Residents/Detainees Population Characteristics on Day One of the Onsite Portion of the Audit	
18. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	2
19. 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
20. 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
21. 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
22. 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

23. 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
24. 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
25. 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
26. 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
27. 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
28. 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
29. 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):	All youth housed at the facility on day one of the audit were interviewed.

Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
30. 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:	4
31. 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
32. 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
33. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	The facility has no contractors or volunteers that are allowed to enter the facility.
INTERVIEWS	
Inmate/Resident/Detainee Interviews	
Random Inmate/Resident/Detainee Interviews	
34. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	2

35. 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 checked="" type="checkbox"/> Other <input type="checkbox"/> None
If "Other," describe:	All youth housed at the facility on day one of the audit were interviewed.
36. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?	All youth housed at the facility on day one of the audit were interviewed.
37. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<input type="radio"/> Yes <input checked="" type="radio"/> No
37. Explain why it was not possible to conduct the minimum number of random inmate/resident/detainee interviews:	All youth housed at the facility on day one of the audit were interviewed.
38. 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):	All youth housed at the facility on day one of the audit were interviewed.
Targeted Inmate/Resident/Detainee Interviews	
39. 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".

40. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	0
40. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<div> <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. </div> <div> <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed. </div>
40. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	The facility had only two residents and both were interviewed. Neither of the residents interviewed had targeted characteristics.
41. 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:	0

41. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<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>
41. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	<p>The facility had only two residents and both were interviewed. None of the residents interviewed had targeted characteristics.</p>
42. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:	<p>0</p>
42. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<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>
42. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	<p>The facility had only two residents and both were interviewed. None of the residents interviewed had targeted characteristics.</p>
43. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:	<p>0</p>

43. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.
43. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	The facility had only two residents and both were interviewed. None of the residents interviewed had targeted characteristics.
44. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:	0
44. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.
44. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	The facility had only two residents and both were interviewed. None of the residents interviewed had targeted characteristics.
45. 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:	0

45. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.
45. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	The facility had only two residents and both were interviewed. None of the residents interviewed had targeted characteristics.
46. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:	0
46. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.
46. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	The facility had only two residents and both were interviewed. None of the residents interviewed had targeted characteristics.
47. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:	0

<p>47. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>47. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The facility had only two residents and both were interviewed. None of the residents interviewed had targeted characteristics.</p>
<p>48. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>0</p>
<p>48. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>48. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The facility had only two residents and both were interviewed. None of the residents interviewed had targeted characteristics.</p>

49. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:	0
49. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<div> <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. </div> <div> <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed. </div>
49. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).	The facility had only two residents and both were interviewed. None of the residents interviewed had targeted characteristics.
50. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):	The facility had only two residents and both were interviewed. None of the residents interviewed had targeted characteristics.
Staff, Volunteer, and Contractor Interviews	
Random Staff Interviews	
51. Enter the total number of RANDOM STAFF who were interviewed:	4

52. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	<input checked="" type="checkbox"/> Length of tenure in the facility <input checked="" type="checkbox"/> Shift assignment <input checked="" type="checkbox"/> Work assignment <input type="checkbox"/> Rank (or equivalent) <input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken) <input type="checkbox"/> None
53. Were you able to conduct the minimum number of RANDOM STAFF interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No
54. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	The Auditor interviewed four staff during the on-site portion of the audit.
Specialized Staff, Volunteers, and Contractor Interviews	
Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.	
55. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	2
56. Were you able to interview the Agency Head?	<input checked="" type="radio"/> Yes <input type="radio"/> No
57. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	<input checked="" type="radio"/> Yes <input type="radio"/> No

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

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

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

	<input type="checkbox"/> Other
61. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input type="radio"/> Yes <input checked="" type="radio"/> No
62. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input type="radio"/> Yes <input checked="" type="radio"/> No
63. Provide any additional comments regarding selecting or interviewing specialized staff.	The facility has no contractors or volunteers authorized to enter the facility.
SITE REVIEW AND DOCUMENTATION SAMPLING	
Site Review	
<p>PREA Standard 115.401 (h) states, "The auditor shall have access to, and shall observe, all areas of the audited facilities." In order to meet the requirements in this Standard, the site review portion of the onsite audit must include a thorough examination of the entire facility. The site review is not a casual tour of the facility. It is an active, inquiring process that includes talking with staff and inmates to determine whether, and the extent to which, the audited facility's practices demonstrate compliance with the Standards. Note: As you are conducting the site review, you must document your tests of critical functions, important information gathered through observations, and any issues identified with facility practices. The information you collect through the site review is a crucial part of the evidence you will analyze as part of your compliance determinations and will be needed to complete your audit report, including the Post-Audit Reporting Information.</p>	
64. Did you have access to all areas of the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
Was the site review an active, inquiring process that included the following:	
65. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?	<input checked="" type="radio"/> Yes <input type="radio"/> No

66. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
67. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
68. Informal conversations with staff during the site review (encouraged, not required)?	<input checked="" type="radio"/> Yes <input type="radio"/> No
69. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).	No text provided.
Documentation Sampling	
Where there is a collection of records to review-such as staff, contractor, and volunteer training records; background check records; supervisory rounds logs; risk screening and intake processing records; inmate education records; medical files; and investigative files-auditors must self-select for review a representative sample of each type of record.	
70. 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
71. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).	No text provided.

SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

72. 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

73. 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.

74. 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

75. 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.

76. 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

77. 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

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

0

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

The facility had no allegations of sexual abuse or sexual harassment.

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

85. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)
Sexual Harassment Investigation Files Selected for Review	
86. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:	0
86. Explain why you were unable to review any sexual harassment investigation files:	The facility had no allegations of sexual abuse or sexual harassment.
87. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)
Inmate-on-inmate sexual harassment investigation files	
88. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0
89. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)

90. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)
Staff-on-inmate sexual harassment investigation files	
91. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:	0
92. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
93. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
94. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.	The facility had no allegations of sexual abuse or sexual harassment.

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

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

☐ Yes

☒ No

Non-certified Support Staff

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

☒ Yes

☐ No

96. Enter the TOTAL NUMBER OF NON-CERTIFIED SUPPORT who provided assistance at any point during this audit:

1

AUDITING ARRANGEMENTS AND COMPENSATION

97. Who paid you to conduct this audit?

☐ The audited facility or its parent agency

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

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

☐ Other

Identify the name of the third-party auditing entity

CCMG

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

115.311	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated 3. Michael Prenger Family Center Mission Statement, not dated 4. Michael Prenger PREA Policy Statement Juvenile, not dated 5. Missouri Child Abuse and Neglect Hotline, not dated 6. Jefferson County Police Department, not dated 7. 19th Judicial Circuit of Missouri Cole County Juvenile Court Organizational Chart, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random staff 2. Supervisor 3. Detention Superintendent/PREA Coordinator <p>Through staff interviews and a review of personnel files, it is evident that this facility</p>

seamlessly integrates the requirements of this standard into its daily protocols. Staff members demonstrated a clear understanding of the facility's PREA practices and protocols, as outlined in the Michael Prenger Family Center PREA Policy.

Site Review Observation:

During the facility tour, the Auditor observed Zero Tolerance, Advocate, and PREA Audit postings displayed throughout the building. The facility is equipped with three interior cameras, ensuring surveillance in key areas. Inside, there are three secure wet cells, along with an interview room that can accommodate an additional youth if necessary. Additionally, the building features a shared shower-staff bathroom with a closing door for privacy and a designated day room.

Provisions:

(a) The Michael Prenger Family Center PAQ affirms the facility's unwavering commitment to maintaining a safe and respectful environment. In accordance with the Michael Prenger Family Center PREA Policy, the center strictly enforces a zero-tolerance stance toward all forms of sexual abuse and sexual harassment, both within its own operations and among 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,"

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.

1. Termination shall be the presumptive disciplinary sanction for staff who are found because of the investigation, to have engaged in sexual abuse.

2. 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 a high-ranking, agency-wide PREA Coordinator, who is

	<p>responsible for ensuring compliance with PREA standards across all facilities. The PREA Coordinator has sufficient time and authority to develop, implement, and oversee agency initiatives related to PREA compliance. Positioned within the agency's organizational structure, the PREA Coordinator reports directly to the Chief Juvenile Officer.</p> <p>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."</p> <p>The facility has provided the Agency's organizational chart, which illustrates the structural hierarchy within the organization. According to the chart, the PREA Coordinator serves as an upper-level, agency-wide administrator, holding dual responsibilities as both the PREA Coordinator and the Superintendent. In this capacity, the Superintendent reports directly to the Juvenile Court Administrator/ Juvenile Officer.</p> <p>(c) The Michael Prenger Family Center PAQ states the facility does not have a PREA Manager. The agency has only one (b) facility.</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.312	Contracting with other entities for the confinement of residents
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated 3. Contract for Services, Missouri Department of Social Services, dated 12/3/2024 <p>Provisions:</p> <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. 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</p>

	<p>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>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.313	Supervision and monitoring
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated 3. Michael Prenger Family Direct Care Staffing Pattern, dated 3/3/2025 4. Michael Prenger Family Staffing Plan, dated 3/3/2025 5. Staffing Plan Annual Evaluation, dated 3/3/2025 6. Unannounced Program Visits, dated Jan – Dec 2024 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random staff 2. Detention Supervisor 3. Detention Superintendent/PREA Coordinator <p>Staff members interviewed confirmed that supervisory personnel conduct unannounced rounds monthly. They also stated that maintaining the required staff-to-resident ratio has not been a concern, as the facility has a maximum capacity of only three residents. The supervisor further explained that he frequently conducts surprise visits during his off shifts to observe operations firsthand, reinforcing the practice of unannounced rounds.</p> <p>Site review observation:</p> <p>The facility is compact, featuring three secure wet cells, each equipped with two bunks. However, the practice of utilizing both bunks in a single cell has been discontinued. It includes a designated shower-staff restroom, ensuring privacy as the bathroom door remains closed during the youth’s 15-minute shower period. A small day room offers residents access to television and a quiet space for reading. Additionally, the facility houses a supervisor's office and a control desk area.</p>

Thoughtful design choices, including minimal furnishing and strategically placed cameras in the hallways and day room, eliminate blind spots and optimize surveillance coverage.

Provisions:

(a) In accordance with The Michael Prenger Family Center PAQ, the facility is committed to maintaining and regularly updating a staffing plan that ensures adequate levels of staffing and, where applicable, video monitoring to safeguard residents from abuse.

The current staffing plan is designed to accommodate the daily number of three residents, ensuring that appropriate supervision, support, and security measures are consistently upheld. The facility diligently document and monitor staffing levels to comply with regulatory requirements and prioritize resident's safety.

Through ongoing evaluation and adherence to best practices, the facility strives to create a safe and supportive environment while making every effort to remain in full compliance with established guidelines.

The facility provided a Michael Prenger Family Center Staffing Plan. The plan is signed and dated on 03-03-2025. The staffing plan encompasses the following:

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.
2. Any judicial finding of inadequacy – which of none have been founded.
3. Any findings of inadequacy from federal investigative bodies – which of none have been found.
4. Any findings of inadequacy from internal or external oversight bodies – which of none have been found.
5. All components of the program's physical plant to include a comprehensive table of all camera placement.
6. The composition of the resident population.
7. The number and placement of supervisory staff.
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.
9. Any applicable State or local laws, regulations or standards of which requirements mirror PREA ratios.
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.
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.

The facility has implemented a Direct Care Staffing Pattern, ensuring a staff-to-youth ratio of 1:3 during both waking and sleeping hours.

(b) Compliance with Staffing Plan: According to the Michael Prenger Family Center PAQ, any instance of non-compliance with the staffing plan must be documented and justified by the facility. In this case, the facility maintained full adherence to the required staffing ratios, with no deviations recorded.

(c) According to the Michael Prenger Family Center PAQ, regulatory guidelines mandate that the facility uphold staff-to-resident ratios of 1:8 during waking hours and 1:6 during sleeping hours to ensure proper supervision and care.

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 affirms that the staffing plan undergoes an annual review, conducted in collaboration with the PREA Coordinator, to ensure compliance with established guidelines and the ongoing safety and well-being of individuals served.

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 has conducted annual evaluations of its staffing plan for the years 2023, 2024, and 2025. These evaluations assess key areas to ensure efficiency, compliance, and workforce satisfaction. The following areas have been 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 mandates that unannounced rounds be conducted by intermediate or higher-level staff. These rounds serve as a proactive measure to identify and deter instances of staff sexual abuse and sexual harassment, ensuring a safer and more accountable environment.

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 has provided documentation for Unannounced Program Visits. Records indicate that each visit occurs three times per month from January 1, 2024, through December 31, 2024. Each round of visits includes observations 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.

	<p>13. Follow up needed.</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.315	Limits to cross-gender viewing and searches
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated 3. Fundamental Practices Outline and Trainer Acknowledgment, not dated 4. Guide In Cross-gender Searches and Transgender Pat Searches, not dated 5. Training Documentation and Verification Examples <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random staff 2. Detention Supervisor 3. Detention Superintendent/PREA Coordinator <p>At the time of the onsite review, this facility had two residents. When analyzing data from the past 12 months, the Detention Superintendent's average daily population is two and indicated that thirty residents had been part of the program within the last year.</p> <p>Each staff member interviewed confirmed that they had received training on cross-gender searches; however, this practice was not implemented at the facility. They stated that if an opposite-gender staff member was unavailable during a shift, law enforcement would conduct the search. Additionally, staff noted that if a search needed to be conducted on a transgender resident, the facility would consider the individual's preference regarding the gender of the staff member performing the search.</p> <p>Site Review Observation:</p> <ol style="list-style-type: none"> 1. Intake area 2. Search area <p>During the facility tour, the Auditor observed the intake and search area. Searches were conducted in the restroom, where youth would shower. This setup ensured that</p>

searches were performed in a private, secure environment, away from camera view. Training records confirmed that 100% of staff had completed training on cross-gender strip searches.

Provisions:

(a) The Michael Prenger Family Center's PAQ affirms that the facility does not engage in cross-gender strip searches or cross-gender visual body cavity searches of residents. Over the past 12 months, the facility has reported zero instances of such searches.

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."

(b) Michael Prenger Family Center PAQ affirms that the facility does not conduct cross-gender strip searches or cross-gender visual body cavity searches, except in cases of exigent circumstances. Compliance with this policy is outlined in provision (a) of this standard.

(c) The facility policy mandates that all cross-gender strip searches, cross-gender visual body cavity searches, and cross-gender pat-down searches must be properly documented and justified. In accordance with provision (a) of this standard, documentation of cross-gender searches must be recorded in shift notes to ensure compliance and accountability.

(d) Michael Prenger Family Center PAQ affirms that the facility has established and implemented policies and procedures to ensure residents can shower, attend to personal hygiene, and change clothing in privacy, without non-medical staff of the opposite gender observing their breasts, buttocks, or genitalia. Exceptions to this policy occur only in exigent circumstances or when such viewing is incidental to routine cell checks, including surveillance via video camera. Compliance with this policy is detailed in provision (a) of this standard.

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)."

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

	<p>bed checks.”</p> <p>(e) The Michael Prenger Family Center PAQ maintains a clear policy prohibiting staff from conducting searches or physical examinations of transgender or intersex residents solely to determine their genital status. The facility has fully upheld this policy, with zero such searches conducted in the past 12 months.</p> <p>Michael Prenger Family Center PREA Policy, page 6, section I.A., second bullet, states, “Transgender or intersex juveniles 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 identity 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. ”</p> <p>(f) The Michael Prenger Family Center PAQ affirms that all security staff receive comprehensive training in conducting cross-gender pat-down searches, as well as searches involving transgender and intersex residents, ensuring these procedures are carried out with professionalism, dignity, and respect.</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>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.316	Residents with disabilities and residents who are limited English proficient
	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. Foreign Language Certified Court Interpreters Listing, note dated
4. Juvenile Spanish PREA Safety First Acknowledgment, not dated
5. Office of State Courts Administrator, Foreign Language Interpreters Contract, not dated
6. Sexual Abuse-Harassment Notice in Spanish, not dated

Interviews:

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

Interviews conducted with both random and specialized staff confirmed that residents were not utilized for translation services. Each staff member interviewed demonstrated their approach to accessing language support, either by consulting supervisory personnel or utilizing the designated contact information for language services.

(a) The Michael Prenger Family Center PAQ outlines the agency's commitment to ensuring that disabled residents have equal opportunities to access and understand its efforts in preventing, detecting, and responding to sexual abuse and harassment. Through established procedures, the agency actively promotes awareness and protection, ensuring all residents receive the necessary information and support.

Michael Prenger Family Center PREA Policy, page 13, section Juvenile Education, states,

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.
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.
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.
4. All such education shall be documented.
5. Key information on these subjects will be continuously and readily available to juveniles through video presentations and discussion."

Foreign Language Certified Court Interpreters Listing

The listing provides names, counties served, contact information, availability, and fees for certified interpreter services in Missouri and Kansas.

The facility provided a Juvenile Spanish PREA Safety First Acknowledgment. This is an intake packet for Spanish speaking juveniles.

(a) 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 Child Advocacy Center of Central Missouri.

(b) Equal Opportunity for Limited English Residents: The Michael Prenger Family Center PAQ ensures that residents with limited English proficiency have full and equal access to all agency efforts aimed at preventing, detecting, and responding to sexual abuse and sexual harassment. The agency has established comprehensive procedures to accommodate linguistic needs, ensuring that language barriers do not hinder participation or the ability to benefit from these critical protections. Policy compliance regarding these measures is outlined in provision (a) of this standard.

(c) According to the Michael Prenger Family Center PAQ, the agency maintains a strict policy prohibiting the use of resident interpreters. Over the past 12 months, the facility has successfully upheld this policy, with no instances of residents being utilized as interpreters.

Michael Prenger Family Center PREA Policy, page 7, section Juveniles with Disabilities and Juveniles Who Have Limited English Proficiency, states,

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.

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.

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.

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.

5. Resident interpreters shall not be used, nor shall they be used as reader except in the limited circumstances of medical or facility emergency.

Conclusion:

The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

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115.317	Hiring and promotion decisions
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated 3. Family Safety Care Registry, not dated 4. Request for Child Abuse Neglect and Criminal Records, not dated 5. MPFC Application Packet, not dated 6. County Police Specific Employment Status Records, not dated 7. Missouri Department of Social Services Application for Employment, note dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Human Resource Manager 2. Detention Superintendent/PREA Coordinator <p>Interviews with the Detention Superintendent/PREA Coordinator and the Human Resource Manager revealed that applicants with convictions for sexual abuse or harassment were systematically excluded during the application review process. Furthermore, individuals terminated from previous institutions for such offenses were deemed ineligible for employment or promotion. The Human Resource Manager also confirmed that criminal background checks and child registry screenings were conducted annually and whenever a promotion application was submitted.</p> <p>Site Review Observation:</p> <p>A thorough examination of the six staff personnel files confirmed full compliance with all required elements of the PREA Audit Juvenile Facilities Documentation Review Employee File/Records. Each file demonstrated adherence to established protocols, ensuring proper documentation and regulatory compliance.</p> <p>Notably, any instances where Administrative Adjudication Checks or Institutional Reference Checks were absent pertained exclusively to staff members who had been employed at the facility prior to the implementation of PREA regulations. This context is important in understanding these exceptions, as those employees were hired under earlier policies that did not mandate such requirements.</p> <p>Overall, the findings affirm the facility's commitment to maintaining best practices and regulatory standards in accordance with PREA guidelines.</p> <p>(a) The Michael Prenger Family Center PAQ outlines the agency's policy regarding</p>

hiring, promotions, and contracting. The policy strictly prohibits the hiring or promotion of any individual who may have contact with residents, as well as the enlistment of any contractor with resident contact, if they have engaged in, been convicted of, or administratively adjudicated for sexual activity as described in paragraph (a)(2) of this standard.

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."

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."

(b) The Michael Prenger Family Center PAQ outlines agency policy requiring the consideration of any incidents of sexual harassment when making decisions regarding hiring, promotions, or contracting services. This policy applies to all individuals who may have contact with residents, ensuring a safe and respectful environment.

(c) The Michael Prenger Family Center PAQ Statement The agency's policy mandates that comprehensive background checks are conducted on all new hires who will have contact with residents. This process includes consulting child abuse registries and making every effort to contact all previous institutional employers to obtain information regarding substantiated allegations of sexual abuse or any resignations that occurred during an ongoing investigation of such allegations. In the past 12 months, the number of persons hired who may have contact with residents and have undergone criminal background checks was ten.

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."

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.”

(d) The Michael Prenger Family Center PAQ establishes that the agency policy mandates a criminal background records check and consultation of applicable child abuse registries before engaging any contractor who may have contact with residents. Over the past 12 months, the agency did not enter any contracts for services wherein all covered staff underwent the required criminal background record checks prior to having 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) Verification of Compliance: To uphold the agency’s requirement that background checks are completed every five years, as outlined in provision (b), the Michael Prenger Family Center shall implement a standardized process for monitoring and documenting compliance. This shall include maintaining accurate records of completed checks, establishing a notification system for upcoming renewals, and ensuring staff and volunteers remain in adherence with this policy. Any deviations from this requirement must be reviewed and addressed in accordance with agency procedures.

(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): Compliance Monitoring and Enforcement Policy compliance is governed by the guidelines outlined in provision (c) of this standard. All applicable entities must adhere to these established protocols to ensure regulatory alignment and operational integrity.

The facility provided a Missouri Department of Social Services Application for Employment. As part of the application process, applicants are required to certify that all information provided in the application is true and accurate. This certification includes acknowledging any reports related to sexual abuse, sexual contact with, or sexual harassment of an inmate, detainee, or resident of a prison, jail, lockup, or other correctional facility—whether public or private. Additionally,

	<p>applicants must disclose any reports of engaging in or attempting sexual activity involving force or inflicted upon an individual unable to consent.</p> <p>(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.”</p> <p>Conclusion:</p> <p>Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.318	Upgrades to facilities and technologies
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<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 upgraded/ installed electronic surveillance system since the last PREA audit.</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>

115.321	Evidence protocol and forensic medical examinations
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Document Review:</p> <p>1. Michael Prenger Family Center PAQ</p>

2. Michael Prenger Family Center PREA Policy, not dated
3. Memorandum from Statewide PEA Coordinator, RE: PREA Standard DYS External Investigation Agencies, dated 12.16.2024
4. Memorandum of Agreement, CAC of Central Missouri, dated 3/3/2025
5. Critical Incident Report, Detention Corrective Action Report, not dated

Interviews:

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

Interviews with all staff demonstrated a clear and comprehensive understanding of the reporting protocols for sexual harassment and sexual abuse. Each staff member affirmed their awareness of the procedures, emphasizing that alleged victims, perpetrators, and the location of the allegation would be preserved until law enforcement arrived to collect any possible evidence.

Site Review Observation:

There have been no criminal investigations conducted in the past 12 months.

(a) According to the Michael Prenger Family Center PAQ, the facility does not hold responsibility for conducting administrative sexual abuse investigations. Additionally, the agency and facility are not tasked with conducting criminal sexual abuse investigations, including cases involving resident-on-resident sexual abuse or staff sexual misconduct.

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. "

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."

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 memorandum for the Statewide PREA Coordinator, regarding investigations. 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."

(b) The Michael Prenger Family Center PAQ states this provision is not applicable as

the facility does not conduct criminal and or administrative investigations.

(c) The Michael Prenger Family Center PAQ outlines that the facility ensures all residents who experience sexual abuse have access to forensic medical examinations. These examinations are provided at no cost to the victim and, whenever possible, are conducted by SAFE or SANE examiners. Over the past 12 months, no medical or SAFE/SANE exams have been performed. In the event a juvenile requires a forensic exam, the incident would be documented on a critical incident form—Detention Action Report—following all aspects of the facility's coordinated response, as detailed in standard 115.365.

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."

Michael Prenger Family Center PREA Policy, page 9, last bullet, states, "Forensic medical examinations are offered to victims without financial cost."

Michael Prenger Family Center PREA Policy, page 9, seventh bullet, states, Child Advocacy Center of Central Missouri provides SAFE examinations and forensic interviews, plus victim advocacy, counseling, and case management.

The facility provided a MOU Children's Advocacy Center of Central Missouri (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)

(d) The Michael Prenger Family Center PAQ outlines the facility's commitment to making a victim advocate from a rape crisis center available to victims, either in person or through other means. All efforts to facilitate this support are thoroughly documented. As the facility does not have qualified staff for victim services, it relies on the expertise and assistance of the Child Advocacy Center (CAC) of Central Missouri to provide comprehensive support.

Michael Prenger Family Center PREA Policy, page 9, fifth bullet, states, "Our area SAFE agency is Child Advocacy Center of Central Missouri;307 Locust Street, Columbia, MO 65201. Phone 573-307-4788."

	<p>(e) The Michael Prenger Family Center PAQ affirms that a qualified staff member or designated community advocate accompanies and supports victims throughout the forensic medical examination process and investigatory interviews. This accompaniment ensures victims receive compassionate emotional support, crisis intervention, and access to vital information and referrals. By fostering a supportive and reassuring environment, the center aims to empower victims during these critical moments, helping them navigate the complexities of their situation with care and dignity.</p> <p>Michael Prenger Family Center PREA Policy, page 9, seventh bullet, states, “Child Advocacy Center of Central Missouri provides SAFE examinations and forensic interviews, plus victim advocacy, counseling, and case management. “</p> <p>(f) Investigative Coordination and Standards Compliance: The Michael Prenger Family Center acknowledges that it does not assume responsibility for administrative investigations, instead relying on designated external agencies to conduct both criminal and administrative inquiries. To ensure thorough and ethical investigative practices, the agency requests that provisions (a)-(e) of this standard be incorporated into all investigative procedures.</p> <p>The facility has entered a Memorandum of Understanding (MOU) with the Children’s Advocacy Center of Central Missouri. This agreement outlines that the Children’s Advocacy Center of Central Missouri will provide victim advocacy services to the youth at the Michael Prenger Family Center. The agreement was signed on March 3, 2025, and remains in effect indefinitely, as it does not have an expiration date.</p> <p>(h) Child Advocacy Center of Central Missouri employees are qualified community-based staff members for the purposes of this section.</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.322	Policies to ensure referrals of allegations for investigations
	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. www.colecounty.org/635/Prison-Rape-Elimination-Act-PREA

4. Sexual Abuse/Harassment Places to Report Notice, English and Spanish versions, not dated

5. Detention Corrective Action Report, (Critical Incident Report), not dated

Interviews:

1. Random staff

2. Detention Supervisor

3. Detention Superintendent/PREA Coordinator

Staff interviews confirmed that residents have multiple avenues to report incidents, including informing a staff member, utilizing the grievance process, or calling the hotline. Additionally, staff indicated that they can privately report allegations through the hotline or by communicating directly with a supervisor.

Site Review Observation:

PREA Zero Tolerance and flyers with internal and external reporting numbers were observed in the facility day room in both English and Spanish.

(a) The Michael Prenger Family Center PAQ affirms the agency's commitment to ensuring that all allegations of sexual abuse and sexual harassment undergo thorough administrative or criminal investigations. Over the past 12 months, the facility has not received any allegations of sexual abuse or sexual harassment.

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 said allegations if there is a potential for criminal charges. The Missouri DSS Child Abuse Hotline shall be notified to investigate initial allegations."

Criminal investigations are conducted by the Jefferson County Police Department, while administrative investigations are overseen by the Court Services Administrator from the Out of Home Placement Investigations Unit. This unit operates under the umbrella of the Children's Division within the Department of Social Services for the State of Missouri.

(b) Referral of Allegations for Investigation: The Michael Prenger Family Center maintains a policy that mandates all allegations of sexual abuse or harassment be promptly referred for investigation to an agency with the legal authority to conduct criminal investigations. This ensures that all claims are handled with the appropriate level of expertise and legal oversight, prioritizing the safety and well-being of those affected. The referral process is carried out in accordance with established protocols to guarantee compliance with legal and ethical standards.

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

	<p>be made in non-emergency situations at https://dss.mo.gov/cd/keeping-kids-safe/-can.htm.🔗🔗</p> <p>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>The facility provided a Sexual Abuse/Harassment Places to Report Notice, English and Spanish versions. The notice speaks to the following options:</p> <ol style="list-style-type: none">1. Grievance Box location2. MPFC Case Manager3. Parents4. Teachers5. Attorneys6. Missouri Child Abuse Hotline7. National Reporting8. Child Advocacy Center of Central Missouri <p>(c) Compliance with the standard is outlined in provision (a) of this document.</p> <p>(d) The Auditor is not required to audit this provision.</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.331	Employee training
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none">1. Michael Prenger Family Center PAQ2. Michael Prenger Family Center PREA Policy, not dated3. Michael Prenger Family Center PREA Policy Statement, not dated4. Michael Prenger Family Center Fundamental Practices, not dated5. Mandated Reporting Training, not dated6. Conflict Resolution7. Training Documentation and Verification Examples, dated within 20248. Training Curriculum, NIC and Juvenile Detention PREA Videos <p>Interviews:</p>

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

Interviews with staff confirmed that all personnel were knowledgeable about and had successfully completed both initial and annual PREA training as of last year.

Site Observation:

During the onsite review of the four employee files annual PREA training has been completed by all staff.

(a) The Michael Prenger Family Center's PAQ affirms that the agency provides comprehensive training to all employees who may interact with residents, ensuring full compliance with all required provisions of this standard.

Michael Prenger Family Center PREA Policy, page 12, section Employee Training, states, "All MPFC staff shall be trained in the following:

1. Zero Tolerance policy for sexual abuse and sexual harassment;
2. Responsibilities for prevention, detection, reporting and response to sexual abuse and sexual harassment;
3. The juveniles' right to be free from sexual abuse and sexual harassment;
4. The right of juveniles and staff to be free from retaliation for reporting sexual abuse and sexual harassment;
5. The dynamics of sexual abuse and sexual harassment in juvenile facilities;
6. The common reaction of juvenile sexual abuse and sexual harassment;
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;
8. How to avoid inappropriate relationships with juveniles;
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
10. Compliance with relevant laws regarding applicable age of consent.

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.

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>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"> 1. View the PREA Video from the National Institute of Corrections. 2. View the PREA Video Juvenile Detention. 3. Read through all PREA Standards. <p>(b) The Michael Prenger Family Center PAQ ensures that training is specifically tailored to address the unique needs, attributes, and gender of residents at the facility. Compliance with this policy is outlined in provision (a) of the standard.</p> <p>(c) Between scheduled trainings, the Michael Prenger Family Center ensures that all employees who may have contact with residents receive refresher information on current policies regarding sexual abuse and harassment. This ongoing education reinforces the agency's commitment to maintaining a safe and respectful environment for all individuals.</p> <p>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."</p> <p>(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.</p> <p>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."</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.332	Volunteer and contractor training
	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 Fundamental Practices, not dated
4. Training Curriculum, NIC and Juvenile Detention PREA Videos

Interviews:

The facility does not have any contractors or volunteers.

The Michael Prenger Family Center PAQ affirms that all volunteers and contractors who have had contact with residents have been thoroughly trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and harassment prevention, detection, and response. Currently, there are no contractors or volunteers in contact with residents.

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."

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 a curriculum statement, stating employees:

4. View the PREA Video from the National Institute of Corrections.
5. View the PREA Video from Greene County Juvenile Detention.
6. Read through all PREA Standards.

(b) The Michael Prenger Family Center PAQ outlines the training provided to volunteers and contractors based on the services they offer and their level of interaction with residents. All individuals who have contact with residents are informed of the agency's zero-tolerance policy regarding sexual abuse and harassment, as well as the procedures for reporting such incidents. The facility affirms that volunteers and contractors receive the same training as employees to ensure consistency in awareness and preparedness.

(c) The Michael Prenger Family Center PAQ affirms that the agency maintains thorough documentation verifying that volunteers and contractors have comprehended the training they have received.

Michael Prenger Family Center PREA Policy, page 13, Section Volunteer and Contractor Training, last bullet, states, "This training shall be documented."

	<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>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.333	Resident education
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated 3. Safety First Handbook, English and Spanish versions, not dated 4. Office of State Courts Administrator, Contract Award with International Language Center, not dated 5. Preventing Sexual Assault Brochure, not dated 6. Sexual Abuse/Harassment Places to Report Flyer, not dated 7. Child Abuse and Neglect Hotline Flyer, English and Spanish versions, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Detention Supervisor/Intake Staff 2. Detention Superintendent/PREA Coordinator 3. Resident Interviews <p>The Facility Detention Supervisor confirmed that resident education is incorporated into the intake packet. This packet provides a clear explanation of the facility's zero-tolerance policy, the no-touching policy, and the procedures residents can follow to report allegations of harassment or abuse.</p> <p>The Detention Superintendent/PREA Coordinator stated that the intake process is not completed until residents return from court, as many do not remain in the facility beyond 72 hours.</p> <p>Site Observation:</p>

During the onsite review, records for both juveniles in the facility were examined and found to be compliant.

(a) The Michael Prenger Family Center follows a strict zero-tolerance policy regarding sexual abuse and harassment. Upon intake, every resident is provided with detailed information about this policy, including procedures for reporting incidents or suspicions of such misconduct. In the past 12 months, 30 residents were admitted and received this vital information at the time of their intake, ensuring that all individuals are aware of their rights and the protective measures in place.

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."

The facility provided Safety First Handbooks in English and Spanish. Page 6 of the handbook includes the following areas for youth to "Remember":

- "You have the right to say "NO" if someone wants to touch you in any way that makes you feel uncomfortable, afraid or confused.
- 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.
- True consent means both partners have equal power. Equal power means equal knowledge and equal freedom to make decisions, without pressure.
- 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.
- Remember if you are sexually harassed or forced into sexual contact let your staff know.
- You will not be blamed if someone touches you in a way that does not seem right, it is not your fault.
- You will not be hurt or blamed if you tell staff or other trusted adults about any abuse you report."

The last page of the handbook states, "I have read and/or covered the material in this workbook. Date:/Signature/Staff Signature"

(b) The Michael Prenger Family Center PAQ states within the past 12 months, 30 residents received age appropriate PREA education within 10 days of intake.

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. "

(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-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 has entered a contract award with the International Language Center under the Office of State Courts Administrator. This agreement ensures the provision of specialized language services, including but not limited to Arabic, Bosnian, Farsi, Mandarin, Russian, Spanish, Tigrinya, and Vietnamese, with the flexibility to accommodate additional languages upon request.

In addition to language support, the contract encompasses a range of essential services, including family support therapy, mental health interpreter assistance, client outreach through educational initiatives, and courtroom interpretation services as needed.

This contract is in effect for a duration of 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

	<p>and Spanish. The notice speaks to the following options for reporting:</p> <ol style="list-style-type: none"> 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. Child Advocacy Center of Central Missouri address and telephone number. <p>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.</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.334	Specialized training: Investigations
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ <p>Interviews:</p> <ol style="list-style-type: none"> 1. Detention Superintendent/PREA Coordinator <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 asserts that this standard does not apply, as both criminal and administrative investigations are conducted by external entities. Criminal investigations are handled by the Jefferson City Police Department, while administrative investigations fall under the jurisdiction of the Court Services Administrator from the Out of Home Placement Investigations Unit. This unit operates within the Children's Division under the Department of Social Services for the State of Missouri.</p> <p>(b) NA</p>

	<p>(c) NA</p> <p>(d) NA</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.335	Specialized training: Medical and mental health care
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated 3. Facility Training Verification Form, PREA Medical and Mental Care Standards <p>Site Observation:</p> <p>Medical and mental health services are through contracted services in the community and do not work at the facility.</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</p>

	<p>completed the required training. Policy compliance and be found in provision (a) of this standard.</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.341	Obtaining information from residents
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated 3. Intake Forms 4. PREA Policy Statement for Juveniles 5. Juvenile's Rights at Admission 6. Missouri Secure Detention SAVAC Sexual Assault Victim/Assailant Checklist - computerized <p>Interview:</p> <ol style="list-style-type: none"> 1. Detention Supervisor/Intake staff <p>The interview with the Detention Supervisor confirmed that a risk assessment is conducted within 72 hours of a resident's admission. While the assessment results regarding resident risk are communicated to facility staff, the specific reasons behind the risk classification are not disclosed.</p> <p>Site Observation:</p> <p>The facility had two residents at the facility during the onset of the onsite review. 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.</p> <p>Provisions:</p> <p>(a) The Michael Prenger Family Center PAQ outlines the facility's commitment to safety through its policy of screening all residents, upon admission or transfer, for the risk of sexual abuse victimization or the potential for sexually abusive behavior toward others. Over the past 12 months, 100% of the 30 residents with a stay exceeding 72 hours were screened within 72 hours of their entry into the facility.</p>

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."

(b) The Michael Prenger Family Center PAQ states the facility conducts risk assessments by using an objective screening instrument.

Michael Prenger Family Center PREA Policy, page 17, section Screening for Risk of Victimization and Abusiveness, Policy, states,

1. An objective screening tool shall be used for this assessment.
2. As a minimum, the MPFC will collect information about a juvenile:
 - a. Prior victimization of abusiveness.
 - 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;
 - c. Current charges and offense history;
 - d. Age;
 - e. Level of emotional and cognitive development;
 - f. Physical size and stature;
 - g. Mental illness or mental disabilities;
 - h. Intellectual or developmental disabilities;
 - i. Physical disabilities
 - j. The juvenile's personal perception of vulnerability; and
 - k. Any other specific information about a juvenile that may indicate heightened needs for supervision, additional safety precautions, or separation from certain other juveniles."

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.

Possible victim status:

1. Age 15 or under/comments
2. Small physical stature (under 5'5" and or LT 125 lbs.) or lacking physical maturity/comments
3. Physical or developmental disability or mental illness/comments
4. First secure confinement of any kind/comments
5. Juvenile is or is perceived to be gay, lesbian, bisexual, transgender, intersex or gender nonconforming/comments
6. History as victim of sexual abuse or exposure to sexual exploitation or violence (If yes then a meeting with a medical or mental health practitioner must be offered

within 14 days) (Information must be reported if not done so previously))/comments.

7. History of facility consensual sex/comments

8. History of protective custody/comments

9. Reports concern over ability to define oneself/comments

10. Lacks facility social support/comments

Possible Predatory Status:

1. Pending sexual assault allegation or prior sexual assault referral/comments

2. History of Institutional predatory behavior/comments

3. History as perpetrator of sexual abuse/comments

4. History as perpetrator of physical abuse/comments

5. Gang affiliation/comments

The screening includes instructions for scoring both potential victim and predatory factors.

(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."

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."

(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."

Conclusion:

The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

115.342	Placement of residents
	<p data-bbox="280 185 981 219">Auditor Overall Determination: Meets Standard</p> <p data-bbox="280 264 564 297">Auditor Discussion</p> <p data-bbox="280 342 544 376">Document Review:</p> <ol data-bbox="280 383 1394 539" style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated 3. Missouri Secure Detention SAVAC Sexual Assault Victim/Assailant Checklist - computerized <p data-bbox="280 580 437 613">Interviews:</p> <ol data-bbox="280 620 788 698" style="list-style-type: none"> 1. Random staff 2. Detention Supervisor/Intake Staff <p data-bbox="280 734 1445 853">Interviews with facility staff confirmed that resident risk levels are effectively communicated to all staff members. However, the specific reasons for a resident's risk status are shared exclusively with supervisory staff.</p> <p data-bbox="280 891 432 925">Provisions:</p> <p data-bbox="280 963 1469 1167">(a) The Michael Prenger Family Center PAQ outlines that the facility utilizes information gathered from the risk screening mandated by §115.341. This data plays a crucial role in determining housing, bed placement, work assignments, educational opportunities, and program participation. The ultimate goal is to ensure the safety of all residents and protect them from any risk of sexual abuse.</p> <p data-bbox="280 1202 1449 1361">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="280 1397 1477 1516">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="280 1552 1469 1839">(b) According to the Michael Prenger Family Center's PAQ, residents are only placed in isolation as a last resort to ensure their safety from other residents while alternative arrangements are made. The facility maintains a commitment to equitable treatment, ensuring that residents in isolation continue to have access to the same programming opportunities as those outside of isolation. Over the past 12 months, there have been no instances of residents being placed in isolation due to risks of sexual victimization or the need for protection from such risks.</p> <p data-bbox="280 1877 1469 2080">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</p>

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.”

(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.

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.”

(d) The Michael Prenger Family Center PAQ outlines that housing and program assignments for transgender or intersex residents are determined on a case-by-case basis, ensuring individualized consideration and appropriate accommodations within the facility.

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.”

(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.”

(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.”

(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.”

(h) The Michael Prenger Family Center PAQ states in the last 12 months, there were zero residents at risk of sexual 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 ensures that if a resident is placed in isolation, they will receive a review every 30 days to assess whether continued

	<p>separation is necessary. This requirement is in compliance with provision (h) of the established standard."</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.351	Resident reporting
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated 3. Safety First Handbook, not dated 4. Detention Resident Rulebook, not dated 5. Preventing Sexual Assault Brochure, not dated 6. Sexual Abuse/Harassment Places to Report Flyer, not dated 7. M.P.F,C, Youth Grievance or Compliant Form, not dated 8. Detention Corrective Action Report (Critical Incident Report), not dated 9. Michael Prenger Family Center Fundamental Practices Acknowledgment, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random staff 2. Detention Supervisor 3. Detention Superintendent/PREA Coordinator <p>Interviews with staff confirmed that all team members are knowledgeable about the avenues available for residents to report allegations. Residents may do so by informing a staff member directly, utilizing the grievance process, or contacting one of the hotline numbers prominently posted within the facility.</p> <p>Site Observations:</p> <p>Flyers with hotline numbers were witnessed in the facilities day room.</p> <p>Previsions:</p> <p>(a) The Michael Prenger Family Center PAQ affirms that the agency has implemented comprehensive procedures designed to provide residents with multiple confidential avenues to report concerns related to sexual harassment, abuse, retaliation, or</p>

neglect. These internal reporting mechanisms ensure that every resident has the opportunity to seek help safely and privately, fostering a secure and supportive environment.

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."

The Michael W. Prenger Family Center is committed to maintaining a safe, humane, and secure environment for all residents. As outlined in the Resident Rule Book, specifically on Page 6 in the PREA Policy Statement, the facility upholds a strong policy of prevention, detection, and investigation regarding any allegations of sexual offenses occurring within the detention facility.

It is the policy of this detention facility to strictly prohibit any sexual activity between staff and juveniles, volunteers and juveniles, or contract personnel and juveniles, regardless of consensual status. Such actions are subject to administrative disciplinary measures and criminal charges. Sexual assault is a crime, and all reported incidents within this facility will be promptly referred to the appropriate law enforcement and child protection authorities.

The Michael W. Prenger Family Center maintains a strict zero-tolerance policy regarding juvenile-on-juvenile sexual offenses, staff sexual misconduct, and sexual harassment towards juveniles. Every allegation of sexual offense, misconduct, or harassment will be thoroughly investigated to ensure the safety and well-being of all individuals within our care.

The facility provided Safety First Handbooks in English and Spanish. Page 6 of the handbook includes the following areas for youth to "Remember":

- "You have the right to say "NO" if someone wants to touch you in any way that makes you feel uncomfortable, afraid or confused.
- 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.
- True consent means both partners have equal power. Equal power means equal knowledge and equal freedom to make decisions, without pressure.
- 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.
- Remember if you are sexually harassed or forced into sexual contact let your staff know.
- You will not be blamed if someone touches you in a way that does not seem right, it is not your fault.

- You will not be hurt or blamed if you tell staff or other trusted adults about any abuse you report.”

The last page of the handbook states, “I have read and/or covered the material in this workbook. Date: /Signature/Staff Signature.”

(b) Resident Reporting and Information Access The Michael Prenger Family Center PAQ establishes that the facility ensures residents have at least one avenue to report abuse or harassment to an external entity, whether public or private, that operates independently of the agency. This measure is designed to provide residents with a secure and accessible means to raise concerns without fear of institutional bias or reprisal.

However, the agency does currently maintain a policy requiring that residents detained solely for civil immigration purposes receive information on how to contact relevant consular officials or appropriate officials within the Department of Homeland Security. The absence of such a policy may present challenges for affected residents seeking official guidance or legal assistance.

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.

(c) Reporting Policies and Procedures The Michael Prenger Family Center PAQ establishes a clear mandate requiring staff to accept reports of sexual abuse and sexual harassment through multiple channels, including verbal, written, anonymous submissions, and third-party disclosures. Staff members are obligated to document all verbal reports immediately to ensure timely and accurate recordkeeping. These procedures uphold the agency’s commitment to addressing and responding to such reports with diligence and transparency.

Resident Reporting

- MPFC staff shall accept reports of a sexual nature made in person, in writing, anonymously, or by third parties.
- All verbal reports will be promptly documented in a Critical Incident Report, ensuring accuracy and timeliness.
- Additionally, staff must record all reported incidents in the daily log, providing a clear record of events and follow-up actions.
- Staff will handle all reports with sensitivity and urgency, ensuring that residents feel safe and supported throughout the reporting process.
- Any reported incidents must be immediately communicated to the appropriate supervisory personnel for review and response.
- Residents will be informed of multiple reporting avenues, including external agencies if necessary, to ensure accessibility and transparency in reporting procedures.

(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 affirms that the agency has implemented procedures that allow staff to report sexual abuse and sexual harassment of residents in a confidential manner. These procedures ensure that staff can make reports without fear of retaliation or exposure. Furthermore, all staff members have been thoroughly informed of these reporting protocols through both initial and annual training sessions, as outlined 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.

Conclusion:

The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

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115.352	Exhaustion of administrative remedies
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Detention Superintendent/PREA Coordinator <p>There were no grievances reported in the last 12 months.</p> <p>Site Observation:</p> <p>A grievance box was observed in the facility.</p> <p>Provisions:</p> <p>(a) The Michael Prenger Family Center PAQ affirms that the agency is exempt from this standard, as it does not have an administrative procedure in place for addressing resident grievances related to sexual abuse.</p> <p>Michael Prenger Family Center PREA Policy, page 20, section Exhaustion of Administrative Remedies, policy, states the following:</p> <p>"I. Policy</p> <ul style="list-style-type: none"> • The MPFC is exempt from the requirements of this section because it does not have administrative procedures to address juvenile grievances regarding sexual abuse. <p>II. Procedures:</p> <p>A. All grievances alleging sexual abuse shall be reported to the DSS Child Abuse and Neglect Hotline.</p> <p>B. Hotline Reports shall be documented on a 109 Form and entered into the Hotline folder/binder.</p> <p>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.</p> <p>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.</p> <p>While a formal grievance procedure is available to youth, policies specify that allegations under the Prison Rape Elimination Act (PREA) are not officially processed</p>

	<p>through this mechanism.</p> <p>(e) NA</p> <p>(f) NA</p> <p>(g) NA</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.353	Resident access to outside confidential support services and legal representation
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated 3. Memorandum of Agreement, Child Advocacy Center of Central Missouri, dated 3/3/2025 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random Staff 2. Detention Supervisor <p>During staff interviews, it was demonstrated that residents may contact the hotline or the Child Advocacy Center of Central Missouri. The advocate's contact number is posted for easy access. Alternatively, residents can verbally inform a staff member, who will then escort them to a private area to make confidential calls.</p> <p>Site Observation:</p> <p>Flyers are posted in the dayroom in both English and Spanish, providing important contact details. The flyers include information for the hotline and the Child Advocacy Center of Central Missouri. If you or someone you know needs support, please refer to the details provided.</p> <p>Provisions:</p> <p>(a) The Michael Prenger Family Center PAQ states the facility provides residents with</p>

access to outside victim advocates for emotional support services related to sexual abuse by doing the following:

- 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.
- 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.
- Enables reasonable communication between residents and these organizations, in as confidential manner as possible.

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."

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

The facility provided a Jefferson County – Child Advocacy SAFE flyer. This flyer has address and phone numbers for:

Prosecuting Attorney
Sheriff's Department
Compass Health Network
Jefferson County Rape and Abuse Crisis Services
Child Advocacy Center of Central Missouri

(b) The Michael Prenger Family Center PAQ outlines the facility's commitment to transparency by informing residents, prior to their access to outside support services, about the extent to which such communications may be monitored. Additionally, the facility ensures that residents are aware of the mandatory reporting rules related to privacy, confidentiality, and privilege. This includes providing clear guidance on the limitations of confidentiality concerning disclosures of sexual abuse made to outside victim advocates, in accordance with relevant Federal, State, or local laws.

Resident Access to Outside Confidential Support Services

Juveniles will be informed of the extent to which their communications with external support services may be monitored.

All MPFC staff are legally required, under state law, to report any suspected child abuse or neglect to the CA/N Hotline at 800-392-3738.

(c) Memoranda of Understanding for Emotional Support Services The Michael Prenger Family Center PAQ affirms that the facility has established formal

	<p>memoranda of understanding with reputable community service providers. These partnerships ensure that residents have access to comprehensive emotional support services specifically designed to address issues related to sexual abuse. The facility is committed to fostering a safe and supportive environment where residents can receive the care and guidance they need.</p> <p>The facility provided a Children’s Advocacy Center of Central Missouri (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 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.”</p> <p>(d) The Michael Prenger Family Center PAQ ensures that residents have reasonable and confidential access to their attorneys or other legal representatives. Additionally, the facility provides residents with reasonable access to their parents or legal guardians. Compliance with this policy is outlined in provision (b) of the applicable standard.</p> <p>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.</p> <p>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).”</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.354	Third-party reporting
	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. Preventing Sexual Assault Brochure, not dated
4. Sexual Abuse-Harassment Notice, not dated

Interviews:

1. Random staff
2. Supervisory staff

During interviews, staff demonstrated their understanding of third-party reporting procedures by either contacting the designated hotline or notifying a trusted adult.

Provisions:

(a) The Michael Prenger Family Center PAQ outlines the facility's commitment to addressing resident safety by providing a clear method for third-party reporting of sexual abuse or harassment. Additionally, the agency ensures transparency by publicly sharing information on how to report such incidents on behalf of residents.

Third-Party Reporting

The Michael Prenger Family Center is committed to ensuring a safe and secure environment for all individuals in its care. As part of this commitment, the facility recognizes the importance of third-party reporting in preventing and addressing incidents of sexual abuse and sexual harassment.

Reporting Mechanisms Any individual—whether a resident, staff member, family member, visitor, or concerned party—may report allegations of sexual abuse and sexual harassment by any available means of communication. This includes, but is not limited to:

Direct verbal reports to facility staff

Written reports submitted via formal complaint procedures

Telephone or electronic communication to designated reporting authorities

Anonymous reporting through established channels

Staff Responsibilities All facility staff are required to accept and respond to reports of sexual abuse and sexual harassment, regardless of the reporting source. Upon receiving such a report, staff shall:

Immediately document the report in the official Shift Notes.

Ensure confidentiality while maintaining compliance with investigative protocols.

Forward the report to the Superintendent for appropriate action, following facility policies and PREA standards.

	<p>Commitment to Confidentiality & Safety The facility guarantees that all reports will be taken seriously, investigated promptly, and handled with discretion. Retaliation against reporters, whether internal or external, is strictly prohibited.</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.361	Staff and agency reporting duties
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated 3. Mandated Reporting Information, not dated 4. Mandated Reporting Statue, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random Staff 2. Detention Supervisor 3. Detention Superintendent/PREA Coordinator 4. Juvenile Officer Court Administrator <p>Interviews with staff confirmed that each individual actively practices and understands the importance of promptly reporting all allegations of sexual abuse and sexual harassment. Supervisory personnel emphasized that the agency's expectation is for reports to be made to them and external reporting agencies immediately upon gaining knowledge of a suspicion or allegation of harassment, retaliation, or abuse.</p> <p>Site Observations:</p> <p>This facility has maintained a record free from any allegations of sexual harassment or sexual abuse.</p> <p>Previsions:</p> <p>(a) The Michael Prenger Family Center PAQ establishes a firm expectation that all staff members promptly report any knowledge, suspicion, or information regarding incidents of sexual abuse or harassment within a facility, regardless of whether the facility is affiliated with the agency. In accordance with agency policy, staff must</p>

immediately report any retaliation against residents or staff who have reported such incidents. Additionally, staff are required to report any instances of neglect or violations of responsibility that may have contributed to an incident or retaliation.

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."

(b) Staff Responsibilities and Compliance Verification: All staff members of The Michael Prenger Family Center are required to adhere to applicable mandatory child abuse reporting laws as outlined in provision (a) of this standard. To ensure compliance, the agency will implement regular training sessions, provide accessible reporting guidelines, and conduct periodic policy reviews. Staff members must demonstrate understanding and adherence to these laws through documented training participation and compliance assessments.

(c) Michael Prenger Family Center PAQ In accordance with agency policy, staff members are strictly prohibited from disclosing any information related to a sexual abuse report except as necessary for treatment, investigation, security, or management decisions. Reports must be directed to designated supervisors, officials, and appropriate State or local service agencies. Compliance with this policy is outlined in provision (a) of this standard.

(d) Michael Prenger Family Center PREA Policy As outlined on page 23, in the section Staff and Agency Reporting Duties, medical and mental health practitioners are required to uphold the same responsibilities as other staff members regarding reporting duties. Practitioners must inform juveniles of these obligations at the outset of treatment, ensuring transparency and adherence to policy.

(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."

The Superintendent shall notify the juvenile's legal representative of any allegations related to the Prison Rape Elimination Act (PREA) as soon as reasonably possible, but no later than fourteen (14) days from the date the allegation was received. This notification shall be documented and include the date, time, and method of communication. The Superintendent shall ensure that the notification process complies with all applicable legal and procedural requirements to safeguard the juvenile's rights and welfare.

	<p>(f) Compliance Confirmation Policy adherence and compliance are established in accordance with the provisions outlined in (e) of this standard.</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.362	Agency protection duties
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated 3. First Responders (PREA), not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Detention Superintendent/PREA Coordinator 2. Juvenile Officer Court Administrator <p>Interviews with the Detention Superintendent/PREA Coordinator and the Juvenile Officer Court Administrator demonstrated that facility staff are committed to acting promptly and responding appropriately upon discovering any incident of harassment, retaliation, or abuse. Both officials emphasized the facility's structured protocols, ensuring immediate intervention and thorough investigation when such incidents arise.</p> <p>The Detention Superintendent/PREA Coordinator detailed the facility's proactive training initiatives, equipping staff to recognize signs of misconduct and swiftly address concerns. They underscored the importance of maintaining a safe environment and fostering a culture where juveniles feel protected and heard.</p> <p>Similarly, the Juvenile Officer Court Administrator highlighted the coordination between detention staff and judicial authorities. They reinforced the importance of oversight and accountability, noting that all incidents are diligently documented and reviewed to prevent recurrence.</p> <p>Together, their insights reflect a facility-wide commitment to safety, transparency, and swift action in addressing any form of misconduct.</p> <p>Site Observation:</p>

	<p>The facility has not been subject to any investigations in the past 12 months</p> <p>Provisions:</p> <p>(a) The Michael Prenger Family Center's PREA Audit Questionnaire (PAQ) affirms that when the agency or facility becomes aware that a resident faces a substantial risk of imminent sexual abuse, it takes immediate action to ensure the resident's safety. In the past 12 months, the facility reports that no residents were identified as being at substantial risk of imminent sexual abuse.</p> <p>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>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.363	Reporting to other confinement facilities
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated 3. Missouri Police and Sheriff Contact Information, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Juvenile Officer Court Administrator <p>The interview with the Juvenile Officer Court Administrator revealed her understanding of the protocol for addressing allegations of sexual abuse involving residents confined at other facilities. She acknowledged her responsibility to notify the head of the facility where the alleged abuse occurred within 72 hours. However, she emphasized that such notifications would be made immediately upon receiving the allegation. Notably, no such instances have been reported in the past 12 months.</p> <p>Provisions:</p> <p>(a) The Michael Prenger Family Center PAQ outlines the agency's policy regarding allegations of sexual abuse involving residents. Specifically, the policy mandates</p>

	<p>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 or appropriate office of the agency or facility where the alleged abuse occurred. Additionally, the policy requires the head of the facility to inform the appropriate investigative agency. Over the past 12 months, the facility has not received any allegations of residents being abused while confined at another facility.</p> <p>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>(b) Notification Requirement: According to the Michael Prenger Family Center PAQ, agency policy mandates that the facility head must provide notification as soon as possible, but no later than 72 hours after receiving the allegation.</p> <p>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>(c) The Michael Prenger Family Center PAQ specifies that the facility must document its provision of notification within 72 hours of receiving an allegation.</p> <p>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>(d) The Michael Prenger Family Center PAQ affirms the facility’s commitment to investigating any allegations received from other agencies or facilities in strict accordance with the PREA standards. Over the past 12 months, the facility has not received any allegations of sexual abuse from external sources.</p> <p>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>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.364	Staff first responder duties
	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. Coordinated Response Plan, not dated

Interviews:

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

Interviews conducted with both random and supervisory staff demonstrated that each individual was fully aware of their first responder responsibilities. Employees consistently articulated their understanding of emergency protocols, rapid response procedures, and their role in ensuring safety. Supervisory personnel reinforced their commitment to guiding their teams during critical incidents, ensuring swift and effective action. The responses indicate a strong organizational emphasis on preparedness and accountability in emergency situations.

Site Observation:

This facility has not had any reports of sexual harassment or sexual abuse, ever.

Provisions:

(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.

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:

- Separate the victim and perpetrator;
- Preserve and protect any crime scene until the investigative agency arrives;

	<ul style="list-style-type: none"> • 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: • Washing their body, • Brushing their teeth, • Changing clothes, • Urinating, • Defecating, • Smoking or • Eating. <p>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.</p> <p>(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>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.365	Coordinated response
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated 3. Coordinated Response Institutional Plan, not dated 4. First Responder Protocols for Sexual Abuse, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random Staff 2. Detention Supervisor

	<p>3. Detention Superintendent/PREA Coordinator 4. Program Director</p> <p>Interviews with staff revealed that the facility's response to allegations of sexual assault is systematically documented to ensure alignment with the established First Responder Protocols and Sexual Abuse Response Procedures.</p> <p>Provisions:</p> <p>(a) The Michael Prenger Family Center PAQ outlines that the facility has established a comprehensive written institutional plan. This plan ensures coordinated actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership in response to incidents of sexual abuse.</p> <p>Michael Prenger Family Center PREA Policy, page 28, section Coordinated Response, state:</p> <ul style="list-style-type: none"> • "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. • 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." <p>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 time frames for duties and the third column speaks to individual responsibilities for each staff in the first column.</p> <p>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>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.366	Preservation of ability to protect residents from contact with abusers
	Auditor Overall Determination: Meets Standard

	<p>Auditor Discussion</p> <p>Document Review: 1. Michael Prenger Family Center PAQ</p> <p>Interviews: 1. Detention Superintendent/PREA Coordinator</p> <p>Following interviews conducted with facility staff, it has been determined that the organization has not entered into any collective bargaining agreements. Employees across various departments confirmed that no formal union representation exists within the facility, and no agreements regarding collective bargaining have been negotiated or enacted.</p> <p>Provisions:</p> <p>(a) The Michael Prenger Family Center PAQ states that the agency has not entered into or renewed any collective bargaining agreements since the last PREA audit.</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.367	Agency protection against retaliation
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Document Review: 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated 3. Michael W. Prenger Family Center, Retaliation Monitoring Form, dated 2.25.2022</p> <p>Interviews: 1. Detention Superintendent/PREA Coordinator 2. Juvenile Officer Court Administrator</p> <p>Interviews with facility administrators confirmed that they would conduct all necessary retaliation monitoring and document it on the facility Retaliation Monitoring Form for up to 90 days or as long as required.</p> <p>Site Observation:</p>

There has been no need for retaliation monitoring in the past 12 months.

(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.

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."

(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 Child Advocacy Center of Central Missouri or other MOU agreement provider."

(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.

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."

The facility provided a Michael W. Prenger Family Center, Retaliation Monitoring Form. The form instructs staff to complete the following:

1. Name of Juvenile
2. Date of Incident
3. What is the safety plan for the juvenile?
4. Name of staff checking on juvenile?
5. Date of staff checking on juvenile?

The facility program manager states retaliation monitoring checks would be documented every 15 minutes during unannounced rounds.

Conclusion:

The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on

	analysis, the facility is compliant with all provisions in this standard.
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115.368	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Detention Supervisor 2. Detention Superintendent/PREA Coordinator <p>During interviews with facility staff, personnel emphasized that each cell is designated for single-use occupancy. This policy ensures individualized housing for all detainees or inmates, eliminating the practice of utilizing cells for protective custody. Staff members confirmed that security procedures and alternative housing solutions are in place to accommodate individuals who require separation for safety reasons. The interviews further illustrated how this system maintains operational efficiency while prioritizing security and well-being.</p> <p>Provisions:</p> <p>(a) The Michael Prenger Family Center PAQ outlines a clear policy regarding the placement of residents who report experiencing sexual abuse. According to the policy, isolation is only used as a last resort when less restrictive measures are insufficient to ensure the safety of the resident and others. Isolation is temporary and remains in effect only until alternative safety measures can be arranged. Furthermore, the policy guarantees that residents placed in isolation under these circumstances retain access to legally mandated educational programming, special education services, and daily large-muscle exercise. Over the past 12 months, no residents who reported sexual abuse have been 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.</p> <p>Documentation of reviews and monitoring shall be maintained in a file or binder.</p> <p>Documentation shall include:</p> <p>A. Length of placement;</p>

	<p>B. Access to large muscle exercise (dates/times);</p> <p>C. Required educational services (dates/times);</p> <p>D. Daily visits from nurse or Clinical Supervisor;</p> <p>E. 30 day reviews;</p> <p>F. Instances when segregation in rooms was used to protect a resident who is alleged to have suffered sexual abuse.”</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.371	Criminal and administrative agency investigations
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated 3. Memorandum from Statewide PEA Coordinator, RE: PREA Standard DYS External Investigation Agencies, dated 2.16.2022 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Detention Superintendent/PREA Coordinator <p>Interviews with the Detention Superintendent confirmed that all investigations are conducted by either the Out of Home Placement Investigator Unit or the local Jefferson City Police Department.</p> <p>Site Observation:</p> <p>The facility did not have any investigations in the past 12 months.</p> <p>Provisions:</p> <p>(a) The Michael Prenger Family Center PAQ states the agency/facility has a policy related to criminal and administrative agency investigations.</p> <p>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>

Staff shall only be responsible for first responder duties.

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.

The MPFC shall complete an administrative investigation as follows:

To determine, if possible, whether staff actions or failures to act contributed to the abuse;

A written report of the administrative investigation shall be completed to include:

Description of physical and testimonial evidence;

Reasoning behind credibility assessments; and

Investigative facts and findings.

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

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

(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.

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

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

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

Michael Prenger Family Center PREA Policy, page 33, section Criminal and Administrative Agency Investigation, states, "The MPFC shall complete an administrative investigation as follows:

To determine, if possible, whether staff actions or failures to act contributed to the abuse;

A written report of the administrative investigation shall be completed to include:

Description of physical and testimonial evidence;

Reasoning behind credibility assessments; and

Investigative facts and findings.

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

(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,

	<p>since the last audit date. Policy compliance can be found in provision (a) of this standard.</p> <p>(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> <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."</p> <p>(k) This standard is not applicable as the facility or agency do not conduct administrative or criminal investigations.</p> <p>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/SANE exams and victim advocacy services.</p> <p>(m) Policy compliance can be found in provision (a) of this standard.</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.372	Evidentiary standard for administrative investigations
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Detention Superintendent/PREA Coordinator <p>Interviews with the Detention Superintendent demonstrated all investigations are</p>

	<p>completed by the Out of Home Placement Investigator Unit and or the local Jefferson City Police Department.</p> <p>Provisions:</p> <p>(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>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>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.373	Reporting to residents
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated 3. Detention Corrective Action Report - Critical Incident Report, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Detention Superintendent/PREA Coordinator <p>Interviews with the Detention Superintendent confirmed that all investigations are conducted by the Out of Home Placement Investigator Unit or the local Jefferson City Police Department. During the investigation process, the Out of Home Investigators promptly notify the Detention Superintendent, who in turn ensures that residents are informed throughout the course of the inquiry.</p> <p>Provisions:</p>

(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.

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):

- o When the staff member is working (said staff member may be suspended with pay while investigation is being conducted);
- o When the staff member is no longer employed at the MPFC, and
- o If the staff member is charged and/or convicted of the allegation.

(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.

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."

(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:

- The staff member is no longer posted within the resident's unit;
- The staff member is no longer employed at the facility;
- The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or
- The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility." Policy compliance can be found in provision (a) of this standard.

(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>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>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 style="list-style-type: none"> 1. Sexual Aggression/Abuse; 2. Report/Allegation of Abuse/Neglect 3. Hotline Called 4. Reporting parties to be notified to include: <ol style="list-style-type: none"> a. Juvenile Court Administrator b. MPFC Superintendent c. MPFC Program Director d. Detention Supervisor e. Child Abuse/Neglect Hotline f. Law Enforcement g. Parent/Legal Guardian <p>(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.</p> <p>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.”</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

1. Michael Prenger Family Center PAQ
2. Michael Prenger Family Center PREA Policy, not dated

Interviews:

1. Detention Superintendent/PREA Coordinator

Interviews conducted confirmed that the facility has maintained a standard of compliance with agency policies regarding sexual abuse and sexual harassment. During this period, there were zero instances of staff disciplinary actions related to violations of these policies.

Provisions:

(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.

At The Michael Prenger Family Center, maintaining a safe and respectful environment for all individuals is our highest priority. As outlined in the agency's Prison Rape Elimination Act Questionnaire (PAQ), all staff members are strictly required to adhere to policies regarding sexual abuse and sexual harassment prevention. Any violation of these policies is subject to disciplinary sanctions, which may include corrective actions up to and including termination.

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."

(b) According to the Michael Prenger Family Center PAQ, there have been zero instances in the past 12 months of facility staff violating agency policies related to sexual abuse or sexual harassment.

(c) The Michael Prenger Family Center PAQ outlines that disciplinary sanctions for violations of agency policies related to sexual abuse or sexual harassment—excluding direct engagement in such acts—are proportionate to the nature and circumstances of the violations, the staff member's disciplinary record, and the penalties applied for comparable offenses by other staff with similar histories. Over the past 12 months, there have been zero instances of staff requiring disciplinary action for sexual abuse or sexual harassment.

Michael Prenger Family Center PREA Policy, page 35, section Disciplinary Sanctions for Staff, second bullet, states, "Termination shall be the presumptive disciplinary

	<p>sanction for staff who are found as a result of the investigation, to have engaged in sexual abuse.”</p> <p>(d) Reporting of Terminations and Resignations The Michael Prenger Family Center PAQ establishes that any termination due to violations of the agency's sexual abuse or sexual harassment policies, or any resignation by staff who would have been terminated for such violations, is reported to law enforcement agencies—unless the activity is clearly non-criminal—as well as to any relevant licensing bodies. Over the past 12 months, no staff members have been terminated for sexual abuse or harassment.</p> <p>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>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.377	Corrective action for contractors and volunteers
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Detention Superintendent/PREA Coordinator <p>During the interview with the Detention Superintendent/PREA Coordinator, it was confirmed that, in the last audit cycle, the facility did not have any volunteers or contractors who were subject to disciplinary action for violating sexual abuse or sexual harassment policies. This demonstrates a commitment to maintaining a safe and compliant environment within the facility.</p>

	<p>(a) The Michael Prenger Family Center PAQ outlines agency policy mandating that any contractor or volunteer involved in sexual abuse must be reported to law enforcement agencies—unless the activity is deemed non-criminal—and to relevant licensing bodies. Additionally, the policy strictly prohibits such individuals from having any contact with residents. Over the past 12 months, there have been no instances of contractors or volunteers being reported to law enforcement or licensing bodies for engaging in sexual abuse of residents.</p> <p>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>(b) Remedial Measures for Policy Violations: The Michael Prenger Family Center's PAQ outlines the facility's commitment to taking appropriate remedial actions in the event of any violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. While the facility has not experienced such an incident, established procedures ensure swift and decisive action if necessary. Remedial measures would include immediate removal from the premises, restriction or termination of access, and, in cases warranting it, permanent termination of the individual's affiliation with the facility. These actions align with the center's dedication to maintaining a safe and respectful environment for all residents.</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.378	Interventions and disciplinary sanctions for residents
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Detention Superintendent/PREA Coordinator/Sexual Abuse Incident Team

Member

The interview with the Detention Superintendent revealed that residents who falsely report PREA allegations may face disciplinary action if the circumstances warrant.

Provisions:

(a) The Michael Prenger Family Center PAQ outlines that residents are subject to disciplinary sanctions only through a formal disciplinary process. This process is initiated following either an administrative finding of resident-on-resident sexual abuse or a criminal finding of guilt for such conduct. Over the past 12 months, the facility has reported zero administrative findings of resident-on-resident sexual abuse. Similarly, there have been no criminal findings of guilt for resident-on-resident sexual abuse during this period.

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."

(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.

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".

(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."

(d) The Michael Prenger Family Center PAQ outlines that the facility provides therapy, counseling, and other interventions aimed at addressing and correcting the underlying causes or motivations for abuse. While these services are available,

	<p>participation in such interventions is not a mandatory condition for access to any rewards-based behavior management system or other behavior-based incentives. Additionally, general programming and educational opportunities remain accessible to residents regardless of their involvement in these 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>(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.</p> <p>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."</p> <p>(f) The Michael Prenger Family Center PAQ states the agency prohibits all sexual activity between residents.</p> <p>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."</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.381	Medical and mental health screenings; history of sexual abuse
	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. Nurse Assessment – Medical Screening, not dated
4. Michael Prenger Family Center 18+ Consent Reporting Form, not dated

Interviews:

1. Detention Superintendent/PREA Coordinator

Interview Summary: Detention Superintendent/PREA Coordinator During the interview with the Detention Superintendent/PREA Coordinator, it was demonstrated that residents requiring mental health services, those disclosing prior sexual abuse, or individuals identified as potential abusers are provided with appropriate follow-up care. Such residents are referred to an offsite local mental health provider to ensure they receive the necessary support and intervention.

Provisions:

(a) At the Michael Prenger Family Center, ensuring the well-being of all residents is a priority. In accordance with §115.341, any resident who discloses prior sexual victimization during the intake screening is offered a follow-up meeting with a qualified medical or mental health practitioner. These follow-up meetings are scheduled within 14 days of the initial screening to provide timely support and care.

Over the past 12 months, zero residents have disclosed prior victimization during their intake screening. To ensure compliance with these essential services, medical and mental health staff diligently maintain secondary materials documenting each case, confirming that follow-up care has been provided in accordance with established guidelines.

The Michael Prenger Family Center remains committed to creating a safe and supportive environment for all residents, prioritizing their health, safety, and recovery.

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.

Prenger Family Health Care Services Facility Note

The Michael Prenger Family Center ensures that juveniles receive medical services in accordance with commonly accepted community medical practices. They have 24-hour access to emergency medical, dental, and mental health services as needed.

All emergency and non-emergency medical procedures are conducted through the facility's nurse, in coordination with Cole County Community Health Center, Capital Regional Medical Center, St. Mary's Health Center, Cole County Health, and other medical professionals.

Upon arrival, juveniles undergo an initial medical screening administered by the facility nurse within five (5) days of admission.

(c) The Michael Prenger Family Center PAQ stipulates that any information shared with other staff is strictly limited to purposes essential for security and management decisions. This includes, but is not limited to, treatment planning, housing arrangements, bed assignments, work placements, education opportunities, and program assignments. Additionally, information may be shared as required by applicable federal, state, or local laws.

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 establishes that medical and mental health practitioners must obtain informed consent from residents before disclosing information regarding prior sexual victimization that occurred outside an institutional setting. However, this requirement does not apply if 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

Conclusion:

The Auditor uses a triangulation approach, by connecting the PREA facility

	documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.
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115.382	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated 3. Nurses Assessment, not dated <p>Provisions:</p> <p>(a) The Michael Prenger Family Center PAQ ensures that resident victims of sexual abuse receive timely and unobstructed access to emergency medical treatment and crisis intervention services. The extent and nature of these services are determined by qualified medical and mental health practitioners, based on their professional judgment. Additionally, medical and mental health staff are responsible for maintaining secondary materials related to such occurrences.</p> <p>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 of Central Missouri).”</p> <p>Michael Prenger Family Center ensures that juveniles receive medical care in accordance with the commonly accepted medical practices within the community. Youths housed at the facility have access to emergency medical, dental, and mental health services 24 hours a day, as needed.</p> <p>Both emergency and non-emergency medical procedures are carried out by the facility’s nurse, in coordination with the Cole County Community Health Center, Capital Regional Medical Center, St. Mary’s Health Center, Cole County Health, and other qualified medical professionals. Additionally, upon arrival, every juvenile will undergo a medical screening conducted by the facility nurse within five (5) days of admission.</p> <p>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</p>

and secured in the Clinical Supervisor's office."

(b) In the absence of qualified medical or mental health staff, personnel shall adhere to the directives outlined in the coordinated response checklist, which includes specific instructions for contacting mental health practitioners.

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."

(c) Implementation and Monitoring To ensure adherence to the Michael Prenger Family Center PAQ and uphold the rights of resident victims of sexual abuse, the facility shall establish a structured process for the timely delivery of emergency contraception and sexually transmitted infection prophylaxis. This shall include:

Medical Evaluation and Access: All resident victims shall be provided a prompt medical evaluation by qualified healthcare professionals to determine the appropriateness of treatment, in accordance with professionally accepted standards of care.

Information and Counseling: Victims will receive clear, accessible, and trauma-informed information about emergency contraception and prophylaxis, including their benefits, limitations, and potential side effects. Counseling services shall also be made available to support their physical and emotional well-being.

Procedural Documentation: Staff must maintain detailed records verifying policy compliance, including timelines of medical interventions and informed consent processes.

Quality Assurance and Review: The facility shall conduct periodic audits to assess the effectiveness of policy implementation and ensure continued compliance with provision (a) of this standard.

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."

(d) Treatment Services Policy The Michael Prenger Family Center PAQ ensures that all victims receive treatment services at no financial cost. These services are provided unconditionally, regardless of whether the victim chooses to identify the abuser or participate in any investigative process related to the incident.

Michael Prenger Family Center PREA Policy, page 38, section Access to Emergency Medical and Mental Health Services, fifth bullet, states, "Treatment services

	<p>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>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.383	Ongoing medical and mental health care for sexual abuse victims and abusers
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated <p>Site Observation:</p> <p>Throughout the facility, residents can access a variety of resources, including sexual abuse community providers and informational pamphlets for students, available in the multipurpose room.</p> <p>Provisions:</p> <p>(a) The Michael Prenger Family Center's PREA Audit Questionnaire (PAQ) affirms the facility's commitment to providing comprehensive medical and mental health evaluations, along with appropriate treatment, to all residents who have experienced sexual abuse in any correctional setting, including prisons, jails, lockups, or juvenile facilities.</p> <p>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>(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>(c) Michael Prenger Family Center PREA Policy, page 40, section, Ongoing Medical</p>

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."

(d) The Michael Prenger Family Center PAQ outlines that female victims of sexually abusive vaginal penetration during incarceration are provided access to pregnancy tests. This policy ensures that appropriate medical care and support are available to address the needs of affected individuals.

(e) The Michael Prenger Family Center PAQ ensures that in cases where pregnancy results from sexual abuse during incarceration, victims are provided with timely and comprehensive information about all lawful pregnancy-related medical services. Additionally, it guarantees prompt access to these services, reflecting a commitment to the rights and well-being of those affected.

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."

(f) The Michael Prenger Family Center PAQ affirms that residents who have experienced sexual abuse during incarceration are provided with medically appropriate testing for sexually transmitted infections.

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."

(g) The Michael Prenger Family Center PAQ is committed to providing comprehensive treatment services to victims at no financial cost. These services are available regardless of whether the victim chooses to identify the abuser or participate in any investigation related to the incident. Our goal is to ensure that all individuals receive the support they need in a safe and compassionate environment.

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."

(h) The Michael Prenger Family Center PAQ outlines the facility's commitment to conducting a mental health evaluation for all known resident-on-resident abusers within 60 days of discovering such abuse history. Additionally, when deemed appropriate by mental health practitioners, treatment is offered to support the

	<p>residents' well-being and rehabilitation.</p> <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."</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.386	Sexual abuse incident reviews
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 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 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Detention Superintendent/PREA Coordinator 2. Juvenile Officer Court Administrator <p>Interviews with facility administration revealed that reviews of sexual abuse incidents are conducted following each Administrative Investigation. Administrators emphasized that findings from these reviews are used to recommend changes to policies and procedures, if necessary.</p> <p>Provisions:</p> <p>(a) The Michael Prenger Family Center PAQ outlines that the facility conducts a sexual abuse incident review following the conclusion of every criminal or administrative sexual abuse investigation, except in cases where the allegation is determined to be unfounded. Over the past 12 months, the facility has not completed any criminal or administrative investigations of alleged sexual abuse.</p>

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) Review of Sexual Abuse Incidents at The Michael Prenger Family Center
According to the PAQ for The Michael Prenger Family Center, reviews of sexual abuse incidents are customarily conducted within 30 days following the conclusion of either a criminal or administrative investigation. Over the past 12 months, the facility recorded zero criminal investigations and one administrative investigation into alleged sexual abuse. This administrative investigation was followed by a sexual abuse incident review within the designated 30-day period, ensuring adherence to policy guidelines. Further details regarding compliance with this standard can be referenced in provision (a).

(c) Incident Review Team Composition and Input
The Michael Prenger Family Center PAQ outlines that the sexual abuse incident review team comprises upper-level management officials. Additionally, the process allows for input from line supervisors, investigators, and medical or mental health practitioners to ensure a comprehensive evaluation. Policy compliance details regarding this standard can be found in provision (a).

(d) The Michael Prenger Family Center PAQ outlines the facility’s process for preparing a report on its findings following sexual abuse incident reviews. This report includes, but is not necessarily limited to, determinations made in accordance with paragraphs (d)(1) through (d)(5) of this section, along with any recommendations for improvement. Once completed, the report is submitted to both the facility head and the 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

	<p>at the MPFC;</p> <ul style="list-style-type: none"> • 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. <p>(e) The Michael Prenger Family Center Program Assessment Questionnaire (PAQ) affirms that the facility diligently implements recommendations for improvement. In cases where recommendations are not adopted, the facility provides thorough documentation outlining its reasoning for not proceeding with the suggested changes.</p> <p>Sexual Abuse Incident Reviews: To enhance safety and accountability, the Michael Prenger Family Center (MPFC) conducts thorough reviews of all sexual abuse incidents. The review team evaluates each case to identify trends, improve preventative measures, and recommend necessary policy or procedural changes.</p> <p>Implementation of Recommendations The MPFC is committed to adopting the recommendations proposed by the review team to improve facility operations and resident safety. In cases where specific recommendations are not implemented, MPFC will document the rationale for non-adoption, ensuring transparency and accountability. These records will be maintained for review by oversight entities and used to refine ongoing efforts in preventing and responding to sexual abuse incidents.</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>
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115.387	Data collection
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated 3. Missouri Department of Social Services Data Collection Instrument, not dated 4. Data Collection – OSCA – PREA Data

(a) / (c)-1,2 The Michael Prenger Family Center PAQ ensures the collection of accurate and consistent data for every allegation of sexual abuse within facilities under its direct control. This process is carried out using a standardized instrument and set of definitions to maintain uniformity and reliability. At a minimum, this instrument gathers the essential data required to address all inquiries from the latest edition of the Survey of Sexual Violence (SSV) conducted by the Department of Justice.

The facility has supplied a Missouri Department of Social Services Data Collection Instrument. This instrument mandates that all state agencies systematically collect data regarding every allegation of sexual abuse at facilities under their direct control.

(b) The Michael Prenger Family Center PAQ outlines that the agency conducts an annual aggregation of incident-based sexual abuse data.

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 least annually."

The agency website is: <https://dss.mo.gov/reports/prison-rape-elimination-act-reports/>.

(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.

The facility provided a Data Collection – OSCA – PREA Data for September of 2021. The data answers questions regarding the following:

1. Facility Information
2. Youth on Youth Incidents Section
3. Staff Incidents Section
4. Total allegations, for Substantiated, Unsubstantiated, Unfounded, and Investigative ongoing
5. Total incidents for 2021 was zero

(e) The Michael Prenger Family Center PAQ states the agency does not contract for the confinement of residents.

(e) The Michael Prenger Family Center PAQ states the Department of Justice has requested agency data for the year 2024.

Conclusion:

The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on

	analysis, the facility is compliant with all provisions in this standard.
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115.388	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none">1. Michael Prenger Family Center PAQ2. Michael Prenger Family Center PREA Policy, not dated3. OSCA – PREA Data for Calendar Year 20244. The Annual Report can be found at: https://dss.mo.gov/reports/prison-rape-elimination-act-reports/ <p>Interview:</p> <p>Interview with Detention Superintendent/PREA Coordinator</p> <p>During the interview with the Detention Superintendent/PREA Coordinator, it was confirmed that the Agency Annual Report is developed on a yearly basis. The report includes a comprehensive comparison of annual statistics, allowing for a thorough assessment of trends and changes over time.</p> <p>The Superintendent emphasized the importance of tracking these numbers to evaluate the effectiveness of agency initiatives, ensure compliance with PREA (Prison Rape Elimination Act) standards, and identify areas for improvement.</p> <p>Review of the 2024 Agency Annual Report</p> <p>An in-depth review of the 2024 Agency Annual Report demonstrated that the report follows a structured approach, integrating previous years' data for comparative analysis. This enables leadership to assess patterns, recognize emerging concerns, and develop strategic responses accordingly.</p> <p>The inclusion of historical data allows for a transparent evaluation of progress, ensuring accountability and continuous development within the agency.</p> <p>(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 style="list-style-type: none">• Identifying problem areas;• Taking corrective action on an ongoing basis; and• Preparing an annual report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole. <p>Michael Prenger Family Center PREA Policy, page 43, section Data Review for Corrective Action, first bullet, states, “The MPFC shall review data collected on</p>

sexual abuse incidents/allegations in order to assess and improve effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including:

- Identifying problem areas;
- Taking corrective action on an on-going basis;
- Preparing an annual report.

(b) Annual Report Summary – Michael Prenger Family Center: The Michael Prenger Family Center PAQ states that the annual report includes a comprehensive comparison of current-year data alongside corrective actions taken in previous years. This report serves as an essential tool in evaluating the agency’s continued progress in addressing incidents of sexual abuse. Through a detailed assessment, the report highlights the effectiveness of implemented measures, identifies areas for further improvement, and reinforces the center’s commitment to ensuring safety and accountability.

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.”

(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: <https://dss.mo.gov/reports/prison-rape-elimination-act-reports/>.

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.”

(d) The Michael Prenger Family Center PAQ states when the agency redacts material from an annual report for publication, the redaction's are limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility.

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.”

Conclusion:

The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.

115.389	Data storage, publication, and destruction
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Michael Prenger Family Center PAQ 2. Michael Prenger Family Center PREA Policy, not dated <p>Interview Summary: Detention Superintendent/PREA Coordinator</p> <p>During the interview with the Detention Superintendent/PREA Coordinator, it was demonstrated that the agency ensures the secure storage and management of sensitive data. Data is housed within the agency's secure intranet, with access restricted to Department Supervisory staff. Additionally, redacted aggregate data is made publicly available on the agency's website.</p> <p>Provisions:</p> <p>Key Findings:</p> <p>Data Security Measures</p> <p>(a) According to the Michael Prenger Family Center (MPFC) PAQ, the agency ensures that incident-based and aggregate data are securely retained.</p> <p>The Michael Prenger Family Center PREA Policy (Page 44, Section: Data Storage, Publication, and Destruction) states that all retained data is secured within the administration area file cabinets.</p> <p>Public Access to Aggregated Data</p> <p>(b) Agency policy mandates that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts must be made publicly available on an annual basis via the agency's website.</p> <p>The Michael Prenger Family Center PREA Policy (Page 44, Section: Data Storage, Publication, and Destruction) reinforces this by stating, "The MPFC shall make all aggregated data collected on sexual abuse available to the public at least on an annual basis."</p> <p>Protection of Personal Identifiers & Data Retention</p> <p>(c) Before publishing aggregated sexual abuse data, all personal identifiers are removed.</p> <p>The agency upholds data retention policies as outlined in §115.387, maintaining sexual abuse data for a minimum of 10 years, unless a different timeframe is required by Federal, State, or local law.</p> <p>The Michael Prenger Family Center PREA Policy (Page 44, Section: Data Storage,</p>

	<p>Publication, and Destruction) confirms: "No personal identifiers will be contained in the publicly released data. The MPFC will maintain sexual abuse data collected for at least 10 years unless Federal, State, or local law requires otherwise."</p> <p>Conclusion:</p> <p>The interview confirmed that the agency maintains a robust framework for safeguarding incident-based and aggregate data. Strict policies govern data retention, storage, and publication while ensuring compliance with PREA standards. The agency effectively balances transparency with privacy protections by making aggregated data available to the public while safeguarding personal identifiers.</p>
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115.401	Frequency and scope of audits
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<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>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>

115.403	Audit contents and findings
	<p>Auditor Overall Determination: Meets Standard</p>

	Auditor Discussion
	<p>(b) The agency has posted the current 2022 PREA audit report, on their website.</p> <p>Conclusion:</p> <p>The Auditor uses a triangulation approach, by connecting the PREA facility documentation, agency policies, on-site observations, site review of the facility, facility practices, interviewed staff and residents, local and national advocates and online PREA Audit: Pre-Audit Questionnaire to make determinations. Based on analysis, the facility is compliant with all provisions in this standard.</p>

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

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

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

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

	functions of the facility? (N/A for non-secure facilities)	
115.315 (a)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.315 (b)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting cross-gender pat-down searches in non-exigent circumstances?	yes
115.315 (c)	Limits to cross-gender viewing and searches	
	Does the facility document and justify all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches?	yes
115.315 (d)	Limits to cross-gender viewing and searches	
	Does the facility implement policies and procedures that enable residents to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering a resident housing unit?	yes
	In facilities (such as group homes) that do not contain discrete housing units, does the facility require staff of the opposite gender to announce their presence when entering an area where residents are likely to be showering, performing bodily functions, or changing clothing? (N/A for facilities with discrete housing units)	yes
115.315 (e)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from searching or physically examining transgender or intersex residents for the sole purpose of determining the resident's genital status?	yes
	If a resident's genital status is unknown, does the facility	yes

	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?	
115.315 (f)	Limits to cross-gender viewing and searches	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex residents in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
115.316 (a)	Residents with disabilities and residents who are limited English proficient	
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who are blind or have low vision?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including:	yes

	Residents who have speech disabilities?	
	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
115.316 (c)	Residents with disabilities and residents who are limited English proficient	
	Does the agency always refrain from relying on resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's	yes

	safety, the performance of first-response duties under §115.364, or the investigation of the resident's allegations?	
115.317 (a)	Hiring and promotion decisions	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the bullet immediately above?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
115.317 (b)	Hiring and promotion decisions	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with residents?	yes
115.317	Hiring and promotion decisions	

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

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

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

	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member?	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
115.321 (e)	Evidence protocol and forensic medical examinations	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.321 (f)	Evidence protocol and forensic medical examinations	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating entity follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency is responsible for investigating allegations of sexual abuse.)	na
115.321 (h)	Evidence protocol and forensic medical examinations	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (Check N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.321(d) above.)	na
115.322 (a)	Policies to ensure referrals of allegations for investigations	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes

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

	Does the agency train all employees who may have contact with residents on: How to detect and respond to signs of threatened and actual sexual abuse and how to distinguish between consensual sexual contact and sexual abuse between residents?	yes
	Does the agency train all employees who may have contact with residents on: How to avoid inappropriate relationships with residents?	yes
	Does the agency train all employees who may have contact with residents on: How to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming residents?	yes
	Does the agency train all employees who may have contact with residents on: How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
	Does the agency train all employees who may have contact with residents on: Relevant laws regarding the applicable age of consent?	yes
115.331 (b)	Employee training	
	Is such training tailored to the unique needs and attributes of residents of juvenile facilities?	yes
	Is such training tailored to the gender of the residents at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male residents to a facility that houses only female residents, or vice versa?	yes
115.331 (c)	Employee training	
	Have all current employees who may have contact with residents received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes

115.331 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.332 (a)	Volunteer and contractor training	
	Has the agency ensured that all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
115.332 (b)	Volunteer and contractor training	
	Have all volunteers and contractors who have contact with residents been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with residents)?	yes
115.332 (c)	Volunteer and contractor training	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.333 (a)	Resident education	
	During intake, do residents receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do residents receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
	Is this information presented in an age-appropriate fashion?	yes
115.333 (b)	Resident education	
	Within 10 days of intake, does the agency provide age-appropriate	yes

	comprehensive education to residents either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
115.333 (c)	Resident education	
	Have all residents received such education?	yes
	Do residents receive education upon transfer to a different facility to the extent that the policies and procedures of the resident's new facility differ from those of the previous facility?	yes
115.333 (d)	Resident education	
	Does the agency provide resident education in formats accessible to all residents including those who: Are limited English proficient?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are deaf?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are visually impaired?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are otherwise disabled?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Have limited reading skills?	yes
115.333 (e)	Resident education	
	Does the agency maintain documentation of resident participation in these education sessions?	yes
115.333 (f)	Resident education	

	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to residents through posters, resident handbooks, or other written formats?	yes
115.334 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.331, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	na
115.334 (b)	Specialized training: Investigations	
	Does this specialized training include: Techniques for interviewing juvenile sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	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
115.334 (c)	Specialized training: Investigations	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	na

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

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

	the agency attempt to ascertain information about: Age?	
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Level of emotional and cognitive development?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Physical size and stature?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Mental illness or mental disabilities?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Intellectual or developmental disabilities?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Physical disabilities?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: The resident's own perception of vulnerability?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Any other specific information about individual residents that may indicate heightened needs for supervision, additional safety precautions, or separation from certain other residents?	yes
115.341 (d)	Obtaining information from residents	
	Is this information ascertained: Through conversations with the resident during the intake process and medical mental health screenings?	yes
	Is this information ascertained: During classification assessments?	yes
	Is this information ascertained: By reviewing court records, case files, facility behavioral records, and other relevant documentation from the resident's files?	yes
115.341 (e)	Obtaining information from residents	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked	yes

	pursuant to this standard in order to ensure that sensitive information is not exploited to the resident's detriment by staff or other residents?	
115.342 (a)	Placement of residents	
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Housing Assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Bed assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Work Assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Education Assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Program Assignments?	yes
115.342 (b)	Placement of residents	
	Are residents isolated from others only as a last resort when less restrictive measures are inadequate to keep them and other residents safe, and then only until an alternative means of keeping all residents safe can be arranged?	yes
	During any period of isolation, does the agency always refrain from denying residents daily large-muscle exercise?	yes
	During any period of isolation, does the agency always refrain from denying residents any legally required educational programming or special education services?	yes
	Do residents in isolation receive daily visits from a medical or mental health care clinician?	yes
	Do residents also have access to other programs and work opportunities to the extent possible?	yes

115.342 (c)	Placement of residents	
	Does the agency always refrain from placing: Lesbian, gay, and bisexual residents in particular housing, bed, or other assignments solely on the basis of such identification or status?	yes
	Does the agency always refrain from placing: Transgender residents in particular housing, bed, or other assignments solely on the basis of such identification or status?	yes
	Does the agency always refrain from placing: Intersex residents in particular housing, bed, or other assignments solely on the basis of such identification or status?	yes
	Does the agency always refrain from considering lesbian, gay, bisexual, transgender, or intersex identification or status as an indicator or likelihood of being sexually abusive?	yes
115.342 (d)	Placement of residents	
	When deciding whether to assign a transgender or intersex resident to a facility for male or female residents, does the agency consider on a case-by-case basis whether a placement would ensure the resident's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns residents to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex residents, does the agency consider on a case-by-case basis whether a placement would ensure the resident's health and safety, and whether a placement would present management or security problems?	yes
115.342 (e)	Placement of residents	
	Are placement and programming assignments for each transgender or intersex resident reassessed at least twice each year to review any threats to safety experienced by the resident?	yes
115.342 (f)	Placement of residents	
	Are each transgender or intersex resident's own views with respect to his or her own safety given serious consideration when	yes

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

	entity or office that is not part of the agency?	
	Is that private entity or office able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the resident to remain anonymous upon request?	yes
	Are residents detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security to report sexual abuse or harassment?	yes
115.351 (c)	Resident reporting	
	Do staff members accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Do staff members promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.351 (d)	Resident reporting	
	Does the facility provide residents with access to tools necessary to make a written report?	yes
115.351 (e)	Resident reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of residents?	yes
115.352 (a)	Exhaustion of administrative remedies	
	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.	no
115.352 (b)	Exhaustion of administrative remedies	

	Does the agency permit residents to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	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
115.352 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: A resident who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	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
115.352 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by residents in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	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
115.352 (e)	Exhaustion of administrative remedies	

	Are third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, permitted to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	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
115.352 (f)	Exhaustion of administrative remedies	
	Has the agency established procedures for the filing of an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	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
115.352 (g)	Exhaustion of administrative remedies	
	If the agency disciplines a resident for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the resident filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	na
115.353 (a)	Resident access to outside confidential support services and legal representation	
	Does the facility provide residents with access to outside victim advocates for emotional support services related to sexual abuse by providing, posting, or otherwise making accessible mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies?	yes
	Does the facility enable reasonable communication between residents and these organizations and agencies, in as confidential a manner as possible?	yes
115.353 (b)	Resident access to outside confidential support services and legal representation	
	Does the facility inform residents, prior to giving them access, of the extent to which such communications will be monitored and	yes

	the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	
115.353 (c)	Resident access to outside confidential support services and legal representation	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide residents with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.353 (d)	Resident access to outside confidential support services and legal representation	
	Does the facility provide residents with reasonable and confidential access to their attorneys or other legal representation?	yes
	Does the facility provide residents with reasonable access to parents or legal guardians?	yes
115.354 (a)	Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of a resident?	yes
115.361 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding retaliation against residents or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or	yes

	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?	
115.361 (b)	Staff and agency reporting duties	
	Does the agency require all staff to comply with any applicable mandatory child abuse reporting laws?	yes
115.361 (c)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials and designated State or local services agencies, are staff prohibited from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
115.361 (d)	Staff and agency reporting duties	
	Are medical and mental health practitioners required to report sexual abuse to designated supervisors and officials pursuant to paragraph (a) of this section as well as to the designated State or local services agency where required by mandatory reporting laws?	yes
	Are medical and mental health practitioners required to inform residents of their duty to report, and the limitations of confidentiality, at the initiation of services?	yes
115.361 (e)	Staff and agency reporting duties	
	Upon receiving any allegation of sexual abuse, does the facility head or his or her designee promptly report the allegation to the appropriate office?	yes
	Upon receiving any allegation of sexual abuse, does the facility head or his or her designee promptly report the allegation to the alleged victim's parents or legal guardians unless the facility has official documentation showing the parents or legal guardians should not be notified?	yes
	If the alleged victim is under the guardianship of the child welfare system, does the facility head or his or her designee promptly report the allegation to the alleged victim's caseworker instead of	na

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

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

	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	no
115.367 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.367 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations, such as housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services?	yes
115.367 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report	yes

	of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Any resident disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Resident housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Resident program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.367 (d)	Agency protection against retaliation	
	In the case of residents, does such monitoring also include periodic status checks?	yes
115.367 (e)	Agency protection against retaliation	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.368 (a)	Post-allegation protective custody	
	Is any and all use of segregated housing to protect a resident who is alleged to have suffered sexual abuse subject to the requirements of § 115.342?	yes

115.371 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency does not conduct any form of administrative or criminal investigations of sexual abuse or harassment. See 115.321(a).)	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
115.371 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations involving juvenile victims as required by 115.334?	yes
115.371 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.371 (d)	Criminal and administrative agency investigations	
	Does the agency always refrain from terminating an investigation solely because the source of the allegation recants the allegation?	yes
115.371 (e)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
115.371	Criminal and administrative agency investigations	

(f)		
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as resident or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring a resident who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.371 (g)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.371 (h)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.371 (i)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.371 (j)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.371(g) and (h) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years unless the abuse was committed by a juvenile resident and applicable law requires a shorter period of retention?	yes
115.371 (k)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the facility or agency	yes

	does not provide a basis for terminating an investigation?	
115.371 (m)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
115.372 (a)	Evidentiary standard for administrative investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.373 (a)	Reporting to residents	
	Following an investigation into a resident's allegation of sexual abuse suffered in the facility, does the agency inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
115.373 (b)	Reporting to residents	
	If the agency did not conduct the investigation into a resident's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the resident? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes
115.373 (c)	Reporting to residents	
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the resident's unit?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency	yes

	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?	
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.373 (d)	Reporting to residents	
	Following a resident's allegation that he or she has been sexually abused by another resident, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following a resident's allegation that he or she has been sexually abused by another resident, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes
115.373 (e)	Reporting to residents	
	Does the agency document all such notifications or attempted notifications?	yes
115.376 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes

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

115.378 (a)	Interventions and disciplinary sanctions for residents	
	Following an administrative finding that a resident engaged in resident-on-resident sexual abuse, or following a criminal finding of guilt for resident-on-resident sexual abuse, may residents be subject to disciplinary sanctions only pursuant to a formal disciplinary process?	yes
115.378 (b)	Interventions and disciplinary sanctions for residents	
	Are disciplinary sanctions commensurate with the nature and circumstances of the abuse committed, the resident's disciplinary history, and the sanctions imposed for comparable offenses by other residents with similar histories?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident is not denied daily large-muscle exercise?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident is not denied access to any legally required educational programming or special education services?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident receives daily visits from a medical or mental health care clinician?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the resident also have access to other programs and work opportunities to the extent possible?	yes
115.378 (c)	Interventions and disciplinary sanctions for residents	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether a resident's mental disabilities or mental illness contributed to his or her behavior?	yes
115.378 (d)	Interventions and disciplinary sanctions for residents	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to offer the offending resident participation in such interventions?	yes

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

	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.381 (d)	Medical and mental health screenings; history of sexual abuse	
	Do medical and mental health practitioners obtain informed consent from residents before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the resident is under the age of 18?	yes
115.382 (a)	Access to emergency medical and mental health services	
	Do resident victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
115.382 (b)	Access to emergency medical and mental health services	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do staff first responders take preliminary steps to protect the victim pursuant to § 115.362?	yes
	Do staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
115.382 (c)	Access to emergency medical and mental health services	
	Are resident victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.382 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial	yes

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

	cooperates with any investigation arising out of the incident?	
115.383 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility attempt to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners?	yes
115.386 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
115.386 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.386 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.386 (d)	Sexual abuse incident reviews	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes

	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.386(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.386 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
115.387 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.387 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.387 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.387 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.387 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents? (N/A if agency does not contract for	yes

	the confinement of its residents.)	
115.387 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	na
115.388 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
115.388 (b)	Data review for corrective action	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.388 (c)	Data review for corrective action	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.388 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when	yes

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

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