

# PREA Facility Audit Report: Final

**Name of Facility:** New Haven Substance Abuse Facility

**Facility Type:** Community Confinement

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 08/04/2022

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
<b>Auditor Full Name as Signed:</b> Adam T. Barnett, Sr.	<b>Date of Signature:</b> 08/04/2022

AUDITOR INFORMATION	
<b>Auditor name:</b>	Barnett, Adam
<b>Email:</b>	adam30906@gmail.com
<b>Start Date of On-Site Audit:</b>	06/22/2022
<b>End Date of On-Site Audit:</b>	06/23/2022

FACILITY INFORMATION	
<b>Facility name:</b>	New Haven Substance Abuse Facility
<b>Facility physical address:</b>	54 East Ramsdell Street , New Haven , Connecticut - 06515
<b>Facility mailing address:</b>	1 Long Wharf Drive, Suite 321, New Haven, Connecticut - 06511

Primary Contact	
<b>Name:</b>	Bob Freeman
<b>Email Address:</b>	bfreeman@aptfoundation.org
<b>Telephone Number:</b>	203-781-4600

Facility Director	
<b>Name:</b>	Dan lead
<b>Email Address:</b>	dlead@aptfoundation.org
<b>Telephone Number:</b>	203-781-4600

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

Facility Characteristics	
<b>Designed facility capacity:</b>	170
<b>Current population of facility:</b>	128
<b>Average daily population for the past 12 months:</b>	132
<b>Has the facility been over capacity at any point in the past 12 months?</b>	No
<b>Which population(s) does the facility hold?</b>	Both females and males
<b>Age range of population:</b>	18-65
<b>Facility security levels/resident custody levels:</b>	Not Correctional Facility. ASAM Level 3.5 Intermediate Long Term Residential Treatment Facility.
<b>Number of staff currently employed at the facility who may have contact with residents:</b>	81
<b>Number of individual contractors who have contact with residents, currently authorized to enter the facility:</b>	0
<b>Number of volunteers who have contact with residents, currently authorized to enter the facility:</b>	1

AGENCY INFORMATION	
<b>Name of agency:</b>	APT Foundation, Inc.
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	1 Long Wharf Drive Suite 321, New Haven, Connecticut - 6511
<b>Mailing Address:</b>	
<b>Telephone number:</b>	

Agency Chief Executive Officer Information:	
<b>Name:</b>	Lynn M. Madden
<b>Email Address:</b>	lmadden@aptfoundation.org
<b>Telephone Number:</b>	203-781-4600

**Agency-Wide PREA Coordinator Information****Name:** Bob Freeman**Email Address:** bfreeman@aptfoundation.org**SUMMARY OF AUDIT FINDINGS**

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

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

**Number of standards exceeded:**

0

**Number of standards met:**

41

**Number of standards not met:**

0

# POST-AUDIT REPORTING INFORMATION

## GENERAL AUDIT INFORMATION

### On-site Audit Dates

1. Start date of the onsite portion of the audit:	2022-06-22
2. End date of the onsite portion of the audit:	2022-06-23

### 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:	JDI NSVRC

## AUDITED FACILITY INFORMATION

14. Designated facility capacity:	142
15. Average daily population for the past 12 months:	132
16. Number of inmate/resident/detainee housing units:	3
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	109
38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	0
39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	0
40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	0

41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	0
42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	0
43. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	0
44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	0
45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	3
46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	0
47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	Note: Total 1st Day - 109 (RSD DOC men - 28); (RSD DOC Women 4); = 32 DOC Residents Other Units: DMHAS Women 11 Amethyst House; PPW CSSD Men 28; CSSD PPW 3; PPW CSSD Women 10; DMHAS PPW Men 19; DMHAS PPW 7 Amethyst House.
<b>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</b>	
49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	81
50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	0
51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	0
52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	No text provided.
<b>INTERVIEWS</b>	
<b>Inmate/Resident/Detainee Interviews</b>	
<b>Random Inmate/Resident/Detainee Interviews</b>	

53. Enter the total number of <b>RANDOM INMATES/RESIDENTS/DETAINEES</b> who were interviewed:	20
54. Select which characteristics you considered when you selected <b>RANDOM INMATE/RESIDENT/DETAINEE</b> interviewees: (select all that apply)	<input type="checkbox"/> Age <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None
55. How did you ensure your sample of <b>RANDOM INMATE/RESIDENT/DETAINEE</b> interviewees was geographically diverse?	Auditor request resident rosters by housing assignments, etc.
56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No
57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
<b>Targeted Inmate/Resident/Detainee Interviews</b>	
58. Enter the total number of <b>TARGETED INMATES/RESIDENTS/DETAINEES</b> who were interviewed:	0
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.  <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.

<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Auditor review PAQ and had discussions with staff.</p>
<p><b>61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Auditor review PAQ and had discussions with staff.0</p>
<p><b>62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Auditor review PAQ and had discussions with staff.</p>
<p><b>63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>

<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Auditor review PAQ and had discussions with staff.</p>
<p><b>64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Auditor review PAQ and had discussions with staff.</p>
<p><b>65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Auditor review PAQ and had discussions with staff.</p>
<p><b>66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>



<p>b. 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>Auditor review PAQ and had discussions with staff.</p>
<p>67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Residents no longer at facility.</p>
<p>68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Auditor review PAQ and had discussions with staff.</p>
<p>69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>

<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>Auditor review PAQ and had discussions with staff.</p>
<p><b>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</b></p>	<p>No text provided.</p>
<p><b>Staff, Volunteer, and Contractor Interviews</b></p>	
<p><b>Random Staff Interviews</b></p>	
<p><b>71. Enter the total number of RANDOM STAFF who were interviewed:</b></p>	<p>12</p>
<p><b>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</b></p>	<p><input checked="" type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p><b>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b></p>	<p>No text provided.</p>
<p><b>Specialized Staff, Volunteers, and Contractor Interviews</b></p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p><b>75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</b></p>	<p>4</p>
<p><b>76. Were you able to interview the Agency Head?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<p><b>a. Explain why it was not possible to interview the Agency Head:</b></p>	<p>Interviewed designee.</p>

<p><b>77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>78. Were you able to interview the PREA Coordinator?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>79. Were you able to interview the PREA Compliance Manager?</b></p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)</p>

<p><b>80. Select which SPECIALIZED STAFF roles were interviewed as part of this audit from the list below: (select all that apply)</b></p>	<p><input type="checkbox"/> Agency contract administrator</p> <p><input type="checkbox"/> Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment</p> <p><input type="checkbox"/> Line staff who supervise youthful inmates (if applicable)</p> <p><input type="checkbox"/> Education and program staff who work with youthful inmates (if applicable)</p> <p><input checked="" type="checkbox"/> Medical staff</p> <p><input type="checkbox"/> Mental health staff</p> <p><input type="checkbox"/> Non-medical staff involved in cross-gender strip or visual searches</p> <p><input checked="" type="checkbox"/> Administrative (human resources) staff</p> <p><input type="checkbox"/> Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff</p> <p><input checked="" type="checkbox"/> Investigative staff responsible for conducting administrative investigations</p> <p><input type="checkbox"/> Investigative staff responsible for conducting criminal investigations</p> <p><input checked="" type="checkbox"/> Staff who perform screening for risk of victimization and abusiveness</p> <p><input type="checkbox"/> Staff who supervise inmates in segregated housing/residents in isolation</p> <p><input type="checkbox"/> Staff on the sexual abuse incident review team</p> <p><input type="checkbox"/> Designated staff member charged with monitoring retaliation</p> <p><input checked="" type="checkbox"/> First responders, both security and non-security staff</p> <p><input checked="" type="checkbox"/> Intake staff</p> <p><input type="checkbox"/> Other</p>
<p><b>81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<p><b>82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<p><b>83. Provide any additional comments regarding selecting or interviewing specialized staff.</b></p>	<p>No text provided.</p>

**SITE REVIEW AND DOCUMENTATION SAMPLING**

## Site Review

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

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

Yes

No

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

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

Yes

No

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

Yes

No

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

Yes

No

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

Yes

No

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

No text provided.

## Documentation Sampling

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

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

Yes

No

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

No text provided.

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

## Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual abuse	2	1	1	1
Staff-on-inmate sexual abuse	0	0	0	0
<b>Total</b>	2	1	2	1

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	0	0	0	0
Staff-on-inmate sexual harassment	1	0	1	0
<b>Total</b>	1	0	1	0

## Sexual Abuse and Sexual Harassment Investigation Outcomes

### Sexual Abuse Investigation Outcomes

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

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

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

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

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

**Sexual Harassment Investigation Outcomes**

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual harassment</b>	0	0	0	2
<b>Staff-on-inmate sexual harassment</b>	0	0	1	0
<b>Total</b>	0	0	1	2

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

**Sexual Abuse Investigation Files Selected for Review**

<b>98. Enter the total number of SEXUAL ABUSE investigation files reviewed/sampled:</b>	2
<b>99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)

**Inmate-on-inmate sexual abuse investigation files**

<b>100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b>	1
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<p>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p><b>Staff-on-inmate sexual abuse investigation files</b></p>	
<p>103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>2</p>
<p>104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p><b>Sexual Harassment Investigation Files Selected for Review</b></p>	
<p>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>1</p>
<p>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p><b>Inmate-on-inmate sexual harassment investigation files</b></p>	
<p>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>1</p>



<p>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
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<p>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
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**Staff-on-inmate sexual harassment investigation files**

<p>111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
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<p>112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
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<p>113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
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<p>114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</p>	<p>No text provided.</p>
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**SUPPORT STAFF INFORMATION**

**DOJ-certified PREA Auditors Support Staff**

<p>115. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
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**Non-certified Support Staff**

<p>116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p>a. Enter the <b>TOTAL NUMBER OF NON-CERTIFIED SUPPORT</b> who provided assistance at any point during this audit:</p>	<p>1</p>
<p><b>AUDITING ARRANGEMENTS AND COMPENSATION</b></p>	
<p>121. Who paid you to conduct this audit?</p>	<p> <input type="radio"/> The audited facility or its parent agency  <input type="radio"/> My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)  <input checked="" type="radio"/> A third-party auditing entity (e.g., accreditation body, consulting firm)  <input type="radio"/> Other </p>
<p>Identify the name of the third-party auditing entity</p>	<p>Diversified Correctional Services, LLC</p>

## Standards

### Auditor Overall Determination Definitions

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

### Auditor Discussion Instructions

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

**115.211 Zero tolerance of sexual abuse and sexual harassment; PREA coordinator**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Supporting Documents, Interviews and Observations:

- Organizational Chart – Administration
- PREA Master Policy
- PREA (Prison Rape Elimination Act) Policies and Procedures
- State of Connecticut Purchase of Services Contract with (Department of Correction) and The Connection, Inc.
- State of Connecticut Department of Correction Administrative Directive: 6.12 – Inmate Sexual Abuse/Sexual Harassment Prevention and Intervention
- State of Connecticut Department of Correction Division of Parole and Community Services
- CDOC Administrative Directive Number 11.4, Parole and Community Services
- CDOC Administrative Directive Number 3.13, Contracts Administration
- Online PREA Audit: Pre-Audit Questionnaire for Community
- Formal and Informal Interviews

115.211 (a)

An agency shall have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlining the agency’s approach to preventing, detecting, and responding to such conduct.

The agency/facility published the above agency policies. The policies mandate a zero tolerance toward all forms of sexual abuse and sexual harassment. The policies outlined the approach to prevent, detect, and response to sexual abuse and sexual harassment.

The agency policy clearly defines general definitions and definitions of prohibited behaviors to include sexual abuse and sexual harassments.

Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.211:

(a) The APT Foundation maintains zero tolerance towards all forms of sexual abuse and sexual harassment throughout the agency.

The APT Foundation, APT Residential Services maintains a comprehensive approach to preventing, detecting, and responding to a PREA-qualifying event. This goal is accomplished through:

1. Comprehensive PREA education for staff:
2. Use of technology to improve facility monitoring:
3. Identification of at-risk persons and potential predators for risk planning for the safety of all persons.
4. Providing high quality substance abuse, mental health and primary care services through professional, compassionate staff; and
5. Timely review should a PREA-qualifying event occur, including planning to minimize risk of future occurrence.

(b) The APT Foundation designates the Director of Clinical Operations/Compliance Officer as the PRE.A Coordinator for the agency, The Director of Clinical Operation/Compliance Officer is a senior level manager with sufficient time and authority to develop, implement and oversee agency efforts to comply with PREA standards. This PREA Coordinator is designated on the APT Foundation’s organizational chart.

115.211 (b)

An agency shall employ or designate an upper-level, agency-wide PREA coordinator with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities.

Central Office Staff: Agency head/designee question, has the agency identified an agency PREA coordinator with enough time to manage all PREA related responsibilities? The agency/facility has a PREA Coordinator that manage all PREA related responsibilities.

Agency Staff: PREA Coordinator question, do you feel that you have enough time to manage all of your PREA-related responsibilities? Yes. PREA related concerns would be considered an immediate priority for me to address. Any other responsibilities would be secondary in the moment.

Agency Staff: PREA Coordinator question, discuss how you coordinate your agency's efforts to comply with the PREA standards. As PREA Coordinator, I participate in planning forums where prevention mechanisms like staffing and monitoring is discussed. I coordinate all training functions for staff as they related to PREA. I am utilized to respond to questions regarding PREA policy and facility operations. I am also part of the team that consults on housing decisions for transgender persons.

Agency Staff: PREA Coordinator question, if you identify an issue with complying with a PREA standard, what actions or processes do you undertake to work toward compliance with that standard? I have full latitude with PREA policy and compliance. If I were to determine we were out of compliance, I would develop a draft revised policy for review by both Facility and Agency Leadership. After incorporating any feedback leading to a formal revision, I would develop and implement a training plan to the revised policy. The PREA Coordinator and Facility Leadership would monitor compliance with revised policy to ensure changes met the intended compliance outcome for three to six months. If the desired outcome did not occur, the process would complete. If it is deemed earlier than three to six months the revised policy was not effective, revision could come sooner.

Discussion: The agency/facility has PREA policies which ensure the sexual safety of facility residents and staff. The policy includes zero-tolerance philosophy from the from the agency central office through the front-line staff in its facilities. The agency/facility PREA coordinator has direct access to the head of the agency and regular communicate with the senior leadership team.

115.212	<b>Contracting with other entities for the confinement of residents</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Supporting Documents, Interviews and Observations:</p> <ul style="list-style-type: none"> <li>• PREA Master Policy</li> <li>• Agency Contract</li> <li>• State of Connecticut Purchase of Services Contract with (Department of Correction) and The Connection, Inc.</li> <li>• State of Connecticut Department of Correction Administrative Directive: 6.12 – Inmate Sexual Abuse/Sexual Harassment Prevention and Intervention</li> <li>• State of Connecticut Department of Correction Division of Parole and Community Services</li> <li>• CDOC Administrative Directive Number 11.4, Parole and Community Services</li> <li>• CDOC Administrative Directive Number 3.13, Contracts Administration</li> <li>• Online PREA Audit: Pre-Audit Questionnaire for Community</li> <li>• Formal and Informal Interviews</li> </ul> <p>115.212 (a)</p> <p>A public agency that contracts for the confinement of its residents with private agencies or other entities, including other government agencies, shall include in any new contract or contract renewal the entity's obligation to adopt and comply with the PREA standards.</p> <p>Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.212:</p> <ol style="list-style-type: none"> <li>1. The APT Foundation maintains a single location that requires PREA compliance and audit.</li> <li>2. The APT Foundation shall always remain current with PREA standards and audit requirements.</li> <li>3. Any new facility the APT Foundation might develop in the future that requires PREA compliance and audit would follow the same policies and audit requirements.</li> <li>4. The APT Foundation does not contract with other providers to house clients and/or provide services to persons enrolled in the APT Foundation's Residential Treatment Program.</li> </ol> <p>Central Office Staff: Agency PREA Coordinator question, do your agency/facility contract with other private agencies or other entities, including other government agencies to house your residents? No. The agency/facility does not contract with other entity for the confinement of its residents.</p> <p>Discussion: The facility has ensured that the contract agreement required language for adoption of and compliance with the PREA standards has been reviewed, discussed, and agreed upon with the contracted entity prior to entering into or renewing the contract.</p> <p>The agency/facility has had PREA audits. The audit results were reviewed to ensure that all contracted facilities are being audited according to the schedule standards require and are in full compliance with the standards. However, do to COVI-19 the audits maybe behind or audited the upcoming year.</p> <p>Monitoring the facility's compliance for PREA includes the years that the facility is not required to un-goes a certified PREA audit. The contract monitor includes monthly reports, annual reports, and monitoring all PREA allegations.</p> <p>115.212 (b)</p> <p>Any new contract or contract renewal shall provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards.</p> <p>See section (a).</p> <p>115.212 (c)</p> <p>Only in emergency circumstances in which all reasonable attempts to find a private agency or other entity in compliance with the PREA standards have failed, may the agency enter into a contract with an entity that fails to comply with these standards. In such a case, the public agency shall document its unsuccessful attempts to find an entity in compliance with the standards.</p> <p>Discussion: The facility has not had any emergency circumstances in which all reasonable attempts to find a private agency or other entity in compliance with the PREA standards have failed because the facility does not contract with other entities to house their residents.</p>

**115.213 Supervision and monitoring**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Supporting Documents, Interviews and Observations:

- PREA Master Policy
- Facility Staffing Plan
- Master Staffing Plan Assessment 2022
- Master Staffing Plan Assessment 2021
- Master Staffing Plan Assessment 2020
- Deviation Log
- Facility Layout
- Staff Roster
- Facility Tour/Observations
- State of Connecticut Purchase of Services Contract with (Department of Correction) and The Connection, Inc.
- State of Connecticut Department of Correction Administrative Directive: 6.12 – Inmate Sexual Abuse/Sexual Harassment Prevention and Intervention
- Online PREA Audit: Pre-Audit Questionnaire for Community
- Formal and Informal Interviews

115.213 (a)

For each facility, the agency shall develop and document a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect residents against sexual abuse. In calculating adequate staffing levels and determining the need for video monitoring, agencies shall take into consideration:

- (1) The physical layout of each facility.
- (2) The composition of the resident population.
- (3) The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and
- (4) Any other relevant factors.

State of Connecticut Purchase of Services Contract with (Department of Correction) and The Connection, Inc. Original Contract 21DOC01112AA section 10 page 10 states, "The contractor shall provide 24/7 on-site supervision of residents. The staffing matrix submitted with the contractor's proposal to the Department's REP #DOC-Res/Non-Res/PS-2021-SM, which is on file the Department, provides the staffing, patterns, and schedule to be maintained for the duration of this state fiscal year unless otherwise authorized by the Department.

The contractor shall assign the following staff to the program. Said staff shall be responsible for implementing and providing the required services.

The Staffing Matrices are established by the funding source however the funding source is open to suggestions based on the agency's on-going assessments of their needs. The staffing matrix is submitted every year. If the agency/facility has changes to recommend, the funding agency does give consideration to the justifications for the requests.

The facility has cameras to supplement supervision of residents. They are located in and out of the facility to help eliminate blind spots and to assist in monitoring during security.

Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.213:

1. The APT Foundation maintains a staffing pattern that meets all regulatory requirements for a ASAM Level III.3 intermediate, long-term residential treatment. The facility is licensed for 170 beds, with an average census of 150.
2. The facility is staffed 24-hours per day with males and females housed in separate buildings on the campus. The Medical Unit separates the male and female buildings. The Medical Unit can be closed at either the Male or Female side to ensure separation of genders while receiving services at the Medical Unit. There is no mixed gender clinical programming at the facility.
3. The facility maintains a comprehensive video surveillance system. This system was purchased and installed as the APT Foundation moved to the 54 East Ramsdell Street. New Haven location in 2017.
4. The APT Foundation completes an annual review of staffing patterns as part of the budget planning process. The staffing review considers any PREA-qualifying event that may have occurred during the period.
5. The annual review will also include potential need for technology upgrades.

6. Although staffing and technology requirements are reviewed at least annually, any PREA qualifying event at the facility would consider staffing and technology needs as part of the Review progress.

Central Office Staff: Agency PREA Coordinator question, when assessing adequate staffing levels and the need for video monitoring, please explain if and how the facility staffing plan considers standard requirements. The staffing plan consider all the components of the facility's physical plant to include blind spots. The composition of the resident population, the prevalence of substantiated and unsubstantiated incidents of sexual abuse and any other relevant factors.

Facility Staff: The Program staff question, does your facility has a staffing plan? Yes. The staffing plan is based on the funding agency and the RFP approval. However, the agency/facility do meet the minimum staff requirements.

Discussion: The staffing plan minimum requirements are determined by the funder, Department of Corrections. The number of residents in the program will determine the minimum number of staff that should remain on the floor at all times. The minimum staff requirements can never be deviated from so the staff will always ensure that the minimum staffing is present on the floor. The facility has video monitoring in blind spots throughout the facility and continue to add cameras as money becomes available. Staff complete hourly headcounts/rounds as an additional means of supervision.

115.213 (b)

In circumstances where the staffing plan is not complied with, the facility shall document and justify all deviations from the plan.

The facility staffing plan is based on the contract with CT DOC. In circumstances where the staffing plan is not complied with, the facility document and notified DOC of deviations.

Central Office Staff: Agency PREA Coordinator question, who reviews and follow up on deviations from the staffing plan? In situations in which a deviation is made from the staffing plan, written justification for such deviation is documented and sent to the PREA coordinator/compliance manager by the facility supervisors.

115.213 (C)

Whenever necessary, but no less frequently that once each year, for each facility shall assess, determine, and document whether adjustments are needed to:

- The staffing plan established pursuant to paragraph (a) of this section.
- Prevailing staffing patterns.
- The facility's deployment of video monitoring systems and other monitoring technologies; and
- The resources the facility has available to commit to ensure adherence to the staffing plan.

Central Office Staff: Agency PREA Coordinator question, if the staffing plan for the facility is reviewed at least once every year, are you consulted regarding any necessary adjustments? The staffing plan is reviewed annually. Yes, per protocol, the PREA coordinator participate and is consulted with development of the plan.

Discussion: The staffing plan is objective with the number and placement of staff and some video technology that is necessary to ensure the sexual safety of the resident population given the facility layout and characteristics, classifications of residents, and security needs and programming. The staffing plan considers sick leave, vacation, FMLA, callouts, training days, military leave, etc...

The agency/facility make its best efforts to comply on a regular basis with the staffing plan and the facility document deviations from the staffing plan. Annually the agency/facility make adjustments as needed to resource the facility has available to commit to ensure adherence to the staffing plan. The agency PREA coordinator/Facility Compliance Manager is a part on the annual review.

The agency/facility intermediate-level and upper-level supervisors conduct unannounced rounds on all shifts to prevent, detect and respond to allegations of sexual abuse and sexual harassment. Staff is prohibited from alerting other staff members of PREA unannounced rounds.



**115.215 Limits to cross-gender viewing and searches**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Supporting Documents, Interviews and Observations:

- PREA Master Policy
- Master Training List – Plus Behavioral Health
- Employee Data Sheet
- PREA Staff Training Power Point Curriculum
- Staff Roster
- Facility Layout
- Searches Policy
- State of Connecticut Department of Correction Administrative Directive: 6.12 – Inmate Sexual Abuse/Sexual Harassment Prevention and Intervention
- State of Connecticut Department of Correction Division of Parole and Community Services
- Online PREA Audit: Pre-Audit Questionnaire for Community
- Formal and Informal Interviews

115.215 (a)

The facility shall not conduct cross-gender strip searches or cross-gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent circumstances or when performed by medical practitioners.

Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.215:

1. The APT Foundation does not conduct strip search and body cavity searches. If such a search was deemed necessary, determination of necessity for the search is done in collaboration with the Director of Residential Services or another Senior-level manager. If a search was deemed necessary, it would be conducted by a member of the Medical Staff. The facility does not conduct body cavity searches under any conditions. If a strip search were to occur, the rationale and findings of the search would be documented in the client record.
2. The APT Foundation only utilizes non-invasive methods to complete pat-down searches. This method is supported and taught by the State of Connecticut Court Support Services Division. This method of search utilizes a "hands-out" sliding motion using only the back of the hand without potential for cupping.
3. There is no cross-gender pat-down searches on either the women or men's unit
4. There are no males that work on the female unit. Females may work on the male unit in general areas of the male unit, however, they do not enter the sleeping and restroom facilities. For either the male or female unit, opposite gendered staff will announce their entrance into the sleeping and restroom facilities.
5. The facility will not search or physically examine a transgender or intersex person for the purpose of determining their genital status. The APT Foundation will respect a transgender or intersex person's preference in determining placement for housing and clinical programming.

Discussion: The facility does not conduct strip searches or body cavity searches at all. Staff are also prohibited from conducting any form of search that involves "touching" by either gender staff. Residents are afforded the utmost privacy in restroom/shower areas where the restroom has stalls and doors and the showers have stalls/curtains and the doors to the restroom/shower areas may be closed as well. Staff are respectful of residents living areas and their privacy.

There have been no strip search or body cavity searches and these are prohibited, nor have there been any searches involving "touch". Residents have privacy while changing clothing because of doors on their rooms. Policy requires residents and staff are subject to hands-off searches that will be conducted in a manner that avoids force, embarrassment or indignity to the person being searched. It also requires that pat downs, body cavity and strip searches are prohibited regardless of the gender of the staff or resident, even in exigent circumstances.

115.215 (b)

As of August 20, 2015, or August 20, 2017 for a facility whose rated capacity does not exceed 50 residents, the facility shall not permit cross-gender pat-down searches of female residents, absent exigent circumstances. Facilities shall not restrict female residents' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision.

The facility does not permit cross-gender pat-down searches.

115.215 (c)

The facility shall document all cross-gender strip searches and cross-gender visual body cavity searches, and shall document all cross-gender pat-down searches of female residents.

Facility Random Staff: Twelve (12) staff were randomly interviewed. The random staff representing staff from all shifts. They were asked: Have you received training on how to conduct cross-gender pat-down searches and searches of transgender and intersex residents in a professional and respectful manner, consistent with security needs? Twelve (12) interviewed random staff reported that they are not allowed to conduct cross-gender pat down searches. Most of the interviewed staff could articulate that they are to search in a professional and respectful manner and that they receive training/discussion that is conducted during orientation.

The facility does not conduct cross-gender strip searches and cross-gender visual body cavity searches.

115.215 (d)

The facility shall 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. Such policies and procedures shall 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.

Discussion: All staff announces their presence prior to entering a resident room. Staff of the opposite gender only enter a bathroom for exigent circumstances and announce their presence prior to entering a bathroom. Resident have the right to shower, perform bodily functions, and change clothing without staff viewing the resident.

Observation: The auditor observes staff of the opposite gender announce their presence when entering resident rooms and bathrooms.

Facility Random Staff: Twelve (12) staff were randomly interviewed. The random staff representing staff from all shifts. They were asked: Are residents able to dress, shower, and toilet without being viewed by staff of the opposite gender? One hundred percent of staff interviewed (12) stated that residents are allowed to dress, shower, toilet without being viewed by staff of the opposite gender. During the facility onsite review, the showers and restroom were observed.

Facility Random Staff: Twelve (12) staff were randomly interviewed. The random staff representing staff from all shifts. They were asked: "Do you or other staff announce your presence when entering a housing unit that houses residents of the opposite gender (from yourself)?" All twelve staff reported that opposite gender staff announce their presence when entering the resident room. The staff reported that they will make announcement by saying "female staff" or male on the unit. During the facility onsite review the auditor observed staff on the tour announcing their presence.

Resident Interviews: Twenty (20) residents were randomly interviewed. Sixteen (16) males and four (4) females from the CT Department of Corrections. The arrival year: 20 entered in 2022. Resident were asked, are you and other residents ever naked in full view of female or male staff (not including medical staff such as doctors, nurses)? Twenty (20) residents stated they were never naked in full view of female or male staff while showering, dressing, or while using the restroom. Several of the residents said male staff do not come into the female unit.

Resident Interviews: Twenty (20) residents were randomly interviewed. Sixteen (16) males and four (4) females from the CT Department of Corrections. The arrival year: 20 entered in 2022. They were asked: Do female or male staff announce their presence when entering your housing area? Twenty (20) residents indicated that staff announce their presence, by saying something like "female or male staff on the floor".

115.215 (e)

The facility shall not search or physically examine a transgender or intersex resident for the sole purpose of determining the resident's genital status. If the resident's genital status is unknown, it may be determined during conversations with the resident, by reviewing medical records, or inf necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner.

Facility Random Staff: Twelve (12) staff were randomly interviewed. The random staff representing staff from all shifts. They were asked: "Are you aware of the policy prohibiting staff from searching or physically examining a transgender or intersex for the purpose of determining that resident's genital status?" Twelve reported yes, that they were aware of the policy prohibiting staff from searching or physically examining a transgender or intersex for the purpose of determining the resident's genital status. Some staff were able to further articulate that such determination would be addressed with medical staff.

115.215 (f)

The agency shall train security staff in how to conduct cross-gender pat down searches, and searches of transgender and intersex residents, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

Discussion: The agency/facility prohibit cross-gender pat-down searches of female resident, absent exigent circumstances. If and exigent circumstance occur the facility will document the process. The facility does not restricted access to programming and other opportunities to comply with this provision.

The facility also has a policy prohibiting cross-gender strip searches and cross-gender visual body cavity searches. Again, if and exigent circumstance occur the facility will document the process.

The facility policy, procedures and practices allow residents to shower, perform bodily functions, and change clothes without being viewed by non-medical staff of the opposite gender. Staff of the opposite gender announce their presence when entering a resident housing unit, room, bathroom, or shower; thus, allowing the resident to cover up.

During the audit period, the facility did not have transgenders or intersex residents.

**115.216 Residents with disabilities and residents who are limited English proficient**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Supporting Documents, Interviews and Observations:

- PREA Master Policy
- Clients with Special Comprehension Problem
- PREA Brochures English
- PREA Brochures Spanish
- List of Residents who are Blind, Deaf, or Hard of Hearing – 0
- List of Residents who are LEP – 0
- List of Residents with Cognitive Disabilities - 0
- Resident Handbook English
- Resident Handbook Spanish
- Parole and Community Services 2018 Residential Audit
- Policy: Prison Rape Elimination Act (PREA) Synopsis
- State of Connecticut Department of Correction Administrative Directive: 6.12 – Inmate Sexual Abuse/Sexual Harassment Prevention and Intervention.
- State of Connecticut Department of Correction Division of Parole and Community Services
- American with Disabilities Policy and Procedure
- Contract: Contract, Grant, Lease, and Loan Agreement Review Form
- Online PREA Audit: Pre-Audit Questionnaire for Community
- Formal and Informal Interviews

115.216 (a)

The agency shall take appropriate steps to ensure that residents with disabilities (including, for example, residents who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of the agency’s effort to prevent, detect, and respond to sexual abuse and sexual harassment. Such steps shall include, when necessary to ensure effective communication with residents who are deaf or hard of hearing, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

State of Connecticut Purchase of Services Contract with (Department of Correction) and The Connection, Inc. Original Contract #21DOC01112AA page 39 Section 2 Americans with Disabilities Act (ADA). “The contractor shall be and remain in compliance with the Americans with Disabilities Act of 1990 as amended from time to time to the extent applicable, during the term of this contract. The agency may cancel or terminate this contract if the contractor fails to comply with the ADA. The contractor represents that it is familiar with the terms of this Act and that it is in compliance with the law. The contractor warrants that it shall hold the state harmless from any liability which may be imposed upon the state as a result of any failure of the contractor to be in compliance with this ADA.”

Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.216:

1. The APT Foundation's Residential Services Division is an ASAM level III.3 residential facility that requires a minimum of 20 hours per week of counseling services. Most of these clinical hours are provided in a group counseling format. This comprehensive level of service may exclude program admission for persons with certain disabilities or who are unable to speak English or Spanish.
2. The APT Foundation's Residential Services Division, as an ASAM level 111.3 clinically managed intermediate long-term residential facility may not accept any person with unstable mental health or physical health conditions that would be better served in a more appropriate setting focusing on their primary needs. The facility may also not accept persons what require detoxification from substances. These persons may become eligible following completion of a medically managed detoxification program.
3. The APT Foundation recognizes that persons served may have limited reading comprehension in either English or Spanish and is prepared to accommodate these individuals through direct reading of relevant consents, including PREA, and direct query of comprehension. The APT Foundation Residential Services Division provides PREA education through a variety of forums, including discussions at Orientation, Group and Individual counseling sessions. This should permit individuals with limited English proficiency the opportunity to understand our desire to prevent, detect, and respond to sexual abuse and harassment.
4. The APT Foundation Residential Services Division has staff that is proficient in both English and Spanish. The APT

Foundation does not rely on interpreters from the client population, except during times of emergency.

5. The APT Foundation Residential Services Division does not rely on interpreters from the client population for education, reporting, or investigation of any matter, including PREA, at the facility.

The agency also will provide written materials in formats or through methods that ensure effective communication with residents/residents, who have intellectual disabilities, limited reading skills or who are blind or have low vision.

Agency Head/Designee: Question, has the agency established procedures to provide residents with disabilities and residents who are limited English proficient equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment? Yes. If yes, please describe such procedures. As part of the initial assessment, a person's disability, including any supportive technology is assessed. The APT Foundation ensures that individuals who have limited English proficiency as made fully aware of their rights, including PREA policy and procedure is fully explained and documented in their record.

The program has not relied on resident interpreters, resident readers, or other types of resident assistants.

115.216 (b)

The agency shall 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, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

The agency has taken another step to ensure residents/residents have access to professional interpretive services via a contract with "Interpreters and Translators, Inc. The agency has an Interpretive Services Agreement. The document states the agency has engaged the Interpreters and Translators, Inc., to provide interpreting services to the company. The company can provide an array of translation and interpretive services including American Sign Language. Services may be provided in person, via phone or video remote.

Central Office Staff: Agency PREA Coordinator question, how does the facility provide PREA for residents with disabilities and residents who are limited English proficient? The agency/facility takes appropriate steps to ensure residents who are LEP or have disabilities, including residents who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, or speech disabilities; have an equal opportunity to participate in or benefit from all aspects of the agency/facility's efforts to prevent, detect, and respond to sexual and sexual harassment.

115.216 (c)

The agency shall not rely on resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-response duties under 115.264, or the investigation of the resident's allegations.

Facility Random Staff: Twelve (12) staff were randomly interviewed. The random staff representing staff from all shifts. They were asked: Does the agency ever allow the use of resident interpreters, resident readers, or other types of resident assistants to assist residents with disabilities who are limited English proficient when making an allegation of sexual abuse or sexual harassment? Eleven random staff reported that resident interpreters are not allowed; nor have resident interpreters, resident readers, or other type of resident assistants been used in relation to allegations of sexual abuse or sexual harassment. One (1) staff member reported that they would initially allow another resident, however, if it is a PREA issue they would stop and get a supervisor.

Discussion: The agency/facility has access to professional translations services. Prior to entry into the facility/program, residents are screened out with regard to certain disabilities because of the nature of the program, which is work release, however when a disabled resident is admitted the facility "meets them at the point of their needs".

115.217	<b>Hiring and promotion decisions</b>
	<p data-bbox="240 145 740 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 208 451 237"><b>Auditor Discussion</b></p> <p data-bbox="240 271 778 300">Supporting Documents, Interviews and Observations:</p> <ul data-bbox="240 327 1461 723" style="list-style-type: none"> <li>• PREA Master Policy</li> <li>• Personnel Polices</li> <li>• Abuse Harassment PREA</li> <li>• Staff Roster</li> <li>• Employee Data Sheet</li> <li>• Master Training List – Plus Behavioral Health</li> <li>• State of Connecticut Department of Correction Administrative Directive: 6.12 – Inmate Sexual Abuse/Sexual Harassment Prevention and Intervention</li> <li>• State of Connecticut Department of Correction Division of Parole and Community Services</li> <li>• Parole and Community Services 2018 Residential Audit</li> <li>• Online PREA Audit: Pre-Audit Questionnaire for Community</li> <li>• Formal and Informal Interviews</li> </ul> <p data-bbox="240 752 360 781">115.217 (a)</p> <p data-bbox="240 808 1461 873">The agency shall not hire or promote anyone who may have contact with residents, and shall not enlist the services of any contractor who may have contact with residents, who:</p> <ul data-bbox="240 900 1490 1064" style="list-style-type: none"> <li>• 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)</li> <li>• Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or</li> <li>• Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph a-2 of this section.</li> </ul> <p data-bbox="240 1090 1485 1288">State of Connecticut Purchase of Services Contract with (Department of Correction) and The Connection, Inc. Original Contract 21DOC01112AA section 15 Criminal History, page 16 states, “The contractor shall provide written notification to the CTDOC Director of Parole and Community Services prior to hiring staff who are currently under any type of criminal justice supervision (that is, state or federal probation or parole, or under the care, custody, and/or supervision of the Connecticut Judicial Branch, CTDOC or the Board of Pardons and Paroles). CTDOC reserves the right to prohibit the contractor from allowing such individual to work in a CTDOC funded program with CTDOC offenders”.</p> <p data-bbox="240 1314 1123 1344">Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.217:</p> <ol data-bbox="240 1370 1441 1435" style="list-style-type: none"> <li>1. The APT Foundation does not hire any individual or utilize contracting services that has engaged in sexual abuse in a prison, jail, lockup, community confinement center, or other institution.</li> </ol> <p data-bbox="240 1462 1461 1559">The APT Foundation will not hire any individual or utilize a contractor that 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.</p> <p data-bbox="240 1585 1469 1650">The APT Foundation will not hire any individual or utilize a contractor that has been civilly or administratively adjudicated to have engaged in the activity above.</p> <ol data-bbox="240 1677 1493 2136" style="list-style-type: none"> <li>2. The APT Foundation will consider any incidents of sexual harassment in determining whether to hire or promote an individual or enlist the services of any contractor that may have contact with a client at APT Residential Services.</li> <li>3. The APT Foundation conducts background checks of new employees who have contact with clients at APT Residential Services, including offenses that are specific to sexual abuse. The APT Foundation also conducts reference checks with prior employers prior to hiring.</li> <li>4. The APT Foundation conducts periodic background checks on all staff employed at APT Residential Services: These checks typically occur once every five years.</li> <li>5. For all new employees to be hired to work in the Residential Services Division will be asked to respond to the three questions noted in Item # 1 above.</li> <li>6. Material omissions regarding such misconduct or the provision of materially false information shall be grounds for termination.</li> </ol>

7. Reference checks for former employees received from other institutional employers will provide information on substantiated allegations of sexual abuse or sexual harassment, if indicated.

Central Office Staff: Administrative HR staff question, does the facility perform criminal record background checks or consider pertinent civil or administrative adjudications for all newly hired employees who may have contact with residents and all employees, who may have contact with resident, who are considered for promotions? Do you do this for any contractor who may have contact with residents as well? Staff indicated yes that the agency conducts a background check on all new hires and contractors working with our program participants. The background check includes a review at the state, national and federal level.

115.217 (b)

The agency shall consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with residents.

Central Office Staff: Administrative HR staff question, does the facility consider prior incidents of sexual harassment when determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with residents? The HR staff indicated yes that they consider any prior incidents of sexual abuse or sexual harassment.

115.217 (c)

Before hiring new employees, who may have contact with residents, the agency shall:

- Perform a criminal background records check; and
- 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.

Central Office Staff: Administrative HR staff question, what system does the agency/facility presently have in place to conduct criminal record background checks of current employees and contractors who may have contact with residents? An outside third party is used to conduct background checks on all new employees – including those hired or promoted at RSD. Research Services, Inc of Avon, Conn has been our third-party vendor for 9 years. The included services: State and National criminal index, State and National sex offender registry, driving history, verifications including professional licensure, and Homeland Security. In addition, 41 federal and international agency registries are reviewed. All background records are securely archived at Research Services. Records are collected as part of the conditional offer letter and every 5 years. Negative information is reviewed and discussed with both the Director of RSD and Compliance Officer.

115.217 (d)

The agency shall also perform a criminal background record check before enlisting the services of any contractor who may have contact with residents.

See section (c).

115.217 (e)

The agency shall 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.

See section (c).

The facility also acknowledges that background checks will be conducted every five (5) years.

115.217 (f)

The agency shall 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 and in any interviews or written self-evaluations conducted as part of reviews of current employees. The agency shall also impose upon employees a continuing affirmative duty to disclose any such misconduct.

Central Office Staff: Administrative HR staff question, does the agency/facility ask all applicants and employees who may have contact with residents about previous misconduct described in section (a) in written applications for hiring or promotions, and in any interviews or written self—evaluations conducted as part of reviews of current employees? The HR staff indicated yes. The conditional offer letter includes questions regarding misconduct as described in section (a).

Annually, employees must acknowledge PREA policy as part of the annual performance evaluation process. PREA policy is included in the Employee Handbook

Central Office Staff: Administrative HR staff question, does the agency/facility impose upon employees a continuing affirmative duty to disclose any such previous misconduct? HR staff indicated yes, employees are required to notify their supervisors of any federal, state or local arrest of conviction no later than five days after such arrest or conviction.

115.217 (g)

Material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.

The agency/facility PREA coordinator indicated that any material omissions regarding false information from staff will be grounds for termination.

115.217 (h)

Unless prohibited by law, the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.

Staff indicated that information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request will be on a case-by-case bases.

Central Office Staff: Administrative HR staff question, when a former employee applies for work at another institution, upon request from that institution, does the agency/facility provide information on substantiated allegations of sexual harassment involving the former employee, unless prohibited by law? The HR staff indicated yes that without written authorization from the former employee.



115.218	<b>Upgrades to facilities and technology</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Supporting Documents, Interviews and Observations:</p> <ul style="list-style-type: none"> <li>• PREA Master Policy</li> <li>• Facility Tour/Observations</li> <li>• State of Connecticut Department of Correction Administrative Directive: 6.12 – Inmate Sexual Abuse/Sexual Harassment Prevention and Intervention</li> <li>• State of Connecticut Department of Correction Division of Parole and Community Services</li> <li>• Online PREA Audit: Pre-Audit Questionnaire for Community</li> <li>• Formal and Informal Interviews</li> </ul> <p>115.218 (a)</p> <p>When designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, the agency shall consider the effect of the design, acquisition, expansion, or modification upon the agency’s ability to protect residents from sexual abuse.</p> <p>Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.218:</p> <ol style="list-style-type: none"> <li>1. The APT Foundation's video surveillance system \Was purchased and installed in 2017 as the facility relocated to 54 East Ramsdell Street. Nev, Haven location.</li> <li>2. The surveillance system was developed in consideration compliance to PREA standard and other health and safety needs of the facility.</li> <li>3. The need for additional enhancements arc considered as part of any incident review at the facility.</li> </ol> <p>Agency Head/Designee: Question, when designing, acquiring, or planning substantial modifications to facilities, how does the agency consider the effects of such changes on its ability to protect residents form sexual abuse? Yes. The APT Foundation is always assessing the readiness and supportiveness of all of our facilities. Any change to a facility will always be made with the intend of improving the experience for the persons we serve. This would include ensuring that we are providing a safe environment, inclusive of PREA standards.</p> <p>115.218 (b)</p> <p>When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the agency shall consider how such technology may enhance the agency’s ability to protect residents from sexual abuse.</p> <p>Agency Head/Designee: Question, how does the agency use monitoring technology (either newly installed or updated) to enhance the protection of residents from incidents of sexual abuse? The APT Foundation has made substantial investments in monitoring technology at the Residential facility. Consideration is made at least annually in the facility budgetary planning process. In the few/rare events that might occur (PREA or other), the need for additional monitoring technology is considered.</p> <p>Discussion: The PREA coordinator/PREA compliance manger or designee is responsible for ensuring PREA is considered whenever the agency/facility designs, acquires or requests specific upgrades to facility and technologies. The recipient of such requests will depend on the nature of the request.</p> <p>There have been no upgrades or modifications to the physical plant nor have there been any upgrades to the monitoring technology.</p>

115.221	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Supporting Documents, Interviews and Observations:</p> <ul style="list-style-type: none"> <li>• PREA Master Policy</li> <li>• PREA Coordinated Response</li> <li>• MOU Women and Families Center</li> <li>• State of Connecticut Department of Correction Administrative Directive: 6.12 – Inmate Sexual Abuse/Sexual Harassment Prevention and Intervention</li> <li>• State of Connecticut Department of Correction Division of Parole and Community Services</li> <li>• Online PREA Audit: Pre-Audit Questionnaire for Community</li> </ul> <p>Formal and Informal Interviews</p> <p>115.221 (a)</p> <p>To the extent the agency is responsible for investigating allegations of sexual abuse, the agency shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.</p> <p>Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.221:</p> <ol style="list-style-type: none"> <li>1. The APT Foundation shall utilize the services of the New Haven Police Department for investigations of sexual abuse, particularly cases where physical evidence may be present.</li> <li>2. The APT Foundation maintains a Coordinated Response protocol for any sexual assault event to ensure the victim and evidence are protected at the crime scene pending the arrival of the New Haven Police Department. If the perpetrator did not leave the facility, they will be separated from the victim and crime scene and supervised by staff. Other residents will also be moved to another location away from the victim and perpetrator in the facility to provide privacy during the New Haven Police Department investigation.</li> <li>3. The APT Foundation does not provide services to minors. Any protocol, if established, and as appropriate, will be adapted from or otherwise based on the most recent edition of the US 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.</li> <li>4. As part of the Coordinated Response protocol, the APT Foundation maintains a comprehensive: v10U with the Women and Families Center. The Coordinated Response requires staff to notify the Women and Families Center and they will assist the victim during the investigation and forensic examinations.</li> <li>5. The APT Foundation will utilize the Yale New Haven Health SAFE or SANE medical evaluations following assault. The representative from the Women and Families Center will provide support during the examination: follow-up medical services; and supportive services.</li> <li>6. The Women and Families Center is also capable of providing services to Males and persons from the LGBTQ communities.</li> <li>7. There are no costs for forensic and all other necessary treatment services in follow-up to the victim.</li> </ol> <p>Facility Random Staff: Twelve (12) staff were randomly interviewed. The random staff representing staff from all shifts. They were asked: “do you know and understand the agency’s protocol for obtaining unusable physical evidence if a resident alleges sexual abuse?” During the on-site audit, twelve random staff were interviewed. Eleven of the twelve interviewed staff could clearly articulate the agency’s protocols. The staff that were aware of the protocols, were able to describe the process and steps required to protect physical evidence, which included take immediate action, stay with the resident, separate the victim from the perpetrator, isolate/secure the scene and secure evidence, notify supervisor, secure evidence in a bag, don’t allow the resident to shower, bath, brush teethe, and overall treat as a crime scene. Most of the direct care staff also reported that they would send the victim to outside medical for an initial evaluation of his/her medical condition.</p> <p>115.221 (b)</p> <p>The protocol shall be developmentally appropriate for youth where applicable, and, as appropriate, shall be 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</p>

comprehensive and authoritative protocols developed after 2011.

The protocol is required to be developmentally appropriate for youth where applicable, and as appropriate, shall be adapted from or otherwise based on the most recent editions of the US Department of Justice's Office on Violence for Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents", or similarly comprehensive and authoritative protocols developed after 2011.

115.221 (c)

The agency shall offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. The agency shall document its efforts to provided SAFEs or SANEs.

The State of Connecticut Technical Guidelines for Health Care Response to Victims of Sexual Assault. In accordance with Connecticut General Statutes Section 19a-112a Commission on the Standardization of the Collection of Evidence in Sexual Assault Investigations 2013 updated copies of the Guidelines are available online.

Discussion: It is the goal of the Connecticut General Assembly and the Commission that sexual assault examinations be standardized, to the extent possible, throughout the state, and that health care personnel who encounter or treat sexual assault victims have knowledge of proper and sensitive response, medical treatment, evidence collection and follow-up services. The Technical Guidelines establish a standardized model for health care response to victims of sexual assault and the collection of sexual assault evidence.

115.221 (d)

The agency shall attempt to make available to the victim advocate from a rape crisis center. If a rape crisis center is not available to provided victim advocates services, the agency shall make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member. Agencies shall document efforts to secure services from rape crisis centers. For the purpose of this standard, a rape crisis center refers to an entity that provides intervention and related assistance, such as the services specified in 42 U.S.C. 1400043, to victims of sexual assault of all ages. The agency may utilize a rape crisis center that is part of a governmental unit as long as the center is not part of the criminal justice system and offers a comparable level of confidentiality as a nongovernmental entity that provides similar victim services.

Memorandum of Agreement between Women and Families Center and APT Foundation.

Women and Families Center provides free, confidential and empowerment based sexual assault crisis and advocacy services including a 24-hour hotline, individual counseling, medical and legal accompaniment and support, and community education and training programs.

- Identify and assign a point of contact at each organization to establish coordination between agencies and access to Sexual Assault Crisis Service (SACS) for APT Foundation clients. Response to client's request to work with SACS will be made and executed within a reasonable amount of time.
- Display sexual assault crisis hotline posters in English and Spanish onsite at APT Foundation and Women and Family Center share information with clients about SACS program and the availability of sexual assault crisis counselors and community-based services.
- At APT Foundation client's request, allow for a sexual assault crisis counselor to accompany and support the victim throughout the forensic medical exam process and investigatory interviews, and provide emotional support, crisis intervention, information, and referrals, as requested by the victim throughout the client's placement in the APR facility.
- At Women and Family Center and PRT Foundation there will be a dedicated and confidential space for SACS to meet with clients.
- To develop site specific protocol and procedure for maintaining PREA standards.
- To collaborate for the continuity of care and discharge planning for clients who are victims of sexual assault and/or abuse.
- To identify and assign designated staff at in an effort to establish a cohesive and seamless delivery of services to clients in APT facilities.

Women and Families Center Responsibilities: Services of a Women and Families Center sexual assault counselor will be offered to APT clients, and if requested, a sexual assault crisis counselor will be allowed to visit with the client while the client is a resident of a CRT facility, and accompany the client at any point in time where support to the client will be provided (hospital, court, parole). A Women and Families Center sexual assault crisis counselor will be available to the client and APT staff to answer any questions, and consult on cases regarding the best care and service delivery. APT Foundation understands that communication in accordance with CGS-52-14K. Communication regrading the client and services provided can occur if the client grants permission to Women and Families Center to waive the privilege of confidential communication. Services will be coordinated by both agencies to meet the needs of the client.

Victims are offered a victim advocate to accompany them during the forensic exam if requested.

Central Office Staff: Agency PREA Coordinator question, in what ways does the agency or facility attempt to make available a victim advocate from a rape crisis center? The agency/facility has an active MOU with the Women and Families Center. These services are offered to residents at no charge.

The APT Foundation maintains a MOU for these services. This information is provided in all documentation provided to the patient. This information is vital as a resident may have a history totally unrelated to PREA and the services can be invaluable to a resident's recovery.

115.221 (e)

As requested by the victim, the victim advocate, qualified agency staff member, or qualified community-based organization staff member shall accompany and support the victim through the forensic medical examination process and investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals.

Central Office Staff: Agency PREA Coordinator question, if a rape crisis center provides victim advocate services, how do you ensure that it meets the qualifications described in standard 115.221? The rape crisis center has qualified staff, if not the local hospital will have qualified staff.

The APT Foundation would only contract with a rape crisis center for services that clearly documents that they are both knowledgeable of PREA standards and are compliant with required PREA elements for care and service delivery. Most centers will clearly identify this compliance via website and other documentation.

115.221 (f)

To the extent the agency itself is not responsible for investigating allegations of sexual abuse, the agency shall request that the investigating agency follow the requirements of paragraphs (a) through (e) of this section.

Facility Random Staff: Twelve (12) staff were randomly interviewed. The random staff representing staff from all shifts. They were asked: "do you know who is responsible for conducting sexual abuse investigations?"

During the on-site audit, the staff answers varied from the Program Manager, PREA Coordinator, or local police department.

115.221 (g)

The requirements of paragraphs (a) through (f) of this section shall also apply to:

- Any State entity outside of the agency that is responsible for investigating allegations of sexual abuse in prisons or jails; and
- Any Department of Justice component that is responsible for investigating allegations of sexual abuse in prisons or jails.

See Section (a) response.

115.221 (h)

For the purposes of this section, a qualified agency staff member or a qualified community-based staff member shall be an individual who has been screened for appropriateness to serve in this role and has received education concerning sexual assault and forensic examination issues in general.

The agency/facility has a Memorandum of Agreement with the Women and Families Center.

Central Office Staff: Agency coordinator/facility PREA compliance manager question, if requested by the victim, does a victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and provided emotional support, crisis intervention, information, and referrals during the forensic medical examination process and investigatory interviews? All victims are accompanied by one of the following, the victim advocate, qualified staff member, or qualified community-based agency/facility to support the victim through the forensic medical examination process and investigatory reviews and provide emotional support, crisis intervention, information, and referrals throughout the process.

**115.222 Policies to ensure referrals of allegations for investigations**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Supporting Documents, Interviews and Observations:

- PREA Master Policy
- Uniform Evidence Protocol
- Case 1 PREA Investigation
- Case 2 PREA Investigation
- Case 3 PREA Investigation
- Letter from Hartford Police Department
- Facility Sexual Abuse and Sexual Harassment Allegations Overview
- MOU Women and Families Center
- PREA Investigation Packages for past 12 months (3)
- Online PREA Audit: Pre-Audit Questionnaire for Community
- Formal and Informal Interviews

115.222 (a)

The agency shall ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.222:

1. The APT Foundation will ensure an administrative or criminal investigation is completed for all allegations of sexual abuse or sexual harassment.
2. While conducting an administrative investigation, if the evidence indicates a criminal investigation is not appropriate, the matter will be turned over to the New Haven Police Department.
3. The APT Foundation, will immediately forward any case of active sexual assault case to the New Haven Police Department. The APT Foundation will fully cooperate with the NHPD investigation and conduct a secondary internal investigation.
4. The APT Foundation will involve the Women and Families Center and SAFE/SANE services of Yale New Haven Hospital, as indicated.
5. All persons will be referred for appropriate medical and supportive counseling, as indicated.

Agency Head/Designee: Question, does the agency ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse or sexual harassment? The APT Foundation conducts administrative review in all alleged cases and proceeds with criminal investigation, if indicated.

115.222 (b)

The agency shall have in place a policy 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. The agency shall publish such policy on its website or, if it does not have one, make the policy available through other means. The agency shall document all such referrals.

Central Office Staff: Agency head/designee question, describe how an administrative or criminal investigation is completed for allegations of sexual abuse or harassment? The agency/facility does not conduct criminal investigations. Criminal investigations are conducted by the state or local police department. However, the agency works closely with the state and local police throughout the investigation process for allegations of sexual abuse.

Administrative investigations are completed internally, with collaboration from all relevant parties, which include but are not limited to: Human Resources, Agency Leadership, Quality Improvement, and the PREA Coordinator. Criminal investigations are handled by the appropriate geographic police department.

Central Office Staff: PREA coordinator question, does the agency require sexual abuse be referred for investigation to an agency with the legal authority to conduct criminal investigations? Yes, what agency?

Local or CT State Police Department, unless the allegation does not involve potentially criminal behavior; then it is referred to agency internal PREA investigator and the Department of Correction (Parole Residents) or Court Support Services Division

(Probation Residents).

115.222 (c)

If a separate entity is responsible for conducting criminal investigations, such publication shall describe the responsibilities of both the agency and the investigating entity.

The facility indicated that the local police department conducted criminal investigations and follow the guidelines of the State of CT.

115.222 (d)

Any State entity responsible for conducting administrative or criminal investigations of sexual abuse or sexual harassment in prisons or jails shall have in place a policy governing the conduct of such investigations.

See Section (a and c) response.

115.222 (e)

Any department of Justice component responsible for conducting administrative or criminal investigations of sexual abuse or sexual harassment in prisons or jails shall have in place a policy governing the conduct of such investigations.

The facility reported that the Department of Justice is not responsible for conducting administrative or criminal investigations of sexual abuse or sexual harassment.

Discussion: Below are the Sexual Abuse, Sexual Harassment Allegations and Investigations Overview:

- The Total number of investigations for the past 12 months = 3
- The total number of sexual abuse investigations = 2
- The total number of sexual harassment investigations = 1
- The number of criminal sexual abuse referred for prosecution = 0

Discussion: Below are the Reviewed Information in the Investigation Packages:

- PREA Incident Reporting Form
- Type of Violations
- Persons Involved
- Alleged Victim
- Alleged Perpetrator
- Witnesses
- Facility Video Reviewed
- Description of Incident
- Persons Notified
- Injuries (If Applicable)
- Disposition and Sign-Off
- Incident Disposition
- The number of SANE reports = 0

Discussion: Below are the results of the PREA Investigation reviewed:

- Substantiated – 2
- Unsubstantiated – 1
- Unfounded – 0
- Pending - 0

115.231	<b>Employee training</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Supporting Documents, Interviews and Observations:</p> <ul style="list-style-type: none"> <li>• PREA Master Policy</li> <li>• Program Staff Meeting PREA Agenda Topics</li> <li>• Master Training List – Plus Behavioral Health</li> <li>• Employee Data Sheet</li> <li>• Staff Roster</li> <li>• Sexual and Physical Assault/Abuse PREA Overview</li> <li>• Training Process</li> <li>• State of Connecticut Department of Correction Administrative Directive: 6.12 – Parole and Community Services 2018 Residential Audit 8/23/18</li> <li>• Inmate Sexual Abuse/Sexual Harassment Prevention and Intervention</li> <li>• State of Connecticut Department of Correction Division of Parole and Community Services</li> <li>• Online PREA Audit: Pre-Audit Questionnaire for Community</li> <li>• Formal and Informal Interviews</li> </ul> <p>115.231 (a)</p> <p>The agency shall train all employees who may have contact with residents on:</p> <ul style="list-style-type: none"> <li>• Its zero-tolerance policy for sexual abuse and sexual harassment.</li> <li>• How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures.</li> <li>• Residents' right to be free from sexual abuse and sexual harassment.</li> <li>• The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment.</li> <li>• The dynamics of sexual abuse and sexual harassment in confinement.</li> <li>• The common reactions of sexual abuse and sexual harassment victims.</li> <li>• How to detect and respond to signs threatened and actual sexual abuse.</li> <li>• How to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming residents; and</li> <li>• How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.</li> </ul> <p>Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.231:</p> <p>(a) The APT Foundation provides training to all employees, who have contact with residents in the following areas:</p> <ol style="list-style-type: none"> <li>(1) The APT Foundation's zero tolerance policy for sexual abuse and sexual harassment</li> <li>(2) The APT Foundation's policies under sexual harassment and abuse in regard to prevention, detection, reporting, and response.</li> <li>(3) The APT Foundation's policy of the Resident's rights to be free from sexual abuse and sexual harassment.</li> <li>(4) The APT Foundation's policy regarding the rights of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment incidents.</li> <li>(5) The basic dynamics of sexual abuse and sexual harassment in residential facilities.</li> <li>(6) The common reactions of sexual abuse and sexual harassment victims.</li> <li>(7) How to detect and respond to signs of threatened and actual sexual abuse.</li> <li>(8) How to avoid inappropriate relationships with residents.</li> <li>(9) How to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender non-conforming residents.</li> <li>(10) How to comply with APT Foundation policy and relevant laws to mandatory reporting of sexual abuse to outside authorities.</li> </ol> <p>(b) The APT Foundation training will be specific to gender, as indicated.</p> <p>(c) The APT Foundation maintains a single program that houses both male and female residents in separate, secure living and treatment spaces.</p> <p>(d) The APT Foundation documents all employee participation in PREA education sessions.</p> <p>(e) In addition to inhouse training, the following training from the NIC is required for professional staff:</p> <p>PREA: Medical Care for Sexual Assault Victims in Confinement Setting: Applicable Staff: MD or APRN</p> <p>PREA: Behavioral Healthcare for Sexual Assault Victims in Confinement Setting: Applicable Staff: Counselors/Clinicians</p>

PREA: Investigating Sexual Abuse in Confinement Setting- Advanced Investigations: Applicable Staff: PREA Coordinator, Residential Clinical Supervisors (Includes PREA Manager)

(f) Inhouse PREA training is provided on an annual basis to staff at the Residential facility.

Facility Random Staff: Twelve (12) staff were randomly interviewed. The random staff representing staff from all shifts. They were asked: "have you received PREA training? And what are some of the topics?" Twelve staff indicated yes that they received PREA training. Staff were aware of the Zero Tolerance Policy, employee and resident rights, signs and symptoms of sexual abuse, reporting and responding. One hundred percent of the direct care staff reported being knowledgeable of the topics they had been trained in. When probed, staff were able to describe the training on zero tolerance, resident and staff rights, dynamics of sexual abuse and sexual harassment, prevention and response protocol as well supportive services available to Residents. Staff indicated they have received training on working with vulnerable populations (LGBTQI, prior history of sexual victimization). The staff reported receiving training in person and online.

During documentation review, the auditor reviewed staff acknowledgement statements of training and certificates.

115.231 (b)

Such training shall be tailored to the gender of the residents at the employee's facility. The employee shall receive additional training if the employee is reassigned from a facility that house only male residents to a facility that houses only female residents, or vice versa.

See section (a) response.

115.231 (C)

All current employees who have not received such training shall be trained within one year of the effective date of the PREA standards, and the agency shall 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. In years in which an employee does not receive refresher training, the agency shall provide refresher information on current sexual abuse and sexual harassment policies.

See Section (a) response.

115.231 (d)

The agency shall document, through employee signature or electronic verification, that employees understand the training they have received.

The PREA coordinator provided multiple pages of training rosters with staff signatures documenting that they received and understood the PREA training they received.

Discussion: The agency/facility train all employees who may have contact with residents on PREA training topics. Employees receive this training prior to having contact with residents. The agency/facility provide the PREA training as a part of pre-service/orientation. Training is also reinforced and enhanced by on-the-job-training, shift briefings, staff meetings and management meetings where experienced and knowledgeable staff members work with new hires to educate them further about PREA practices. The PREA training is documented through rosters (staff signatures or electronic verification), meeting minutes, shift briefing notes.

Refresher training occurs every year that the certified PREA audit is not conducted. This is provided to staff meetings, shift briefing, and management meetings.



115.232	<b>Volunteer and contractor training</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Supporting Documents, Interviews and Observations:</p> <ul style="list-style-type: none"> <li>• PREA Master Policy</li> <li>• List of Volunteers- 0</li> <li>• Employee Data Sheet</li> <li>• Online PREA Audit: Pre-Audit Questionnaire for Community</li> <li>• Formal and Informal Interviews</li> </ul> <p>115.232 (a)</p> <p>The agency shall ensure 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.</p> <p>Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.232:</p> <p>1. The APT Foundation typically does not utilize volunteers in our facilities. If volunteers and/or interns are utilized, they are required to participate in all agency training, including PREA, as a compensated employee. The APT Foundation maintains a facilities Department that performs regular and/or ongoing work within the facility. The Facilities Department is trained in PREA according to agency protocol. Contractors performing short-term and/or emergency repairs are advised of PREA upon entrance to the facility and typically work under supervision of an APT Foundation Facilities Department.</p> <p>2. The APT Foundation does not utilize contractors that qualify for formal PREA education according to policy. Most work at the facility is completed by the onsite Facilities staff, which participates in all PREA training at the Facility. Any contractors would be present limited scope projects and are supervised by a member of the Facilities Department. If a member of the Facilities Department. is no available. another APT Foundation staff person would supervise the contractor to ensure no contact with Residents occur.</p> <p>115.232 (b)</p> <p>The level and type of training provided to volunteers and contractors shall be based on the services they provided and level of contact they have with residents, but all volunteer and contractors who have contact with residents shall be notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.</p> <p>See Section (a) response.</p> <p>115.232 (c)</p> <p>The agency shall maintain documentation confirming that volunteers and contractors understand the training they have received.</p> <p>See Section (a) response.</p> <p>Discussion: The agency/facility ensure that volunteers and contractors who have contact with residents are trained in their responsibilities regarding sexual abuse and sexual harassment prevention, detection, response policies and procedures at the agency/facility in which they are working.</p> <p>The agency/facility also ensures that everyone in the facility, including volunteers and contractors, understand the agency's zero-tolerance policy toward sexual abuse and sexual harassment, that the agency prohibits them from engaging in sexual relations with residents and that sexual abuse and sexual harassment is always reported.</p> <p>During the audit period, the facility did not have any volunteers or contractors.</p>

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Supporting Documents, Interviews and Observations:

- PREA Master Policy
- PREA Talking Points Meetings with Clients
- Clients with Special Comprehension Problems
- Intake PREA Patient Understanding DOC – 32
- Require Number of Resident Interviewed Random - 20
- Require Number of Resident Interviewed Targeted – 0
- Resident Data Sheet
- Resident Handbook English
- Resident Handbook Spanish
- Resident Orientation PREA – DOC 32
- Resident Roster
- Online PREA Audit: Pre-Audit Questionnaire for Community
- Formal and Informal Interviews

115.233 (a)

During the intake process, residents shall receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment, their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents.

Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.233:

1. All clients entering the program are advised of our PREA policies. including zero tolerance policy of sexual harassment and abuse. They are also advised of reporting mechanisms while at the facility. This information is also posted throughout the facility as well as reviewed during treatment planning sessions.

2. PREA policies are available to all persons, regardless of comprehension or disability level including:

- (1) Limited English
- (2) Limited Hearing
- (3) Visually Impaired
- (4) Other Disability
- (5) Reading Comprehension Levels

The core of APT Foundation services at the facilities is a regulatory requirement of 20 hours of group counseling sessions per week. Although the facility attempts to serve all persons requiring services, the APT Foundation may not be able ethically provide services to persons who are deaf or blind. The APT Foundation primary referral sources are aware of the group counseling requirement and will typically not refer individuals to this facility and will refer to more appropriate community-based providers.

3. Participation in PREA forums few clients are contained in documentation in the APT Foundation's Electronic Health Record.

4. The APT Foundation's PREA policies are available in multiple formats including posters throughout the facility and in the resident handbook provided to all clients at the time of admission to the facility.

5. PREA information is reviewed on an ongoing basis while in the program according to the schedule of treatment plan reviews completed for all residents while at the facility.

6. If a risk plan is in place, the effectiveness of the plan will also be reviewed as part of the treatment planning session.

Central Office Staff: Agency PREA Coordinator question, what type of PREA education is provided to the residents? The residents receive information explaining the agency's zero tolerance policy regarding sexual abuse and sexual harassment, how to report incidents or suspicions of sexual abuse or sexual harassment, their rights to be free from sexual abuse and sexual harassment, and to be free from retaliation for reporting; multiple ways for residents to privately report sexual abuse or sexual harassment and reporting sexual abuse and sexual harassment and remain anonymous.

Resident Interviews: Twenty (20) residents were randomly interviewed. Sixteen (16) males and four (4) females from the CT Department of Corrections. The arrival year: 20 entered in 2022. They were asked: When you first came here, did you get information about the facility's rules against sexual abuse and harassment? Twenty (20) residents stated they were given some information related to PREA at admission.

When asked how that information was given, residents indicated they were given a PREA brochure or pamphlet and handbook. Some said they were given a sheet with information on it. Others said they were given the information orally. They also said the information is on the walls in the unit.

Resident Interviews: Twenty (20) residents were randomly interviewed. Sixteen (16) males and four (4) females from the CT Department of Corrections. The arrival year: 20 entered in 2022. They were asked: When you came here, were you told about:

- Your right to not be sexually abused or sexually harassed? Twenty (20) interviewed residents stated they had been made aware of their rights.
- How to report sexual abuse or sexual harassment? Twenty (20) interviewed residents stated they had been made aware of how to report.
- Your right not to be punished for reporting sexual abuse or sexual harassment? Twenty (20) interviewed residents stated they aware of their rights not to be punished for reporting.
- About how long after coming here did you get the information above? When asked this question, there were a wide variety of answers. Eighteen (18) residents said they receive the information the same day they were admitted. Two said they thought it occurred within the first week of admission.

Discussion: The facility provides basic, critical information to every resident upon intake. This information includes some verbal and written regarding the facility's no-tolerance policy toward sexual abuse and sexual harassment and information about the ways to report sexual abuse and sexual harassment. Residents can report externally and internally including phone numbers and addresses they would need to report.

The facility provides residents education, both critical information at intake and more comprehensive education within 30 days upon resident arrival or transfer from a different facility. If a resident is release and return to the facility, gets the information again.

Information collected by the auditor's "Residents' Information Spreadsheet".

- Resident Initial PREA Screening
- Screening within 72 hours
- Resident Initial PREA Education Session
- Education within 10 days
- Facility Orientation
- PREA Acknowledgement Statement
- Reassessments with 30 days
- Residents selected for Interview
- Resident Refusal to Interview

115.233 (b)

The agency shall provide refresher information whenever a resident is transferred to a different facility.

Discussion: The facility indicated that refresher information is whenever residents are transferred to the facility and through PREA posters, sessions with case managers.

115.233 (c)

The agency shall provide resident education in formats accessible to all residents, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to residents who have limited reading skills.

Discussion: The facility provides PREA information to the residents regarding sexual safety and PREA be accessible regardless of ability and language. Residents who are limited English proficient, are deaf, visually impaired, disabled, including residents with mental illness, or have limited reading skills can get both the information provided at intake and the more complete education in a manner they can understand.

During the first day of the on-site auditor the facility report following target residents.

115.233 (d)

The agency shall maintain documentation of resident participation in these education sessions.

Discussion: Residents sign an acknowledgment affirming they understand the agency has a zero-tolerance policy toward all forms of sexual abuse and sexual harassment and policies and procedures in place to protect residents from victimization. Residents are encouraged to report it in person, writing or by telephone.

Information collected by the auditors on the "Residents' Data Sheet".

- Resident Initial PREA Screening
- Screening within 72 hours
- Resident Initial PREA Education Session
- Education within 10 days
- Facility Orientation
- PREA Acknowledgement Statement
- Reassessments with 30 days
- Residents selected for Interview
- Resident Refusal to Interview

115.233 (e)

In addition to providing such education, the agency shall ensure that key information is continuously and readily available or visible to residents through poster, resident handbooks, or other written formats.

Discussion: The facility has critical information continuously available to residents through posters, PREA handouts and meetings/sessions with case managers or counselors.

**115.234 Specialized training: Investigations**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Supporting Documents, Interviews and Observations:

- PREA Master Policy
- Facility Sexual Abuse and Sexual Harassment Overview
- Case 1 Investigation
- Case 2 Investigation
- Case 3 Investigation
- Employee Data Sheet
- NIC Investigation Training Certificates - 4
- PREA Investigation Training
- American Jail Association – PREA Investigation Training
- Specialized Training: Investigating Sexual Abuse in Correctional Setting Notification of Curriculum Utilization December 2013
- Online PREA Audit: Pre-Audit Questionnaire for Community
- Formal and Informal Interviews

115.234 (a)

In addition to the general training provided to all employees pursuant to standard 115.31, the agency shall ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings.

Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.234:

1. The APT Foundation utilizes the NIC (National Institute of Corrections) online training for Investigations.
2. The APT Foundation has designed the PREA Coordinator, PREA Manager, and Residential Clinical Supervisors as staff persons required to take the specialized Investigations training.
3. Certificates of Completed Investigations training are maintained.
4. Staff that are required to complete the specialized Investigations training, are also required to complete annual inhouse training.

Central Office: PREA investigator question, did you receive training specific to conducting sexual abuse investigations in confinement setting? Yes. staff have completed the PREA Resource Center Investigation training for Community Confinement. Training topics include Techniques for interviewing sexual abuse victims, Proper use of Miranda and Garrity warnings, Sexual abuse evidence collection in confinement settings and the criteria and evidence required to substantiate a case for administrative or prosecution referral?

The facility does not conduct criminal investigations.

Discussion: The investigators who handle sexual abuse and sexual harassment incidents has training in sexual abuse investigations. Investigators are responsibility of gathering and preserving evidence in the case; interview all parties to include victims, perpetrators, witnesses, etc.; and review prior complaints and reports of sexual abuse involving the suspected perpetrator.

115.234 (b)

Specialized training shall include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.

Central Office: PREA investigator question, what topics were included in your training? Training topics include Techniques for interviewing sexual abuse victims, Proper use of Miranda and Garrity warnings, Sexual abuse evidence collection in confinement settings and the criteria and evidence required to substantiate a case for administrative or prosecution referral?

115.234 (c)

The agency shall maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations.

The facility maintains documentation of investigations.

115.234 (d)

Any State entity or Department of Justice component that investigates sexual abuse in confinement settings shall provide such training to its agents and investigators who conduct such investigations.

The facility indicate that the Department of Justice do not investigate sexual abuse at this facility. The local police Department investigate criminal cases.

Discussion: Below are the Sexual Abuse, Sexual Harassment Allegations and Investigations Overview:

- The Total number of investigations for the past 12 months = 3
- The total number of sexual abuse investigations = 2
- The total number of sexual harassment investigations = 1
- The number of criminal sexual abuse referred for prosecution = 0

Discussion: Below are the Reviewed Information in the Investigation Packages:

- PREA Incident Reporting Form
- Type of Violations
- Persons Involved
- Alleged Victim
- Alleged Perpetrator
- Witnesses
- Facility Video Reviewed
- Description of Incident
- Persons Notified
- Injuries (If Applicable)
- Disposition and Sign-Off
- Incident Disposition
- The number of SANE reports = 0

Discussion: Below are the results of the PREA Investigation reviewed:

- Substantiated – 2
- Unsubstantiated – 1
- Unfounded – 0
- Pending - 0

115.235	<b>Specialized training: Medical and mental health care</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Supporting Documents, Interviews and Observations:</p> <ul style="list-style-type: none"> <li>• PREA Master Policy</li> <li>• Medical Health Care Certificates</li> <li>• Employee Data Sheet</li> <li>• Master Training List – Plus Behavioral Health</li> <li>• List of Medical Staff - 6</li> <li>• List of Mental Health Staff - 27</li> <li>• Online PREA Audit: Pre-Audit Questionnaire for Community</li> <li>• Formal and Informal Interviews</li> </ul> <p>115.235 (a)</p> <p>The agency shall ensure that all full and part time medical and mental health care practitioners who work regularly in its facilities have been trained in:</p> <ul style="list-style-type: none"> <li>• How to detect and assess signs of sexual abuse and sexual harassment.</li> <li>• How to preserve physical evidence of sexual abuse.</li> <li>• How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and</li> <li>• How and to whom to report allegations or suspicions of sexual abuse and sexual harassment.</li> </ul> <p>Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.235:</p> <ol style="list-style-type: none"> <li>1. The APT Foundation utilizes the NIC (National Institute of Corrections) online training to complete specialized training.</li> <li>2. Medical staff, including Physicians and Advanced Practice Nurses working in Primary Care or Psychiatry complete the following: PREA: Medical Care for Sexual Assault victims in a Confinement Setting.</li> <li>3. Clinical Staff (Counselors and Clinicians) are required to complete the following: PREA: Behavioral Health Care for Sexual Assault Victims in a Confinement Setting.</li> <li>4. Certificates of Completion are maintained on file.</li> <li>5. APT Foundation medical staff will not complete forensic examinations for victims of sexual assault. Forensic evaluations will be completed at Yale New Haven Hospital with a member from the Women and Families Center present.</li> <li>6. The APT Foundation does not utilize contractors or volunteers for Medical or Clinical care.</li> </ol> <p>115.235 (b)</p> <p>If medical staff employed by the agency conduct forensic examinations, such medical staff shall receive the appropriate training to conduct such examinations.</p> <p>The facility does not conduct forensic examinations. Forensic examinations if needed will be conducted at the local hospital.</p> <p>115.235 (C)</p> <p>The agency shall maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere.</p> <p>The program does not have any medical or mental health staff.</p> <p>115.235 (d)</p> <p>Medical and mental health care practitioners shall also receive the training mandated for employees under standard 115.31 or for contractors and volunteers under standard 115.32, depending upon the practitioner’s status at the agency.</p> <p>Discussion: The program does not have any medical or mental health staff. If a resident needed the services of medical, they will be transfer to the local hospital.</p>

**115.241 Screening for risk of victimization and abusiveness**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Supporting Documents, Interviews and Observations:

- PREA Master Policy
- PREA Screening Tool
- PREA Screening DOC – 32
- Required Number of Resident Interviewed
- Resident Data Sheet
- Resident Roster
- Online PREA Audit: Pre-Audit Questionnaire for Community
- Formal and Informal Interviews

115.241 (a)

All residents shall be assessed during an intake screening and upon transfer to another facility for their risk of being sexually abused by other residents or sexually abusive toward other residents.

Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.241:

(a) The APT Foundation conducts an initial screening for risk of sexual abuse victimization or sexual abusiveness prior to admission of the program. This screening is maintained in the client's electronic health record.

(b) All persons entering the facility have a completed behavioral health evaluation completed by a licensed professional (LCSW or LPC) within 72 hours of admission to the facility. The evaluation is maintained in the client's electronic health record.

(c) / (d) The evaluation of sexual abuse and sexual harassment information is completed as part of the persons' developmental history in a 90791 psychiatric diagnosis interview. The evaluation contains the following elements:

1. Whether the resident has a mental, physical or developmental disability
2. The resident's age
3. The resident's build
4. Incarceration history
5. Criminal history
6. Prior convictions for sex offenses against an adult or child
7. The resident's current perception of their sexuality and gender identity
8. History of experiences of sexual victimization
9. Resident's perception of vulnerability, if applicable.

(e) The APT Foundation considers individuals who may have committed a prior act of sexual abuse; prior convictions for violent offenses; and history of prior institutional violence or sexual abuse, as known to the agency, in assessing residents for risk of being sexually abusive. This evaluation often occurs prior to admitting evaluation and completed collaboratively with the applicable referral source in each case.

(t) The facility follows-up all assessments within the first 30 days to determine whether updates to information become necessary.

(g) A resident's risk level will be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that may change the risk level of the resident for either sexual victimization or abusiveness.

(h) Any client may refuse to answer questions (D-1, 7, 8, or 9) above in this section without discipline.

(i) All information contained in the client electronic health record is limited on a "need to know" basis with an established audit mechanism in place to ensure unauthorized system access of confidential information.

Facility Staff: Staff who perform PREA screening for risk of victimization response to, do you screen residents upon admission to your facility or transfer from another facility for risk of sexual abuse victimization or sexual abusiveness toward other residents? Yes, residents are screened upon admission into the facility for risk of sexual abuse victimization or sexual abusiveness toward other residents. This is completed by the admitting clinician.

Discussion: The agency, as required in policy, does not make housing and program assignments based on any criteria other than making individualized determinations about how to ensure the safety of each resident housing and program



assignments. Transgender or intersex residents housing, program assignments and their safety are determined on a case-by-case basis.

The facility has a policy governing the practice and procedures for screening residents. The screening process occur in a setting that ensures privacy as possible given the potentially of sensitive information that are discussed. The screening location has adequate space, privacy and time to conduct a quality screening of the resident for the desired information. Staff receive LGBTI training on effective and professional communication during the staff PREA training

Information collected by the auditors on the "Residents' Data Sheet".

- Resident Initial PREA Screening
- Screening within 72 hours
- Resident Initial PREA Education Session
- Education within 10 days
- Facility Orientation
- PREA Acknowledgement Statement
- Reassessments with 30 days
- Residents selected for Interview
- Resident Refusal to Interview

115.241 (b)

Intake screening shall ordinarily take place within 72 hours of arrival at the facility.

Facility Staff: Staff who perform PREA screening for risk of victimization response to, do you screen residents for risk of sexual victimization or risk of sexually abusing other resident within 72 hours of their intake? Yes. This is completed no later than 72 hours, ideally same day of admission.

Discussion: The screening occurs within 72 hours of arrival at the facility which includes transfer residents from other facilities.

Information collected by the auditor's "Residents' Data Sheet".

115.241 (c)

Such assessments shall be conducted using an objective screening instrument.

Discussion: The facility uses PREA screening information to inform the agency or facility decisions regarding a particular resident's housing unit, and programming needs. The assessment is conducted using an objective screening instrument. The residents are reassessed when warranted by incident of sexual abuse, and upon receipt of and new or relevant information.

115.241 (d)

The intake screening shall consider, at a minimum, the following criteria to assess residents for risk of sexual victimization:

- Whether the resident has a mental, physical, or developmental disability;
- The age of the residents;
- The physical build of the resident;
- Whether the resident has previously been incarcerated;
- Whether the resident's criminal history is exclusively nonviolent;
- Whether the resident has prior convictions for sex offenses against an adult or child;
- Whether the resident is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;
- Whether the resident has previously experienced sexual victimization;
- The residents own perception of vulnerability; and

The Risk for Victimization or Abusiveness objective screening instrument for addresses the following as a part of the Residential Evaluation:

- Patient Admitted Date
- Counselor
- Session Time and Date
- Social History
- Mental Status Exam
- PREA (Prison Rape Elimination Act) Risk Assessment (Residential Only)

Each Box if Present under Vulnerability and Aggressive. Please follow notification protocol and documentation for either Vulnerability or Aggressive if present.

1. Vulnerability: (If 1 or 2 below are present, Notify Residential Supervisor):

- a. Identifies as a member of the LGBTQI community or appears gender non-conforming
- b. Mental, Physical, Development Disabilities

2. If 3 or more below are present – Notify Residential Supervisor

- a. Age or appearance that may increase victimization
- b. Small in stature
- c. No previous incarcerations
- d. Criminal history is exclusively non-violent
- e. Previous of sexual victimization
- f. Perceives self to be vulnerable

3. Not at risk

4. Client presents with #1 or #2 above or three or more or more risk factors from #3 to #8. Risk communicated with Residential Supervisor.

5. Aggressive (if item 2 or 3 is confirmed – Notify Residential Supervisor)

- a. Prior convictions for violent offenses (murder, robbery, assault)
- b. Prior acts or convictions of sexual assault – notify residential supervisor
- c. History of institutional violence of sexual offense – notify residential supervisor

6. Remarks/Determination

- a. Not Present
- b. Client presents with Risk factor 2 or 3 above – notify residential supervisor

Residential Orientation: Resident completed orientation to facility within 3 days. As part of the orientation, the resident by their signature below indicates they have received reviewed the following:

- Has received PREA education, including zero tolerance to sexual assault, sexual abuse, and sexual harassment. Further, understands the facility prohibits sexual contact between Residents; Staff, and any other person at the facility.
- Understands the PREA reporting mechanism.
- Has received a copy of the resident handbook guiding care at APT Residential Services.
- Consent to release of information form
- Resident Rights/Compliance Agreement

Facility Staff: Staff who perform PREA screening for risk of victimization response to, what does the initial risk screening consider? It considers the resident's disabilities, resident age, physical build/characteristics of residents, previous incarceration history, criminal history, including nonviolent offenses and sex offenses; sexual orientation, previous sexual victimization of resident, and resident perception of vulnerability. The PREA screening instrument includes all the requirements of the PREA standards and agency policy.

Facility Staff: Staff who perform PREA screening for risk of victimization response to, what is the process for conducting the initial screening? The resident is informed what PREA is and the agency's policy regarding it. Then the resident is asked a series of questions that are PREA related from the screening form. The screening elements are included as part of the comprehensive substance abuse and mental assessment. This information is then collated into a risk assessment for either victim or aggressive. If deemed at risk, the facility is notified to complete a risk plan for housing, monitoring, and clinical needs.

Discussion: The facility screening considers all criteria listed in the standard and more. The facility instrument considers prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse if know to the facility or agency.

Information collected by the auditor's "Residents' Data Sheet".

115.241 (e)

The intake screening shall consider prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to the agency, in assessing residents for risk of being sexually abusive.

Resident Interviews: Twenty (20) residents were randomly interviewed. Sixteen (16) males and four (4) females from the CT Department of Corrections. The arrival year: 20 entered in 2022. They were asked: When you first came here, do you remember whether you were asked any questions like whether you had been in jail or prison before, whether you have ever

been sexually abused, whether you identify with being gay, lesbian, or bisexual, and whether you think you might be in danger of sexual abuse here?

Twenty (20) residents interviewed stated they recalled being asked the PREA related questions.

Residents that said they were asked the PREA related questions, were asked the same day as admission or within one week. Of those who recalled being asked the questions, they also stated the questions were asked in private by staff.

Residents were asked a follow-up question; do you know if staff asked you these types of questions again while you have been here (reassessment)? All of the interviewed residents indicated they were asked those questions again by their case manager.

115.241 (f)

Within a set time period, not to exceed 30 days from the resident's arrival at the facility, the facility will reassess the resident's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening.

Discussion: Residents are rescreened within 30 days of their arrival at the facility. Resident also reassessed when warranted by the circumstances where additional information may be presented. This information maybe new referral, incident reports, safety of the residents, or any relevant information.

Information collected by the auditor's "Residents' Data Sheet".

- Resident Initial PREA Screening
- Screening within 72 hours
- Resident Initial PREA Education Session
- Education within 10 days
- Facility Orientation
- PREA Acknowledgement Statement
- Reassessments with 30 days
- Residents selected for Interview
- Resident Refusal to Interview

115.41 (g)

A resident's risk level shall be reassessed when warranted due to referral, request, incident of sexual abuse, or receipt of additional information that bears on the resident's risk of sexual victimization or abusiveness.

Facility Staff: Staff who perform PREA screening for risk of victimization response to, do you reassess a resident's risk level as needed due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the resident's risk of sexual victimization or abusiveness? Yes, the process is completed within 30 days. The residents' risk level is reassessed as needed due to a referral, request, incident, of sexual abuse, or receipt of additional information that bears on the residents' risk of sexual victimization or abusiveness.

115.241 (h)

Residents may not be disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d-1, 7, 8, 9) of this section.

Facility Staff: Staff who perform PREA screening for risk of victimization response to, are residents disciplined in any way for refusing to respond to (or for not disclosing complete information related to) the following requirements in the standards. No.

Discussion: Residents are not required to answer questions that they are not ready to disclosed or share information on. The residents are not disciplined for not answering any of the sensitive questions.

115.241 (i)

The agency shall implement appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information in not exploited to the resident's detriment by staff or other residents.

Central Office Staff: Agency PREA coordinator/PREA compliance manager question, has the agency/facility outlined who should have access to a resident's risk assessment within the facility in order to protect sensitive information from exploitation? Yes. The agency/facility has confidentiality protocols which outlines who should have access to a resident's risk assessment within the facility in order to protect sensitive information from exploitation. Protocols ensure sensitive information is not exploited to the resident's detriment by staff or other residents.

The core elements of the risk assessment are available only to treating staff. Patient care associates who monitor activity within the facility will not be aware of specific details other than the resident requires additional risk monitoring, including any specific monitoring requirements, if indicated

Facility Staff: Staff who perform PREA screening for risk of victimization response to, has the agency outlined who can have access to a resident's risk assessment within the facility to protect sensitive information from exploitation? Yes. The agency/facility has outlined who can have access to the residents' risk assessment within the facility in order to protect sensitive information from exploitation. Only clinical staff would have immediate access to specific information. Patient care associates would only be aware of the specifics related to the risk plan regarding supervision and surveillance of the resident.

Discussion: The sensitive information from the screening information is protected. The information is control and is disseminated to key staff and any additional staff on a case-by-case basis or as needed.

115.242	<b>Use of screening information</b>
	<p data-bbox="244 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 273 778 300">Supporting Documents, Interviews and Observations:</p> <ul data-bbox="244 331 855 658" style="list-style-type: none"> <li>• PREA Master Policy</li> <li>• Facility Layout</li> <li>• PREA Screening DOC 32</li> <li>• Resident Data Sheet</li> <li>• Resident Roster</li> <li>• Staff Schedule Women and Men</li> <li>• List of Transgender and Intersex Residents – 0</li> <li>• List of Bisexual Gay and Lesbian – 0</li> <li>• Online PREA Audit: Pre-Audit Questionnaire for Community</li> <li>• Formal and Informal Interviews</li> </ul> <p data-bbox="244 689 360 716">115.242 (a)</p> <p data-bbox="244 748 1406 837">The agency shall use information from the risk screening required by standard 115.241 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive.</p> <p data-bbox="244 869 1123 896">Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.242:</p> <ol data-bbox="244 927 1485 1330" style="list-style-type: none"> <li>1. The APT Foundation utilizes information obtain during screening, evaluation, and updates, as indicated, to inform housing, bed, work, education, programming, and supportive services.</li> <li>2. A PREA Risk Factor Plan is developed any for person determined at evaluation to be at high risk for being sexually victimized or at high risk for being sexually abusive.</li> <li>3. Both the Evaluation and PR.EA Risk Factor Plan (if applicable) are documented in the resident record.</li> <li>4. The APT Foundation makes housing and program assignments on a case-by-case basis for individuals who may be transgender or intersex,</li> <li>5. A transgender or intersex resident's views with respect to his or her own safety shall be given serious consideration.</li> <li>6. Transgender and intersex residents can shower separately from other residents.</li> </ol> <p data-bbox="244 1361 1426 1420">The APT Foundation does not restrict housing for LGBT residents to separate, dedicated wings in the facility. All LGBT residents are fully integrated into the housing and clinical programming of the facility.</p> <p data-bbox="244 1451 1485 1675">Facility Staff: Staff who perform PREA screening for risk of victimization response to, how does the agency/facility use information from risk screening during intake to keep residents safe from being sexually victimized or from being sexually abuse? The agency uses the information collected during intake to house residents in a safe manner. This way a known predator will not be housed with a known victim. This included education and programming. To make decisions regarding housing – potential victims are housed in rooms closest to the PCA station to enhance contact and observation. Likewise, to ensure a person with a potential abuse history are not housed in the same room – ideally in a room a distance away from the housing of a potential victim.</p> <p data-bbox="244 1706 1453 1796">Discussion: The facility is using PREA information to make determinations for all residents regarding housing, bed, work, education, and program assignments. The information is use to maintain separation between residents at risk of being sexually victimized and residents likely to commit sexual abuse.</p> <p data-bbox="244 1827 1118 1854">The facility physical layout also considers in the determinations of housing assignments.</p> <p data-bbox="244 1886 360 1912">115.242 (b)</p> <p data-bbox="244 1944 1257 1971">The agency shall make individualized determinations about how to ensure the safety of each resident.</p> <p data-bbox="244 2002 1465 2092">Discussion: The facility uses the PREA screening information from standard 115.41 to make individualized determinations for all residents regarding housing, bed work, education, and program assignments. These determinations are to maintain separation between residents' persons at risk of being sexually victimized and residents likely to commit sexual abuse.</p> <p data-bbox="244 2123 360 2150">115.242 (c)</p>

In deciding whether to assign a transgender or intersex resident to a facility for male or female residents, and in making other housing and programming assignments, the agency shall consider on a case-by-case basis whether a placement would ensure the residents health and safety, and whether the placement would present management or security problems.

Central Office Staff: Agency PREA Coordinator question, how does the agency or facility determine housing and program assignments for transgender or intersex residents? The facility ensures all residents are screened to assess their risk of being sexually abused or being sexually abusive toward other residents using an objective assessment/screening instrument.

The program completes a PREA Risk Assessment which looks at both protective and risk factors and the outcome determines housing. A known predator will not be housed with a known victim. Prior to a resident identified above arriving at the program, program leadership and the funding agency have a discussion to confirm that this is the best fit and safest location for the resident. When the resident arrives, program staff have a conversation with the resident to find out how the program can accommodate the resident so that the resident is and feels safe. If the accommodation is not possible then program leadership will discuss with DOC a possible solution or transfer to another program for the resident.

The facility utilizes this information to assist in housing decisions. In facility procedures, a resident who is identified as being at risk is housed in rooms closest to the Patient Care Associate desks. This ensures there is close contact and frequent observation with these residents. Further, this information will ensure that a potential victim is not housed with a potentially abusive resident.

Discussion: Abusive residents will not be housed with a known victim or a vulnerable resident. Prior to a resident identified above arriving at the program, program leadership and the funding agency have a discussion to confirm that this is the best fit and safest location for the resident. When the resident arrives, program can accommodate the resident so that the resident is and feels safe. If the accommodation is possible then the program will comply and if the accommodation is not possible then program leadership will discuss with DOC a possible solution or transfer to another program for the resident. The program ensures that the resident can shower alone and if the resident requests it, use the bathroom facilities by themselves.

Staff were asked, where do the facility place vulnerable or abusive resident in and open housing units? Staff indicated that residents at risk of being sexually abused and those who are likely to abuse other resident are bunked at opposite sides of the dormitory. The vulnerable resident is bunked near the door that enters the housing unit or closest to staff location.

115.242 (d)

Placement and programming assignments for each transgender or intersex resident shall be reassessed at least twice each year to review any threats to safety experienced by the resident.

Central Office Staff: Agency PREA Coordinator question, how often are placement and programming assignments for each transgender or intersex resident reassessed to review any threats to safety experienced by the resident? Yes.

Discussion: The placement and program assignment of transgender and intersex residents are reassessed every six months to review any threats to safety experienced by the resident.

The facility did not have any known transgenders or intersex residents during the audit period.

115.242 (e)

A transgender or intersex resident's own view with respect to his or her own safety shall be given serious consideration.

Central Office Staff: Agency PREA Coordinator question, are a transgender or intersex resident's own view with respect to his or her own safety given serious consideration in placement and programming assignments? Yes. Absolutely. Residents who identify as transgender or intersex views discussed when making all decisions about their personal safety.

Facility Staff: Staff who perform PREA screening for risk of victimization response to, are a transgender or intersex resident's own view of his or her own safety given serious consideration in placement and programming assignments? Yes. Transgender or intersex residents' own views of his or her safety are given serious consideration in placement and programming assignments. A transgender or intersex resident is consulted and a primary means of consideration.

Discussion: As a part of the housing and programming determinations involving a transgender or intersex resident, staff indicated that they will give serious consideration to the residents' own views regarding his or her safety.

115.242 (f)

Transgender and intersex residents shall be given the opportunity to shower separately from other residents.

Central Office Staff: Agency PREA Coordinator question, are transgender and intersex residents given the opportunity to shower separately from other residents? If yes, how are they given the opportunity? Yes. The agency can accommodate

single toilet/shower rooms for a transgender or intersex persons. This plan would be included in housing plans.

Facility Staff: Staff who perform PREA screening for risk of victimization response to, are transgender and intersex residents given the opportunity to shower separately from other residents? The facility can accommodate single toilet/shower rooms for use by transgender or intersex residents.

Discussion: The facility has procedures that address transgenders and intersex residents that give them the opportunity to disrobe, shower, and dress apart from other residents. Transgenders and intersex residents can request to shower after the shower are closed to all resident.

The facility did not have transgenders and intersex residents during the audit period.

115.242 (g)

The agency shall not place lesbian, gay, bisexual, transgender, or intersex residents in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such residents.

Central Office Staff: Agency PREA Coordinator question, how does the agency/facility ensure against placing lesbian, gay, bisexual, transgender, or intersex residents in dedicated facilities, units, or wing solely on the basis of their sexual orientation, genital status, or gender identity? The facility does not place lesbian, gay bisexual, transgender, or intersex residents in dedicated housing. The facility is not subject to a consent decree, legal settlement, or legal judgement requiring that it establish a dedicated housing.

Discussion: The auditor requested any consent decree, legal settlement, or legal judgement requiring the facility to establish a dedicated facility, unit, or wing for LGBTI residents, and any documentation of housing if there were a consent decree, legal settlement, or legal judgement. The facility reported none.

The auditor also researches the internet regarding any consent decree, legal settlement, or legal judgement requiring the facility to establish a dedicated facility, unit, or wing for LGBTI resident. No information was founded by the auditor.

The agency does not place lesbian, gay, bisexual, transgender, or intersex residents in dedicated facilities, units, or wings solely on the basis of identification or status.

115.251	<b>Resident reporting</b>
	<p data-bbox="240 143 740 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 208 453 239"><b>Auditor Discussion</b></p> <p data-bbox="240 271 778 302">Supporting Documents, Interviews and Observations:</p> <ul data-bbox="240 327 855 824" style="list-style-type: none"> <li>• PREA Master Policy</li> <li>• Facility Layout</li> <li>• Required Number of Resident Interviewed</li> <li>• Resident Handbook English</li> <li>• Resident Handbook Spanish</li> <li>• Resident Roster</li> <li>• Brochure: (PREA English)</li> <li>• Brochure: (PREA Spanish)</li> <li>• PREA Poster English</li> <li>• PREA Poster Spanish</li> <li>• DOC PREA Poster</li> <li>• Investigation Packages Past 12 Months (3)</li> <li>• Resident Phones (Observed)</li> <li>• Online PREA Audit: Pre-Audit Questionnaire for Community</li> <li>• Formal and Informal Interviews</li> </ul> <p data-bbox="240 853 360 884">115.251 (a)</p> <p data-bbox="240 911 1436 1005">The agency shall provide multiple internal ways for residents to privately report sexual abuse and sexual harassment, retaliation, by other residents or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.</p> <p data-bbox="240 1034 1123 1066">Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.251:</p> <ol data-bbox="240 1093 1493 1527" style="list-style-type: none"> <li>1. The APT Foundation maintains multiple means for privately reporting sexual abuse and sexual harassment, retaliation by other residents or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. This notification process and contact numbers are included in posters throughout the facility, contained in the residential handbook; as well as educational sessions at the facility.</li> <li>2. The APT Foundation posts the number for the Women and Families Center to report a PREA qualifying event at the facility. The APT Foundation maintains a comprehensive service MOU with the Women and Families Center.</li> <li>3. The APT Foundation accepts reports made verbally, in writing, anonymously, and from third parties. All reports are documented and investigated accordingly.</li> <li>4. The APT Foundation provides a compliance telephone "hotline" as part of the agencies overall Corporate Compliance Plan under direction of the Corporate Compliance Officer, who is also the PREA Coordinator, as a means for staff to privately report sexual abuse or sexual harassment of residents.</li> </ol> <p data-bbox="240 1556 1493 1718">Central Office Staff: Agency PREA Coordinator question, how does the agency or facility provide at least one way for residents to report abuse or harassment to a public or private entity or office that is not part of the agency? Yes. Residents may report directly to the Women and Families Center and they may also report to their referral source. All referral sources are required to be compliant with PREA regulations and would have an obligation to report back to the agency for review and investigation.</p> <p data-bbox="240 1747 1493 1841">Central Office Staff: Agency PREA Coordinator question, do these procedures enable receipt and immediate transmission of resident's reports of sexual abuse and sexual harassment to agency officials that allow the resident to remain anonymous upon request? Yes.</p> <p data-bbox="240 1870 1493 2134">Facility Random Staff: Twelve (12) staff were randomly interviewed. The random staff representing staff from all shifts. They were asked: "how can residents privately report sexual abuse and sexual harassment, retaliation by other residents or staff for reporting sexual abuse and sexual harassment, or staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment?" The interviewed random sample of twelve staff reported that the residents can privately report by using the hotline number, notify staff, family, or friends. Such reports can be made verbally or in writing. All the interviewed staff reported that if a resident makes a report verbally or in writing, sexual abuse or harassment, the allegations are responded to immediately and they would immediately document the allegation.</p>



Resident Interviews: Twenty (20) residents were randomly interviewed. Sixteen (16) males and four (4) females from the CT Department of Corrections. The arrival year: 20 entered in 2022. They were asked: How would you report any sexual abuse or sexual harassment that happened to you or someone else? They were all asked is there someone who does not work at this facility who you could report to about sexual abuse or sexual harassment? Twenty (20) interviewed residents could name more than one way they could report if they needed to. Residents said they would call the PREA Hotline. Some residents said they could report to a trusted staff.

Twenty (20) interviewed residents said they could also report to a family member outside the facility.

Discussion: The agency/facility has multiple internal ways of residents to privately report sexual abuse, sexual harassment, retaliation by other residents or staff for reporting sexual abuse and sexual harassment, and staff violated their responsibilities that may have contributed to the sexual abuse.

Residents are informed of the different ways to report, methods, and how to access the internal and external reporting process.

During the facility tour the auditor observed intake process/location, where the PREA screening occurred, the location of the drop boxes and whether they were lock. The resident mail process was discussed, how resident mail are sent and received.

The facility has toll-free hotline numbers available to residents. During the tour the auditor tested critical functions such as the phones.

115.251 (b)

The agency shall also provide at least one way for residents to report abuse or harassment to a public or private entity or office that is not part of the agency, and that is able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials, allowing the resident to remain anonymous upon request.

Externally, residents may contact the Connecticut Alliance to End Sexual Violence and that information is provided and displayed in high traffic areas of the program as is additional PREA material.

115.251 (c)

Staff shall accept reports made verbally, in writing, anonymously, and from third parties and shall promptly document any verbal reports.

Facility Random Staff: Twelve (12) staff were randomly interviewed. The random staff representing staff from all shifts. They were asked: "when a resident alleges sexual abuse or sexual harassment, can he or she do so verbally, in writing, anonymously, and from third parties?" The interviewed random sample of twelve staff reported that the residents can privately report by using the hotline number, notify staff, family, or friends. Such reports can be made verbally or in writing. All the interviewed staff reported that if a resident makes a report verbally or in writing, sexual abuse or harassment, the allegations are responded to immediately and they would immediately document the allegation.

Resident Interviews: Twenty (20) residents were randomly interviewed. Sixteen (16) males and four (4) females from the CT Department of Corrections. The arrival year: 20 entered in 2022. They were asked: Do you know if you are allowed to make a report without having to give your name?

Eighteen (18) interviewed residents said they knew they could make an anonymous report. Two (2) residents said they did not know whether they could or not. The interviewer explained how they could make an anonymous report.

Resident Interviews: Twenty (20) residents were randomly interviewed. Sixteen (16) males and four (4) females from the CT Department of Corrections. The arrival year: 20 entered in 2022. They were asked: Can you make reports of sexual abuse or sexual harassment either in person or in writing? They were also asked if a friend or relative could make a report for them so they could remain anonymous.

Twenty (20) interviewed residents could make reports of sexual abuse in person to staff and in writing. They also reported that friends and family members will report for them if needed too.

Resident Interviews: Twenty (20) residents were randomly interviewed. Sixteen (16) males and four (4) females from the CT Department of Corrections. The arrival year: 20 entered in 2022. They were asked: Have you ever reported to the authorities, either in person or in writing, that you were sexually abused or sexually harassed while in this facility? Twenty (20) residents stated they have never reported that they were sexual abused or sexually harassed while in this facility and that that was because it had never happen. A number of residents, during the interviews reported that they have not heard of any allegations of either sexual abuse or sexual harassment at this facility.

Discussion: Residents sign an PREA acknowledgment form confirming they have been provided information related to reporting. The Zero Tolerance Policy for Sexual Harassment and Sexual Abuse Acknowledgment, affirms their understands

that they have the right to report allegations of sexual abuse and harassment. The statement encourages residents to report. They are advised they may report in person, in writing, or by telephone. They are told that a third party may report allegations of sexual abuse or sexual harassment to the staff, program director, program managers, or the designated PREA coordinator and the PREA hotline number.

Resident or third parties may also report to the Department of Correction PREA Investigation Unit or the Connecticut Alliance to End Sexual Violence. The form acknowledges that all allegations of sexual abuse and sexual harassment will be taken seriously and investigated by the proper authorities and that there will be no negative consequences for reporting.

Most of the residents of the program have cell phones and can communicate with anyone at any time. The resident has access to the community either looking for work, on pass, or during work. Residents have access to their families using their cell phones, during visitation or through writing. They would also have access to their attorneys if they have one.

Information collected by the auditor's "Residents' Information Spreadsheet".

- Resident Initial PREA Screening
- Screening within 72 hours
- Resident Initial PREA Education Session
- Education within 10 days
- Facility Orientation
- PREA Acknowledgement Statement
- Reassessments with 30 days
- Residents selected for Interview
- Resident Refusal to Interview

115.251 (d)

The agency shall provide a method for staff to privately report sexual abuse and sexual harassment of residents.

Facility Random Staff: Twelve (12) staff were randomly interviewed. The random staff representing staff from all shifts. They were asked: "how can staff privately report sexual abuse and sexual harassment of residents?" The interviewed twelve random staff reported that staff can privately reporting by using the hotline number, notify supervisor, notify the program manager, or notify the PREA coordinator. Such reports can be made verbally or in writing. All of the interviewed staff also could articulate at least one method in which staff could make a private report. The majority of staff reported they would notify Program Manager.

Discussion: Below are the Sexual Abuse, Sexual Harassment Allegations and Investigations Overview:

- The Total number of investigations for the past 12 months = 3
- The total number of sexual abuse investigations = 2
- The total number of sexual harassment investigations = 1
- The number of criminal sexual abuse referred for prosecution = 0

Discussion: Below are the Reviewed Information in the Investigation Packages:

- PREA Incident Reporting Form
- Type of Violations
- Persons Involved
- Alleged Victim
- Alleged Perpetrator
- Witnesses
- Facility Video Reviewed
- Description of Incident
- Persons Notified
- Injuries (If Applicable)
- Disposition and Sign-Off
- Incident Disposition
- The number of SANE reports = 0

Discussion: Below are the results of the PREA Investigation reviewed:

- Substantiated – 2
- Unsubstantiated – 1
- Unfounded – 0
- Pending - 0



**115.252 Exhaustion of administrative remedies**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Supporting Documents, Interviews and Observations:

- PREA Master Policy
- Sexual Abuse and Sexual Harassment Overview
- Case 1 Investigation
- Case 2 Investigation
- Case 3 Investigation
- Grievance Procedures
- Grievance List - 0
- Grievances that are PREA Related (0)
- Investigation Packages Past 12 Months (3)
- Online PREA Audit: Pre-Audit Questionnaire for Community
- Formal and Informal Interviews

115.252 (a)

An agency shall be exempt from this standard if it does not have administrative procedures to address resident grievances regarding sexual abuse.

Central Office Staff: Agency PREA Coordinator question, what happens to and resident grievance regarding sexual abuse and sexual harassment? When a resident submits a grievance alleging sexual abuse and/or sexual harassment, the grievance coordinator immediately submits the grievance to the PREA investigator or the office responsible for investigating PREA allegations.

Facility Staff: The facility Program staff indicated that all PREA issues that comes through the formal grievance process are send directly to the investigator for processing.

115.252 (b)

- The agency shall not impose a time limit on when a resident may submit a grievance regarding an allegation of sexual abuse.
- The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege and incident of sexual abuse.
- The agency shall not require a resident to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse.
- Nothing in this section shall restrict the agency’s ability to defend against a resident lawsuit on the ground that applicable status of limitations has expired.

See section (a)

115.252 (c)

The agency shall ensure that:

- A resident who alleges sexual abuse may submit a grievance with without submitting it to a staff member who is the subject of the compliant, and
- Such grievance is not referred to a staff member who is the subject of the compliant.

The agency/facility do not required residents who alleges sexual abuse may submit a grievance with without submitting it to staff member who is the subject of the compliant and grievances are not referred to a staff member who is the subject of the compliant. The facility has drop boxes.

See section (a)

115.252 (d)

- The agency shall issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance.
- Computation of the 90-day time period shall not include time consumed by residents in preparing any administrative appeal.
- The agency may claim an extension of time to respond, of up to 70 days, if the normal time period for response is insufficient to make an appropriate decision. The agency shall notify the resident in writing of any such extension and provide a date by which a decision will be made.

- 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, the resident may consider the absence of a response to be a denial at that level.

See Section (a) response.

115.252 (e)

- Third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, shall be permitted to assist residents in filing request for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of residents.
- If a third-party file such a request on behalf on a resident, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.
- If the resident declines to have the request processed on his or her behalf, the agency shall document the resident decision.

See section (a)

115.252 (f)

- The agency shall establish procedures for the filing of an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse.
- After receiving an emergency grievance alleging a resident is subject to a substantial risk of imminent sexual abuse, the agency shall immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken, shall provide an initial response within 48 hours, and shall issue a final agency decision within 5 calendar days. The initial response and final agency decision shall document the agency's determination whether the resident is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

See section (a)

115.252 (g)

The agency may discipline a resident for filing a grievance related to alleged sexual abuse only where the agency demonstrates that the residents filed the grievance in bad faith.

Staff indicated that the agency may discipline a resident for filing a grievance related to alleged sexual abuse only where the agency demonstrates that the residents filed the grievance in bad faith. The facility had not used this process within the past 12 months.

Discussion: When a resident submits a grievance alleging sexual abuse and/or sexual harassment, the grievance coordinator immediately submits the grievance to the PREA investigator or the office responsible for investigating PREA allegations.

Discussion: Below are the Sexual Abuse, Sexual Harassment Allegations and Investigations Overview:

- The Total number of investigations for the past 12 months = 3
- The total number of sexual abuse investigations = 2
- The total number of sexual harassment investigations = 1
- The number of criminal sexual abuse referred for prosecution = 0

Discussion: Below are the Reviewed Information in the Investigation Packages:

- PREA Incident Reporting Form
- Type of Violations
- Persons Involved
- Alleged Victim
- Alleged Perpetrator
- Witnesses
- Facility Video Reviewed
- Description of Incident
- Persons Notified
- Injuries (If Applicable)
- Disposition and Sign-Off
- Incident Disposition
- The number of SANE reports = 0

Discussion: Below are the results of the PREA Investigation reviewed:

- Substantiated – 2
- Unsubstantiated – 1

- Unfounded – 0
- Pending - 0

**115.253 Resident access to outside confidential support services**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Supporting Documents, Interviews and Observations:

- PREA Master Policy
- Sexual Abuse and Sexual Harassment Overview
- Case 1 Investigation
- Case 2 Investigation
- Case 3 Investigation
- Facility Layout
- MOU APT Women and Families Center
- Required Number of Resident Interviewed
- Resident Handbook English
- Resident Handbook Spanish
- PREA Poster English
- PREA Poster Spanish
- PREA Brochure Spanish
- PREA Brochure English
- DOC PREA Poster
- MOU with Advocacy Center – The Connecticut Alliance to End Sexual Violence
- Online PREA Audit: Pre-Audit Questionnaire for Community
- Formal and Informal Interviews

115.253 (a)

The facility shall provide residents with access to outside victim advocates for emotional support services related to sexual abuse by giving residents mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations, and, for persons detained solely for civil immigration purposes, immigrant services agencies. The facility shall enable reasonable communication between residents and these organizations and agencies, in as confidential a manner as possible.

Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.253:

1. The APT Foundation maintains a comprehensive service MOU with the Women and Families Center. The Women and Families Center can provide confidential support services to any resident that may have experienced sexual abuse or harassment at our facility: another facility; or from the community in general.
2. The staff from the APT Foundation and the staff from the Women and Families Center shall inform residents, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws.
3. In general, communications between the two organizations are limited to cases of where a resident may have expressed suicidal or homicidal thoughts or ideations and are at risk for potentially hurting themselves or others.
4. For Residents that are discharging to an area outside of the coverage provided by the Women and Families Center, referrals to similar services will be considered in their new area of residence.

Central Office Staff: Agency PREA Coordinator question, does the agency/facility 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. The agency/facility has an active MOU with the Women and Families Center. These services are offered to resident free of charge.

Resident Interviews: Twenty (20) residents were randomly interviewed. Sixteen (16) males and four (4) females from the CT Department of Corrections. The arrival year: 20 entered in 2022. They were asked: Twenty (20) residents were randomly interviewed. Sixteen (16) males and four (4) females from the CT Department of Corrections. The arrival year: 20 entered in 2022. They were asked: does the facility give you mailing addresses and telephone numbers for these outside services? Interviewed residents reported that there are numbers and mailing addresses posted in the facility. Most of the residents said they don't know the details of the services, but feels they could confidentiality communicate with the services if needed.

A review of documentation indicated that outside information regarding services was available to residents at intake, PREA brochures, and posters.

Discussion: The facility has determined which rape crisis center that are available to provide emotional support services to residents. The facility has an agreement/MOU with The Families Center, a member center of the Connecticut Alliance to End Sexual Violence.

If a resident is placed in some type of restricted housing, they will have access to emotional support services.

The facility does not house residents solely for civil immigration purposes. However, if they did, the facility would notify any persons detained solely for civil immigration purposes about how they can access immigrant services agencies and provide mailing addresses and regular and toll-free telephone numbers

115.253 (b)

The facility shall inform residents, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws.

In addition to the contact information, the sheet states, "Each Member Sexual Assault Crisis Program" provides hotline services 24 hour/day, 7 days a week; 24-hour crisis counseling; information and referral; advocacy for children and non-abusing parent; short term counseling for victims and their family and/or friends and support groups.

115.253 (c)

The agency shall 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. The agency shall maintain copies of agreements or documentation showing attempts to enter into such agreements.

Discussion: Memorandum of Agreement between Women and Families Center and APT Foundation.

Women and Families Center provides free, confidential and empowerment based sexual assault crisis and advocacy services including a 24-hour hotline, individual counseling, medical and legal accompaniment and support, and community education and training programs.

- Identify and assign a point of contact at each organization to establish coordination between agencies and access to Sexual Assault Crisis Service (SACS) for APT Foundation clients. Response to client's request to work with SACS will be made and executed within a reasonable amount of time.
- Display sexual assault crisis hotline posters in English and Spanish onsite at APT Foundation and Women and Family Center share information with clients about SACS program and the availability of sexual assault crisis counselors and community-based services.
- At APT Foundation client's request, allow for a sexual assault crisis counselor to accompany and support the victim throughout the forensic medical exam process and investigatory interviews, and provide emotional support, crisis intervention, information, and referrals, as requested by the victim throughout the client's placement in the APR facility.
- At Women and Family Center and PRT Foundation there will be a dedicated and confidential space for SACS to meet with clients.
- To develop site specific protocol and procedure for maintaining PREA standards.
- To collaborate for the continuity of care and discharge planning for clients who are victims of sexual assault and/or abuse.
- To identify and assign designated staff at in an effort to establish a cohesive and seamless delivery of services to clients in APT facilities.

Women and Families Center Responsibilities: Services of a Women and Families Center sexual assault counselor will be offered to APT clients, and if requested, a sexual assault crisis counselor will be allowed to visit with the client while the client is a resident of a CRT facility, and accompany the client at any point in time where support to the client will be provided (hospital, court, parole). A Women and Families Center sexual assault crisis counselor will be available to the client and APT staff to answer any questions, and consult on cases regarding the best care and service delivery. APT Foundation understands that communication in accordance with CGS-52-14K. Communication regarding the client and services provided can occur if the client grants permission to Women and Families Center to waive the privilege of confidential communication. Services will be coordinated by both agencies to meet the needs of the client.

Victims are offered a victim advocate to accompany them during the forensic exam if requested.

The auditor reached out to the following organizations:

- Just Detention International (JDI) – is a health and human rights organization that seeks to end sexual abuse in all forms of detention. Founded in 1980, JDI is the only organization in the U.S. – and the world – dedicated exclusively to ending sexual



abuse behind bars. They hold government officials accountable for prisoner rape; challenge the attitudes and misperception that enable sexual abuse to flourish; and make sure that survivors get the help they need.

Contact: Just Detention International (JDC) / Wilshire Blvd., Suite 340 Los Angeles, CA 90010 / Email sent: 3/25/22 at 6:05 am. Received response on 4/1/22 at 12:47 pm. The operations officer indicated a review of their database indicates that the organization have not received any information regarding this facility. The operations officer also recommended to contact the local rape crisis centers for information.

- National Sexual Violence Resource Center (NSVRC) – is the leading nonprofit in providing information and tools to prevent and respond to sexual violence. NSVRC translates research and trends into best practices that help individuals, communities and service providers achieve real and lasting change. NSVRC also work with the media to promote informed reporting.

Contact: National Sexual Violence Resources Center (NSVRC) /2101 N. Front Street Governor's Plaza North, building #2 Harrisburg, PA 17110 / Email sent: 3/25/22 at 6:10 am. Received response on 3/25/22 at 1:33 pm. The staff indicated that the organization do not track who requests information from them. The organization do not provide direct services and are simply an information and referral service.

Resident Interviews: Twenty (20) residents were randomly interviewed. Sixteen (16) males and four (4) females from the CT Department of Corrections. The arrival year: 20 entered in 2022. They were asked: Do you know if there are services available outside of this facility for dealing with sexual abuse, if you needed it? Two interviewed residents said no, when probe, residents said they never had a need to use the outside services. Continue to probe regarding PREA information, residents said they were given PREA information

Discussion: Below are the Sexual Abuse, Sexual Harassment Allegations and Investigations Overview:

- The Total number of investigations for the past 12 months = 3
- The total number of sexual abuse investigations = 2
- The total number of sexual harassment investigations = 1
- The number of criminal sexual abuse referred for prosecution = 0

Discussion: Below are the Reviewed Information in the Investigation Packages:

- PREA Incident Reporting Form
- Type of Violations
- Persons Involved
- Alleged Victim
- Alleged Perpetrator
- Witnesses
- Facility Video Reviewed
- Description of Incident
- Persons Notified
- Injuries (If Applicable)
- Disposition and Sign-Off
- Incident Disposition
- The number of SANE reports = 0

Discussion: Below are the results of the PREA Investigation reviewed:

- Substantiated – 2
- Unsubstantiated – 1
- Unfounded – 0
- Pending - 0

115.254	<b>Third party reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Supporting Documents, Interviews and Observations:</p> <ul style="list-style-type: none"> <li>• PREA Master Policy</li> <li>• Facility Sexual Abuse and Sexual Harassment Overview</li> <li>• Agency Website</li> <li>• Online PREA Audit: Pre-Audit Questionnaire for Community</li> <li>• Formal and Informal Interviews</li> </ul> <p>115.254 (a)</p> <p>The agency shall establish a method to receive third party reports of sexual abuse and sexual harassment and shall distribute publicly information on how to report sexual abuse and sexual harassment on behalf of a resident.</p> <p>Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.254:</p> <ol style="list-style-type: none"> <li>1. The APT Foundation accepts third-party reports of sexual abuse and harassment.</li> <li>2. Any third-party report is directed to the PREA Coordinator or Senior Leadership (Clinical Supervisor or Director) at the Residential facility.</li> <li>3. The third-party report, will follow existing investigative policy.</li> <li>4. If the third-party report involves an incident that occurred at another facility, the report will be passed on to the facility.</li> <li>5. If the third-party report is confirmed by the resident, the resident will be offered medical and emotional support services as outlined in PREA policies.</li> </ol> <p>Discussion: The agency/facility has established a method for receiving reports of sexual abuse and sexual harassment from third parties, and ensure that the reports are handle the same way as other reports of sexual abuse or sexual harassment, including ensuring that any identified or potential victims are safe and receive necessary support services, and that reports are thoroughly investigated.</p> <p>The agency/facility publicize information on third-party reporting, through websites; by posting in public areas of the facility lobby or visitation area and pamphlets.</p> <p>Interviews with staff confirmed they have been trained to take all allegations and reports seriously and to report them immediately, including those reported by third parties. The verbal reports are to be followed up with a written report before the end of the shift.</p> <p>Discussion: Below are the Sexual Abuse, Sexual Harassment Allegations and Investigations Overview:</p> <ul style="list-style-type: none"> <li>• The Total number of investigations for the past 12 months = 3</li> <li>• The total number of sexual abuse investigations = 2</li> <li>• The total number of sexual harassment investigations = 1</li> <li>• The number of criminal sexual abuse referred for prosecution = 0</li> </ul> <p>Discussion: Below are the Reviewed Information in the Investigation Packages:</p> <ul style="list-style-type: none"> <li>• PREA Incident Reporting Form</li> <li>• Type of Violations</li> <li>• Persons Involved</li> <li>• Alleged Victim</li> <li>• Alleged Perpetrator</li> <li>• Witnesses</li> <li>• Facility Video Reviewed</li> <li>• Description of Incident</li> <li>• Persons Notified</li> <li>• Injuries (If Applicable)</li> <li>• Disposition and Sign-Off</li> <li>• Incident Disposition</li> <li>• The number of SANE reports = 0</li> </ul>

Discussion: Below are the results of the PREA Investigation reviewed:

- Substantiated – 2
- Unsubstantiated – 1
- Unfounded – 0
- Pending - 0

115.261	<b>Staff and agency reporting duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Supporting Documents, Interviews and Observations:</p> <ul style="list-style-type: none"> <li>• PREA Master Policy</li> <li>• List of Residents Under the Age of 18 – 0</li> <li>• Online PREA Audit: Pre-Audit Questionnaire for Community</li> <li>• Formal and Informal Interviews</li> </ul> <p>115.261 (a)</p> <p>The agency shall require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency; retaliation against residents or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.</p> <p>Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.261:</p> <ol style="list-style-type: none"> <li>1. The APT Foundation requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in the facility, whether or not it is part of the agency; retaliation against residents or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.</li> <li>2. The APT Foundation expects incidents to be communicated by staff and general information regarding the specifics of the information maintained as confidentially as possible. This is to permit treatment, investigation, and other security and management decisions while protecting the resident.</li> <li>3 Unless otherwise precluded by Federal, State, or local law, medical and mental health practitioners are required to report sexual abuse pursuant to paragraph (a) above. The practitioner shall inform the resident of their duty to report, and the limitations of confidentiality at the initiation of services.</li> <li>4 APT Residential Services does not serve individuals under the age of 18.</li> <li>6. The APT Foundation staff will report all allegations of sexual abuse and harassment, including third-party and anonymous reports, to the facilities designated investigators.</li> </ol> <p>Facility Staff: The Program staff question, are all allegations of sexual abuse and sexual harassment (including those from third-party and anonymous sources) reported directly to designated facility investigators? Yes. All reports of sexual abuse and sexual harassment that are received from third-party, and anonymous sources must be received, responded to and investigated according to policies.</p> <p>Facility Random Staff Twelve (12) staff were randomly interviewed. The random staff representing staff from all shifts. They were asked: “Does the agency require all staff to report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility; retaliation against residents or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation?”</p> <p>Twelve random staff interviews indicated a clear understanding of the duty to report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility; retaliation against Residents or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident of retaliation immediately.</p> <p>The various ways staff indicated that they could make a report included, but was not limited to:</p> <ul style="list-style-type: none"> <li>• Report to supervisor</li> <li>• Report to the PREA “person” and Warden</li> <li>• Complete an incident report</li> </ul> <p>The twelve interviewed staff consistently described a process for reporting any information related to sexual abuse incidents as: reporting immediately, isolate the resident from other residents, don’t allow the resident to bath, shower, or brush teeth, preserve evidence; and report to someone else for the investigation.</p> <p>115.261 (b)</p>

Apart from reporting to designated supervisors or officials, staff shall not reveal 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.

Staff will only reveal PREA information to the Program Manager and PREA coordinator. Any other information will only be disseminated to individuals necessary to make treatment, investigation, and other security or management decisions.

Staff are required to maintain confidentiality of any PREA related issues.

115.261 (c)

Unless otherwise precluded by Federal, State, or local law, medical and mental health practitioners shall be required to report sexual abuse pursuant to paragraph (a) of this section and to inform residents of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services.

Policy requires all staff to report sexual abuse.

115.261 (d)

If the alleged victim is under the age of 18 or considered a vulnerable adult under a state or local vulnerable persons statute, the agency shall report the allegation to the designated State or local services agency under applicable mandatory reporting laws.

Central Office Staff: Agency PREA Coordinator/facility PREA compliance manager question, how do you respond when an allegation of sexual abuse or sexual harassment is made by someone under the age 18 or someone considered a vulnerable adult under state or local law? The agency only house individuals that are at least 18 years of age, but if the agency were to receive a report of child abuse or neglect, the facility are mandated reports and complete a report to DCF. Further, if the alleged victim is considered a vulnerable adult, then as mandated reporters, the agency notify the appropriate agency of the allegation.

The facility does not housed residents under the age of 17 and under.

115.261 (e)

The facility shall report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators.

The agency policy provides information for third parties to report allegations of sexual abuse and sexual harassment. To report a PREA allegations through a third party, call the State of Connecticut DOC, PREA Investigations Unit via the hotline (number provided) or to the Connecticut Alliance to End Sexual Violence (numbers are provided for English and Spanish).

Discussion: The agency/facility is aware of reporting and receiving timely information about sexual abuse, sexual harassment, retaliation, and staff neglect, or violations of responsibilities that may have contributed to an incident or retaliation.

The agency/facility has a reporting policy. The policy requires staff members, including medical and mental health staff to immediately report any knowledge, suspicion, or information of any incident in any facility, even in a facility that is not a part of the agency.

The facility complies with the state or local mandatory reporting laws and report sexual abuse allegations concerning any victim considered to be vulnerable adults.

Interviews with staff confirmed they have been trained to take all allegations and reports seriously and to report them immediately, including those reported by third parties. The verbal reports are to be followed up with a written report before the end of the shift.

115.262	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

Supporting Documents, Interviews and Observations:

- PREA Master Policy
- Case 1 Investigation
- Case 2 Investigation
- Case 3 Investigation
- List of Residents in Segregation that was/are PREA Related Past 12 Months (0)
- Online PREA Audit: Pre-Audit Questionnaire for Community
- Formal and Informal Interviews

115.262 (a)

When an agency learns that a resident is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the resident.

The facility screens all newly admitted residents for potential for victimization or for potential sexual abusiveness. This process is in place to ensure that a potential victim and potential abuser are not housed together in the same bedroom.

Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.262:

1. The APT Foundation, following any report or suspicion that a resident is subject to a substantial risk of imminent sexual abuse, will take immediate action to protect the resident from the threat.

Agency Head/Designee: Question, when you learn that a resident is subject to a substantial risk of imminent sexual abuse, what protective action does the agency take? The APT Foundation will review room assignment and may move the resident to a room located closer to the PCA station for enhanced supervision. The resident would be placed on much more frequent room checks by staff.

Facility Staff: Twelve (12) staff were randomly interviewed. The random staff representing staff from all shifts. They were asked: if you learn a resident is at risk of imminent sexual abuse, what actions do you take to protect the resident? Staff stated they would protect the residents by remove them from the alleged abuser, contact supervisor for additional instructions.

Discussion: Below are the Sexual Abuse, Sexual Harassment Allegations and Investigations Overview:

- The Total number of investigations for the past 12 months = 3
- The total number of sexual abuse investigations = 2
- The total number of sexual harassment investigations = 1
- The number of criminal sexual abuse referred for prosecution = 0

Discussion: Below are the Reviewed Information in the Investigation Packages:

- PREA Incident Reporting Form
- Type of Violations
- Persons Involved
- Alleged Victim
- Alleged Perpetrator
- Witnesses
- Facility Video Reviewed
- Description of Incident
- Persons Notified
- Injuries (If Applicable)
- Disposition and Sign-Off
- Incident Disposition
- The number of SANE reports = 0

Discussion: Below are the results of the PREA Investigation reviewed:

- Substantiated – 2
- Unsubstantiated – 1
- Unfounded – 0
- Pending - 0

115.263	<b>Reporting to other confinement facilities</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Supporting Documents, Interviews and Observations:</p> <ul style="list-style-type: none"> <li>• PREA Master Policy</li> <li>• Case 1 Investigation</li> <li>• Case 2 Investigation</li> <li>• Case 3 Investigation</li> <li>• List of Residents arriving at the facility that reported allegations while at another facility – 0</li> <li>• List of Residents reported allegations to another facility that occurred while at your facility - 0</li> <li>• Online PREA Audit: Pre-Audit Questionnaire for Community</li> <li>• Formal and Informal Interviews</li> </ul> <p>115.263 (a)</p> <p>Upon receiving an allegation that a resident was sexually abused while confined at another facility, the head of the facility that received the allegation shall notify the head of the facility or appropriate office of the agency where the alleged abuse occurred.</p> <p>Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.263:</p> <ol style="list-style-type: none"> <li>1. Upon receiving an allegation that a resident was sexually abused while confined at another facility, the APT Foundation via the PREA Coordinator will contact the head of the facility or the appropriate office of the agency where the alleged abuse occurred.</li> <li>2. Notification to the other facility shall occur no later than 72 hours after receiving the allegation.</li> <li>3. The APT Foundation will document that the notification to the other facility has occurred.</li> <li>4. The agency head or agency office that receives the notification shall ensure that the allegation is investigated in accordance with these standards.</li> </ol> <p>The facility head or agency office that receives such notification is responsible for ensuring the allegation is investigated in accordance with PREA Standards.</p> <p>Agency Head/Designee: Question, if another agency or facility within another agency refers allegations of sexual abuse or sexual harassment that occurred within one of your facilities, is there a designated point of contact? Any external report received by the agency would take seriously and passed along to the PREA Coordinator for investigation.</p> <p>Is there example of such allegations being reported from another facility or agency? There have been no external reports received by the agency during the past three years.</p> <p>Central Office Staff: Agency head/designee question, what happens when your agency receives such allegations? All appropriate staff would be notified. If an allegation came from another agency/facility, staff would notify the PREA coordinator/compliance manager designated person from that agency.</p> <p>115.263 (b)</p> <p>Such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation.</p> <p>Policy requires if the alleged incident occurred while the resident resided in another facility, the PREA Coordinator will immediately notify that facility and document that notification of the alleged incident has been communicated. The communication will occur no longer than 72 hours after the PREA Coordinator was made aware of the alleged incident.</p> <p>115.263 (c)</p> <p>The agency shall document that it has provided such notification.</p> <p>Discussion: Below are the Sexual Abuse, Sexual Harassment Allegations and Investigations Overview:</p> <ul style="list-style-type: none"> <li>• The Total number of investigations for the past 12 months = 3</li> <li>• The total number of sexual abuse investigations = 2</li> <li>• The total number of sexual harassment investigations = 1</li> <li>• The number of criminal sexual abuse referred for prosecution = 0</li> </ul>



Discussion: Below are the Reviewed Information in the Investigation Packages:

- PREA Incident Reporting Form
- Type of Violations
- Persons Involved
- Alleged Victim
- Alleged Perpetrator
- Witnesses
- Facility Video Reviewed
- Description of Incident
- Persons Notified
- Injuries (If Applicable)
- Disposition and Sign-Off
- Incident Disposition
- The number of SANE reports = 0

Discussion: Below are the results of the PREA Investigation reviewed:

- Substantiated – 2
- Unsubstantiated – 1
- Unfounded – 0
- Pending - 0

Notification:

- Reporting from another Facility – 0
- Reporting to another Facility - 0

115.263 (d)

The facility head or agency office that receives such notification shall ensure that the allegation is investigated in accordance with these standards.

Central Office Staff: Agency head/designee question, what happens when your agency receives such notification of allegations?

All allegations go through the PREA coordinator or the PREA team who then make appropriate collateral contacts to those needing to be informed of the situation.

Discussion: The agency/facility will refer reports of sexual abuse that occurred in another facility back to that facility and receive report from other agency/facilities about sexual abuse reported to have occurred in this facility and they ensure that the allegation is investigated.

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Supporting Documents, Interviews and Observations:

PREA Master Policy

- Sexual Abuse and Sexual Harassment Overview
- Case 1 Investigation
- Case 2 Investigation
- Case 3 Investigation
- Sexual Abuse Incident Coordinated Response Plan
- Online PREA Audit: Pre-Audit Questionnaire for Community
- Formal and Informal Interviews

115.264 (a)

Upon learning of an allegation that a resident was sexually abused, the first security staff member to respond to the report shall be required to:

- Separate the alleged victim and abuser.
- Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence.
- If the abuse occurred within a time period that still allows for the collection of 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; and
- 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.

Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.264:

1. Upon learning of an allegation that a resident was sexually abused, the first staff member to respond will immediately reach out to other staff to contact a supervisor and notify police, if indicated. The staff person will then:

- Separate the alleged victim and abuser.
- Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence.
- If the abuse occurred within a time period that still allows for the collection of any physical evidence, request that the alleged victim no take any actions that could destroy physical evidence, including as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and
- If the abuse occurred within a time period that still allows for the collection of any physical evidence, request that the alleged abuser no take any actions that could destroy physical evidence, including as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.
- The APT Foundation does not employ security staff at APT Residential Services. The facility is staffed by Patient Care Associates, Clinicians, and Nursing Staff (first and second shifts only).
- The APT Foundation maintains a coordinated response plan to coordinate actions taken in response to staff first responders, medical and mental health practitioners, investigators, and facility leadership.

Facility Random Staff: Twelve (12) staff were randomly interviewed. The random staff representing staff from all shifts. They were asked: "If you are the first person to be alerted that a resident has allegedly been the victim of sexual abuse, what is your responsibility in that situation?" Twelve interviewed random staff reported being aware of the agency procedure for reporting any information related to a resident who may be at imminent risk of sexual abuse. One hundred percent of the interviewed staff could articulate immediate notification to the supervisor. Ten of the interviewed staff also stated that they would seek to have the resident moved into another area, separate involved parties, secure evidence and immediately complete an incident report.

When probed on protecting the DNA evidence, staff indicated they would not let the residents brush their teeth, used the bathroom, eating or drinking.

When the twelve interviewed staff were probed on who they would not share the information with staff that they would only share with immediate supervisor or higher ups, and that they would not share with other residents.

Discussion: Below are the Sexual Abuse, Sexual Harassment Allegations and Investigations Overview:

- The Total number of investigations for the past 12 months = 3
- The total number of sexual abuse investigations = 2
- The total number of sexual harassment investigations = 1
- The number of criminal sexual abuse referred for prosecution = 0

Discussion: Below are the Reviewed Information in the Investigation Packages:

- PREA Incident Reporting Form
- Type of Violations
- Persons Involved
- Alleged Victim
- Alleged Perpetrator
- Witnesses
- Facility Video Reviewed
- Description of Incident
- Persons Notified
- Injuries (If Applicable)
- Disposition and Sign-Off
- Incident Disposition
- The number of SANE reports = 0

Discussion: Below are the results of the PREA Investigation reviewed:

- Substantiated – 2
- Unsubstantiated – 1
- Unfounded – 0
- Pending - 0
  
- Medical Referrals – 0
- Mental Health Referrals - 0

115.264 (b)

If the first staff responder is not a security staff member, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff.

The first responder for non-security will follow that same process and the security staff.

Discussion: The agency/facility thru training distinguish the roles of first responders from investigators. First responders do not conduct any part of the investigation and their role is to protect the victim, separate the victim and alleged abuser, to protect and preserve the scene and any evidence that may exist at the scene or evidence on the victim and alleged abuser.

115.265	<b>Coordinated response</b>
	<p data-bbox="240 143 740 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 208 451 239"><b>Auditor Discussion</b></p> <p data-bbox="240 271 778 302">Supporting Documents, Interviews and Observations:</p> <ul data-bbox="240 327 855 488" style="list-style-type: none"> <li>• PREA Master Policy</li> <li>• Sexual Abuse Incident Coordinated Response Plan</li> <li>• Investigation Packages for past 12 Months (3)</li> <li>• Online PREA Audit: Pre-Audit Questionnaire for Community</li> <li>• Formal and Informal Interviews</li> </ul> <p data-bbox="240 517 360 548">115.265 (a)</p> <p data-bbox="240 575 1458 638">The facility shall develop a written institutional plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators, and facility leadership.</p> <p data-bbox="240 665 1123 696">Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.265:</p> <p data-bbox="240 723 1481 817">The APT Foundation maintains a coordinated response plan to coordinate actions taken in response to an incident of sexual abuse. The response plan coordinates efforts of first responders; medical and mental health practitioners; investigators; and facility leadership. Some elements of the response plan include:</p> <ol data-bbox="240 846 1485 1550" style="list-style-type: none"> <li>a. Assist the initiating staff person in protecting and separating the alleged victim and aggressor.</li> <li>b. Assist the initiating staff person in preserving the scene and evidence, as indicated.</li> <li>c. Removing other residents from the vicinity where the emergency occurred.</li> <li>d. Contacting a supervisor to report to the emergency location.</li> <li>e. Contacting 911 and wait for emergency personnel to arrive on the scene and to direct to the emergency location.</li> <li>f. Contacting the Women and Children's Center to activate their response.</li> <li>g. Contacting the Program Director to advise of the emergency.</li> <li>h. The Program Director will contact APT Administration with any known details.</li> <li>1. The Program Director or Clinical Supervisor will contact the resident's referral source</li> <li>l. The Program Director; APT Administration; and other professional staff will be utilized to coordinate supportive services for the victim.</li> <li>k. APT Administration will initiate investigation of incident, in collaboration with other external entities, as indicated.</li> <li>l. All other investigative policies are followed post-investigation.</li> </ol> <p data-bbox="240 1579 1461 1641">The coordinated response plan delineates the full action steps involved and is posted in general staff areas throughout the facility.</p>

115.266	<b>Preservation of ability to protect residents from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Supporting Documents, Interviews and Observations:</p> <ul style="list-style-type: none"> <li>• PREA Master Policy</li> <li>• All Union Contracts (Collective Bargaining) - none</li> <li>• Online PREA Audit: Pre-Audit Questionnaire for Community</li> <li>• Formal and Informal Interviews</li> </ul> <p>115.266 (a)</p> <p>Neither the agency nor any other governmental entity responsible for collective bargaining on the agency's behalf shall enter into or renew 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.</p> <p>Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.266:</p> <ol style="list-style-type: none"> <li>1. The APT Foundation is an independent, non-profit community-based organization. The APT Foundation and/or its employees do not currently participate in any collective bargaining activities or other agreements that limits the agency's ability to remove alleged staff sexual abusers from contact with residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted.</li> <li>2. Nothing in this standard shall restrict the entering into or renewal of agreements that govern:</li> <li>3. The conduct of the disciplinary process, if such agreements are not inconsistent with the provisions of sections: 115.272 and 115.276; or</li> <li>4. Whether a no-contact assignment that is imposed pending the outcome of an investigation shall be expunged from or retained in the staff member's personnel file following a determination that the allegation of sexual abuse is not substantiated.</li> </ol> <p>Agency Head/Designee: Question, has your agency, or any governmental entity responsible for collective bargaining on your behalf, entered into or renewed any collective bargaining agreements or other agreements since August 20, 2012? No. This is not applicable. The facility does not enter into any collective bargaining agreements.</p> <p>115.266 (b)</p> <p>Nothing in this standard shall restrict the entering into or renewal of agreement that govern:</p> <ul style="list-style-type: none"> <li>• The conduct of the disciplinary process, as long as such agreements are not inconsistent with the provisions of standards 115.72 and 115.76; or</li> <li>• Whether a no-contact assignment that is imposed pending the outcome of an investigation shall be expunged from or retained in the staff member's personnel file following a determination that the allegation of sexual abuse is not substantiated.</li> </ul> <p>Discussion: The agency/facility is not involved in any form of collective bargaining and has the ability to remove any staff alleged to have violated an agency sexual abuse or sexual harassment policy.</p>

**115.267 Agency protection against retaliation**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Supporting Documents, Interviews and Observations:

- PREA Master Policy
- Sexual Abuse and Sexual Harassment Overview
- Case 1 Investigation
- Case 2 Investigation
- Case 3 Investigation
- Investigation Package for the Past 12 Months (3)
- Retaliation Monitoring Documentation (1)
- Online PREA Audit: Pre-Audit Questionnaire for Community
- Formal and Informal Interviews

115.267 (a)

The agency shall establish 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 and shall designate which staff members or departments are charged with monitoring retaliation.

Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.267:

1. The APT Foundation shall 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 and shall designate staff persons who are charged with monitoring for retaliation.
2. The APT Foundation shall employ multiple protection measures, such as housing changes or transfers for resident victim or abusers; removal or alleged staff or resident abusers from contact with victims; and emotional supports for residents or staff persons who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.
3. The APT Foundation shall monitor for at least 90 days following a report of sexual abuse. The agency will monitor the conduct and treatment of residents or staff who reported the sexual abuse and 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. The APT Foundation shall act promptly to remedy any such retaliation. Items the APT Foundation will monitor include resident disciplinary reports; housing; programming changes; or negative performance reviews or reassignments of staff. The APT Foundation shall continue such monitoring beyond 90 days if the initial monitoring indicates a continued need.
4. The APT Foundation maintains a retaliation log where documentation of retaliation checks as they occur.
5. In the case of residents, such monitoring shall also include periodic status checks.
6. If any other individual who cooperates with an investigation expresses fear of retaliation, the APT Foundation shall take appropriate measures to protect that individual against retaliation.
7. The APT Foundation shall discontinue monitoring for any allegation that is deemed unfounded.

Agency Head/Designee: Question, how do you protect residents and staff from retaliation for sexual abuse or sexual harassment allegations? The APT Foundation policy requires ongoing monitoring for retaliation for any allegation related to sexual abuse or sexual harassment. The retaliation policy is monitored by the PREA Coordinator and Facility Director unless the allegation was made against the person in either role. The CEO would then be charged with monitoring in collaboration with another Supervisor at the facility.

115.267 (b)

The agency shall employ multiple protection measures, such as housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.

The agency reserves the right to employ the following measures, in case of retaliations, as it sees fit:

- Housing Changes/Transfers for resident victims and/or abusers,
- Removal of alleged staff or resident abuser from contact with victims,
- Emotional support services for residents or staff who fear retaliation for reporting sexual abuse, sexual harassment, or for

cooperating with alleged PREA investigations.

115.267 (c)

For at least 90 days following a report of sexual abuse, the agency shall monitor the conduct and treatment of residents or staff who reported the sexual abuse and of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff and shall act promptly to remedy any such retaliation. Items the agency should monitor include any resident disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. The agency shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need.

The agency PREA coordinator will monitor the conduct and treatment of residents and staff who have reported the sexual abuse and of the victim for no less than 90 days after the report of sexual abuse. Staff are to ensure that no changes, that may indicate potential retaliation, have transpired. This includes, but is not limited to:

1. Disciplinary reports
2. Housing status
3. Program Changes
4. Negative performance reviews or
5. Staff reassignments

Staff members are reminded, that in the event of suspected retaliation, staff are required to notify the PREA coordinator immediately. On site staff will also perform periodic status checks on the alleged victim. The PREA coordinator, in an interview concerning retaliation and retaliation monitoring, indicated the agency has a zero tolerance for retaliation. Allegation they would discuss with the Program Director and staff and speak to the resident(s) and advise the Program Manager to watch staff. They are instructed not to move the alleged victim unless requested. She related the agency uses the following as protection monitors, cameras, one hour counts of residents, resident education and staff training.

115.267 (d)

In the case of residents, such monitoring shall also include periodic status checks.

Policy requires on site staff members to perform periodic status checks on the alleged victim.

Discussion: Below are the Sexual Abuse, Sexual Harassment Allegations and Investigations Overview:

- The Total number of investigations for the past 12 months = 3
- The total number of sexual abuse investigations = 2
- The total number of sexual harassment investigations = 1
- The number of criminal sexual abuse referred for prosecution = 0

Discussion: Below are the Reviewed Information in the Investigation Packages:

- PREA Incident Reporting Form
- Type of Violations
- Persons Involved
- Alleged Victim
- Alleged Perpetrator
- Witnesses
- Facility Video Reviewed
- Description of Incident
- Persons Notified
- Injuries (If Applicable)
- Disposition and Sign-Off
- Incident Disposition
- The number of SANE reports = 0

Discussion: Below are the results of the PREA Investigation reviewed:

- Substantiated – 2
- Unsubstantiated – 1
- Unfounded – 0
- Pending - 0
- The number of residents monitor for retaliation - 0

115.267 (e)

If any other individual who cooperates with an investigation expresses a fear of retaliation, the agency shall take appropriate measures to protect that individual against retaliation.

In the event that a resident or staff member cooperates with investigators and expresses a fear of retaliation, the agency shall take appropriate measures to protect that individual against retaliation. The agency obligation to monitor shall terminate if the agency determines that the alleged allegation is unfounded.

Agency Head/Designee: Question, if an individual who cooperates with an investigation expresses a fear of retaliation, how does the agency take measures to protect that individual against retaliation? The individual would be reassured of the APT Foundation policy against retaliation by others in the organization. The agency would then monitor and conduct regular checks with the individual to ensure they were not experiencing retaliation for participating in an investigation.

115.267 (f)

An agency's obligation to monitor shall terminate if the agency determines that the allegation is unfounded.

In the event that a resident or staff member cooperates with investigators and expresses a fear of retaliation, the agency shall take appropriate measures to protect that individual against retaliation. The agency obligation to monitor shall terminate if the agency determines that the alleged allegation is unfounded.

Discussion: The agency/facility has a policy that protect residents and staff who report sexual abuse or sexual harassment from retaliation. The agency has designated a staff member that are charged with monitoring retaliation.

Some protection measures that the agency/facility has on hand are, housing changes or transfers for resident victims or abusers; Removal of alleged staff or resident abusers from contact with victims; Provide emotional support services for resident who fear retaliation for reporting sexual abuse or sexual harassment or cooperating with investigations.

The agency/facility PREA coordinator/facility compliance manager serve as the PREA monitor. The monitoring last for least 90 days.

Discussion: Below are the Sexual Abuse, Sexual Harassment Allegations and Investigations Overview:

- The Total number of investigations for the past 12 months = 3
- The total number of sexual abuse investigations = 2
- The total number of sexual harassment investigations = 1
- The number of criminal sexual abuse referred for prosecution = 0

Discussion: Below are the Reviewed Information in the Investigation Packages:

- PREA Incident Reporting Form
- Type of Violations
- Persons Involved
- Alleged Victim
- Alleged Perpetrator
- Witnesses
- Facility Video Reviewed
- Description of Incident
- Persons Notified
- Injuries (If Applicable)
- Disposition and Sign-Off
- Incident Disposition
- The number of SANE reports = 0

Discussion: Below are the results of the PREA Investigation reviewed:

- Substantiated – 2
- Unsubstantiated – 1
- Unfounded – 0
- Pending - 0



115.271	<b>Criminal and administrative agency investigations</b>
	<p data-bbox="244 147 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="244 210 451 237"><b>Auditor Discussion</b></p> <p data-bbox="244 273 778 300">Supporting Documents, Interviews and Observations:</p> <ul data-bbox="244 327 855 658" style="list-style-type: none"> <li>• PREA Master Policy</li> <li>• Sexual Abuse and Sexual Harassment Overview</li> <li>• Case 1 Investigation</li> <li>• Case 2 Investigation</li> <li>• Case 3 Investigation</li> <li>• PREA Investigation Packages for Past 12 Months (3)</li> <li>• Facility 2021 Annual PREA Report</li> <li>• Facility Incident Report</li> <li>• Online PREA Audit: Pre-Audit Questionnaire for Community</li> <li>• Formal and Informal Interviews</li> </ul> <p data-bbox="244 685 360 712">115.271 (a)</p> <p data-bbox="244 748 1433 806">When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, it shall do so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports.</p> <p data-bbox="244 842 1126 869">Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.271:</p> <ol data-bbox="244 896 1490 1657" style="list-style-type: none"> <li>1. The APT Foundation under no circumstance conduct a primary investigation of an active sexual assault. The matter will be directed to the New Haven Police Department for investigation.</li> <li>2. The APT Foundation will fully cooperate with the New Haven Police Department during their investigation.</li> <li>3. The APT Foundation will obtain New Haven Police Department investigation reports, when available.</li> <li>4. The APT Foundation will protect any evidence, including physical or DNA, electronic monitoring, the victim, witnesses, and alleged perpetrator, pending arrival of New Haven Police Department.</li> <li>5. The APT Foundation will conduct a secondary investigation for any case of an active sexual assault to determine corrective means to prevent occurrences in the future. The investigation will include the PREA incident report and PREA incident review elements. The secondary investigation will be completed by managers who have completed the specialized training from the NIC (National Institute of Corrections).</li> <li>6. The APT Foundation will immediately contract the Women and Families Center to assist the victim during initial examinations as part of the investigation as well as for follow-up medical and supportive counseling.</li> <li>7. The APT Foundation will continue the investigative process if a person discharges from treatment prior to completion of any investigation.</li> <li>8. The APT Foundation will provide referrals for continued medical and emotional support as part of discharge planning for any person who is leaving the facility.</li> <li>9. The APT Foundation will contact New Haven Police Department in matters where a person reports a prior sexual assault, either at the Facility or at another location either prior to admission or during the current admission at the facility.</li> </ol> <p data-bbox="244 1693 616 1720">Administrative (Agency) Investigation</p> <ol data-bbox="244 1747 1490 2136" style="list-style-type: none"> <li>1. The APT Foundation shall immediately upon report begin an administrative investigation for cases of sexual harassment or sexual abuse (non-assault). This is assuming there is little or no physical evidence at the time of the report.</li> <li>2. The APT Foundation will immediately turn over any case of Sexual Harassment or Sexual Abuse (non-assault) to New Haven Police Department if it appears the matter is better served by Criminal Investigation.</li> <li>3. The APT Foundation for the purpose of an Administrative Investigation will utilize Managers that have completed Specialized training through the NIC (National Institute of Corrections).</li> <li>4. The investigation will include the PREA incident report and PREA incident review elements.</li> <li>5. The APT Foundation will contract the Women and Families Center to assist the victim for follow-up medical, if applicable, and supportive counseling.</li> </ol>

6. The APT Foundation will continue the investigative process if a person discharges from treatment prior to completion of any investigation.

7. The APT Foundation will provide referrals for continued medical and emotional support as part of discharge planning for any person who is leaving the facility.

Central Office: PREA investigator question, how do you handle anonymous or third-party reports of sexual abuse or sexual harassment? Anonymous and third-party reported are accepted and investigated according to policy. In general, they are not investigated differently, although depending on timing of the report, the resident may have already been discharged from the facility that may present challenges in completing the investigation. We generally have knowledge of where a resident transitions at least over the short-term. We also have cell phone numbers (unfortunately frequently change) and emergency contact information that would also be utilized. The facility would make every possible attempt contact the person to conduct the investigation.

Central Office: PREA investigator question, how long does it take to initiate an investigation following an allegation of sexual abuse or sexual harassment? And what would be the first steps in initiating and investigation and how long would they take? The first response to an allegation of sexual abuse/sexual harassment is to ensure the immediate safety of the victim. This include removing the proximity of the victim and the abuser, providing access to a victim's advocate, first aid and or urgent medical care all while preserving all evidence. The response team would meet, and a prompt investigation would be immediate initiated.

115.271 (b)

Where sexual abuse is alleged, the agency shall use investigators who have received special training in sexual abuse investigations pursuant to standard 115.34. Training topics include Techniques for interviewing sexual abuse victims, Proper use of Miranda and Garrity warnings, Sexual abuse evidence collection in confinement settings and the criteria and evidence required to substantiate a case for administrative or prosecution referral.

115.271 (c)

Investigators shall gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator.

Discussion: The investigators who handle sexual abuse and sexual harassment incidents has training in sexual abuse investigations. Investigators are responsibility of gathering and preserving evidence in the case; interview all parties to include victims, perpetrators, witnesses, etc.; and review prior complaints and reports of sexual abuse involving the suspected perpetrator.

115.271 (d)

When the quality of evidence appears to support criminal prosecution, the agency shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.

The agency will not conduct PREA criminal investigations. All PREA allegations within funded programs will be referred to the Connecticut State Police for investigation. All PREA allegations in DOC funded programs will be referred to State of Connecticut Department of Correction's PREA Investigation Unit for investigation.

Central Office: PREA investigator question, when you discover evidence that a prosecutable crime may have taken place, do you consult with prosecutors before you conduct compelled interviews? If internal investigation indicated prosecutable crime, the allegation would be turned over to the Police to investigate. The facility would not conduct compelled interviews and would cooperate with the Police investigation.

115.271 (e)

The credibility of an alleged victim, suspect, or witness shall be assessed on an individual as is and shall not be determined by the person's status as resident or staff. No agency shall require a resident who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation.

Central Office: PREA investigator question, would you, under any circumstances, require a resident who alleges sexual abuse to submit to a polygraph examination or truth-telling devices as a condition for proceeding with an investigation. No. Would never require a resident to submit to polygraph testing. This would be outside the scope of an internal investigation conducted by agency – any allegation would be investigated without these tests.

115.271 (f)

Administrative Investigations:

- Shall include an effort to determine whether staff actions or failures to act contributed to the abuse; and
- Shall be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.

Central Office: PREA investigator question, what efforts do you make during an administrative investigation to determine whether staff actions or failures to act contributed to the sexual abuse. The agency/facility will make every effort to determine whether staff actions or failures to act contributed to the abuse. These efforts will be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.

This is a vital component of any investigation – what steps can the agency take to reduce potential recurrence in the future. Again, staff training and policy review are key factors to consider here.

115.271 (g)

Criminal investigations shall be documented in a written report that contains a through description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible.

Central Office: PREA investigator question, are criminal investigations documented? What is contained in that report? Yes, criminal investigations are documented in a written report that contains a through description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible. The outside entity that is conducting the criminal investigation made add additional documentations. The facility does not conduct criminal investigations. The facility will collaborate with the entity conducting the criminal investigation.

115.271 (h)

Substantiated allegations of conduct that appears to be criminal shall be referred for prosecution.

Central Office: PREA investigator question, when you discover evidence that a prosecutable crime may have taken place, do you consult with prosecutors before you conduct compelled interviews? When the quality of evidence appears to support criminal prosecution, the agency conducts compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.

115.271 (i)

The agency shall retain all written reports referenced in paragraphs (f) and (g) of this section for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

The agency retains all written reports regarding investigations.

- Ensuring that all reports are retained for the entirety of the alleged abuser is incarcerated or employed by the agency plus five years.

115.271 (j)

The departure of the alleged abuser or victim from the employment or control of the facility or agency shall not provide a basis for terminating an investigation.

Central Office: PREA investigator question, how do you proceed when a staff member alleged to have committed sexual abuse terminates employment prior to a completed investigation into his/her conduct? Following an allegation by a resident involving a staff person, they are immediately suspended from the work force pending investigation. At the time of suspension, they are given no additional information beyond a compliant has been received and would be investigated and that they would be contacted for interview. No determination is made regarding the status of continued employment at that time. Should they attempt to terminate employment, they would be counseled on the risks of their decision, including the possibility legal involvement based on the nature of the allegation and it would be in their best interest to cooperate with the investigation. Failure to cooperate in the investigation would result in termination of employment and the employee would be flagged as ineligible for rehire.

The investigation proceeds the same as any other allegation – it is reported to the criminal investigator to continue regardless of employees' status with the agency/facility.

Central Office: PREA investigator question, how do you proceed with a victim who alleges sexual abuse or sexual harassment or an alleged abuser leaves the facility prior to a completed investigation into incident? The facility generally knows where persons discharging from the facility are going for continued care – as least 30 days post-discharge from the program, which is more than adequate time to complete most investigations. The facility would continue the investigation

provided the parties are cooperative with contacts. The investigator proceeds the same as any other allegation – the review continues and reported to authorities if needed.

115.271 (k)

Any State entity or Department of Justice component that conducts such investigations shall do so pursuant to the above requirements.

The agency stated that they will comply with any DOJ investigation.

115.271 (l)

When outside agencies investigate sexual abuse, the facility shall cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation.

Central Office: PREA investigator question, when an outside agency investigates an incident of sexual abuse in the facilities, what role do you play? The investigator provides any information requested and assist in any way they can as requested. When outside agency investigates sexual abuse, the facility fully cooperates with the investigating authority. Additionally, the agency/facility would make every effort to stay informed as to the status of the investigation.

Central Office Staff: Agency PREA Coordinator question, if an outside agency investigates allegations of sexual abuse, how does the agency remain informed of the progress of a sexual abuse investigation? The PREA coordinators are responsible for maintaining regular contact with the outside agency that is investigating the allegations. The facility completes internal investigations for all allegations. If an external entity (Police Department) is involved, the agency will fully support the investigation by the external entity/

Discussion: The agency/facility ensure that all allegations of sexual abuse and sexual harassment are investigated thoroughly and properly. The agency/facility when investigated can deter sexual abuse and sexual harassment by ensuring that investigations are documented and documentary evidence is preserved; investigations are completed regardless of the status of the victim or perpetrator, and all substantiated allegations that rise to the level of a criminal offense are referred for prosecution.

The administrative investigations try to determine whether staff action or failures to act contributed to the abuse. The investigations documented in a written report that describes the physical and testimonial evidence if any, the reasoning behind assessments, and investigative facts and findings.

The criminal investigations are also documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence. The agency/facility retain the investigations for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

When investigations are conducted outside of the agency/facility, the facility cooperate with the outside investigator and remain informed about the progress of the investigations.

The investigators who handle sexual abuse incidents has training in sexual abuse investigations. Investigators are responsible for gathering and preserving evidence in the case; interview all parties to include victims, perpetrators, witnesses, etc.; and review prior complaints and reports of sexual abuse involving the suspected perpetrator.

Discussion: Below are the Sexual Abuse, Sexual Harassment Allegations and Investigations Overview:

- The Total number of investigations for the past 12 months = 3
- The total number of sexual abuse investigations = 2
- The total number of sexual harassment investigations = 1
- The number of criminal sexual abuse referred for prosecution = 0

Discussion: Below are the Reviewed Information in the Investigation Packages:

- PREA Incident Reporting Form
- Type of Violations
- Persons Involved
- Alleged Victim
- Alleged Perpetrator
- Witnesses
- Facility Video Reviewed
- Description of Incident
- Persons Notified
- Injuries (If Applicable)
- Disposition and Sign-Off

- Incident Disposition
- The number of SANE reports = 0

Discussion: Below are the results of the PREA Investigation reviewed:

- Substantiated – 2
- Unsubstantiated – 1
- Unfounded – 0
- Pending - 0

115.272	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Supporting Documents, Interviews and Observations:</p> <ul style="list-style-type: none"> <li>• PREA Master Policy</li> <li>• Investigation Packages for Past 12 Months (3)</li> <li>• Online PREA Audit: Pre-Audit Questionnaire for Community</li> <li>• Formal and Informal Interviews</li> </ul> <p>115.272 (a)</p> <p>The agency shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>The agency's PREA Review, requires no standard higher than a preponderance of the evidence in determining whether PREA related allegations of sexual abuse and sexual harassment are substantiated.</p> <p>Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.272:</p> <p>1. The APT Foundation shall impose no standard higher than ii preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>Central Office: PREA investigator question, what standards of evidence do you require to substantiate allegations of sexual abuse or sexual harassment? The agency/facility uses the preponderance of evidence.</p>

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Supporting Documents, Interviews and Observations:

- PREA Master Policy
- Investigation Packages for Past 12 Months (3)
- Online PREA Audit: Pre-Audit Questionnaire for Community
- Formal and Informal Interviews

115.273 (a)

Following an investigation into a resident's allegation that he or she suffered sexual abuse in an agency facility, the agency shall inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.

Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.273:

1. The APT Foundation responds to all complaints filed by residents either verbally or in writing. PREA complaints and will include whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.
2. If an investigation is completed by an outside agency, the APT Foundation will request findings of the investigation in order to fulfill notification of the outcome of the investigation to the client.
3. Following a resident's allegation that a staff member has committed sexual abuse against the resident, the APT Foundation shall subsequently inform the resident (unless the allegation is unfounded) whenever:
  - The staff person is no longer posted within the resident's unit.
  - The staff person is no longer employed at the facility.
  - The APT Foundation learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or
  - The APT Foundation learns that the staff member has been convicted on a charge related to sexual abuse within the facility.
4. The APT Foundation, following a resident's allegation that he or she has been sexually abused by another resident, shall inform the alleged victim whenever:
  - The APT Foundation learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or
  - The APT Foundation learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.
5. The APT Foundation shall document all such notifications or attempts to notification.
6. The APT Foundation's obligation to report under this standard shall terminate if the resident is released from the agency's custody.

115.273 (b)

If the agency did not conduct the investigation, it shall request the relevant information from the investigative agency in order to inform the resident.

The PREA coordinator to request the relevant information from the investigative entity in order to inform the alleged victim of the outcome of the investigation. At the conclusion of a PREA investigation, the PREA coordinator or program staff will notify the alleged victim, verbally or in writing whether the allegation was determined to be substantiated or unsubstantiated whenever:

- The staff member is no longer posted within the unit.
- The staff member is no longer employed with the agency.
- 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.

115.273 (c)

Following a resident's allegation that a staff member has committed sexual abuse against the resident, the agency shall subsequently inform 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 indicated 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.

The PREA coordinator to request the relevant information from the investigative entity in order to inform the alleged victim of the outcome of the investigation. At the conclusion of a PREA investigation, the PREA coordinator or program staff will notify the alleged victim, verbally or in writing whether the allegation was determined to be substantiated or unsubstantiated whenever:

- The staff member is no longer posted within the unit.
- The staff member is no longer employed with the agency.
- 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.

Central Office: PREA investigator question, do your agency procedures require that a resident who makes an allegation of sexual abuse must be informed as to whether the allegation has been determined to be informed as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation? The agency/facilities procedures require notification to be made to any current resident when the outcome is substantiated, unsubstantiated, or unfounded. The agency does not report back to residents the outcomes of allegations against staff that are unfounded.

115.273 (d)

Following a resident's allegation that he or she has been sexually abused by another resident, the agency shall subsequently inform the alleged victim whenever:

- The agency learns that the alleged abuser has been indicated 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.

In the event of a resident-on-resident PREA allegation, the PREA coordinator or program staff, is required to inform the alleged victim whenever:

- The agency learns that the alleged abuser has been indicated 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.

115.273 (e)

All such notifications or attempted notifications shall be documented.

Notifications to alleged victims is to be documented by the PREA coordinator. They will continue to investigate all cases.

115.273 (f)

An agency's obligation to report under this standard shall terminate if the resident is released from the agency's custody.

The agency PREA coordinator indicated that the agency's obligation to report under this standard is terminate if the resident is released from custody.



115.276	<b>Disciplinary sanctions for staff</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Supporting Documents, Interviews and Observations:</p> <ul style="list-style-type: none"> <li>• PREA Master Policy</li> <li>• Investigation Packages for Past 12 Months (3)</li> <li>• List of Staff that Received Disciplinary Sanctions - 0</li> <li>• Online PREA Audit: Pre-Audit Questionnaire for Community</li> <li>• Formal and Informal Interviews</li> </ul> <p>115.276 (a)</p> <p>Staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.</p> <p>Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.276:</p> <ol style="list-style-type: none"> <li>1. The APT Foundation shall apply disciplinary sanctions up to and including termination to any staff person who violates the agency's sexual abuse and harassment policies.</li> <li>2. The APT Foundation shall utilize termination as the presumptive disciplinary sanction for a staff person that has engaged in sexual abuse.</li> <li>3. The APT Foundation shall utilize sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be commensurate with the nature and circumstances of the act committed, the staff person's disciplinary history, and the sanctions imposed for comparable offenses by other staff persons with similar histories.</li> <li>4. The APT Foundation shall report any termination for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, to law enforcement agencies, unless the activity was clearly not criminal. Reports to any relevant licensing bodies will also be made.</li> </ol> <p>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, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.</p> <p>115.276 (b)</p> <p>Termination shall be the presumptive disciplinary sanction for ho have engaged in sexual abuse.</p> <p>See section (a).</p> <p>115.276 (c)</p> <p>Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.</p> <p>Central Office Staff: The agency PREA coordinator indicated that disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment and be commensurate with the nature and circumstances of the acts committed, disciplinary history and comparable offenses by other staff with similar histories.</p> <p>115.276 (d)</p> <p>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, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.</p> <p>The agency PREA coordinator indicated that all terminations for violations of sexual abuse or sexual harassment policies or resignations by staff who would have been terminated if not for their resignation will be reported to law enforcement agencies.</p> <p>Discussion: During the audit period, the agency/facility had one disciplinary sanctions of staff.</p>

115.277	Corrective action for contractors and volunteers
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>Supporting Documents, Interviews and Observations:</p> <ul style="list-style-type: none"> <li>• PREA Master Policy</li> <li>• List of Contractors that Received Corrective Action -0</li> <li>• List of Volunteers the Received Corrective Action -0</li> <li>• Online PREA Audit: Pre-Audit Questionnaire for Community</li> <li>• Formal and Informal Interviews</li> </ul> <p>115.277 (a)</p> <p>Any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with residents and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.</p> <p>Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.277:</p> <ol style="list-style-type: none"> <li>1. The APT Foundation will report any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with residents and shall be reported to law enforcement, unless the activity was clearly not criminal, and to relevant licensing bodies.</li> <li>2. The APT Foundation shall take appropriate remedial measures and shall consider whether to prohibit further contact, with residents, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.</li> </ol> <p>The facility staff indicated that all substantiated allegations would result in sanctions, including but not limited to termination and referral for prosecution. The facility does not have any contractors or volunteers however staff indicated if they did have a contractor or volunteer who had violated an agency sexual abuse or sexual harassment policy the services would be suspended, and they would not be allowed back into the program pending an investigation. If the allegations were substantiated the contractor or volunteer would be referred to prosecution and barred from coming back into the facility.</p> <p>115.277 (b)</p> <p>The facility shall take appropriate remedial measures and shall consider whether to prohibit further contact with residents, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.</p> <p>See section (a).</p> <p>Discussion: During this PREA audit period, there were no corrective action of volunteer and contract staff.</p>

**115.278**      **Disciplinary sanctions for residents**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Supporting Documents, Interviews and Observations:

- PREA Master Policy
- Investigation Packages for Past 12 Months (3)
- List of Residents the Received Disciplinary Sanctions -0
- Online PREA Audit: Pre-Audit Questionnaire for Community
- Formal and Informal Interviews

115.278 (a)

Residents shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the resident engaged in resident-on-resident sexual abuse or following a criminal finding of guilt for resident-on-resident sexual abuse.

Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.278:

A. Residents shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following any administrative finding that the resident engaged in resident-on-resident sexual abuse or following any criminal finding of guilt for resident-on-resident sexual abuse. A resident in these cases will typically be referred to their referral source and/or discharged the program with a referral to another program continued services.

B. Sanctions shall be commensurate with the nature and circumstances the abuse committed, the resident's disciplinary history, and sanctions imposed comparable offences by other residents with similar histories.

C. The disciplinary shall whether a resident's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.

D. The APT Foundation does not provide direct therapy or other counseling services for residents to correct underlying reasons or motivations for abuse. If indicated, the facility would make the necessary referrals to an organization that provides this service directly.

E. The APT Foundation may discipline a resident for sexual contact with staff only upon finding that the staff member did not consent to such contact.

F. For the purpose of disciplinary action. a report of sexual abuse made in good faith upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying. even if an investigation does not establish evidence sufficient to substantiate the allegation.

G. The APT Foundation prohibits all sexual activity between residents and may discharge a resident for such an activity. The APT Foundation will not, however, deem such activity to constitute sexual abuse if it determines that the activity was not coerced.

For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.

115.278 (b)

Sanctions shall be commensurate with the nature and circumstances of the abuse committed, the resident's disciplinary history, and the sanctions imposed for comparable offenses other residents with similar histories.

Central Office Staff: The agency PREA coordinator indicated, sanctions are commensurate with the nature and circumstances of the abuse committed.

115.278 (c)

The disciplinary process shall consider whether a resident's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, in any, should be imposed.

Central Office Staff: The agency PREA coordinator indicated, the disciplinary process considers whether a resident's mental

disabilities or mental illness contributed to the behavior.

115.278 (d)

If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, the facility shall consider whether to require the offending inmate to participate in such interventions as a condition of access to programming or other benefits.

Central Office Staff: The agency PREA coordinator indicated, the facility may not offer therapy or counseling, however if needed the facility will recommend outside services.

115.278 (e)

The agency may discipline a resident for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

Central Office Staff: The agency PREA coordinator indicated, that the agency may discipline a resident for sexual contact with staff only upon a finding that the staff member did not consent to such contact. However, all sexual activity is prohibited.

115.278 (f)

For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.

Central Office Staff: The agency PREA coordinator indicated, that all PREA reports are taken in good faith. If an investigation does not establish evidence sufficient to substantiate the allegation, the reporting resident will not be viewed as falsely reporting or lying upon a reasonable belief that the incident occurred.

115.278 (g)

An agency may, in its discretion, prohibit all sexual activity between residents and may discipline residents for such activity. An agency may not, however, deem such activity to constitute sexual abuse if it determines that the activity is not coerced.

Central Office Staff: The agency PREA coordinator indicated, the agency policy prohibits all sexual activity between residents and will discipline resident for sexual activities.

Discussion: During this audit period, there were no disciplinary sanctions for residents regarding sexual abuse or sexual harassment.

115.282	<b>Access to emergency medical and mental health services</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Supporting Documents, Interviews and Observations:</p> <ul style="list-style-type: none"> <li>• PREA Master Policy</li> <li>• MOU Women and Families Center</li> <li>• Online PREA Audit: Pre-Audit Questionnaire for Community</li> <li>• Formal and Informal Interviews</li> </ul> <p>115.282 (a)</p> <p>Resident victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment.</p> <p>Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.278:</p> <ol style="list-style-type: none"> <li>1. The APT Foundation shall ensure that residential victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment. The APT Foundation maintains a comprehensive MOU to assist the APT Foundation in ensuring all necessary medical and mental health services are obtained.</li> <li>2. If no qualified medical or mental health practitioners are available at the time a report of recent abuse is available, first responding staff will take preliminary steps to protect the victim pursuant to section 115.262 and will immediately notify supervisory staff either at the facility or on-call to assist in referral to appropriate medical and/or mental health practitioners.</li> <li>3. Resident victims of sexual abuse while incarcerated shall be offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with with professionally accepted standards of care, where medically appropriate. Family planning services, if applicable, shall be included.</li> <li>4. Treatment services shall be provided to the victim without financial cost regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</li> </ol> <p>115.282 (b)</p> <p>If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders shall take preliminary steps to protect the victim pursuant to standard 115.62 and shall immediately notify the appropriate medical and mental health practitioners.</p> <p>The resident has access to the Women and Families Center, enabling the resident to access crisis intervention services, including an advocate to accompany the resident through any forensic exam and investigatory process.</p> <p>115.282 (C)</p> <p>Resident victims of sexual abuse while incarcerated shall be offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.</p> <p>The PREA Coordinator is responsible for ensuring the safety of the resident within the program; contacting the over-seeing Parole/Probation Officer to determine if an immediate investigation is required; and if agreed by the resident, contacting the Women and Families Center so that the victim(s) of sexual abuse will receive timely and unimpeded access to emergency medical treatment services.</p> <p>115.282 (d)</p> <p>Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>These services will be provided to the victim at no cost, regardless of cooperation with the investigation. These services, according to policy, will be available on an on-going basis, until the resident is released from the facility. Contact information is provided.</p>

**115.283 Ongoing medical and mental health care for sexual abuse victims and abusers**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Supporting Documents, Interviews and Observations:

- PREA Master Policy
- MOU APT Women and Families Center
- Online PREA Audit: Pre-Audit Questionnaire for Community
- Formal and Informal Interviews

115.283 (a)

The facility shall offer medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.

On-going medical and mental health services are afforded to any resident who has been the victim of sexual abuse. Although there are no on-site medical or mental health staff, these services are available through community providers. On-going services related to sexual abuse are at "no cost" to the victim and any services not provided at the hospital are provided through community healthcare practitioners.

Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.283:

1. The APT Foundation shall offer medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.
2. The APT Foundation shall provide referral for follow-up, treatment planning, and continued care upon discharge from the facility. A pregnancy test for females may also be indicated.
3. The APT Foundation shall provide victims with medical and mental health services consistent with the community level of care.
4. The APT Foundation shall offer pregnancy testing for resident victims of sexually abusive vaginal penetration while incarcerated.
5. The APT Foundation will provide timely and comprehensive information and access to all lawful pregnancy-related medical services.
6. The APT Foundation shall offer victims of sexual abuse testing for sexually transmitted infections as medically appropriate.
7. The APT Foundation will provide all testing and treatment for medical and mental health services at no cost to the resident.
8. The APT Foundation shall 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.

115.283 (b)

The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or replacement in, other facilities, or their release from custody.

The facility medical staff provided the appropriate follow-up services and referrals for continued care.

115.283 (c)

The facility shall provide such victims with medical and mental health services consistent with the community level of care.

Facility medical staff indicated that the medical and mental health services are consistent with the community level of care.

115.283 (d)

Resident victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests.

Facility staff indicated that these will be offered to female residents.

115.283 (e)

If pregnancy results from the conduct described in paragraph (d) of this section, such victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services.

Facility staff indicated that these services will be offered within a timely manner.

115.283 (f)

Resident victims of sexual abuse who incarcerated shall be offered tests for sexually transmitted infections as medically appropriate.

Facility staff indicated that these services will be offered.

115.283 (g)

Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

Facility staff indicated that services are offered to residents without financial cost.

115.283 (h)

All facility shall 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.

Facility staff indicated that mental health evaluation is provided for now resident-on-resident abusers.

Memorandum of Agreement between Women and Families Center and APT Foundation.

Women and Families Center provides free, confidential and empowerment based sexual assault crisis and advocacy services including a 24-hour hotline, individual counseling, medical and legal accompaniment and support, and community education and training programs.

- Identify and assign a point of contact at each organization to establish coordination between agencies and access to Sexual Assault Crisis Service (SACS) for APT Foundation clients. Response to client's request to work with SACS will be made and executed within a reasonable amount of time.
- Display sexual assault crisis hotline posters in English and Spanish onsite at APT Foundation and Women and Family Center share information with clients about SACS program and the availability of sexual assault crisis counselors and community-based services.
- At APT Foundation client's request, allow for a sexual assault crisis counselor to accompany and support the victim throughout the forensic medical exam process and investigatory interviews, and provide emotional support, crisis intervention, information, and referrals, as requested by the victim throughout the client's placement in the APR facility.
- At Women and Family Center and PRT Foundation there will be a dedicated and confidential space for SACS to meet with clients.
- To develop site specific protocol and procedure for maintaining PREA standards.
- To collaborate for the continuity of care and discharge planning for clients who are victims of sexual assault and/or abuse.
- To identify and assign designated staff at in an effort to establish a cohesive and seamless delivery of services to clients in APT facilities.

Women and Families Center Responsibilities: Services of a Women and Families Center sexual assault counselor will be offered to APT clients, and if requested, a sexual assault crisis counselor will be allowed to visit with the client while the client is a resident of a CRT facility and accompany the client at any point in time where support to the client will be provided (hospital, court, parole). A Women and Families Center sexual assault crisis counselor will be available to the client and APT staff to answer any questions and consult on cases regarding the best care and service delivery. APT Foundation understands that communication in accordance with CGS-52-14K. Communication regarding the client and services provided can occur if the client grants permission to Women and Families Center to waive the privilege of confidential communication. Services will be coordinated by both agencies to meet the needs of the client.

Victims are offered a victim advocate to accompany them during the forensic exam if requested.

Discussion: The agency/facility ensures that a victim of sexual abuse in the facility is provided, at no cost, unimpeded, unconditional, and timely emergency medical treatment and crisis intervention services following a sexual assault. The medical treatment is determined solely by medical and mental health professionals according to their professional

judgement. Victim will be provided timely information and access to emergency contraception and sexually transmitted infections prophylaxis.

Discussion: Below are the Sexual Abuse, Sexual Harassment Allegations and Investigations Overview:

- The Total number of investigations for the past 12 months - 3
- The total number of sexual abuse investigations - 2
- The total number of sexual harassment investigations - 1
- The number of criminal sexual abuse referred for prosecution - 0

The facility does not have medical staff on site.



**115.286 Sexual abuse incident reviews**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Supporting Documents, Interviews and Observations:

- PREA Master Policy
- Annual Management Report Incident Report Trending Data
- SSV Summary 2021
- Online PREA Audit: Pre-Audit Questionnaire for Community
- Formal and Informal Interviews

115.286 (a)

The facility shall 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.

Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.286:

- a) The APT Foundation shall 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.
- b) Review, if indicated, shall occur within 30 days of completion of the investigation.
- c) The review team, if indicated, shall include senior management officials, with the input from line supervisor, investigators, and medical or mental health professionals.
- d) The review team shall:
  - 1) Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse.
  - 2) 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 was motivated or otherwise caused by group dynamics at the facility.
  - 3) Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse.
  - 4) Assess the adequacy of staffing levels in that area during different shifts; and
  - 5) Prepare a report of its findings, including but not necessarily
  - 6) Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1) - (d)(5) of this section, and any recommendations for improvement, and submit such report to the facility head and PREA Compliance Manager.
- e) The facility shall implement the recommendations for improvement or shall document its reasons for not doing so.

Central Office Staff: Agency PREA Coordinator question, if the agency/facility conducts sexual abuse incident reviews, does the facility prepare a report of its findings from the reviews, including any determinations per standard 115.286 (d) 1-5 and any recommendations for improvement? Yes. Incident reviews are completed for allegations. We maintain a formal review process inclusive of the elements noted in d-1 through d-5. The review document is a template to ensure required elements are completed.

115.286 (b)

Such review shall ordinarily occur within 30 days of the conclusion of the investigation.

Central Office: The Agency PREA coordinator confirmed if the at the completion of the PREA investigation with the 30 days.

115.286 (c)

The review team shall include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners.

Staff indicated that if and when a PREA investigation is completed, the review team include Agency PREA Coordinator,

Facility Program Director, Facility Administrative Investigator, Agency HR staff and first responder.

The facility does not have medical and mental health staff.

115.286 (d)

The review team shall:

- Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse.
- Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian; gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise cause by other group dynamics at the facility.
- Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse.
- Assess the adequacy of staffing levels in that area during different shifts.
- Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and
- Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to paragraphs (d) of this section, and any recommendations for improvement and submit such report to the facility head and PREA compliance manager.

See section (a).

115.286 (e)

The facility shall implement the recommendations for improvement or shall document its reasons for not doing so.

The agency indicated that they would implement the recommendations for improvement or document its reason for not doing so.

115.287	<b>Data collection</b>
	<p data-bbox="242 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="242 208 451 237"><b>Auditor Discussion</b></p> <p data-bbox="242 271 777 300">Supporting Documents, Interviews and Observations:</p> <ul data-bbox="242 327 852 521" style="list-style-type: none"> <li>• PREA Master Policy</li> <li>• 2021 PREA Data Collection Workbook</li> <li>• Annual Management Report Incident Report Trending Data</li> <li>• SSV Summary 2021</li> <li>• Online PREA Audit: Pre-Audit Questionnaire for Community</li> <li>• Formal and Informal Interviews</li> </ul> <p data-bbox="242 551 360 580">115.287 (a)</p> <p data-bbox="242 609 1477 669">The agency shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions.</p> <p data-bbox="242 698 1485 795">The PREA allegation data collected, in order to assess and improve the effectiveness of its sexual abuse prevention, detection and response policies and training; identify problem areas; take corrective action on an ongoing basis; and prepare an annual report of the findings and any corrective actions taken within each facility or the agency as a whole.</p> <p data-bbox="242 824 1422 853">The PREA coordinator is responsible for implementing this policy and for ensuring the PREA data is securely retained.</p> <p data-bbox="242 882 360 911">115.287 (b)</p> <p data-bbox="242 940 1075 969">The agency shall aggregate the incident-based sexual abuse data at least annually.</p> <p data-bbox="242 999 504 1028">See Section (a) response.</p> <p data-bbox="242 1057 360 1086">115.287 (c)</p> <p data-bbox="242 1115 1442 1176">The incident-based data collected shall include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.</p> <p data-bbox="242 1205 1123 1234">Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.287:</p> <ol data-bbox="242 1263 1430 1709" style="list-style-type: none"> <li>1. The APT Foundation shall collect accurate, uniform data for every allegation of sexual abuse at the facility using a standardized instrument and set of definitions.</li> <li>2. The APT Foundation shall aggregate the incident-based sexual abuse data at least annually.</li> <li>3. The APT Foundation's incident-based data collected shall include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.</li> <li>4. The APT Foundation shall maintain, review, and collect data as needed from all available incident-based documents including reports, investigation files, and sexual abuse incident reviews.</li> <li>5. The APT Foundation does not contract for the confinement of its residents.</li> <li>6. The APT Foundation, upon request, shall provide all such data from the previous calendar year to the Department of Justice no later than June 30.</li> </ol> <p data-bbox="242 1738 1485 1798">The PREA coordinator is responsible for ensuring that the PREA Data is collected, reviewed, stored, published, and retained in a uniform manner.</p> <p data-bbox="242 1827 713 1856">These measures include, but are not limited to:</p> <ol data-bbox="242 1886 1493 2125" style="list-style-type: none"> <li>1. Collect PREA allegation data using the agency's software management system, and comply with the SSV's set of definitions.</li> <li>2. Aggregate PREA allegation data annually.</li> <li>3. Provide the Department of Justice.</li> <li>4. Create an annual report which includes a comparison of the current year's data and corrective actions with those from prior years and an assessment of the agency's progress in addressing sexual abuse.</li> <li>5. Ensure the annual report with aggregated PREA allegation data is published on the agency's website annually.</li> </ol>

115.287 (d)

The agency shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.

The reviewed website contained PREA related statistics. Each facility was listed (each PREA program). Data, for each program, included: resident on resident allegation, resident on staff allegations, staff on resident allegations, substantiated cases, unsubstantiated cases, unfounded cases, investigations pending, and policy changes

115.287 (e)

The agency also shall obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents.

See Section (a) response.

115.287 (f)

Upon request, the agency shall provide all such data from the previous calendar year to the Department of Justice no later than June 30.

The agency provided data from previous calendar year to providing the DOJ request the information. The agency provided the auditor with agency Annual PREA Report 2020-2021 and Department of Justice SSV Reports 2020 (Summary).

115.288	<b>Data review for corrective action</b>
	<p data-bbox="240 145 740 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="240 210 451 239"><b>Auditor Discussion</b></p> <p data-bbox="240 271 778 300">Supporting Documents, Interviews and Observations:</p> <ul data-bbox="240 329 852 521" style="list-style-type: none"> <li>• PREA Master Policy</li> <li>• Annual Management Report Incident Report Trending Data</li> <li>• SSV Summary 2021</li> <li>• Agency's Website</li> <li>• Online PREA Audit: Pre-Audit Questionnaire for Community</li> <li>• Formal and Informal Interviews</li> </ul> <p data-bbox="240 553 360 582">115.288 (a)</p> <p data-bbox="240 611 1437 672">The agency shall review data collected and aggregated pursuant to standard 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by:</p> <ul data-bbox="240 701 1394 797" style="list-style-type: none"> <li>• Identifying problem areas.</li> <li>• Taking corrective action on an ongoing basis; and</li> <li>• Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole.</li> </ul> <p data-bbox="240 826 1123 855">Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.288:</p> <p data-bbox="240 884 1461 981">(a) The APT Foundation shall review data collected and aggregated pursuant to Section 115.287 above in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including:</p> <ol data-bbox="240 1010 1174 1151" style="list-style-type: none"> <li>1. Identifying problem areas.</li> <li>2. Taking corrective action on an ongoing basis; and</li> <li>3. Preparing an annual report on its findings and corrective actions for the facility and agency.</li> </ol> <p data-bbox="240 1180 1461 1240">(b) Such report shall include a comparison of the current year's data and corrective actions with those from prior years and shall provide an assessment of the APT Foundation's progress in addressing sexual abuse.</p> <p data-bbox="240 1270 1461 1330">(c) The APT Foundation's report shall be approved by the agency head and made readily available to the public through its website or other means.</p> <p data-bbox="240 1359 1461 1420">(d) The APT Foundation may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of the facility but must indicated the nature of the material redacted.</p> <p data-bbox="240 1449 1422 1478">The PREA coordinator is responsible for implementing this policy and for ensuring the PREA data is securely retained.</p> <p data-bbox="240 1507 1461 1680">Agency Head/Designee: Question, how do you use incident-based sexual abuse data to assess and improve sexual abuse prevention, detection, and response policies, practices, and training? The APT Foundation monitors all incidents, including sexual abuse data, is tracked, and trended to monitor for areas that may present opportunity for improvement, including technology, policy review, staffing enhancement, and training. The data is reviewed at least annually by the Operation's Management Team (OTM) senior leadership team and the APT Foundation's Board of Directors.</p> <p data-bbox="240 1709 360 1738">115.288 (b)</p> <p data-bbox="240 1767 1485 1827">Such report shall include a comparison of the current year's data and corrective actions with those from prior years and shall provide an assessment of the agency's progress in addressing sexual abuse.</p> <p data-bbox="240 1856 1493 1989">Central Office: Agency PREA coordinator question, does the agency take corrective action on an ongoing basis based on this data? Yes, after any allegation, the agency PREA coordinator have a conversation with the Program Manager to request any concerns, comments, or questions so the agency always continue to improve. The agency annual report is reviewed by agency leadership and the CEO.</p> <p data-bbox="240 2018 360 2047">115.288 (c)</p> <p data-bbox="240 2076 1485 2136">The agency's report shall be approved by the agency heard and made readily available to the public through its website or, if it does not have one, through other means.</p>

The reviewed website contained PREA related statistics. Each Connection facility was listed (each PREA program). Data, for each program, included: resident on resident allegation, resident on staff allegations, staff on resident allegations, substantiated cases, unsubstantiated cases, unfounded cases, investigations pending, and policy changes.

Agency Head/Designee: Question, do you approve annual reports written pursuant to 115.288? Yes. The agency head reviews all annual reports and are also brought to the APT Foundation's Board of Directors.

115.288 (d)

The agency may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility but must indicated the nature of the material redacted.

A review of the agency PREA 2020 Annual Report did not have any personal identifiers. All personal identifiers were removed from the Annual report.

Central Office Staff: Agency PREA Coordinator question, what types of material are typically redacted from the annual report? Does the agency/facility indicate the nature of material redacted? Yes. The agency/facility redact specific material from the reports when publication would present a clear and specific threat to the safety and security of the program. Staff and resident names would be redacted from the report as well to protect the confidentiality of each person.

115.289	<b>Data storage, publication, and destruction</b>
	<p data-bbox="242 145 738 174"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="242 208 451 237"><b>Auditor Discussion</b></p> <p data-bbox="242 271 777 300">Supporting Documents, Interviews and Observations:</p> <ul data-bbox="242 327 855 421" style="list-style-type: none"> <li>• PREA Master Policy</li> <li>• Online PREA Audit: Pre-Audit Questionnaire for Community</li> <li>• Formal and Informal Interviews</li> </ul> <p data-bbox="242 450 360 479">115.289 (a)</p> <p data-bbox="242 508 1190 537">The agency shall ensure that data collected pursuant to standard 115.87 are securely retained.</p> <p data-bbox="242 566 1117 595">Policy: APT Foundation, Inc. APT Residential Services: PREA Policy Section – 115.289</p> <ol data-bbox="242 624 1485 891" style="list-style-type: none"> <li>1. The APT Foundation shall ensure that data collected pursuant to section 115.287 are securely retained.</li> <li>2. The APT Foundation shall make all aggregated sexual abuse data readily available to the public at least annually through its website or through other means.</li> <li>3. The APT Foundation shall remove all personal identifiers before making aggregated sexual abuse data publicly available.</li> <li>4. The APT Foundation shall maintain sexual abuse data collected pursuant to section 115.287 for at least 10 years after the date of the initial collection.</li> </ol> <p data-bbox="242 920 360 949">115.289 (b)</p> <p data-bbox="242 978 1490 1072">The agency shall 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.</p> <p data-bbox="242 1102 360 1131">115.289 (c)</p> <p data-bbox="242 1160 1362 1189">Before making aggregated sexual abuse data publicly available, the agency shall remove all personal identifiers.</p> <p data-bbox="242 1218 1469 1279">A review of the agency website did not have any personal identifiers. All personal identifiers were removed from the Annual report.</p> <p data-bbox="242 1308 360 1337">115.289 (d)</p> <p data-bbox="242 1366 1450 1426">The agency shall maintain sexual abuse data collected pursuant to 115.87 for at least 10 years after the date of the initial collection unless Federal, State, or local law requires otherwise.</p> <p data-bbox="242 1456 505 1485">See Section (a) response.</p>

115.401	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Supporting Documents, Interviews and Observations:</p> <ul style="list-style-type: none"> <li>• Notices of PREA Audit – Upload Notices Pics of Postings</li> <li>• Facility Last DOJ PREA Certified Audit Report</li> </ul> <p>Formal and Informal Interviews</p> <p>115.401 (a)</p> <p>During the three-year period starting on August 20, 2013, and during each three-year period thereafter, the agency shall ensure that each facility operated by the agency, or a private organization on behalf of the agency, is audited at least once.</p> <p>A review of the agency’s website provided PREA audit reports according to cycles.</p> <p>The facility PREA reports are included on the agency website.</p> <p>115.401 (b)</p> <p>During each one-year period starting on August 20, 2013, the agency shall ensure that at least one third of each facility type operated by the agency, or by a private organization on behalf of the agency, is audited.</p> <p>A review of the agency’s website provided PREA audit reports according to cycles.</p> <p>The facility PREA reports are included on the agency website.</p> <p>115.401 (c)</p> <p>The Department of Justice may send a recommendation to an agency for an expedited audit if the department has reason to believe that a particular facility may be experiencing problems relating to sexual abuse. The recommendation may also include referrals to resources that may assist the agency with PREA related issues.</p> <p>The PREA coordinator and the facility acknowledges this provision.</p> <p>115.401 (d)</p> <p>The Department of Justice shall develop and issue an audit instrument that will provide guidance on the conduct of and contents of the audit.</p> <p>The auditor uses the required Prison Rape Elimination Act (PREA) Community standards audit instrument to enter collected information online, 28 C.F.R Part 115 Docket No. OAG-131 RIN 1105-AB34 May 17, 2012.</p> <p>115.401 (e)</p> <p>The agency shall bear the burden of demonstrating compliance with the standards.</p> <p>The PREA coordinator and facility acknowledge this provision. The agency and the facility provided requested information to bear the burden of demonstrating compliance with the standards.</p> <p>115.401 (f)</p> <p>The auditor shall review all relevant agency-wide policies, procedures, reports, internal and external audits, and accreditation for each facility type.</p> <p>The auditor provided the facility with Documentation Checklist. The checklist is organized by standards to help the facility thru the pre-audit, onsite and post audit phase and to provide the requested documentation by auditor.</p> <p>115.401 (g)</p> <p>The audits shall review, at a minimum, a sampling of relevant documents and other records and information for the most recent one-year period.</p> <p>The auditor sample size is based on the number of residents at the facility on the first day. The random staff sample size is based on a minimum of twelve or more based on interview outcomes and facility size.</p> <p>115.401 (h)</p>



The auditor shall have access to, and shall observe, all areas of the audited facilities.

On the first day of the audit after the entrance conference, the auditor conducted a comprehensive tour of the facility. It was requested that when the auditor paused to speak to a resident or staff, that staff on the tour to please step away so the conversation might remain private. This request was well respected.

During the site review the auditor made numerous observations, including the posting of Notices of PREA Audits, PREA Related Posters, and TIP Posters (with phone numbers to call to report any concern or condition), notices advising resident that female staff routinely work in the facility, locations of showers and privacy issues, bathrooms, medical/grievance boxes, requests forms and boxes for requests, configuration of living units, capacities of dorm/bed rooms, observations of blind spots, camera deployment, the use of mirrors to mitigate blind spots, staffing levels, supervision of resident, accessibility to telephones and instructions for using the phones to report sexual abuse, main control room, dayroom, classrooms, etc..

APT Residential Services utilizes a camera system that is gender specific with limited ability to review, alter or destroy the surveillance videos. There are only three (3) individuals who are authorized to review the video when appropriate and must be directed by the management team. The facility employs cameras in the building that cover common areas, laundry rooms, hallways, fire escapes and the entire exterior of the building. The program also has door alarms on all the enterer and exterior doors so that staff will be aware when a door has opened 24/7. The general population must ring a doorbell before the exterior door is open so that staff can visibly see who is visiting or waiting to enter. Each floor monitor is specific to the floor i.e. women can only see the women's floor and men can only see the men's floor.

The facility is divided into four living units.

- First Floor Women's and Children Program Unit has a total of 18 contracted beds (15 DMHAS and 3 CSSD). Bedrooms: 18 single occupancies with individual bathrooms.
- Second Floor General Women's Program Unit has a total of 46 contracted beds (DOC 15, CSSD 15 and DMHAS-Community 16). Bedrooms: 23 double occupancy rooms to include shared bathroom between two rooms.
- Men's Unit East has a total of 60 contracted beds (DOC 47, CSSD 12 and DMHAS-Community 0). Bedrooms: 6 rooms with 4 beds; 12 rooms with 3 beds to include shared bathroom between two rooms or shared community showers and toilets.
- Men's Unit West has a total of 46 contracted beds (DOC 0; CSSD 21 and DMHAS-Community 25). Bedrooms: 4 rooms with 4 beds and 10 rooms with 3 beds to include shared bathroom between two rooms or shared community showers and toilets.

PREA posters were posted in English and Spanish to include phone numbers. The facility allows residents to have cell phones. The resident's risk screenings start at intake and are completed by intake staff or case managers.

The auditor was provided unimpeded access to all parts of the facility and all secure rooms and storage areas in the facility. While inspecting the facility, doors and offices were checked consistently to ensure they are secured and locked. The auditor observed the location of staff. Informal dialogue occurred with residents and staff, asking PREA related questions and agency procedures a safety consideration. Residents that engaged in conversation with the auditor discussed feeling safe at the facility.

The auditor did observed announcements of female staff entering the male living areas and male staff entering the female living areas. The auditor had opportunities to view resident and staff interaction. There was also ample time to observe the nature and quality of resident supervision throughout the on-site audit process, and in all instances the auditor observed appropriate respect on the part of both residents and staff.

115.401 (i)

The auditor shall be permitted to request and receive copies of any relevant documents (including electronically stored information).

The auditor provided the facility the agency/facility with a documentation checklist. The checklist is organized by standards to help the facility thru the pre-audit, onsite and post audit phase and to provide the requested documentation by auditor.

The PREA coordinator and the facility provided the auditor all relevant documents as requested.

115.401 (j)

The auditor shall retain and preserve all documentation relied upon in making audit determinations. Such documentation shall be provided to the Department of Justice upon request.

The auditor has upload additional information in OMS. Other reviewed information will be maintained for the required timeframe of 15 months before destruction, if the facility does not appeal any decisions.

115.401 (k)

The auditor shall interview a representative sample of resident, residents, and detainees, and of staff, supervisors, and administrators.

Staff Interviewed:

The auditor conducted interviews with the following agency leadership staff, and are counted in the totals. Below are the staff interviewed previously, by the lead auditor, associate, on-site, and by telephone:

- Agency Staff (4)
- Facility Specialized Staff (4)
- Randomly Selected Staff (12)
- Informal Interviews (2)

The auditor requested and was provided a staff roster with non-security and security staff.

Interviews with random, informal and specialized staff confirmed that the facility's staff understood the agency's position regarding the Prison Rape Elimination Act (PREA). Random and specialized staff were all knowledgeable about their roles in the prevention, reporting, and detection of sexual abuse and sexual harassment, and their responsibilities in the event of a PREA related incident, particularly as a first responder.

115.401 (l)

The auditor shall be permitted to conduct private interviews with residents and detainees.

Resident Interviewed:

The geographic diversity was achieved by the total number of housing units, number of housing units by gender, and the number of interviews conducted in each housing unit. Adequate gender representation was considered when the facility has both male and female resident.

- Randomly Selected Residents: (20)

The auditor requested and was provided a roster of resident listed by living units.

- Informally Interviewed Residents (1)
- Targeted Residents (0)

All resident that was formally interviewed were asked the required random interview questions provided by the National PREA Resource Center.

Resident were respectful and cooperative with auditor and the associate auditor. All resident wore masks and maintained social distancing practices during the formal interviews. The resident's uniforms were clean, and their hygiene satisfactory.

Interviews with resident revealed that they understand PREA safeguards and the facility's zero-tolerance policy.

Comprehensive resident PREA education is provided in written form during resident orientation, and through the handbook, kiosks, personal instruction, videos, and posters.

115.401 (m)

Resident and detainees shall be permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel.

During the pre-audit period, the facility received instructions to post the required PREA Audit Notice of the upcoming audit prior to the on-site visit for confidential communications. The facility posted the notices in English and Spanish. The auditor received email, pictures confirming the posted notices and observed the posted notices on-site.

As of 7/18/22, there was no communication from a resident or staff. Staff interviews indicated that residents are permitted to send confidential information or correspondence in the same manner as if they were communicating with legal counsel.

115.401 (n)

Auditors shall attempt to communicate with community-based or victim advocates who may have insight into relevant conditions in the facility.

The auditor reached out to the following organizations:

- Just Detention International (JDI) – is a health and human rights organization that seeks to end sexual abuse in all forms of detention. Founded in 1980, JDI is the only organization in the U.S. – and the world – dedicated exclusively to ending sexual abuse behind bars. They hold government officials accountable for prisoner rape; challenge the attitudes and misperception that enable sexual abuse to flourish; and make sure that survivors get the help they need.

Contact: Just Detention International (JDI) / Wilshire Blvd., Suite 340 Los Angeles, CA 90010 / Email sent: 3/25/22 at 6:05 am. Received response on 4/1/22 at 12:47 pm. The operations officer indicated a review of their database indicates that the organization have not received any information regarding this facility. The operations officer also recommended to contact the local rape crisis centers for information.

- National Sexual Violence Resource Center (NSVRC) – is the leading nonprofit in providing information and tools to prevent and respond to sexual violence. NSVRC translates research and trends into best practices that help individuals, communities and service providers achieve real and lasting change. NSVRC also work with the media to promote informed reporting.

Contact: National Sexual Violence Resources Center (NSVRC) /2101 N. Front Street Governor’s Plaza North, building #2 Harrisburg, PA 17110 / Email sent: 3/25/22 at 6:10 am. Received response on 3/25/22 at 1:33 pm. The staff indicated that the organization do not track who requests information from them. The organization do not provide direct services and are simply an information and referral service.

Memorandum of Agreement between Women and Families Center and APT Foundation.

Women and Families Center provides free, confidential and empowerment based sexual assault crisis and advocacy services including a 24-hour hotline, individual counseling, medical and legal accompaniment and support, and community education and training programs.

- Identify and assign a point of contact at each organization to establish coordination between agencies and access to Sexual Assault Crisis Service (SACS) for APT Foundation clients. Response to client’s request to work with SACS will be made and executed within a reasonable amount of time.
- Display sexual assault crisis hotline posters in English and Spanish onsite at APT Foundation and Women and Family Center share information with clients about SACS program and the availability of sexual assault crisis counselors and community-based services.
- At APT Foundation client’s request, allow for a sexual assault crisis counselor to accompany and support the victim throughout the forensic medical exam process and investigatory interviews, and provide emotional support, crisis intervention, information, and referrals, as requested by the victim throughout the client’s placement in the APR facility.
- At Women and Family Center and PRT Foundation there will be a dedicated and confidential space for SACS to meet with clients.
- To develop site specific protocol and procedure for maintaining PREA standards.
- To collaborate for the continuity of care and discharge planning for clients who are victims of sexual assault and/or abuse.
- To identify and assign designated staff at in an effort to establish a cohesive and seamless delivery of services to clients in APT facilities.

Women and Families Center Responsibilities: Services of a Women and Families Center sexual assault counselor will be offered to APT clients, and if requested, a sexual assault crisis counselor will be allowed to visit with the client while the client is a resident of a CRT facility, and accompany the client at any point in time where support to the client will be provided (hospital, court, parole). A Women and Families Center sexual assault crisis counselor will be available to the client and APT staff to answer any questions, and consult on cases regarding the best care and service delivery. APT Foundation understands that communication in accordance with CGS-52-14K. Communication regarding the client and services provided can occur if the client grants permission to Women and Families Center to waive the privilege of confidential communication. Services will be coordinated by both agencies to meet the needs of the client.

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

Supporting Documents, Interviews and Observations:

- Formal and Informal Interviews

115.403 (a)

Each audit shall include a certification by the auditor that no conflict of interest exists with respect to his or her ability to conduct an audit of the agency under review.

The auditor certified that there is no conflict of interest.

Leader Auditor Biography:

Adam has retired from the Georgia Department of Juvenile Justice, December 31, 2020. He has work in state government for 30 years. While in state government he has served in the following positions: Agency PREA Coordinator, Project Manager for PREA Grants, Federal Grant Peer Reviewer, Agency Internal Auditor, Program Director of Counseling Services (DOC), and Director of Compliance Management (Prison Rape Elimination Act – PREA; American Correctional Association – ACA; and Internal Audits (OCI).

Professional Certifications: Certified PREA Auditor, ACA Certified Auditor, American Society for Quality “Certified Quality Improvement Associate.

PREA Audits: Conducted over 95 PREA auditors (Prisons, Jails, Community and Juvenile Facilities).

115.403 (b)

Audit reports shall state whether agency-wide policies and procedures comply with relevant PREA standards.

The auditor’s report stated whether agency wide policies and procedures comply with relevant PREA standards.

115.403 (c)

For each PREA standard, the auditor shall determine whether the audited facility reaches one of the following findings: Exceeds Standards, Meets Standards; Or Does Not Meet Standard. The audit summary shall indicate, among other things, the number of provisions the facility has achieved at each grade level.

The auditor has assigned a finding to each standard.

115.403 (d)

Audit reports shall describe the methodology, sampling sizes, and basis for the auditor’s conclusions about each standard provision for each audited facility and shall include recommendations for any required corrective action.

The auditor uses a triangular approach, by connecting the PREA facility documentation, agency policies, on-site observation, site review of the entire facility and complex, determination of facility practice, interviewed staff and resident, local and national advocates, etc. to make determinations for each standard. Each standard and/or provision is designed with documentation reviewed, online PREA Audit: Pre-Audit Questionnaire, overall findings, and interview results.

The auditor is using the stylistic rules for the Field Training Program (FTP) Auditor Trainee Report Writing Reference Manual as best practices.

The auditor sample size is based on the number of residents at the facility on the first day. The random staff sample size based on a minimum of twelve or more based on interview outcomes and facility size.

115.403 (e)

Auditor shall redact any personally identifiable resident or staff information from their reports but shall provide such information to the agency upon request and may provide such information to the Department of Justice.

The auditor has redacted personally identifiable residents from the report and can provide such information to the agency upon request and may provide such information to the Department of Justice.

115.403 (f)

The agency shall ensure that the auditor’s final report is published on the agency’s website if it has one or is otherwise made readily available to the public.

The facility’s final PREA reports are published on the agency website.

<b>Appendix: Provision Findings</b>		
<b>115.211 (a)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
<b>115.211 (b)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its community confinement facilities?	yes
<b>115.212 (a)</b>	<b>Contracting with other entities for the confinement of residents</b>	
	If this agency is public and it contracts for the confinement of its residents with private agencies or other entities, including other government agencies, has the agency included the entity's obligation to adopt and comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents.)	na
<b>115.212 (b)</b>	<b>Contracting with other entities for the confinement of residents</b>	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents.)	na
<b>115.212 (c)</b>	<b>Contracting with other entities for the confinement of residents</b>	
	If the agency has entered into a contract with an entity that fails to comply with the PREA standards, did the agency do so only in emergency circumstances after making all reasonable attempts to find a PREA compliant private agency or other entity to confine residents? (N/A if the agency has not entered into a contract with an entity that fails to comply with the PREA standards.)	na
	In such a case, does the agency document its unsuccessful attempts to find an entity in compliance with the standards? (N/A if the agency has not entered into a contract with an entity that fails to comply with the PREA standards.)	na
<b>115.213 (a)</b>	<b>Supervision and monitoring</b>	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring to protect residents against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The physical layout of each facility?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the resident population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes

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

<b>115.215 (e)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from searching or physically examining transgender or intersex residents for the sole purpose of determining the resident's genital status?	yes
	If the resident's genital status is unknown, does the facility determine genital status during conversations with the resident, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
<b>115.215 (f)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex residents in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes



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

<b>115.216 (c)</b>	<b>Residents with disabilities and residents who are limited English proficient</b>	
	Does the agency always refrain from relying on resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-response duties under §115.264, or the investigation of the resident's allegations?	yes
<b>115.217 (a)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the two questions immediately above ?	yes
	Does the agency prohibit the enlistment of the services of any contractor who may have contact with residents who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of the services of any contractor who may have contact with residents who: Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of the services of any contractor who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the two questions immediately above ?	yes
<b>115.217 (b)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with residents?	yes
	Does the agency consider any incidents of sexual harassment in determining to enlist the services of any contractor who may have contact with residents?	yes
<b>115.217 (c)</b>	<b>Hiring and promotion decisions</b>	
	Before hiring new employees who may have contact with residents, does the agency: Perform a criminal background records check?	yes
	Before hiring new employees who may have contact with residents, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
<b>115.217 (d)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with residents?	yes
<b>115.217 (e)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with residents or have in place a system for otherwise capturing such information for current employees?	yes

<b>115.217 (f)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
<b>115.217 (g)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
<b>115.217 (h)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
<b>115.218 (a)</b>	<b>Upgrades to facilities and technology</b>	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect residents from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012 or since the last PREA audit, whichever is later.)	na
<b>115.218 (b)</b>	<b>Upgrades to facilities and technology</b>	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect residents from sexual abuse? (N/A if agency/facility has not installed or updated any video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012 or since the last PREA audit, whichever is later.)	yes
<b>115.221 (a)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal or administrative sexual abuse investigations.)	na
<b>115.221 (b)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Is this protocol developmentally appropriate for youth where applicable? (NA if the agency/facility is not responsible for conducting any form of criminal or administrative sexual abuse investigations.)	na
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (NA if the agency/facility is not responsible for conducting any form of criminal or administrative sexual abuse investigations.)	na

<b>115.221 (c)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
<b>115.221 (d)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member?	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
<b>115.221 (e)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
<b>115.221 (f)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes
<b>115.221 (h)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.221(d) above).	na
<b>115.222 (a)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes

<b>115.222 (b)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency have a policy in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
<b>115.222 (c)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for conducting criminal investigations. See 115.221(a).)	yes
<b>115.231 (a)</b>	<b>Employee training</b>	
	Does the agency train all employees who may have contact with residents on: Its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with residents on: Residents' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: The dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with residents on: The common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with residents on: How to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with residents on: How to avoid inappropriate relationships with residents?	yes
	Does the agency train all employees who may have contact with residents on: How to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming residents?	yes
	Does the agency train all employees who may have contact with residents on: How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
<b>115.231 (b)</b>	<b>Employee training</b>	
	Is such training tailored to the gender of the residents at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male residents to a facility that houses only female residents, or vice versa?	yes

<b>115.231 (c)</b>	<b>Employee training</b>	
	Have all current employees who may have contact with residents received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
<b>115.231 (d)</b>	<b>Employee training</b>	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
<b>115.232 (a)</b>	<b>Volunteer and contractor training</b>	
	Has the agency ensured that all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
<b>115.232 (b)</b>	<b>Volunteer and contractor training</b>	
	Have all volunteers and contractors who have contact with residents been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with residents)?	yes
<b>115.232 (c)</b>	<b>Volunteer and contractor training</b>	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
<b>115.233 (a)</b>	<b>Resident education</b>	
	During intake, do residents receive information explaining: The agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do residents receive information explaining: How to report incidents or suspicions of sexual abuse or sexual harassment?	yes
	During intake, do residents receive information explaining: Their rights to be free from sexual abuse and sexual harassment?	yes
	During intake, do residents receive information explaining: Their rights to be free from retaliation for reporting such incidents?	yes
	During intake, do residents receive information regarding agency policies and procedures for responding to such incidents?	yes
<b>115.233 (b)</b>	<b>Resident education</b>	
	Does the agency provide refresher information whenever a resident is transferred to a different facility?	yes

<b>115.233 (c)</b>	<b>Resident education</b>	
	Does the agency provide resident education in formats accessible to all residents, including those who: Are limited English proficient?	yes
	Does the agency provide resident education in formats accessible to all residents, including those who: Are deaf?	yes
	Does the agency provide resident education in formats accessible to all residents, including those who: Are visually impaired?	yes
	Does the agency provide resident education in formats accessible to all residents, including those who: Are otherwise disabled?	yes
	Does the agency provide resident education in formats accessible to all residents, including those who: Have limited reading skills?	yes
<b>115.233 (d)</b>	<b>Resident education</b>	
	Does the agency maintain documentation of resident participation in these education sessions?	yes
<b>115.233 (e)</b>	<b>Resident education</b>	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to residents through posters, resident handbooks, or other written formats?	yes
<b>115.234 (a)</b>	<b>Specialized training: Investigations</b>	
	In addition to the general training provided to all employees pursuant to §115.231, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).	yes
<b>115.234 (b)</b>	<b>Specialized training: Investigations</b>	
	Does this specialized training include: Techniques for interviewing sexual abuse victims?(N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).	yes
	Does this specialized training include: Proper use of Miranda and Garrity warnings?(N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).	yes
	Does this specialized training include: Sexual abuse evidence collection in confinement settings?(N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).	yes
	Does this specialized training include: The criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).	yes
<b>115.234 (c)</b>	<b>Specialized training: Investigations</b>	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a).)	yes

<b>115.235 (a)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
<b>115.235 (b)</b>	<b>Specialized training: Medical and mental health care</b>	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency does not employ medical staff or the medical staff employed by the agency do not conduct forensic exams.)	yes
<b>115.235 (c)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
<b>115.235 (d)</b>	<b>Specialized training: Medical and mental health care</b>	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.231? (N/A for circumstances in which a particular status (employee or contractor/volunteer) does not apply.)	yes
	Do medical and mental health care practitioners contracted by and volunteering for the agency also receive training mandated for contractors and volunteers by §115.232? (N/A for circumstances in which a particular status (employee or contractor/volunteer) does not apply.)	yes
<b>115.241 (a)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all residents assessed during an intake screening for their risk of being sexually abused by other residents or sexually abusive toward other residents?	yes
	Are all residents assessed upon transfer to another facility for their risk of being sexually abused by other residents or sexually abusive toward other residents?	yes
<b>115.241 (b)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
<b>115.241 (c)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes



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

<b>115.241 (h)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Is it the case that residents are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes
<b>115.241 (i)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the resident's detriment by staff or other residents?	yes
<b>115.242 (a)</b>	<b>Use of screening information</b>	
	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes
	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?	yes
	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
<b>115.242 (b)</b>	<b>Use of screening information</b>	
	Does the agency make individualized determinations about how to ensure the safety of each resident?	yes
<b>115.242 (c)</b>	<b>Use of screening information</b>	
	When deciding whether to assign a transgender or intersex resident to a facility for male or female residents, does the agency consider on a case-by-case basis whether a placement would ensure the resident's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns residents to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex residents, does the agency consider on a case-by-case basis whether a placement would ensure the resident's health and safety, and whether a placement would present management or security problems?	yes
<b>115.242 (d)</b>	<b>Use of screening information</b>	
	Are each transgender or intersex resident's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes
<b>115.242 (e)</b>	<b>Use of screening information</b>	
	Are transgender and intersex residents given the opportunity to shower separately from other residents?	yes

<b>115.242 (f)</b>	<b>Use of screening information</b>	
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing: lesbian, gay, and bisexual residents in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I residents pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing: transgender residents in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I residents pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing: intersex residents in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I residents pursuant to a consent decree, legal settlement, or legal judgement.)	yes
<b>115.251 (a)</b>	<b>Resident reporting</b>	
	Does the agency provide multiple internal ways for residents to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: Retaliation by other residents or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
<b>115.251 (b)</b>	<b>Resident reporting</b>	
	Does the agency also provide at least one way for residents to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the resident to remain anonymous upon request?	yes
<b>115.251 (c)</b>	<b>Resident reporting</b>	
	Do staff members accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Do staff members promptly document any verbal reports of sexual abuse and sexual harassment?	yes
<b>115.251 (d)</b>	<b>Resident reporting</b>	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of residents?	yes

<b>115.252 (a)</b>	<b>Exhaustion of administrative remedies</b>	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address resident grievances regarding sexual abuse. This does not mean the agency is exempt simply because a resident does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
<b>115.252 (b)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency permit residents to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring a resident to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
<b>115.252 (c)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency ensure that: a resident who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
<b>115.252 (d)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by residents in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency determines that the 90-day timeframe is insufficient to make an appropriate decision and claims an extension of time (the maximum allowable extension is 70 days per 115.252(d)(3)), does the agency notify the resident in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the resident does not receive a response within the time allotted for reply, including any properly noticed extension, may a resident consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
<b>115.252 (e)</b>	<b>Exhaustion of administrative remedies</b>	
	Are third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, permitted to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of residents? (If a third party files such a request on behalf of a resident, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the resident declines to have the request processed on his or her behalf, does the agency document the resident's decision? (N/A if agency is exempt from this standard.)	yes

<b>115.252 (f)</b>	<b>Exhaustion of administrative remedies</b>	
	Has the agency established procedures for the filing of an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging a resident is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the resident is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
<b>115.252 (g)</b>	<b>Exhaustion of administrative remedies</b>	
	If the agency disciplines a resident for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the resident filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
<b>115.253 (a)</b>	<b>Resident access to outside confidential support services</b>	
	Does the facility provide residents with access to outside victim advocates for emotional support services related to sexual abuse by giving residents mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility enable reasonable communication between residents and these organizations, in as confidential a manner as possible?	yes
<b>115.253 (b)</b>	<b>Resident access to outside confidential support services</b>	
	Does the facility inform residents, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
<b>115.253 (c)</b>	<b>Resident access to outside confidential support services</b>	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide residents with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
<b>115.254 (a)</b>	<b>Third party reporting</b>	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of a resident?	yes

<b>115.261 (a)</b>	<b>Staff and agency reporting duties</b>	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against residents or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
<b>115.261 (b)</b>	<b>Staff and agency reporting duties</b>	
	Apart from reporting to designated supervisors or officials, do staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
<b>115.261 (c)</b>	<b>Staff and agency reporting duties</b>	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform residents of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
<b>115.261 (d)</b>	<b>Staff and agency reporting duties</b>	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
<b>115.261 (e)</b>	<b>Staff and agency reporting duties</b>	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
<b>115.262 (a)</b>	<b>Agency protection duties</b>	
	When the agency learns that a resident is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the resident?	yes
<b>115.263 (a)</b>	<b>Reporting to other confinement facilities</b>	
	Upon receiving an allegation that a resident was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
<b>115.263 (b)</b>	<b>Reporting to other confinement facilities</b>	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
<b>115.263 (c)</b>	<b>Reporting to other confinement facilities</b>	
	Does the agency document that it has provided such notification?	yes
<b>115.263 (d)</b>	<b>Reporting to other confinement facilities</b>	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes

<b>115.264 (a)</b>	<b>Staff first responder duties</b>	
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
<b>115.264 (b)</b>	<b>Staff first responder duties</b>	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
<b>115.265 (a)</b>	<b>Coordinated response</b>	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes
<b>115.266 (a)</b>	<b>Preservation of ability to protect residents from contact with abusers</b>	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
<b>115.267 (a)</b>	<b>Agency protection against retaliation</b>	
	Has the agency established a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
<b>115.267 (b)</b>	<b>Agency protection against retaliation</b>	
	Does the agency employ multiple protection measures, such as housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes

<b>115.267 (c)</b>	<b>Agency protection against retaliation</b>	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any resident disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency:4. Monitor resident housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor resident program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignment of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
<b>115.267 (d)</b>	<b>Agency protection against retaliation</b>	
	In the case of residents, does such monitoring also include periodic status checks?	yes
<b>115.267 (e)</b>	<b>Agency protection against retaliation</b>	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
<b>115.271 (a)</b>	<b>Criminal and administrative agency investigations</b>	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.221(a). )	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.221(a). )	yes
<b>115.271 (b)</b>	<b>Criminal and administrative agency investigations</b>	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.234?	yes



<b>115.271 (c)</b>	<b>Criminal and administrative agency investigations</b>	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
<b>115.271 (d)</b>	<b>Criminal and administrative agency investigations</b>	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
<b>115.271 (e)</b>	<b>Criminal and administrative agency investigations</b>	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as resident or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring a resident who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
<b>115.271 (f)</b>	<b>Criminal and administrative agency investigations</b>	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
<b>115.271 (g)</b>	<b>Criminal and administrative agency investigations</b>	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
<b>115.271 (h)</b>	<b>Criminal and administrative agency investigations</b>	
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
<b>115.271 (i)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency retain all written reports referenced in 115.271(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
<b>115.271 (j)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the facility or agency does not provide a basis for terminating an investigation?	yes
<b>115.271 (l)</b>	<b>Criminal and administrative agency investigations</b>	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.221(a).)	yes
<b>115.272 (a)</b>	<b>Evidentiary standard for administrative investigations</b>	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes

<b>115.273 (a)</b>	<b>Reporting to residents</b>	
	Following an investigation into a resident's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
<b>115.273 (b)</b>	<b>Reporting to residents</b>	
	If the agency did not conduct the investigation into a resident's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the resident? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.)	yes
<b>115.273 (c)</b>	<b>Reporting to residents</b>	
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the resident's unit?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
<b>115.273 (d)</b>	<b>Reporting to residents</b>	
	Following a resident's allegation that he or she has been sexually abused by another resident, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following a resident's allegation that he or she has been sexually abused by another resident, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes
<b>115.273 (e)</b>	<b>Reporting to residents</b>	
	Does the agency document all such notifications or attempted notifications?	yes
<b>115.276 (a)</b>	<b>Disciplinary sanctions for staff</b>	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
<b>115.276 (b)</b>	<b>Disciplinary sanctions for staff</b>	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes

<b>115.276 (c)</b>	<b>Disciplinary sanctions for staff</b>	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
<b>115.276 (d)</b>	<b>Disciplinary sanctions for staff</b>	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies, unless the activity was clearly not criminal?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
<b>115.277 (a)</b>	<b>Corrective action for contractors and volunteers</b>	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with residents?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
<b>115.277 (b)</b>	<b>Corrective action for contractors and volunteers</b>	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with residents?	yes
<b>115.278 (a)</b>	<b>Disciplinary sanctions for residents</b>	
	Following an administrative finding that a resident engaged in resident-on-resident sexual abuse, or following a criminal finding of guilt for resident-on-resident sexual abuse, are residents subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
<b>115.278 (b)</b>	<b>Disciplinary sanctions for residents</b>	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the resident's disciplinary history, and the sanctions imposed for comparable offenses by other residents with similar histories?	yes
<b>115.278 (c)</b>	<b>Disciplinary sanctions for residents</b>	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether a resident's mental disabilities or mental illness contributed to his or her behavior?	yes
<b>115.278 (d)</b>	<b>Disciplinary sanctions for residents</b>	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending resident to participate in such interventions as a condition of access to programming and other benefits?	yes
<b>115.278 (e)</b>	<b>Disciplinary sanctions for residents</b>	
	Does the agency discipline a resident for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes

<b>115.278 (f)</b>	<b>Disciplinary sanctions for residents</b>	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
<b>115.278 (g)</b>	<b>Disciplinary sanctions for residents</b>	
	Does the agency always refrain from considering non-coercive sexual activity between residents to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between residents.)	yes
<b>115.282 (a)</b>	<b>Access to emergency medical and mental health services</b>	
	Do resident victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
<b>115.282 (b)</b>	<b>Access to emergency medical and mental health services</b>	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.262?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
<b>115.282 (c)</b>	<b>Access to emergency medical and mental health services</b>	
	Are resident victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
<b>115.282 (d)</b>	<b>Access to emergency medical and mental health services</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.283 (a)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
<b>115.283 (b)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
<b>115.283 (c)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
<b>115.283 (d)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are resident victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all-male" facility. Note: in "all-male" facilities, there may be residents who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes

<b>115.283 (e)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If pregnancy results from the conduct described in paragraph § 115.283(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if “all-male” facility. Note: in “all-male” facilities, there may be residents who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
<b>115.283 (f)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are resident victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
<b>115.283 (g)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.283 (h)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility attempt to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners?	yes
<b>115.286 (a)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
<b>115.286 (b)</b>	<b>Sexual abuse incident reviews</b>	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
<b>115.286 (c)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
<b>115.286 (d)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.286(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
<b>115.286 (e)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes

<b>115.287 (a)</b>	<b>Data collection</b>	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
<b>115.287 (b)</b>	<b>Data collection</b>	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
<b>115.287 (c)</b>	<b>Data collection</b>	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
<b>115.287 (d)</b>	<b>Data collection</b>	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
<b>115.287 (e)</b>	<b>Data collection</b>	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents? (N/A if agency does not contract for the confinement of its residents.)	na
<b>115.287 (f)</b>	<b>Data collection</b>	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	na
<b>115.288 (a)</b>	<b>Data review for corrective action</b>	
	Does the agency review data collected and aggregated pursuant to § 115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
<b>115.288 (b)</b>	<b>Data review for corrective action</b>	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
<b>115.288 (c)</b>	<b>Data review for corrective action</b>	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
<b>115.288 (d)</b>	<b>Data review for corrective action</b>	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
<b>115.289 (a)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency ensure that data collected pursuant to § 115.287 are securely retained?	yes

<b>115.289 (b)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
<b>115.289 (c)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
<b>115.289 (d)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency maintain sexual abuse data collected pursuant to § 115.287 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
<b>115.401 (a)</b>	<b>Frequency and scope of audits</b>	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes
<b>115.401 (b)</b>	<b>Frequency and scope of audits</b>	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	yes
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	yes
<b>115.401 (h)</b>	<b>Frequency and scope of audits</b>	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
<b>115.401 (i)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
<b>115.401 (m)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to conduct private interviews with residents?	yes
<b>115.401 (n)</b>	<b>Frequency and scope of audits</b>	
	Were inmates, residents, and detainees permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
<b>115.403 (f)</b>	<b>Audit contents and findings</b>	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes