

PREA Facility Audit Report: Final

Name of Facility: Cove Prep Adolescent Residential Treatment Facility

Facility Type: Juvenile

Date Interim Report Submitted: 07/22/2024

Date Final Report Submitted: 11/22/2024

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
Auditor Full Name as Signed: Farooq Mallick	Date of Signature: 11/22/2024

AUDITOR INFORMATION	
Auditor name:	Mallick, Asghar
Email:	afarooq.mallick@gmail.com
Start Date of On-Site Audit:	06/17/2024
End Date of On-Site Audit:	06/18/2024

FACILITY INFORMATION	
Facility name:	Cove Prep Adolescent Residential Treatment Facility
Facility physical address:	310 Grove Road , Torrance, Pennsylvania - 15717
Facility mailing address:	PO Box G, Torrance,

Primary Contact

Name:	Darren Stiffler
Email Address:	Darren.stiffler@coveprep.com
Telephone Number:	7244599700

Superintendent/Director/Administrator	
Name:	Dana Evangelista
Email Address:	dana.evangetlista@coveprep.com
Telephone Number:	7244599700

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

Facility Health Service Administrator On-Site	
Name:	Crystal Banks
Email Address:	crystal.banks@coveprep.com
Telephone Number:	7244599700

Facility Characteristics	
Designed facility capacity:	51
Current population of facility:	51
Average daily population for the past 12 months:	51
Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Mens/boys

<p>Which population(s) does the facility hold? Select all that apply (Nonbinary describes a person who does not identify exclusively as a boy/man or a girl/woman. Some people also use this term to describe their gender expression. For definitions of “intersex” and “transgender,” please see https://www.prearesourcecenter.org/standard/115-5)</p>	
<p>Age range of population:</p>	12-20
<p>Facility security levels/resident custody levels:</p>	5 Secure
<p>Number of staff currently employed at the facility who may have contact with residents:</p>	71
<p>Number of individual contractors who have contact with residents, currently authorized to enter the facility:</p>	4
<p>Number of volunteers who have contact with residents, currently authorized to enter the facility:</p>	0

AGENCY INFORMATION	
Name of agency:	White Deer Run, Inc.
Governing authority or parent agency (if applicable):	
Physical Address:	106 Davies Drive, York, Pennsylvania - 17415
Mailing Address:	
Telephone number:	

Agency Chief Executive Officer Information:	
Name:	
Email Address:	

Telephone Number:	
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Agency-Wide PREA Coordinator Information			
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Name:	Chianti Franklin	Email Address:	chianti.franklin@coveprep.com
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Facility AUDIT FINDINGS	
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Summary of Audit Findings	
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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:	
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0	
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Number of standards met:	
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43	
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Number of standards not met:	
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0	
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POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2024-06-17
2. End date of the onsite portion of the audit:	2024-06-18

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	<p>This auditor spoke to the Director of Blackburn Center to confirm there is a MOU in place. The Director informed me that they just visited the facility and provided both youth and staff with training and information regarding their youth advocacy program. She stated that the MOU is current and they have not been called during the past year for any PREA related incident.</p> <p>This auditor spoke to a representative from Excelsa Health Latrobe Hospital to confirm there is a current MOU in place for the hospital to provide forensic examinations free of cost to all youth. The representative confirmed there is a current MOU in place.</p> <p>This auditor spoke to a representative from the Pennsylvania State Police to verify that they have a MOU in place to conduct criminal investigations pertaining to PREA related incidents. The representative confirmed there is a current MOU in place and they have not been called to conduct any criminal investigations in the last year.</p>

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	51
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15. Average daily population for the past 12 months:	51
16. Number of inmate/resident/detainee housing units:	6
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	
18. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	45
19. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	45
20. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	3
21. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	0

22. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	0
23. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	0
24. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	17
25. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	1
26. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	14
27. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	14
28. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0

<p>29. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</p>	<p>Cove PREP is a program that admits youth from Pennsylvania as well as other states that focuses on sex offender treatment. The population consists of all male youth who are Caucasian, African American, and Hispanic; ranging in age from 12-20 years.</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>30. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</p>	<p>45</p>
<p>31. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>0</p>
<p>32. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>4</p>
<p>33. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</p>	<p>Cove PREP staff consisted of Caucasian and African American male and female staff with 1 month of service to 24 years of service. Staff interviewed were from all three shifts and various positions within the organization. There were no volunteers. The contracted psychologist interviewed has been employed for 15.5 years. The Educational Director was employed for 8.5 years and was interviewed.</p>
<p>INTERVIEWS</p>	
<p>Inmate/Resident/Detainee Interviews</p>	
<p>Random Inmate/Resident/Detainee Interviews</p>	
<p>34. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>12</p>

<p>35. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</p>	<p><input type="checkbox"/> Age</p> <p><input type="checkbox"/> Race</p> <p><input type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic)</p> <p><input type="checkbox"/> Length of time in the facility</p> <p><input type="checkbox"/> Housing assignment</p> <p><input type="checkbox"/> Gender</p> <p><input type="checkbox"/> Other</p> <p><input type="checkbox"/> None</p>
<p>36. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p>	<p>Residents were randomly picked from all 6 units. It was based on there age, length of stay, geographical location, and race. Targeted residents were chosen by there gender identity, prior victimization, and any vulnerabilities that were identified.</p>
<p>37. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>38. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>This auditor interviewed medical and clinical staff, the CEO, PREA Coordinator, and random staff to confirm there were no residents that were blind. During the on-site audit this auditor reviewed medical, clinical, and resident case files to verify there were no residents who were blind.</p>
<p>Targeted Inmate/Resident/Detainee Interviews</p>	
<p>39. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>8</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>40. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>40. 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>40. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>This auditor interviewed medical and clinical staff, the CEO, PREA Coordinator, and random staff to confirm there were no residents that had physical disabilities. During the on-site audit this auditor reviewed medical, clinical, and resident case files to verify there were no residents that had physical disabilities.</p>
<p>41. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>3</p>

<p>42. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>42. 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>42. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>This auditor interviewed medical and clinical staff, the CEO, PREA Coordinator, and random staff to confirm there were no residents that were blind. During the on-site audit this auditor reviewed medical, clinical, and resident case files to verify there were no residents who were blind.</p>
<p>43. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>43. 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>43. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>This auditor interviewed medical and clinical staff, the CEO, PREA Coordinator, and random staff to confirm there were no residents that were hard of hearing or deaf. During the on-site audit this auditor reviewed medical, clinical, and resident case files to verify there were no residents who were hard of hearing or deaf.</p>

<p>44. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>44. 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>44. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>This auditor interviewed medical and clinical staff, the CEO, PREA Coordinator, and random staff to confirm there were no residents that were Limited English Proficient (LEP). During the on-site audit this auditor reviewed medical, clinical, and resident case files to verify there were no residents who were LEP.</p>
<p>45. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>3</p>
<p>46. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>1</p>
<p>47. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>0</p>

<p>47. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>47. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>This auditor interviewed medical and clinical staff, the CEO, PREA Coordinator, and random staff to confirm there were no residents that reported prior sexual abuse in this facility. During the on-site audit this auditor reviewed medical, clinical, and resident case files to verify there were no residents who reported prior sexual abuse in this facility.</p>
<p>48. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>5</p>
<p>49. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>
<p>49. 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>49. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The facility does not use segregated housing or isolation per their policy. This auditor toured all areas of the facility and did not observe any areas where youth could be segregated. This auditor interviewed the CEO, Program Director, PREA Coordinator, Clinical Director, medical staff, supervisors, direct care staff, and random residents who all confirmed that segregation and isolation are not utilized at Cove PREP.</p>
<p>50. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>Residents were randomly picked from all 6 units. It was based on their age, length of stay, geographical location, and race. Targeted residents were chosen by their gender identity, prior victimization, and any vulnerabilities that were identified.</p>
<p>Staff, Volunteer, and Contractor Interviews</p>	
<p>Random Staff Interviews</p>	
<p>51. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>12</p>
<p>52. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p><input checked="" type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input checked="" type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p>53. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

<p>54. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>Cove PREP staff consisted of Caucasian and African American male and female staff with 1 month of service to 24 years of service. Staff interviewed were from all three shifts and various positions within the organization.</p>
<p>Specialized Staff, Volunteers, and Contractor Interviews</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>55. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</p>	<p>11</p>
<p>56. Were you able to interview the Agency Head?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>57. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>58. Were you able to interview the PREA Coordinator?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>59. Were you able to interview the PREA Compliance Manager?</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>

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

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

	<input type="checkbox"/> Other
61. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input type="radio"/> Yes <input checked="" type="radio"/> No
62. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
62. Enter the total number of CONTRACTORS who were interviewed:	2
62. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Security/detention <input checked="" type="checkbox"/> Education/programming <input checked="" type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other
63. Provide any additional comments regarding selecting or interviewing specialized staff.	Staff were interviewed from all departments; they consisted of Caucasians, African American, and Hispanic; their length of service ranged from 2 year to 13 years.

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.

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

<p>69. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</p>	<p>During the facility tour this auditor observed youth on their units, in classrooms, and in recreational areas. This auditor observed Blackburn Center phone numbers, Childline posters, and other PREA related information pertaining to reporting posted throughout the facility. This auditor had informal conversations with residents and staff during the facility tour. Youth were asked about PREA education, bathroom procedures and privacy, gender announcements by staff, and their visitation practices.</p>
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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.

<p>70. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p>71. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</p>	<p>This auditor reviewed facility policies, youth records, resident intake procedures including PREA education, MOUs, unannounced rounds forms, retaliation monitoring forms, staffing plan, administrative meeting minutes, annual PREA report, risk assessments, and logbooks.</p>
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SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

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

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

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

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

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

Sexual Harassment Investigation Outcomes

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

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

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

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

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

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

78. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:	0
78. Explain why you were unable to review any sexual abuse investigation files:	There were no reported allegations of sexual abuse during the past 12 months. This was confirmed during interview with CEO, PREA Coordinator, Pennsylvania State Police, and Director of Blackburn Center.

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

<p>85. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p>Sexual Harassment Investigation Files Selected for Review</p>	
<p>86. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>86. Explain why you were unable to review any sexual harassment investigation files:</p>	<p>There were no reported allegations of sexual harassment during the past 12 months. This was confirmed during interview with CEO, PREA Coordinator, Pennsylvania State Police, and Director of Blackburn Center.</p>
<p>87. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p>Inmate-on-inmate sexual harassment investigation files</p>	
<p>88. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>89. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

<p>90. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p>Staff-on-inmate sexual harassment investigation files</p>	
<p>91. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>92. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p>93. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p>94. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</p>	<p>There were no reported allegations of sexual abuse or sexual harassment during the past 12 months. This was confirmed during interview with CEO, PREA Coordinator, Pennsylvania State Police, and Director of Blackburn Center.</p>

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

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

- Yes
- No

Non-certified Support Staff

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

- Yes
- No

AUDITING ARRANGEMENTS AND COMPENSATION

97. Who paid you to conduct this audit?

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

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

115.311	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy is committed to the prevention and elimination of sexual abuse and sexual harassment within their facility through compliance with the Prison Rape Elimination Act of 2003. Cove PREP is committed to the equal opportunity to participate in and benefit from all aspects of the agency’s effort to prevent, detect and respond to sexual abuse and sexual harassment. Violations of this policy may result in disciplinary sanctions for staff and youth perpetrators and/or criminal prosecution as authorities deem appropriate. This policy contains the necessary definitions, sanctions, and descriptions of the agency strategies and responses to sexual abuse and sexual harassment and forms the foundation for the agency’s training efforts with residents, staff, volunteers, and contractors.</p> <p>Cove PREP has a designated PREA Coordinator who reports directly to the Chief Executive Officer. Her official title is Risk Officer. This auditor reviewed the Agency Organizational Chart, confirmed the PREA Coordinator’s position, and noted that she reports directly to the Chief Executive Officer for any PREA related issues within the</p>

	<p>agency. She is aware of the PREA standards and has stated that she is committed to PREA and implementing PREA at Cove PREP. This was her first PREA audit as the PREA Coordinator. The PREA Coordinator also reported that she has the support needed and sufficient time to develop, implement, and oversee the agency's efforts towards PREA compliance in both the facility and to fulfill the PREA responsibilities. She was interviewed by this auditor on June 18, 2024.</p> <p>Reviewed documentation to determine compliance:</p> <ul style="list-style-type: none"> • Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Cove PREP Organizational Chart • Pre-audit Questionnaire <p>Interviews:</p> <ul style="list-style-type: none"> • Interview with Chief Executive Officer • Interview with PREA Coordinator
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115.312	Contracting with other entities for the confinement of residents
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Cove PREP does not contract for the confinement of its residents with other private agencies/entities. This was confirmed during interview with the PREA Coordinator and Chief Executive Officer. As a result of Cove PREP not contracting for the confinement of its residents with other agencies/entities, there were no contracts for this auditor to review.</p> <p>Reviewed documentation to determine compliance:</p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire <p>Interviews:</p> <ul style="list-style-type: none"> • Interview with Chief Executive Officer • Interview with PREA Coordinator

115.313	Supervision and monitoring
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Auditor Overall Determination: Meets Standard

Auditor Discussion

a) The Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy (Zero Tolerance of Sexual Abuse and/or Sexual Harassment) requires the facility to develop, implement and document a staffing plan that provides for adequate levels of staffing, and where applicable, video monitoring to protect youth against sexual abuse. The Annual Vulnerability Assessment (Video Surveillance and Staffing Plan) must be submitted to the Director of Operations and the PREA Coordinator on an annual basis. In determining adequate staffing levels and the need for video monitoring, facilities must take into consideration:

1. Generally accepted juvenile detention and correctional/secure residential practices;
2. Any judicial findings of inadequacy;
3. Any findings of inadequacy from federal investigative agencies;
4. Any findings of inadequacy from internal or external oversight bodies;
5. All components of the facility's physical plant (including "blind spots" and/or areas where staff or youth may be isolated);
6. Composition of the different facilities;
7. Number and placements of supervisory staff;
8. Programs occurring on each shift;
9. Relevant laws, regulations, and standards;
10. Prevalence of substantiated and unsubstantiated incidents of sexual abuse; and
11. Minimum staff to youth ratios must be 1 to 8 during waking hour and 1 to 16 during sleeping hours.

Any deviations from the Staffing Plan due to limited and discrete exigent circumstances must be documented and retained. All deviations must also be communicated to the Director of Operations and the PREA Coordinator. Only security staff must be included in those reports. There have been no instances of not meeting the ratio and this was confirmed by interview of the Director of Operations and by review of the facility staff schedules.

The Staffing Plan at Cove PREP did address the staffing ratio requirements of 1:6 during waking and 1:12 during sleeping hours. It noted the total number of cameras [eighty-five (85)]. The plan is reviewed during weekly meetings but they were unable to produce the documents. There was no annual review of the Staffing Plan by the PREA Coordinator. The facility is not in compliance with this standard and will be required to document the review of the Staffing Plan and to date and sign the Staffing Plan. The facility will be on a 120-day Corrective Action and will be required to submit a signed and dated Staffing Plan and submit documentation of review of the Staffing Plan. The facility is currently budgeted for forty-six (46) direct care staff and has forty-six (46) positions filled.

Cove PREP is equipped with eighty-five (85) video surveillance cameras (72 indoor

cameras and 13 outdoor cameras). The video surveillance system provides video coverage of all housing units, program areas, recreational areas, dining room, hallways, and exit doors. Recordings from these devices remain on a secure server for approximately sixty (60) days. It was noted that the video surveillance system was installed in 2015 and upgraded in 2019. Interview the Director of Operations confirmed the video surveillance system is inspected on an annual basis.

b) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states minimum staff to youth ratios must be 1:6 during waking hours and 1:12 during sleeping hours. Any deviations from the plan due to limited and discrete exigent circumstances must be documented on the Video Surveillance and Staffing Plan.

There have been no instances of not meeting ratio and this was confirmed by interview and review of the most recent Pa. Department of Human Services licensing report. The Department of Human Services inspects staffing during their annual licensing inspection and throughout the year if there is a reportable incident.

The ratio that is required by the Pa. 3800 Child Care regulations are 1:12 during the sleeping shift and 1:6 during the waking hours. The PREA Compliance Manager states the ratios are 1:6.

The Director of Operations reported that there have been no deviations from the staffing plan during the past 12 months. The Director of Operations also reported that in the event administrative staff at Cove PREP feel staffing ratios cannot be maintained during an upcoming Tour, staff would be held over and paid overtime to meet the ratios. Interviews with the Director of Operations and PREA Coordinator revealed that staffing is monitored shift to shift by the Supervisor and that adjustments are made as needed to ensure the ratios are met. Staff schedules and resident rosters were also reviewed by this auditor.

c) The Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states that minimum staff to youth ratios must be 1:6 during waking hours and 1:12 during sleeping hours. Any deviations from the plan due to limited and discrete exigent circumstances must be documented and is also communicated to the PREA Coordinator and the Director of Operations.

The Annual Vulnerability Assessment (Video Surveillance and Staffing Plan) states the facility runs at a minimum of 1:12 staff to resident ratio during Tour 1 (11:00pm to 7:00am) and a minimum of 1:6 staff to resident ratio during Tour 2 (7:00am to 3:00pm) and Tour 3 (3:00pm to 11:00pm). It was confirmed by this auditor after reviewing population reports for the past 12 months, staff schedules, and observations made during the tour of the facility that these ratios were being met on a regular basis at the facility. During the on-site portion of the audit, there were a total of forty-four (44) residents residing at the facility. There has been a minimum of two (2) staff assigned to each living unit during Tour 2 and Tour 3, and a minimum of two (2) staff assigned to each living unit during Tour 1 to ensure proper supervision of the residents.

d) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that the PREA Coordinator will schedule and conduct an annual (or more frequently,

as necessary) facility review using the Staffing Plan. Review of the Staffing Plan confirmed that the Staffing Plan was not dated and was not signed by the PREA Coordinator and the Director of Operations. The Chief Executive Officer stated during his interview that his team does meet on a weekly basis to discuss the Staffing Plan. The facility did not produce documents to verify this during the on-site portion of the audit. The facility does not meet compliance with this standard. They will be placed on Corrective Action for 120 days to sign and date the Staffing Plan, as well as submit documentation to verify that the Staffing Plan is reviewed monthly.

e) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states management staff shall conduct and document unannounced rounds, at a minimum of twice each month (one during waking shift and one during sleeping shift) at each facility, to identify and deter staff sexual abuse and/or sexual harassment. All rounds shall be documented using the Unit Checks by Time/Unit report. Staff is prohibited from alerting other staff members or residents that rounds are occurring.

A review of Unannounced Forms confirmed the facility only conducts unannounced rounds on each weekend during waking hours. They do not conduct them on all three (3) shifts each month. They do not comply with this standard. Cove PREP will be placed on a 120-day Corrective Action. During the on-site portion of the audit the PREA Coordinator created a new Unannounced Form which will be used. Cove PREA will be required to conduct unannounced rounds on all three (3) shifts and document such. Cove PREP will be required to submit documents of the unannounced rounds each month during the Corrective Action period.

Cove PREP reviewed their staffing plan on a monthly basis during their administrative team meeting. They discussed total number of staff, total vacancies, and special watches. Minutes from these meetings were sent to this auditor to confirm that the staffing plan is discussed on a monthly basis. This auditor interviewed members of the administrative team during the corrective action period to confirm the staffing plan was discussed. Cove PREP is now in compliance with this standard.

Cove PREP has submitted three (3) unannounced rounds forms per month during the corrective action period. The unannounced rounds were conducted on all shifts with varying days and times. The unannounced rounds forms were submitted to this auditor and uploaded into the portal on a monthly basis. This auditor interviewed staff that conducted the unannounced rounds during the corrective action period to confirm unannounced rounds took place as stated as documented. Cove PREP is now in compliance with this standard.

Review of documentation and proof to determine compliance:

- Pa. Bureau of Human Services 3800 Child Care Regulations
- Pennsylvania Department of Human Services Licensing and Inspection Summary
- Pre-Audit Questionnaire

	<ul style="list-style-type: none"> • Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Cove PREP staff schedules • Unannounced Rounds Logs • Resident Roster • Cove PREP Annual Vulnerability Assessment (Video Surveillance and Staffing Plan) • Locations of video surveillance cameras (interior and exterior) • Tour of the facilities <p>Interviews:</p> <ul style="list-style-type: none"> • Interview with Chief Executive Officer • Interview with Director of Operations • Interview with PREA Coordinator • Interview with random staff from all three (3) shifts • Interview with staff that conduct unannounced rounds • Interview with random residents
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115.315	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a-c) Cove PREP’s Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy contains the necessary requirements for this standard. It prohibits staff from conducting of cross gender searches and that the youth may only be searched by staff of the same gender. All searches must be conducted with a witness. The policy states that resident searches take place upon admission to the program and are completed in the presence of two (2) staff.</p> <p>The Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy, along with Cove PREP Policy & Search Procedure, prohibits the search or physical examination of a Transgender or Intersex resident for the sole purpose of determining that resident’s genital status. Residents state that they have never been subject to a cross gender pat down search. All security staff have received training regarding the search of a Transgender or Intersex resident in a respectful and dignified manner and most could candidly discuss the search policy for such a resident.</p> <p>Staff and residents interviewed supported that cross-gender strip searches and cross-gender pat searches are prohibited and do not occur at Cove PREP. During interviews, staff could describe what an exigent circumstance would be. During the past 12 months, there have been no cross-gender strip searches or cross-gender</p>

visual body cavity searches of residents performed by medical staff or non-medical staff at Cove PREP.

Interviews with residents, staff, Clinical Director, Director of Operations, Supervisors, and the PREA Coordinator confirmed there have been no cross-gender pat searches of residents during the past 12 months at Cove PREP. Staff interviewed understood what an exigent circumstance would be and that this is the only time they would be permitted to conduct a cross-gender pat search.

Staff interviewed reported that it is against Cove PREP policy to conduct any cross-gender pat search. Staff and residents interviewed confirmed there have been no cross-gender pat searches conducted at Cove PREP .

d) The Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy and Cove PREP Policy & Bathroom Procedure state, "Staff shall enable residents to shower, perform bodily functions, and change clothing without staff of either gender viewing their buttocks or genitalia, except in exigent circumstances."

All residents and staff stated that all staff of the opposite gender announce themselves using a practice known as "knock and announce" when entering a housing unit or resident room. This was witnessed by this auditor during the tour of the facility when a female staff announced themselves. All residents stated that they shower alone (single user bathroom) and the showers are monitored by a staff member of the same gender. The residents stated that they have the privacy to shower, change their clothes, and use the bathroom without any staff watching them. Transgender and intersex residents would shower alone according to the policy and interviews. This auditor observed bathrooms containing single showers. Same sex staff conduct showers. There is a sign in sheet for the bathroom. The shower procedure was demonstrated to this auditor during the tour of the facility. The resident closes the door and it is locked from the outside automatically. Only staff have the ability to unlock it by using a key fob. The resident can also open the door from the inside.

e) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states, "Staff are prohibited from searching or physically examining a Transgender or Intersex resident for the sole purpose of determining the resident's genital status."

Staff interviewed understood that they are prohibited from searching or physically examining a transgender or intersex resident for the sole purpose of determining the resident's genital status. Staff interviewed stated that if a resident's genital status is unknown, they would attempt to determine the genital status by having a conversation with the resident, reviewing medical records, and reviewing the case history of the resident. There was one (1) transgender resident admitted into the facility during the past 12 months. There was one (1) transgender resident residing at Cove PREP during the on-site portion of this audit. The transgender resident was interviewed by this auditor during the on-site portion of the audit. The resident stated that he showers alone as all residents do and that he does not have any concerns for his safety. The transgender resident also stated that he was searched

	<p>with his undergarments on during intake but has not been pat searched since then.</p> <p>According to the Pre-Audit Questionnaire, there were no cross-gender strip searches or cross-gender pat searches during the past 12 months. This was confirmed during interviews with the Director of Operations, PREA Coordinator, Campus Supervisors, staff, and residents during the on-site portion of this audit.</p> <p>f) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy prohibits staff from conducting any type of pat search of a resident other than that conducted by a same gender staff. Staff are trained in cross-gender pat searches and searches of transgender and intersex residents in a professional and respectful manner. All staff are required to participate in and complete these trainings upon hire. Staff interviewed were able to describe these trainings to this auditor and discuss key points covered during the trainings during interviews with this auditor.</p> <p>Reviewed documentation to confirm compliance:</p> <ul style="list-style-type: none"> • Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Cove PREP Policy & Searches Procedure • Cove PREP Policy & Bathroom Procedure • Staff Training Curriculum • Documentation of Transgender Resident Notification of Search Policy • Staff Training documentation • Tour of Facility <p>Interviews:</p> <ul style="list-style-type: none"> • Interview with the Director of Operations • Interview with Clinical Director • Interviews with Supervisors • Interview with the PREA Coordinator • Interviews with random staff • Interviews with residents • Interview with transgender resident
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115.316	Residents with disabilities and residents who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states that residents with disabilities (including those who have intellectual,

psychiatric, or speech disabilities) shall have equal opportunity to all aspects of Cove PREP efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Such steps shall include, when necessary to ensure effective communication, providing them interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. In addition, Cove PREP shall 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 and/or limited reading skills.

This auditor interviewed three (3) cognitively disabled residents during the on-site portion of this audit. These residents confirmed their needs are being met and an intake staff took the time to explain the materials and answer any questions that they had, and anytime they did not comprehend something, they know they can seek assistance from a staff, and they will take the time to review the material they do not understand to ensure they are able to comprehend the material. During an interview with the PREA Coordinator, she noted any disabled resident residing in the facility, receives an equal opportunity to participate in and benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse. It was noted while reviewing the resident roster and resident files with the PREA Coordinator that there were forty-four (44) youth residing at the facility during the on-site portion of this audit who had some sort of cognitive disability (including residents identified as having an intellectual disability, a psychiatric disability, or a speech disability).

b) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that residents, who are limited in English proficiency, shall have equal opportunity to all the Cove PREP's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, in accordance with Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy for individuals with Limited English Proficiency.

The PREA brochure is available to residents in both English and Spanish. Both versions of this brochure were reviewed by this auditor prior to the on-site portion of this audit. PREA posters are in the living units, all common areas, hallways, and the area where family visits take place. These posters are also in both English and Spanish.

In addition, Limited English Proficient (LEP) interpreters are also available through Optimal Phone Interpreters. This auditor was provided a list of LEP liaisons that are available to residents at Cove PREP.

There were no limited English proficient residents residing at Cove PREP during the on-site portion of this audit. Therefore, there were no residents for this auditor to interview. It was also confirmed during an interview with the PREA Coordinator and a review of resident files that there have been no limited English proficient residents admitted into the facility during the past 12 months.

c) Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states, "Cove PREP shall not rely on resident interpreters, resident readers, or other

	<p>types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise a resident’s safety, the performance of first responder duties, or the investigation of the resident’s allegations.”</p> <p>Interviews with staff confirmed that residents are not used as interpreters. In addition, it was confirmed during interviews with staff, the Director of Operations, and PREA Coordinator that there have been no circumstances during the past 12 months at Cove PREP where resident interpreters, readers, or other types of resident assistants have been used. Staff did state that the interpreting service was used in the past for a deaf resident. Staff stated there would be two (2) Hearing Specialists during waking hours to work with the resident in school and other program areas. Staff interviewed all understood there are interpreters and resources available for the residents through Optimal Phone Interpreters. They also provide Braille for the blind residents and a hearing specialist for the deaf residents from the Speech and Hearing at Indiana University in Pennsylvania.</p> <p>Reviewed documentation to determine compliance:</p> <ul style="list-style-type: none"> • Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • MOU with Optimal Phone Interpreters • English and Spanish Reporting Posters • PREA Brochures (English and Spanish) • Resident with Disabilities Tracking Sheet • Tour of the facility <p>Interviews:</p> <ul style="list-style-type: none"> • Interview with Director of Operations • Interview with PREA Coordinator • Interviews with random staff • Interviews with random residents • Interview with three (3) cognitively disabled residents
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115.317	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a-b) Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy and the Pa. Child Protective Services Law require criminal history checks, FBI clearances, and Pa. Child Abuse checks for employees and contractors prior to employment. The policy states that Cove PREP 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:

1. Has engaged in sexual abuse in prison, jail, lockup, community confinement facility, juvenile facility, or other institution,
2. Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force or coercion; or if the victim did not consent or was unable to consent or refused; or
3. Has been civilly or administratively adjudicated to have engaged in the activity described above.

Cove PREP shall consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of a contractor, that may have contact with residents.

The practice of conducting background checks for all prospective employees prior to employment was confirmed during an interview with a Human Resource staff as well as reviewing twelve (12) randomly selected employee files. All employee files reviewed by this auditor had the appropriate background checks. The Pa. Child Protective Services Law requires these clearances prior to employment and all new employees' files are inspected during the annual licensing inspection as well as those of contractors and volunteers. A percentage of random employee files are inspected by DHS as well. There have been no citations for non-compliance in this area.

c) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states, "Before hiring new employees who may have contact with residents, Cove PREP shall:

1. Perform a criminal background check
2. Consult with any child abuse registry maintained by the State or locality in which the employee would work (ChildLine)
3. Make its best effort to contact all prior institutional employees for information on substantiated allegations of sexual abuse or any allegation of resignation during a pending investigation of an allegation of sexual abuse, consistent with Federal, State, and local laws."

During the past 12 months, there were fifty-three (53) employees hired at Cove PREP who may have contact with residents. This auditor reviewed twelve (12) randomly selected staff files contained in the above-mentioned background information. This was also confirmed during an interview with a Human Resource staff. In addition, the PREA Coordinator was able to describe the agency's hiring and promotion process in detail to this auditor.

d) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that contractor agencies shall ensure all criminal background checks are conducted and documented prior to service for employees who may have contact with

residents. Additionally, background checks will be completed no less than every three (3) years. Proof of criminal background checks shall be provided to Cove PREP.

During the past 12 months, there were four (4) contractors approved to enter Cove PREP to have contact with residents. This auditor requested and was provided background checks for the four (4) approved to enter the facility to confirm compliance with this standard.

e) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states, Cove PREP shall conduct all criminal background checks no less than every three (3) years for current employees.

In addition, the policy states, "Cove PREP shall ensure all criminal background checks are conducted prior to service, for educational staff assigned to Cove PREP."

Background checks will be completed every three (3) years on their anniversary of hire/contract date.

During interviews with a Human Resource staff and the PREA Coordinator, it was noted that when a person is hired at Cove PREP, their name is registered in a national database that tracks any contacts with law enforcement agencies. During interview with the Human Resources staff, she stated that the facility does a FBI, State Police, Sex Abuse Registry, and Child Abuse checks every three (3) years for all employees, contractors, and volunteers. The facility also conducts a Pennsylvania Sterling screen every three (3) years which includes a sex offender check. Checks are made to the statewide Central Register of Child Abuse and Maltreatment every three (3) years for current employees and any employee eligible for promotion. This auditor was able to review twelve (12) randomly selected staff files to confirm the above-mentioned practice has been implemented and is being adhered to.

f) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy notes applicants are required to report their application for employment any arrests that may impact their ability to work with youth. Applicants are asked directly in written applications and/or interviews for hiring or promotion, and in any interviews or written self-evaluations conducted as part of reviews of current employees.

g) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states, "Material omission regarding such misconduct or the provision of materially false information shall be grounds for termination."

This screening process noted above was confirmed during an interview with a Human Resources staff as well as reviewing twelve (12) randomly selected employees background checks. The employment application allows prospective employees to disclose their criminal history prior to a background check being completed.

The Human Resource staff noted that when requested, Cove PREP does provide

	<p>information on substantiated or 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.</p> <p>Reviewed documentation to determine compliance:</p> <ul style="list-style-type: none"> • Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Pa. Department of Human Services 3800 Child Care Regulations • Pa. Department of Human Services Licensing and Inspection Summary • Pa. Child Protective Services Law • Review of twelve (12) randomly selected staff files for background checks • Review of Contractors Background Checks • Files of Contractor Clearances <p>Interviews:</p> <ul style="list-style-type: none"> • Interview with Director of Operations • Interview with the PREA Coordinator • Interview with the Human Resource staff
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115.318	Upgrades to facilities and technologies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) Cove PREP develops a Staffing Plan on an annual basis. The facility's most recent Annual Vulnerability Assessment (Video Surveillance and Staffing Plan) was provided to this auditor prior to the on-site portion of this audit and was reviewed during the interview with the PREA Coordinator during the on-site portion of this audit. The Staffing Plan was not dated and not signed by the PREA Coordinator, Director of Operations, or the Chief Executive Officer prior to the audit.</p> <p>The facility does not meet this standard based on failing to provide documentation of an annual review of the Staffing Plan prior to the audit. Cove PREP will be placed on 120-day Corrective Action. The facility will be required to date and sign the Video Surveillance and Staffing Plan and provide monthly meeting documentation of their review of this document.</p> <p>There have been no expansion or modification projects completed at Cove PREP since the last PREA audit in 2020. The video surveillance system was updated in 2019.</p> <p>Through interviews with the Director of Operations and the PREA Coordinator it was confirmed that if there are any additional plans for expansion or modifications at</p>

Cove PREP, the agency will take into consideration the possible need to increase video monitoring and to further review monitoring technology to protect residents from sexual abuse.

b) The Video Surveillance and Staffing Plan noted there were eighty-five (85) cameras (72 interior cameras and 13 exterior cameras). The facility's camera system is monitored by staff. The facility has a video surveillance system which provides coverage of all housing units, hallways, stairwells, recreational areas, dining room, and educational classrooms. Any modifications, upgrades, expansions to the facility will include consideration of such design, acquisition, expansion, or modification will impact or enhance the ability to protect residents from sexual abuse and/or sexual harassment. This was confirmed during interviews with the Director of Operations and PREA Coordinator.

The facility does not meet this standard based on failing to provide documentation of an annual review of the Staffing Plan prior to the audit. Cove PREP will be placed on 120-day Corrective Action. The facility will be required to date and sign the Video Surveillance and Staffing Plan and provide monthly meeting documentation of their review of this document.

Cove PREP reviewed their staffing plan on a monthly basis during their administrative team meeting. They discussed total number of staff, total vacancies, and special watches. Minutes from these meetings were sent to this auditor to confirm that the staffing plan is discussed on a monthly basis. This auditor interviewed members of the administrative team during the corrective action period to confirm the staffing plan was discussed. Cove PREP is now in compliance with this standard.

Reviewed documentation to determine compliance:

- Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy
- Cove PREP Annual Vulnerability Assessment (Video Surveillance and Staffing Plan)
- Tour of the facility

Interviews:

- Interview with Director of Operations
- Interview with PREA Coordinator

115.321	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

a) Cove PREP does conduct administrative investigations for sexual abuse and sexual harassment. Cove PREP does have four (4) certified investigators. All allegations are also reported to Pa ChildLine. An investigator from the Westmoreland County Children and Youth Services conducts administrative investigations. A representative from the Westmoreland County Children and Youth Services was contacted and stated that all agents who conduct investigations at Cove PREP have been trained in uniform evidence protocol. Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states that all allegations of sexual abuse and/or sexual harassment shall be referred for investigation by law enforcement unless the allegation does not involve potentially criminal behavior. Pennsylvania State Police are responsible for conducting criminal investigations. A representative from the Pennsylvania State Police was contacted and he verified this process. Cove PREP has a MOU with Pennsylvania State Police which was verified by this auditor.

b) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that the protocol shall be developmentally appropriate for youth and shall be adapted from a comprehensive and authoritative proceedings and criminal prosecutions.

The Director of Operations, PREA Coordinator, Clinical Director, and nurse stated during their interviews that Excelsa Health Latrobe Hospital is where a resident would be transported for a forensic examination by a SANE/SAFE. Cove PREP has a Memorandum of Understanding with Excelsa Health Latrobe Hospital that confirms Excelsa Health Latrobe Hospital will provide a forensic examination conducted by a Sexual Assault Nurse Examiner or a similarly credentialed examiner with the patient's consent. This examiner will collect and maintain the integrity of evidence collected during the examination for law enforcement. Excelsa Health Latrobe Hospital will also contact Blackburn Center (member of the Pa. Coalition Against Rape, PCAR) to send an advocate to Excelsa Health Latrobe Hospital.

c) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states, that Cove PREP offers residents who experience sexual abuse access to forensic medical examination, without financial cost, where evidentiary or medically appropriate.

In reviewing documentation, there were no incidents of sexual abuse at Cove PREP during the past 12 months that involved penetration and required a resident to be transported to Excelsa Health Latrobe Hospital for a forensic examination by a SANE/SAFE.

d) The PREA Coordinator provided this auditor with a Memorandum of Agreement with Blackburn Center (PCAR) that states a victim advocate would be dispatched to the hospital to provide rape crisis counseling and advocacy services to the victim.

The Director from Blackburn Center (PCAR) was interviewed via phone by this auditor and confirmed an advocate would respond to Excelsa Health Latrobe Hospital to provide rape counseling, emotional support, and advocacy services to any victim of sexual abuse. She also stated that they recently visited the facility and met with

the residents and staff to explain their services to them.

e) Cove PREP has a Memorandum of Agreement with Blackburn Center (PCAR) which states an advocate would be contacted to accompany and support the victim through the forensic medical examination process and investigatory interviews.

This advocate would also provide emotional support, crisis intervention, information, and referrals. This auditor was provided a copy of the Memorandum of Agreement with Blackburn Center (PCAR) to review prior to the on-site portion of this audit. In addition, this auditor was able to interview a representative from Blackburn Center (PCAR) to confirm the services listed in the Memorandum of Agreement are available to any resident victim of sexual abuse at Cove PREP.

f) Cove PREP and the Westmoreland County Children and Youth Services conduct sexual abuse and sexual harassment administrative and criminal investigations. All alleged incidents of sexual abuse and sexual harassment which may be criminal in nature are also reported to other appropriate authorities as required to the Pennsylvania State Police.

An interview with a representative from Pennsylvania State Police confirmed this agency complies with all PREA investigative standards when completing an investigation at Cove PREP. The Pennsylvania State Police only conduct criminal investigations. If the allegation does not meet the criteria for a criminal prosecution or crime, the investigation is closed. Cove PREP does follow up with an administrative investigation.

Cove PREP has four (4) trained investigators that received their certificates of completion through the NIC Academy Division. This auditor received the training curriculum and training certificates of the three (3) staff certified as investigators. The certificate states the individual has completed the on-line PREA course: Investigating Sexual Abuse in a Confined Setting presented by the National Institute of Corrections. The investigators took the NIC Investigators training prior to the on-site portion of the audit. Cove PREP did not have any trained investigators in the past and just completed the NIC training one (1) month prior to the on-site portion of the audit.

There were no reported allegations during the past twelve (12) months that required forensic exams. This was confirmed during interview with the Facility Director and medical staff.

Reviewed documentation to determine compliance:

- Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy
- MOU with Excelsa Health Latrobe Hospital
- MOU with Blackburn Center (PCAR)
- MOU with Pennsylvania State Police
- NIC certificates of Investigation Training
- NIC Training Curriculum for Investigations

	<p>Interviews:</p> <ul style="list-style-type: none"> • Interview with Director of Operations • Interview with PREA Coordinator • Interview with Nursing Coordinator • Interview with Clinical Director • Interview with the Cove PREP Investigator • Interview with representative from Excelsa Health Latrobe Hospital • Interview with Director of Blackburn Center (PCAR) • Interview with representative from Pennsylvania State Police
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115.322	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that any reports (direct, indirect, third party) received involving sexual abuse and/or sexual assault shall be immediately called into ChildLine. It requires that all allegations of sexual abuse and sexual harassment be investigated. It requires that all allegations that may be criminal in nature be referred to law enforcement. Cove PREP will refer the allegations of sexual abuse and sexual harassment to the Pennsylvania State Police. The State Police will look into the allegation and only investigate it if it meets their criteria. Cove PREP has four (4) trained investigators to conduct administrative investigations. All Cove PREP staff are mandated reporters of abuse and all staff interviewed were aware of their obligations to report abuse under Pennsylvania law.</p> <p>b) As noted in the Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy, all allegations of sexual abuse and sexual harassment are referred to Pa ChildLine for investigation. Interviews with the Chief Executive Officer and PREA Coordinator confirmed that during an open investigation, communication is maintained between the Westmoreland County Children and Youth Services and Cove PREP through telephone calls, emails, and on-site visits. An interview with a representative from the Westmoreland County Children and Youth Services also confirmed these statements.</p> <p>Information regarding the referral of allegations of sexual abuse and sexual harassment for investigation and other PREA related information is posted on the agency website. PREA related information is also posted in the facility in each living unit, common areas, and visiting areas. These posters were observed by this auditor during the tour of the facility.</p> <p>c) The Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states</p>

that the agency shall request the investigating agency conduct investigations in compliance with PREA standards.

A representative from the Westmoreland County Children and Youth Services was contacted and stated her agency completes thorough investigations on each incident and sends a detailed report to the PREA Coordinator noting their findings, determinations, and recommendations at the completion of each investigation. The PREA Coordinator noted that following the facility receiving an investigative report from the Westmoreland County Children and Youth Services indicating an Unsubstantiated or Substantiated determination regarding a sexual abuse investigation, a PREA Abuse Incident Review is conducted by the Incident Review Team.

There were no allegations of sexual abuse during the past 12 months at Cove PREP.

Cove PREP has four (4) trained investigators that received their certificates of completion through the NIC Academy Division. This auditor received the training curriculum and training certificates of the four (4) staff certified as investigators. The certificate states the individual has completed the on-line PREA course: Investigating Sexual Abuse in a Confined Setting presented by the National Institute of Corrections.

There were no allegations reported during the past twelve (12) months at Cove PREP. Thus, there were no investigative reports to review.

Reviewed documentation to determine compliance:

- Pennsylvania Child Protective Services Law
- Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy
- MOU with Pennsylvania State Police
- Agency Website
- NIC certificates of Investigation Training
- NIC Training Curriculum for Investigations

Interviews:

- Interview with Chief Executive Officer
- Interview with PREA Coordinator
- Interview with representative from Westmoreland County Children and Youth Services
- Interview with representative from Pennsylvania State Police

Auditor Overall Determination: Meets Standard

Auditor Discussion

a) Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that all employees must receive training that is specific to juveniles and the gender of the population they are working with. Employees must sign an acknowledgement verifying that they understand the training they received. Current employees must receive this training and receive refresher training annually. This training must include the following critical subjects:

1. The agency's policy on zero tolerance for sexual abuse and sexual harassment.
2. How to fulfill their responsibilities under agency sexual misconduct prevention, detecting, reporting, and response policy and procedures.
3. Residents' right to be free from sexual abuse and sexual harassment.
4. The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment in juvenile facilities.
5. Dynamics of sexual abuse and sexual harassment in confinement.
6. Common reactions of sexual abuse and sexual harassment of juvenile victims.
7. How to detect and respond to signs of threatened and actual sexual misconduct.
8. How to avoid inappropriate relationships with residents.
9. How to communicate effectively and professionally with residents, including those who identify as lesbian, gay, transgender, intersex, or gender non-conforming.
10. How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.
11. Relevant laws regarding the applicable age of consent.

All employees receive an initial training during orientation. Trainings received by all staff is documented and indicated staff members acknowledge that they received the training and understood the training. Current employees who received this training, receive refresher training annually.

All staff interviewed reported that they received initial PREA training/annual refresher on all areas noted in this standard. All staff interviewed were aware of their obligations related to PREA, their obligations as mandated reporters of abuse, their duties as first responders, and the facility protocols related to evidence collection. Interviews with staff members also confirmed they receive the training and understood the material that was covered in the training they received. This auditor was able to review the Training Roster and confirm they had appropriate staff members signatures and noted if they understood the training they received.

b) PREA training is provided specific to the facility annually.

In addition to the above-mentioned trainings, staff also received mandated reporter training. Staff were able to discuss their mandated reporter responsibilities as well as their first responder responsibilities.

During the on-site portion of this audit, it was noted that posters are posted throughout the facility to educate both staff and residents on agency PREA policies.

c) Cove PREP current employees must receive the initial PREA training and refresher training annually. This auditor reviewed training records and confirmed all staff completed the annual trainings/refreshers on a yearly basis. Interviews with staff also confirmed they receive the trainings/refreshers on a monthly / annual basis and understood the material that was covered in the trainings/refreshers they received.

d) All staff who successfully completed the annual PREA training must document through employee signature that employees understand the training they have received. This auditor was able to review the Cove PREP PREA Training Roster and confirmed they had the appropriate staff signatures and noted if they understood the training they received.

Interviews with randomly selected staff confirmed they are knowledgeable of PREA. Staff demonstrated their knowledge of PREA and the residents' and staff's rights to be free from retaliation for reporting allegations of sexual abuse and sexual harassment during interviews. Staff were also able to note the appropriate steps they would take to protect residents of imminent sexual abuse as well as their role as a first responder.

Reviewed documentation to determine compliance:

- Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy
- Pennsylvania Department of Human Services 3800 Child Care Regulations
- Pre-Audit Questionnaire
- PREA Training Curriculum
- Mandated Reporter Curriculum
- Training Roster
- Training files of contractors
- Random employee files

Interviews:

- Interview with the Director of Operations
- Interview with the PREA Coordinator
- Interviews with random staff

Auditor Overall Determination: Meets Standard

Auditor Discussion

a) Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that Cove PREP shall ensure that all volunteers have been trained on their responsibilities with respect to the prevention, detection, and response to sexual abuse and/or sexual harassment. The Zero Tolerance of Sexual Abuse and/or Sexual Harassment for contractors and volunteers' pamphlet shall be provided and sign-off obtained and maintained on file.

Cove PREP reported that there were four (4) contractors, zero (0) volunteers, and no student interns are currently approved to enter the facility. During the past 12 months, there have been four (4) contractors and zero (0) volunteers approved to enter the facility.

During an interview with the PREA Coordinator, it was noted that prior to entering the facility, all volunteers, student interns, and contractors are given PREA Brochures, Volunteer/Contractor/Intern Training and Acknowledgement Form to review and sign off indicating they have received the training and understood it.

b) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that Cove PREP shall ensure that all contracting entities have received and understood their responsibilities with respect to prevention, detection, and response to sexual abuse and/or sexual harassment.

c) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states the PREA volunteer, student intern, and contractor Sign-Off shall be completed; documentation shall be maintained by the PREA Coordinator.

The PREA Coordinator was able to explain the process of educating a volunteer/contractor prior to them entering the facility to ensure they are aware of the agency zero-tolerance policy, their duty to report, and the importance of appropriate interactions with the residents.

There have been four (4) contractors approved to enter the facility during the past 12 months. This auditor requested and received signed Volunteer/Contractor/Intern Training and Acknowledgement Forms for four (4) contractors approved to enter Cove PREP during the past 12 to confirm they received training prior to entering the facility and having contact with residents.

Interview with a contracted employee, reported that they would report any allegation of sexual abuse and/or sexual harassment to their supervisor. They would also report to Pa ChildLine either by phone or email. The contracted employee acknowledged receiving PREA training annually. This auditor was able to verify this through training records.

Reviewed documentation to determine compliance:

	<ul style="list-style-type: none"> • Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Pre-Audit Questionnaire • PREA Brochure for Contractors • Training logs • Signed Training Acknowledgements for Contractors and Volunteers <p>Interviews:</p> <ul style="list-style-type: none"> • Interview with PREA Coordinator • Interview with contractor
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115.333	Resident education
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states that all juveniles, upon intake, shall receive verbal and written information about sexual misconduct during their orientation. The information shall address:</p> <ol style="list-style-type: none"> 1. Their right to have confidential access to their attorney or other legal representation; 2. Their right to have reasonable access to parents or legal guardians; 3. How to report incidents or suspicions of sexual abuse or sexual harassment; 4. The facility’s process and procedure for a resident to file a grievance; 5. The facility’s process and procedure for accessing the facility’s client advocate; 6. How to access outside victim advocates for emotional support services related to sexual abuse (this information shall include mailing addresses and telephone numbers, including toll-free numbers of available local, state and/or national victim advocacy or rape crisis organizations); 7. For individuals being admitted to the facility solely for civil immigration purposes, mailing addresses, telephone numbers (including toll-free hotlines were available) of immigrant service agencies; 8. The extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws; 9. Information related to the Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy; 10. Information related to the agency’s policy against for reporting sexual abuse, sexual harassment or cooperating with an investigation; 11. For transgender and intersex youth, information related to their right to shower separately and;

12. Comprehensive education in person via a video recording:

- Their right to be free from sexual abuse and sexual harassment
- Their right to be free from retaliation for reporting sexual abuse or harassment
- The agency's response policies and procedures for responding to reports of sexual abuse or sexual harassment

a) The Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states that upon admission, youth must be informed of the Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy on excessive use of force, sexual abuse, and sexual harassment.

In addition, Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states upon during intake, Cove PREP shall provide age-appropriate education to residents, in person about their rights to be free from sexual abuse and sexual harassment, and free from retaliation for reporting allegations of sexual abuse and sexual harassment. Youth must be provided information concerning prevention, intervention, self-protection, reporting of sexual abuse and the agency's zero tolerance policy."

This auditor was able to review copies of PREA pamphlets and Blackburn Packet Information. All residents receive these pamphlets upon admission to Cove PREP. They are available in both English and Spanish. Upon receiving the pamphlets at intake, each resident signs an acknowledgement form noting they received these pamphlets. This auditor was able to review twelve (12) randomly selected resident files to confirm each resident received the PREA education pamphlets and signed an acknowledgement form noting they received the pamphlets. Residents interviewed were knowledgeable of PREA and were able to articulate ways they can report sexual harassment and sexual abuse. In addition, all residents interviewed confirmed they received PREA education during their intake (day of admission to the facility).

b) Cove PREP reports there were fifty-three (53) residents admitted to the facility whose stay was 10 days or longer during the past 12 months. All fifty-three (53) of the residents received comprehensive PREA education following their intake into the facility. The facility delivers comprehensive PREA education to each resident following the intake process (during their first day at the facility). This education included their right to be free from both sexual abuse and sexual harassment and retaliation for reporting such incidents. This auditor reviewed twelve (12) randomly selected resident files and confirmed all twelve (12) of the files noted these residents received their comprehensive PREA education during intake. All residents interviewed confirmed they received comprehensive PREA education during their first day of being admitted into the facility. Each resident's file had a signed acknowledgement form noting they received the comprehensive PREA education.

c) The Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states that youth who are transferred from another facility must receive this information again

to the extent that the information from the previous facility differs from their new facility.

In addition, Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states that youth must be informed of the zero-tolerance policy on excessive force, sexual abuse, and sexual harassment.

Nursing Coordinator interviewed reported each resident admitted into Cove PREP receives PREA education during the intake process. The Nursing Coordinator stated that they pass the PREA education to a staff member on the unit and that they do not review this with the resident. Unit staff do complete the process with the resident. Some residents that were interviewed stated that staff just give them the packet and have them sign off acknowledging they have received their PREA education. This practice does not meet compliance with the standard. The residents are not read the PREA education nor is there any follow up regarding comprehensive PREA education. During the on-site portion of the audit, the Chief Executive Officer identified five (5) staff that would be responsible for educating residents upon admission regarding their rights to be free from sexual abuse and sexual harassment; as well as review the Blackburn Center information and pamphlets with each resident. This will be followed up on by comprehensive PREA education by the resident's therapist between day 7-10 after intake. Cove PREP does not comply with this standard and will be placed on a 120-day Corrective Action period. Cove PREP will be required to submit all signed acknowledgements of residents that they received their initial PREA education upon intake and their comprehensive PREA education between day 7 and 10. They will submit these documents to this auditor during the 120-day Corrective Action period.

All residents interviewed confirmed they received comprehensive PREA education during their intake at the facility. They also acknowledged reviewing and receiving the PREA pamphlets upon intake.

d) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that Cove PREP shall provide residents education in formats accessible to all residents, including those who are limited English proficient or otherwise disabled, as well as to residents who have limited reading skills.

Language assistance resources are available through Optimal Phone Interpreters. They also provide Braille for the blind and a hearing specialist for the deaf. Facility must not rely upon youth interpreters, youth readers or other types of youth assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could jeopardize a youth's safety, the performance of first responder duties subject to section 115.364 of the PREA Juvenile Standards, or the investigation of the youth's allegations. All education and information must be made available in formats accessible to all youth (limited English, deaf, visually impaired, or otherwise disabled, as well as limited reading skills).

Interview with Clinical Director and Nursing Coordinator confirmed all PREA education information is communicated in a language clearly understood by the resident, during the intake process and during the resident's first day at the facility.

Language assistance resources are available through Optimal Phone Interpreters. The facility also ensures that key information about PREA is continuously and readily available or visible through posters, the Resident Handbook, and PREA pamphlets in both English and Spanish. This auditor was able to confirm this material was available in both English and Spanish during the tour of the facility and by reviewing the Resident Handbook and PREA pamphlets that all residents receive.

This auditor interviewed three (3) cognitively disabled residents residing at Cove PREP during the on-site portion of this audit. These residents confirmed all PREA education materials were explained to them in a language they understood, and the staff took the time to answer any questions they had. There were no limited English proficient residents residing at the facility during the on-site portion of this audit. It was noted there have been no limited-English proficient residents admitted into Cove PREP during the past 12 months.

e) Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that receipt of the above (PREA) education and information must be documented for each youth.

All resident intake PREA education are documented on acknowledgment forms. These acknowledgement forms are signed and dated by the resident upon receiving the intake PREA education information. During the on-site portion of the audit the PREA Coordinator modified the existing form to include the staff's name who delivered the education along with the date. In addition, each resident receives the PREA education pamphlets and Resident Handbook upon intake into the facility. Each resident signs an acknowledgment form noting they received these pamphlets. These acknowledgement forms are kept in the resident's file. This auditor was able to review twelve (12) resident files and each file contained the above-mentioned documentation confirming the resident received the PREA pamphlets during and the PREA education withing 24 hours of being admitted into the facility.

f) At intake, all residents receive PREA pamphlets and the Resident Handbook. These pamphlets include information about the agency's zero tolerance policy and reporting information noting ways to report an allegation of sexual abuse or sexual harassment. In addition, there were visible posters (in both English and Spanish) in the hallways, all common areas, visiting areas, and in the living units of the facility that were viewed by this auditor during the on PREA during on-site portion of the audit. All residents interviewed stated they have been educated on PREA during their first day. All residents were also provided with a Resident Handbook and Blackburn Center during intake that has telephone numbers to report any sexual abuse or sexual harassment.

All residents are provided PREA education. All residents interviewed stated they were educated about PREA upon admission during their intake process. The residents were knowledgeable about PREA, zero tolerance policy, their right to be free from sexual abuse and sexual harassment, their right to be free from retaliation

for reporting, and were aware of multiple ways to report sexual abuse and sexual harassment (internally and externally).

Cove PREP is not in compliance with this standard. All residents must receive initial PREA education that must be read to them in a language clearly understood to the resident. Each resident must receive comprehensive PREA education by their therapist between 7-10 days of admission. This must be documented and signed by the resident that he received the PREA education and understood the contents of the PREA education. The staff delivering the comprehensive education must also sign and date the form. The new form was created by the PREA Coordinator during the on-site portion of the audit. Cove PREP will be placed on a Corrective Action for 120 days. They will be required to change the verbiage in the PREA policy and required to submit all signed resident acknowledgement forms of new intakes to verify they received their initial PREA education and their comprehensive PREA education by their therapist between days 7 and 10 while on the 120-day Corrective Action period. The facility will be required to submit monthly documentation to this auditor to confirm all residents received their initial PREA education upon intake and their PREA comprehensive education by their therapist between day 7 and 10.

Cove PREP had 27 new admits during the corrective action period. All residents were provided with the initial PREA education upon admission to the facility. Staff that conducted the youth intake also provide the intake PREA education. The clinical therapist followed the initial PREA education with a comprehensive PREA education on day 7-10. The facility submitted documentation for the initial PREA education upon admission and for the comprehensive PREA education on day 7-10. Staff and residents signed both forms. This auditor interviewed intake staff and a clinical therapist during the corrective action period to review their roles and confirm at this process is intact. This auditor also interviewed randomly selected youth that were admitted during the corrective action period to confirm they were provided the initial PREA education upon admission and then the comprehensive education by their clinical therapist between days 7-10. Cove PREP forwarded all signed forms by staff and youth to this auditor of youth that were admitted during the corrective action period and uploaded these documents into the portal. Cove PREP is now in compliance with this standard.

Reviewed documentation to determine compliance:

- Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy
- Pre-Audit Questionnaire
- PREA Brochures in English and Spanish
- Resident PREA Acknowledgement Form
- PREA Resident Pamphlet and Resident Orientation Booklet
- Posters for Reporting Sexual Abuse and Sexual Harassment in English and Spanish
- Twelve (12) resident files PREA Education Program Curriculum
- Resident Handbook
- MOU with Optimal Phone Interpreters

	<ul style="list-style-type: none"> • PREA Admission Tracking Sheet • Blackburn Packet Information <p>Interviews:</p> <ul style="list-style-type: none"> • Interview with Nursing Coordinator who conducts PREA Education at Intake • Interviews with Clinical Director • Random resident interviews • Interviews with three (3) cognitively disabled residents
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115.334	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) Westmoreland County Children and Youth Services is the entity outside of the agency responsible for the administrative investigations of allegations of sexual abuse and sexual harassment. Westmoreland County Children and Youth Services has responsibility for administrative investigations of all PREA related allegations and incidents. All criminal investigations are conducted by the Pennsylvania State Police.</p> <p>b-d) Westmoreland County Children and Youth Services is responsible for the administrative investigation of all allegations of sexual abuse and sexual harassment at Cove PREP. A representative from Westmoreland County Children and Youth Services was interviewed and confirmed all investigators complete the PREA training. This training covers the topics of interviewing juvenile sexual abuse victims; proper use of Miranda and Garrity warnings; sexual abuse evidence collection in confinement settings; and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.</p> <p>Cove PREP has four (4) agency investigators that have completed the required specialized training in conducting sexual abuse investigations. This auditor interviewed one (1) investigator who described the training in detail.</p> <p>In addition, the PREA Coordinator and Director of Operations were able to confirm all allegations of sexual abuse and sexual harassment are referred to Pa ChildLine and Pennsylvania State Police for investigation.</p> <p>All staff members interviewed were aware that Westmoreland County Children and Youth Services complete all non-criminal sexual abuse and sexual harassment investigations and the Pennsylvania State Police conduct all criminal investigations.</p> <p>Cove PREP has four (4) trained investigators that received their certificates of</p>

	<p>completion through the NIC Academy Division. This auditor received the training curriculum and training certificates of the four (4) staff certified as investigators. The certificate states the individual has completed the on-line PREA course: Investigating Sexual Abuse in a Confined Setting presented by the National Institute of Corrections.</p> <p>There were no allegations reported during the past twelve (12) months at Cove PREP.</p> <p>Reviewed documentation to determine compliance:</p> <ul style="list-style-type: none"> • Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • MOU with Pennsylvania State Police • NIC certificates of Investigation Training • NIC Training Curriculum for Investigations <p>Interviews:</p> <ul style="list-style-type: none"> • Interview with Director of Operations • Interview with PREA Coordinator • Interview with Facility Investigator • Interview with representative Pennsylvania State Police
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115.335	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states that all full time and part time medical and mental health practitioners who work at Cove PREP shall be trained in no less than: detecting and assessing signs of sexual abuse and harassment; preserving physical evidence of sexual abuse; responding effectively and professionally to victims of sexual abuse and harassment; and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment.</p> <p>There are currently two (2) medical staff and six (6) mental health staff employed at Cove PREP. Training records reviewed by this auditor confirmed all medical and mental health staff at the facility completed the required specialized trainings. Medical and mental health staff confirmed they received the trainings and understood the material specific to their job title.</p> <p>b) Cove PREP does not conduct forensic examinations. In the event of an allegation of sexual abuse with penetration, forensic examinations are conducted at Excelsior</p>

Health Latrobe Hospital by SANE/SAFE. A Memorandum of Understanding (MOU) is in place with Excelsa Health Latrobe Hospital that confirms Excelsa Health Latrobe Hospital will provide a forensic rape examination conducted by a Sexual Assault Nurse Examiner (SANE) or other similarly credentialed examiner. This auditor was provided with a copy of the Memorandum of Understanding with Excelsa Health Latrobe Hospital to confirm compliance.

c) This auditor received and reviewed medical and mental health staff training records, training certificates, and sign off/acknowledgement forms at Cove PREP. In addition, interviews with medical and mental health staff confirmed they had received and understood the specialized trainings they received specific to their job title.

d) As noted in the Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy, mental health staff and medical staff also receive the PREA training all staff at the facility are required to complete on an annual basis. Mental health and medical staff interviewed were knowledgeable of the PREA standards and their roles regarding sexual abuse and sexual harassment prevention, detection, and response at Cove PREP. This auditor was able to review mental health staff training records to confirm they received and successfully completed the annual PREA training that all staff at Cove PREP are required to complete. This was also confirmed during interviews with medical and mental health staff at the facility. All medical and mental health staff have completed the on-line PREA Training, and this auditor reviewed certificates of completion.

Reviewed documentation to determine compliance:

- Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy
- MOU with Excelsa Health Latrobe Hospital
- Employee Training Curriculum
- Documentation of PREA Training for Medical and mental health staff
- Training Logs
- NIC Certificates of Completion of Medical Training
- Medical and Mental Health Specialized Training logs

Interviews:

- Interview with Nursing Coordinator
- Interview with Clinical Director
- Interview with representative from Excelsa Health Latrobe Hospital

115.341	Obtaining information from residents
	Auditor Overall Determination: Meets Standard

Auditor Discussion

a) Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy addresses the use of the Vulnerability Assessment Instrument, Risk of Victimization, and/or Sexually Aggressive Behavior in that it shall be administered within seventy-two (72) hours of intake to obtain information about each resident's personal history and behavior to reduce the risk of sexual abuse by or toward a resident. The Vulnerability Assessment Instrument is used to obtain victimization or abusiveness, current charges, mental health and/or developmental status, and placement history.

The policy states that the results of the Vulnerability Assessment are utilized when making program, room assignments, and determining the appropriate level of supervision necessary.

This auditor discussed the Vulnerability Assessment Instrument (VAI) with a staff who completes the form and the PREA Coordinator. The Vulnerability Assessment Instrument (VAI) is completed by the Nursing Coordinator. Residents are reassessed periodically (a minimum of every 6 months) after the initial screening by a mental health staff. All staff interviewed were aware this screening is used to protect residents from sexual abuse while being housed at Cove PREP.

During the past 12 months, there were fifty-three (53) residents admitted to Cove PREP whose length of stay in the facility was for 72 hours or longer. All Cove PREP residents admitted to the facility were screened for risk of sexual victimization or risk of sexually abusing other residents within seventy-two (72) hours by being administered the Vulnerability Assessment Instrument. This auditor was able to confirm the Vulnerability Assessment Instrument is completed upon intake by interviewing a Nursing Coordinator who completes the assessment and by reviewing the database that logs the Vulnerability Assessment Instrument with the PREA Coordinator.

Interviews with residents confirmed the Vulnerability Assessment Instrument (VAI) is completed as noted in the above-mentioned policy as all residents interviewed stated they were asked questions when they first arrived as to whether they had ever been sexually abused, if they had any disabilities, or if they were fearful of sexual abuse while at Cove PREP. Twelve (12) current resident files were reviewed for documentation verifying the risk assessments were being completed as per the above-mentioned policy. All the files reviewed had the above-mentioned screening (VAI) completed within 72 hours of intake and periodically throughout the resident's stay at the facility.

b) The Vulnerability Assessment Instrument (VAI) is an objective screening assessment commonly used to conduct risk assessments of each resident upon admission to the facility and periodically throughout their stay at the facility. The Nursing Coordinator who competes the VAI was interviewed and understood how to administer this screening and was aware of its importance in keeping residents safe from sexual abuse. The Nursing Coordinator interviewed was able to explain how she reviews case history notes and behavior records of the resident prior to intake

and then administers the VAI to the resident by completing a one-on-one interview during the intake process.

c) The Vulnerability Assessment Instrument attempts to ascertain information about: prior sexual victimization or abusiveness; any gender non-conforming appearance or manner of identification as lesbian, gay, bisexual, transgender, or intersex, and whether the youth may therefore be vulnerable to sexual abuse; current charges and offense history; age; level of emotional and cognitive development; physical size and stature; mental illness or mental disabilities; physical disabilities; the youth's own perception of vulnerability; and any other specific information about the individual youth that may indicate needs for heightened supervision, additional safety precautions, or separation from certain other youth.

This auditor was able to review the VAI that is used to screen residents at Cove PREP and confirms this tool captures the information required in this standard. A review of twelve (12) randomly selected resident files confirmed the VAI is being completed within 72 hours of intake and periodically throughout the resident's stay at Cove PREP after the initial screening is completed.

d) Interviews with the PREA Coordinator and Nursing Coordinator revealed that the Nursing Coordinator interview each resident face to face upon admission. Each resident is then reassessed periodically throughout their stay by a clinical staff. It was noted that the initial screening is completed during the resident's intake on their first day at the facility (no later than 72 hours after their admission). During an interview, the Nursing Coordinator who completes the VAI also stated they use case history notes and behavioral record when completing the initial VAI during intake.

e) All completed VAIs are securely kept in the resident's file and have restricted access for mental health and administrative staff at Cove PREP. All pertinent necessary information is recorded and communicated to staff for housing assignments or additional supervision purposes only to ensure sensitive information is not exploited to the resident's detriment by staff or other residents. During an interview with the PREA Coordinator, this auditor was able to review resident files which were kept secured to confirm confidentiality of the documents. In addition, interviews with staff confirmed all pertinent information is documented in the logbook to ensure all staff are aware of any precautions implemented to protect the resident(s) at the facility.

Reviewed documentation to determine compliance:

- Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy
- Pre-Audit Questionnaire
- Vulnerability Assessment Instrument: Risk of Victimization and/or Sexually Aggressive Behavior
- Completed Vulnerability Assessment Instruments for twelve (12) residents
- Six-month Reassessments

	<ul style="list-style-type: none"> • Tracking logs of all admissions • Review of resident files <p>Interviews:</p> <ul style="list-style-type: none"> • Interview with the Director of Operations • Interview with PREA Coordinator • Interview with Nursing Coordinator that performs screening for risk of victimization and abusiveness • Interviews with random residents
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115.342	Placement of residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy pertaining to screening/assessing residents at intake states that residents who are determined as a potential risk will not be singled out, however will be closely monitored by staff and their behavior will be evaluated throughout their stay. Housing/room decisions for each youth will be based on the risks determined by the intake screen and Assessment Instrument, as well as any information ascertained through conversations during the intake process and medical and mental health screenings with the goal of keeping all residents safe and free from sexual abuse.</p> <ol style="list-style-type: none"> 1. Lesbian, gay, bisexual, transgender, or intersex residents shall not be placed in particular housing, bed, or other assignments solely on the basis of such identification or status, nor shall agencies consider lesbian, gay, bisexual, transgender, or intersex identification or status as an indicator of likelihood of being sexually abusive. 2. All housing placements will be made with the sole intention of ensuring the resident's health and safety. 3. Transgender or Intersex resident's safety evaluation shall be reassessed every thirty (30) days to review any threats to safety and each transgender or intersex's own views, with respect to his or her own safety, shall be given serious consideration. 4. Transgender or Intersex residents shall follow the Cove PREP operating procedures regarding showering separately. <p>Isolation is not practiced and is prohibited by both the facility and the Pennsylvania</p>

Department of Human Services 3800 Child Care Regulations. Isolation was not used during the past twelve (12) months.

a) Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states youth are to be screened for potential vulnerabilities to victimize others with sexually aggressive behavior upon arrival/intake at Cove PREP. This screening will be documented using the Vulnerability Assessment Instrument and entered into the health records within 72 hours of admission. Living unit and room assignments must be made accordingly.

Interviews with the Nursing Coordinator and Clinical Director confirmed the Vulnerability Assessment Instrument is completed by the mental health staff within 72 hours of intake and living units and bedroom assignments are made accordingly to keep all residents at Cove PREP free from sexual abuse and sexual harassment. Both were able to discuss how the Vulnerability Assessment Instrument is used to place all residents in appropriate living units and bedroom assignments to ensure residents are kept safe at all times.

A review of the Vulnerability Assessment Instrument (VAI) supported this policy. Residents confirmed through interviews that screenings are being administered as per policy. Any residents who are identified as sexually vulnerable from the information noted on the VAI, would have a Safety Plan developed for them and this would be communicated to all staff to keep them safe. Safety Plans include increased supervision during waking hours or one-to-one supervision.

b) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that residents may be isolated from others only as a last resort when less restrictive measures are inadequate to keep them and other residents safe, and then only until an alternative means of ensuring residents' safety can be arranged. During any period of isolation, Cove PREP shall not deny residents daily large muscle exercise and are legally required educational programming or special education services. Residents that are isolated shall receive daily visits from a medical and/or mental health provider. Isolation is not practiced and is prohibited by both Cove PREP and by the Pa. Department of Human Services 3800 Child Care Regulations.

It was documented on the PAQ that there were no residents in isolation during the past 12 months at Cove PREP. Interviews with the Director of Operations and the PREA Coordinator confirmed Cove PREP has not used isolation to protect any resident at risk for sexual victimization during the past 12 months as the use of isolation is prohibited in Cove PREP. During the four of the facility, this auditor did not notice any areas where a resident could be isolated.

c) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that lesbian, gay, transgender, bisexual, or intersex youth shall not be placed in particular housing, bed, or other assignments solely on the basis of such identification, or status, nor shall Cove PREP consider lesbian, gay, transgender, bisexual, transgender, or intersex identification or status as an indicator of likelihood of being sexually abusive.

There were seventeen (17) residents residing at Cove PREP who identified as LGBTI during the time of the on-site portion of this audit. Four (4) residents were interviewed, three (3) that identified as being bi-sexual and one (1) identified as being transgendered. All four (4) residents stated that they are on units with generic residents and that they do not have a specific unit for gay, bi-sexual, or transgender residents. They said they program with all residents on their unit.

Interviews with the Director of Operations and the PREA Coordinator confirmed that under no circumstance would a resident be placed in a specific living unit or bedroom based solely on their sexual identification. The PREA Coordinator stated residents are placed in appropriate living units and bedrooms by using the results from the Vulnerability Assessment Instrument to ensure safety.

d) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that in reaching a determination of whether to assign a transgender or intersex youth to a housing and programming assignments, Cove PREP must consider on a case-by-case basis whether the placement would ensure the resident's health and safety, and whether the placement would present programmatic management and/or security problems.

There was one (1) transgender resident admitted to Cove PREP during the past 12 months. This transgender resident was interviewed during the on-site portion of the audit.

e) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that placement and programming for transgender and intersex youth must be reassessed at least twice a year or sooner if a complaint has been made, to review any threat to safety experienced by the youth.

There was one (1) transgender resident admitted to Cove PREP during the past 12 months. The Clinical Director and the Nursing Coordinator noted the resident's treatment plan and placement is reviewed monthly during Team Meetings with the resident. All members of the resident's treatment team attended these monthly meetings. There was one (1) transgender or intersex resident residing at Cove PREP during the on-site portion of this audit. The transgender resident was interviewed by this auditor during the on-site portion of the audit.

f) Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states, "Transgender and intersex youth's own views with respect to their own safety must be given serious consideration."

There was one (1) transgender resident admitted to Cove PREP during the past 12 months. An interview with the PREA Coordinator confirmed she ensures the resident's views are given serious consideration as staff are educated on how to interact professionally with all residents at the facility. There was one (1) transgender resident that was interviewed during the on-site portion of the audit. The transgender resident stated that his therapist checks with him on his safety on a regular basis.

g) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that

transgender and youth must be given the opportunity to shower separately from other youth. All residents at Cove PREP shower separately. All bathrooms are single-user bathrooms as was observed during tour of the facility.

There was one (1) transgender resident admitted to Cove PREP during the past 12 months. Interviews with the PREA Coordinator and staff confirmed that any transgender resident residing in the facility are given the opportunity to shower separately from the other residents. All staff interviewed stated that transgender and intersex residents would shower alone as well as any other resident because all bathrooms are single-user bathrooms. There was one (1) transgender resident residing at Cove PREP during the on-site portion of this audit. The resident was interviewed during the on-site portion of the audit and he stated that he showers alone and no one else can enter the bathroom because it is locked.

h-i) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that residents may be isolated from others only as a last resort when less restrictive measures are inadequate to keep them and other residents safe, and then only until an alternative means of ensuring residents' safety can be arranged. If a resident is isolated, the facility shall clearly document the incident in the logbook:

- The basis for the facility's concern for the resident's safety;
- The reason why no alternative means of separation can be arranged.

There were no residents at Cove PREP who were at risk of sexual victimization held in isolation during the past 12 months. The use of isolation is prohibited in the facility. Therefore, there was no documentation for this auditor to review.

Reviewed documentation to determine compliance:

- Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy
- Pennsylvania Department of Human Services 3800 Child Care Regulations
- Shower Procedures
- Bathroom Procedures
- Vulnerability Assessment of twelve (12) residents
- Housing/Room Logs
- PREA Admission Tracking logs
- Documentation of risk-based housing
- Review of resident files

Interviews:

- Interviews with Director of Operations
- Interview with Clinical Director
- Interview with Nursing Coordinator who conducts risk screening
- Interview with random staff
- Interviews with three (3) residents who identified as bi-sexual
- Interview with transgender resident

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115.351	Resident reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy has established procedures for allowing multiple internal ways for residents to report privately to officials regarding sexual abuse and sexual harassment, and staff neglect. The document showed several ways for residents to report sexual abuse, sexual harassment, or retaliation. There are:</p> <ol style="list-style-type: none"> 1. Direct reporting to an employee, educational staff, medical staff, or contracted entity; 2. Privately reporting to a public or private entity, or an office that is not part of the agency (Blackburn Center); 3. Privately reporting to ChildLine, Blackburn Center (PCAR); 4. Third parties including family members, Parole Officers, Caseworkers, and attorneys. <p>Reporting information is delivered to the residents through the intake process, Resident Handbook, PREA pamphlets, and posters. Numerous posters (in both English and Spanish) were observed throughout the facility by this auditor during the tour. These posters highlighted the various ways residents and staff can report incidents of sexual abuse and sexual harassment.</p> <p>There are grievance forms located on each housing unit. This was observed by this auditor during tour of the facility.</p> <p>Interviews with residents confirmed they were educated on how to report allegations of sexual abuse, sexual harassment, retaliation, and neglect. All residents interviewed were able to note several ways to report allegations to facility staff, administrative staff, the hotline [Blackburn Center (PCAR) or ChildLine], their parents, P.O.s, or caseworkers.</p> <p>b) The Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states that Cove PREP shall provide at least one method for residents to report sexual abuse and/or sexual harassment to a public or private entity or office that is not part of Cove PREP and that is able to receive and immediately forward resident reports of sexual abuse and/or sexual harassment to Cove PREP officials allowing the resident to remain anonymous upon request. These methods include, but are not limited to:</p> <ol style="list-style-type: none"> 1. Private reporting to a public or private entity, or an office that is not part of the agency (Blackburn Center): This “hotline” information is located on

every phone. There is a phone number and address for the Blackburn Center posted above every phone.

2. Staff shall provide residents with access to call ChildLine.

Reporting information is delivered to the residents through the intake process, Resident Handbook, PREA pamphlets, and posters. Numerous posters (in both English and Spanish) were observed throughout the facility by this auditor during the tour. These posters highlighted the various ways residents and staff can report incidents of sexual abuse and sexual harassment.

In addition, the pamphlets at Cove PREP were reviewed by this auditor and they contained telephone numbers and addresses for residents to report allegations of sexual abuse and sexual harassment to offices outside of the facility. In this case, the pamphlets contain the toll-free telephone numbers and addresses to Blackburn Center (PCAR) or ChildLine.

The primary reporting mechanism is to an outside agency, ChildLine, or Blackburn Center (PCAR) via phone. This allows receipt of the report and transmission to the facility anonymously if requested. This reporting method is informed to all youth upon intake, on PREA pamphlets, and posted throughout the facility.

There were no reported allegations of sexual abuse during the past twelve (12) months. There were no residents who alleged abuse to interview by this auditor.

Most residents interviewed were aware of their right to contact outside agencies including Blackburn Center (PCAR) and ChildLine. Residents interviewed also confirmed they received this information through posters in their living units and around the facility, PREA pamphlets, and PREA education received at intake.

There were no residents placed at Cove PREP solely for civil immigration purposes. However, during interviews with agency management, it was determined they would provide these residents information on how to contact consular officials and relevant officials at the Department of Homeland Security to report sexual abuse and/or sexual harassment.

c) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that staff shall accept reports made verbally, in writing, anonymously and from third parties. These reports shall be immediately processed according to child abuse regulations.

Staff interviewed were knowledgeable of the various ways residents and staff can report incidents of sexual abuse, sexual harassment, or retaliation. In addition, staff interviewed stated they would immediately document a verbal report by notifying their supervisor and contacting ChildLine immediately to report the allegation.

d) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states Cove PREP shall provide residents with access to tools necessary to create a written report. There shall be grievance forms located in all common areas to allow the

residents to create written reports. Grievance forms were observed by this auditor in each unit during the tour of the facility.

Youth also have the option of reporting allegations to Blackburn Center (PCAR) via their respective toll-free numbers posted above all phones. Additionally, youth, their families, and the public have the ability to report allegations outside the agency/facility via the toll-free number for ChildLine that are posted on the agency website.

Interviews with residents confirmed they are educated on ways to report allegations of sexual abuse or sexual harassment upon intake into the facility. All residents stated that they were informed about the grievance process and how to fill out a grievance form. In addition, the residents were able to note ways they could report allegations of sexual abuse, sexual harassment, and retaliation to Blackburn Center (PCAR) or ChildLine either in writing or calling and speaking to a representative directly. The ChildLine toll-free telephone numbers are listed in their Resident Handbook, PREA pamphlets, and on posters throughout the facility. The Blackburn Center (PCAR) telephone numbers are posted above all phones. This was observed by this auditor during the tour of the facility. Staff interviewed also understood the ways a resident can privately report allegations of sexual harassment, sexual abuse, and retaliation.

e) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states staff shall provide the ability to privately report sexual abuse and/or sexual harassment of residents.

Interviews with staff confirmed they are aware that they are permitted to privately report allegations of sexual abuse and sexual harassment. All staff interviewed stated they could report the allegation to an administrative staff at the facility or by reporting the allegation to ChildLine via the toll-free hotline.

Reviewed documentation to determine compliance:

- Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy
- Pennsylvania Department of Human Services 3800 Child Care Regulations
- Pre-Audit Questionnaire
- Grievance Policy
- Resident Handbook in Spanish and English
- Pa Child Protective Services Law
- Mandated Reporter Training Curriculum
- Telephone and Visitation Policy
- Posters in facility
- MOU with Blackburn Center (PCAR)
- PREA Intake Pamphlet
- Residents Rights Form
- Blackburn Packet Information

Interviews:

	<ul style="list-style-type: none"> • Interview with Director of Operations • Interview with PREA Coordinator • Interview with Clinical Director • Interviews with randomly selected staff • Interviews with residents • Interview with Director of Blackburn Center (PCAR)
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115.352	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a-h) Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy and Grievance Policy state that grievance can be used to report sexual abuse or harassment, but residents are not required to use a grievance. If they do, they can do so without having to submit or refer to the staff involved in the grievance. Residents cannot be disciplined for filing a grievance. The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy contains all necessary provisions and timelines. The Pa. Department of Human Services, during their annual licensing inspection, inspects resident files for this signed acknowledgement by both parent and resident. I reviewed twelve (12) resident files, and all contained notification of the grievance process. Additionally, the most recent Licensing and Inspection Summary did not contain any citations for notifying of the grievance process.</p> <p>PREA pamphlets describe various ways a resident can report sexual abuse and sexual harassment. Each resident receives a copy of these pamphlets at intake and the staff review these pamphlets during the intake process with each resident. The grievance process is not listed as a formal mechanism to report sexual abuse or sexual harassment in either of these pamphlets.</p> <p>All residents interviewed were aware of the grievance procedure. All the resident files reviewed contained notification of the grievance process. In addition, all staff interviewed could describe the steps they would take to protect a resident from imminent sexual abuse. These steps included separating the alleged victim from the alleged aggressor, increasing supervision, contacting their supervisor, and documenting the threats in writing.</p> <p>There were no grievances filed by third parties alleging sexual abuse, sexual harassment, or retaliation at Cove PREP during the past 12 months. This was confirmed by reviewing resident files and grievance records with the PREA Coordinator during the on-site portion of this audit.</p> <p>Reviewed documentation to determine compliance:</p>

	<ul style="list-style-type: none"> • Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Grievance Policy • PA Department of Human Services Annual Licensing and Inspection Summaries • Pre-Audit Questionnaire • Resident Handbook • Child’s Right Form • Facility grievance records • Grievance forms • Files of twelve (12) residents <p>Interviews:</p> <ul style="list-style-type: none"> • Interview with PREA Coordinator • Interview with Nursing Coordinator • Interviews with randomly selected staff • Interviews with randomly selected residents
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115.353	Resident access to outside confidential support services and legal representation
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>a) Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that Cove PREP will provide residents with access to outside support services and legal representation related to sexual abuse, by providing, posting, or otherwise making accessible mailing addresses and telephone numbers of local, state, and/or national victim advocacy organizations. Cove PREP shall enable reasonable communication between residents and these organizations and agencies, in as confidential a manner as possible.</p> <p>PREA pamphlets contain telephone numbers and addresses for victim advocates from Blackburn Center (PCAR). All residents receive a copy of these pamphlets at intake including the Blackburn Packet Information. In addition to residents receiving a copy of the above-mentioned pamphlets, there are numerous posters posted around the facility with telephone numbers and addresses to Blackburn Center (PCAR). This information is available in both English and Spanish and was reviewed by this auditor and noted during the tour of the facility. Cove PREP has a Memorandum of Agreement with Blackburn Center (PCAR) which was reviewed by this auditor. The Memorandum of Agreement states Blackburn Center (PCAR) will provide any victim of sexual abuse a victim advocate.</p>

Interviews with residents confirmed they are educated and aware of the services that are available to them in the event they are a victim of sexual assault at Cove PREP. Several residents stated during their interviews that a person from Blackburn Center came to speak to them about services they provide two (2) weeks back.

b) Most of the residents interviewed were aware of the services available to them from Blackburn Center (PCAR) in the event they are a victim of sexual abuse.

Residents interviewed also stated they were educated that any correspondence with Blackburn Center (PCAR) is confidential and private. In addition, the residents understood the responsibility of the victim advocate to report new information of sexual abuse to the authorities as they are mandated to report that information.

Residents noted during interviews this information is provided to them during their intake, is noted in pamphlets and Resident Handbook they receive during their intake into the facility and is posted throughout the facility.

There were no allegations of sexual abuse at Cove PREP during the past 12 months.

c) Cove PREP has a MOU with Blackburn Center (PCAR), and the services they offer.

The MOU was reviewed, and this auditor spoke to the Director of Blackburn Center (PCAR) via telephone prior to the on-site audit. She confirmed the services offered in the MOU. She also stated that twice a year she conducts an informational session for all residents and staff at Cove PREP. She said that she was just at the facility two (2) weeks ago.

The Memorandum of Agreement confirms each party's responsibilities regarding this standard. The PREA Coordinator described this Memorandum of Agreement and the services that are provided by Blackburn Center (PCAR) including that they provide advocacy services to any victims of assault at Cove PREP.

d) Visitation and contact with legal representation and family members is outlined in the Visitation Policy. Cove PREP provides residents with reasonable and confidential access to their attorneys and/or legal representation as well as parents or legal guardians. Attorneys can also visit whenever it is convenient for them to do so, and these visits/conversations would be in a private setting. Parents or legal guardians are permitted to visit on a weekly basis and residents also receive telephone calls to family members on a weekly basis. All residents interviewed stated they receive weekly telephone calls to their families and weekly visits (if the family is able to visit).

Reviewed documentation to determine compliance:

- Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy
- Pre-Audit Questionnaire
- Telephone and Visitation Policy
- MOU with Blackburn Center (PCAR)
- Resident Handbook
- English and Spanish PREA posters in the facility

	<ul style="list-style-type: none"> • Resident PREA Pamphlet • Blackburn Packet Information <p>Interviews:</p> <ul style="list-style-type: none"> • Interviews with the Director of Operations • Interview with the PREA Coordinator • Interviews with randomly selected staff • Interviews with twelve (12) residents • Interview with Director of Blackburn Center (PCAR)
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115.354	Third-party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy describes third-parties, including fellow residents, staff members, volunteers, contractors, family members, attorneys, outside advocates, and others, shall be accepted reporters of any sexual abuse and/or sexual harassment reports. Cove PREP has established various methods to receive third-party reports of sexual abuse and sexual harassment which includes Cove PREP’s public website that lists the PREA Coordinator’s number, administrative staff numbers, and the ChildLine number to call if sexual abuse or sexual harassment is suspected.</p> <p>This auditor was able to review the agency’s website and confirm multiple methods to file a third-party report is posted on the website. The Blackburn Center telephone number was posted on the website during the on-site portion of the audit. In addition to being posted on the agency website, multiple methods to file a third-party report is posted in the visiting area of the facility and were observed by this auditor during the tour of the facility.</p> <p>Interviews with residents confirmed they are aware of who third parties are. They were also aware that these individuals can report allegations or incidents of sexual abuse or sexual harassment on their behalf. All staff interviewed acknowledged that they would accept a third-party report of abuse and respond in the same manner as if they had witnessed the abuse themselves. Staff interviewed noted they would document the allegation and report the allegation to ChildLine for investigation.</p> <p>There were no allegations of sexual abuse or sexual harassment filed by a third party at Cove PREP during the past 12 months. If allegations were reported to ChildLine they would be investigated.</p>

	<p>Reviewed documentation to determine compliance:</p> <ul style="list-style-type: none"> • Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Pre-Audit Questionnaire • Cove PREP website • PREA posters in English and Spanish <p>Interviews:</p> <ul style="list-style-type: none"> • Interviews with randomly selected staff • Interviews with twelve (12) residents
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115.361	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) Cover PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy stated that all staff of Cove PREP must, immediately report any known or suspected or suspected act or allegation of sexual misconduct or retaliation to the administration through the appropriate chain of command. They must treat all reported incidents or prohibited conduct seriously and ensure that known or suspected acts or allegations of sexual misconduct are reported immediately and referred to the proper authorities. All staff, contractors, and volunteers are mandated by policy to report any knowledge of sexual abuse and/or sexual harassment, and any suspected retaliation.</p> <p>All staff members interviewed were aware that any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment, staff neglect, or any violation of responsibilities that may have contributed to an incident or retaliation, must be reported to ChildLine. All staff members interviewed were aware that they must immediately contact their supervisor to report the allegation of sexual abuse and/or sexual harassment. Interviews with staff members (including medical and mental health staff) confirmed they are aware of their obligations to protect the confidentiality of the information they obtain from a report of sexual abuse.</p> <p>b) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states, "Cove PREP requires all staff to comply with mandated reporter laws."</p> <p>All staff interviewed were aware of their responsibility to report any allegations of</p>

sexual abuse or sexual harassment to ChildLine for investigation. The staff were able to describe their role as Mandated Reporters to this auditor during the interviews and were aware of the ChildLine hotline or Blackburn Center to report allegations of sexual abuse and sexual harassment.

c) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that apart from reporting to designated supervisors, and State or local service agencies, all Cove PREP staff are prohibited from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions.

Interviews with staff, including medical and mental health, confirmed they are aware of their obligations to protect the confidentiality of the information they obtained from a report of sexual abuse.

d) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that medical and mental health practitioners shall be required to report sexual abuse to designated supervisors and officials, as well as to designated State or local service agencies where required by mandated reporting laws.

Medical and mental health staff interviewed indicated that disclosure is provided to residents regarding the limitation of confidentiality and their duty to report at the initiation of treatment services. In addition, these staff are required to report any knowledge, suspicion, or information regarding any allegation of sexual abuse or sexual harassment to their direct supervisor immediately upon learning of the allegation. This information is also reported to ChildLine for investigation. Staff interviewed also discussed completing Mandated Reporter trainings on an annual basis and were able to discuss their role as mandated reporters during interviews.

e) The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that upon receiving any allegation of sexual abuse, facility administration shall promptly report the allegation to ChildLine and/or State Police as well as the alleged victim's parents or legal guardians.

Interview with the Chief Executive Officer stated that the Pa 3800 regulations require a report within 24-hours, documenting notifications of parent, guardian, probation officer, case worker, and court. He stated that if there is an attorney of record, they would also be notified. There were no allegations reported during the past twelve (12) months.

All staff interviewed also stated that in addition to reporting the allegation to their direct supervisor; and are required to report the allegation to ChildLine and document the allegation/incident.

f) All allegations of sexual abuse, sexual harassment, neglect, and retaliation are reported to ChildLine for investigation. ChildLine will determine if the information meets the requirements to register a report for investigation.

	<p>It should be noted: all staff (including medical and mental health staff) are trained to treat third party reports the same as if they witnessed the incident themselves when receiving a report from a third party.</p> <p>Interviews with the Chief Executive Officer, PREA Coordinator, and staff (including medical and mental health staff) confirmed they are aware of how to report an allegation and were aware all allegations are investigated by Cove PREP and the Westmoreland County Children and Youth Services and the Pennsylvania State Police. The Chief Executive Officer and the PREA Coordinator were able to describe the reporting process as well as the investigative process once the allegation is referred to ChildLine.</p> <p>There were no allegations of sexual abuse made at Cove PREP during the past twelve (12) months. All staff that were interviewed were aware of their responsibility to report allegations of sexual abuse and sexual harassment as they are mandated reporters.</p> <p>Reviewed documentation to determine compliance:</p> <ul style="list-style-type: none"> • Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Pennsylvania Department of Human Services 3800 Child Care Regulations • Pennsylvania Child Protective Services Law • Pre-Audit Questionnaire • Training Logs • PREA posters in English and Spanish • Employee Handbook <p>Interviews:</p> <ul style="list-style-type: none"> • Interview with the Chief Executive Officer • Interview with the PREA Coordinator • Interview with Nursing Coordinator • Interview with Clinical Director • Interviews with randomly selected staff
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115.362	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states that when Cove PREP learns that a resident is subject to substantial risk of imminent sexual abuse, it shall take immediate action to protect the resident. In addition, such residents must be monitored, counseled, and provided appropriate</p>

	<p>treatment.</p> <p>The Chief Executive Officer was interviewed regarding the protective action the agency takes when learning that a resident is subject to substantial risk of imminent sexual abuse. The Chief Executive Officer reported the agency would ensure steps are taken to remove the risk to the resident which could include separation of the resident from the potential abuser, either by transferring the resident to another facility or making a living unit change if the potential abuser is a staff working at the facility. The staff could also be removed from the living unit or placed on administrative leave pending an investigation. The Chief Executive Officer stressed the safety of the resident is the agency's utmost priority.</p> <p>Staff interviewed stated they would immediately separate the resident at risk from the potential abuser, increase supervision, call for additional staff assistance if needed, and report the incident to their direct supervisor and ChildLine. Their direct supervisor would then determine the best course of action to ensure the safety of the resident. In addition, staff interviewed stated they would also document the incident.</p> <p>Interview with the Chief Executive Officer confirmed staff members would be expected to act immediately to separate the resident at risk from a potential abuser. In addition, he reported a Safety Plan would be developed and implemented to ensure the safety of the resident at risk. The Safety Plan would include increased supervision/monitoring, separation from the potential abuser, and making a housing unit and/or room change as necessary.</p> <p>There were no residents that the facility determined were subject to substantial risk of sexual abuse during the past 12 months.</p> <p>Reviewed documentation to determine compliance:</p> <ul style="list-style-type: none"> • Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Pre-Audit Questionnaire <p>Interviews:</p> <ul style="list-style-type: none"> • Interview with the Chief Executive Officer • Interviews with the PREA Coordinator • Interviews with randomly selected staff
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115.363	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

a) Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states upon receiving an allegation that a youth was sexually abused while confined at another facility, the Cove PREP administrator of the facility that received the allegation shall call the facility head or appropriate office of the agency where the alleged abuse occurred as well as ChildLine and/or appropriate investigative agency. Such notifications must be provided as soon as possible, but no later than 72 hours after receiving the allegation. The notification must be documented.

Interview with the Chief Executive Officer confirmed this reporting process and noted that there has not been a report in the last 12 months of any allegations of sexual abuse or sexual harassment occurring to a resident while in another facility.

b) Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy notes the Cove PREP Director of Operations or Clinical Director that receives the allegation must notify the Facility Director of the other facility or appropriate office of the agency where the alleged abuse occurred and must also notify the appropriate investigative agency. Such notifications must be provided as soon as possible, but no later than 72 hours after receiving the allegation.

Interview with the Director of Operations confirmed he understood the timeframe to notify the agency/facility where the alleged abuse occurred. Cove PREP did not receive any allegations that a resident was abused while residing at another facility.

c) The Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy notes notifications to the facility where the alleged abuse occurred must be documented.

Interview with the Director of Operations confirmed he would document any notification of alleged abuse. He also stated an email would also be sent to the Facility Director of the facility where the alleged abuse occurred (after contacting this person by telephone) to provide further documentation. In addition to documenting the allegation, the Director of Operations noted he would immediately report the allegation of abuse to ChildLine investigation. If the allegation occurred in a facility outside of the state, he stated he would contact the proper investigative agency in the state where the allegation occurred.

d) The Director of Operations was able to articulate what his responsibilities would be if he received an allegation from another facility that a resident was sexually abused or sexually harassed while residing at Cove PREP. He stated he would immediately contact ChildLine to report the allegation of abuse for investigation. He stated if the alleged abuser was still residing or employed at Cove PREP, a Safety Plan would be developed immediately to ensure the safety of all residents.

The facility did not receive any allegations/notifications from other facilities that a resident was sexually abused or sexually harassed while residing at Cove PREP during the past 12 months. This was verified through the Pre-Audit Questionnaire and interviews with the Director of Operations and the PREA Coordinator.

Reviewed documentation to determine compliance:

	<ul style="list-style-type: none"> • Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Pennsylvania Child Protective Services Law • Pre-Audit Questionnaire <p>Interviews:</p> <ul style="list-style-type: none"> • Interview with the Director of Operations • Interviews with the PREA Coordinator
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115.364	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy and Reporting/ Responding to Allegations of Sexual Abuse Policy state that upon learning of an allegation that a resident was sexually abused, the first staff member to respond shall act in accordance with the policies. The first staff member to respond to the scene shall be required to:</p> <ol style="list-style-type: none"> 1. Separate the victim and alleged abuser; 2. Preserve and protect the scene until appropriate steps can be taken to collect any evidence; 3. Request that alleged victim not take any actions that could destroy physical evidence, including as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, swimming, drinking, or eating; 4. Take steps to prevent the alleged abuser from destroying evidence, such as washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; 5. Notify the Director of Operations or designee and document the incident; 6. Transport to Excelsior Health Latrobe Hospital. <p>There were no allegations of sexual abuse or sexual harassment that were reported during the past twelve (12) months that required first responder actions.</p> <p>All staff interviewed could articulate the steps they would take as a first responder. Their responses were consistent with the Zero Tolerance of Sexual Abuse and/or Sexual Harassment Policy and Reporting/Responding to Allegations of Sexual Abuse Policy.</p> <p>b) Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy notes first responder duties for non-security staff are the same as security staff. Non-security staff have been trained appropriately in the above-mentioned duties</p>

	<p>as a first responder.</p> <p>Non-security staff interviewed were educated in their role as first responders and were able to articulate exactly what they would be expected to do in the event they were the first responder to an incident of sexual abuse. They stated they would immediately call for assistance so security staff would be able to report to the area of the incident and assist with securing the scene.</p> <p>Reviewed documentation to determine compliance:</p> <ul style="list-style-type: none"> • Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Pre-Audit Questionnaire • Cove PREP Policy - Reporting/Responding to Allegations of Sexual Abuse <p>Interviews:</p> <ul style="list-style-type: none"> • Interview with the Director of Operations • Interview with the PREA Coordinator • Interview with Clinical Director • Interviews with randomly selected staff
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115.365	Coordinated response
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>a) Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy requires an Institutional Plan for a coordinated response. A copy of the Cove PREP's Coordinated Response was provided to this auditor. The plan provided clear and concise direction for response to any alleged PREA violation.</p> <p>There have been no incidents in the past twelve (12) months that required the use of the coordinated response. Interviews with the Chief Executive Officer, medical staff, mental health staff, and direct care staff indicated that each is knowledgeable of his/her responsibilities in regards to an incident or allegation of sexual assault. There is a sexual assault checklist that requires the staff person to check off each item such as notification of medical, administration, and documentation. All staff interviewed were aware of their program's Institutional Plan and where to locate the plan. There is a sexual response form that requires the staff person to check off each item such as notification of medical, administration, and documentation.</p> <p>Reviewed documentation to determine compliance:</p>

	<ul style="list-style-type: none"> • Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Coordinated Response Checklist Form • Pre-Audit Questionnaire <p>Interviews:</p> <ul style="list-style-type: none"> • Interview with Chief Executive Officer • Interview with Nursing Coordinator • Interview with Clinical Director • Interview with Nursing Coordinator • Interviews with randomly selected staff
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115.366	Preservation of ability to protect residents from contact with abusers
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states that neither Cove PREP nor any other governmental entity responsible for collective bargaining on the agency’s behalf shall enter into or renew any collective bargaining unit agreement that limits the ability to remove alleged staff sexual abusers from contact with any residents pending the outcome of an investigation or a determination of whether and to what extent discipline is warranted. There are no unions or bargaining units at Cove PREP. The Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy authorizes Cove PREP to protect youth from contact with alleged abusers up to and including suspending staff without pay. There were no reported allegations of staff sexual misconduct during this audit period.</p> <p>During interview the Chief Executive Officer, he stated that any time there is an allegation, a safety plan for the specific resident, and all the residents, is put into place. This always includes removing the staff person from contact with the resident or residents and depending upon the allegation, placing the staff member on Administrative Leave until the investigation is completed.</p> <p>Reviewed documentation to determine compliance:</p> <ul style="list-style-type: none"> • Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Pa. Child Protective Services Law <p>Interview:</p>

	<ul style="list-style-type: none"> • Interview with Chief Executive Officer • Interview with PREA Coordinator
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115.367	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a-e) Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that Cove PREP shall ensure all residents and/or staffs who report and/or cooperate with investigations of sexual abuse and/or sexual harassment are protected from retaliation.</p> <p>Protective measures may include unit or room changes (regardless of if they are victims or abuser); removal of alleged staff or resident(s) from contact with victim(s); emotional support services for residents or staff who fear retaliation for reporting abuse or sexual harassment or for cooperating with investigations. Policy requires monitoring for at least 90 days following an allegation of sexual abuse or sexual harassment (or until an allegation is determined to be Unfounded following investigation). Items that may be monitored include any resident disciplinary reports, housing or programming changes, negative performance reviews, and reassignments of staff.</p> <p>Interview with the Director of Operations indicated he along with the Shift Supervisors and Milieu Manager serve as retaliation monitors at Cove PREP. They were educated and trained on signs of retaliation. The Director of Operations stated the agency would expect that actions would be taken immediately to ensure the resident was safe. It is the expectation of the agency that any resident who reports an allegation of sexual abuse or sexual harassment would be monitored for at least 90 days or until the allegation is investigated by the Westmoreland County Children and Youth Services and the Pennsylvania State Police and determined to be Unfounded. He stated they would monitor the resident by completing status checks for at least 90 days per policy. These status checks are made on a daily basis by checking in with the youth and/or reviewing documentation such as resident disciplinary reports, and housing or programming changes. They monitor behavioral changes in residents, such as isolating oneself. They monitor work records of staff, including tardiness, and absenteeism.</p> <p>There were no incidents of retaliation, known or suspected, during the past twelve (12) months. This auditor reviewed the Retaliation Monitoring Form.</p> <p>Reviewed documentation to determine compliance:</p>

	<ul style="list-style-type: none"> • Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Retaliation Monitoring form <p>Interview:</p> <ul style="list-style-type: none"> • Interview with Director of Operations who is responsible for monitoring retaliation • Interview with Milieu Manager who is responsible for monitoring retaliation
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115.368	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy notes segregated housing of residents to keep them safe from sexual misconduct is not used and prohibited by Cove PREP and the Pa. Department of Human Services 3800 Child Care Regulations; and Cove PREP prohibits the use of isolation.</p> <p>Interview with the Director of Operations and the PREA Coordinator confirmed the prohibition of segregated housing for this purpose. During the tour of the facility, this auditor did not notice any places where a resident could be segregated or isolated. In addition, interviews with residents at the facility confirmed the prohibition of segregated housing.</p> <p>Reviewed documentation to determine compliance:</p> <ul style="list-style-type: none"> • Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Pennsylvania 3800 Child Care Regulations • Tour of the facility <p>Interview:</p> <ul style="list-style-type: none"> • Interview with Chief Executive Officer • Interview with PREA Coordinator • Interviews with random residents

115.371	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard

Auditor Discussion

a) Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states any reports (direct, indirect, third-party) received involving sexual abuse and/or sexual harassment shall be reviewed by the facility administrator to determine if an incident meets the minimum criteria under the guidelines established by Prison Rape Elimination Act. The incident shall be reviewed promptly, thoroughly, and objectively. If the minimum criteria is met, the allegation shall be reported to the Pennsylvania ChildLine or the Pennsylvania State Police.

b) Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states that if the minimum criteria is met, the allegation shall be reported to the Pennsylvania State Police who have been trained in sexual abuse investigations involving juvenile victims. There is a MOU with the Pennsylvania State Police. The facility has four (4) investigators that have received specialized training in sexual abuse investigations involving juvenile victims. The investigators received their training prior to the on-site portion of the audit. This auditor interviewed one (1) investigator and reviewed the NIC certification.

c-h) Interview with a representative from Pennsylvania State Police confirmed that criminal investigations are completed by the Pennsylvania State Police and include gathering and preserving direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; interviewing alleged victims, suspected perpetrators, and witnesses; reviewing prior complaints and reports of sexual abuse involving the suspected perpetrator.

The Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy notes the facility will cooperate with outside investigators and will remain informed of the investigative process. During interview the PREA Coordinator, she stated that if an investigation is conducted by the Pennsylvania State Police, they maintain contact with the Pennsylvania State Police investigators during an open investigation via telephone calls, e-mails, and on-site visits. If it is an administrative investigation, they will remain in contact with the investigator from the Westmoreland County Children and Youth Services via telephone calls and emails.

i-j) The Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy requires that all files are kept as long as the alleged abuser is within Cove PREP custody or employed by the agency, plus five (5) years. This was confirmed by the PREA Coordinator.

k-m) Per Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy, the departure of an alleged abuser or victim from their employment or control by the facility/agency does not provide a basis for termination of an investigation. They state the investigation would continue until a determination is made. This was also confirmed by the PREA Coordinator and by a Facility Investigator.

There were no allegations of sexual abuse during the past twelve (12) months at

	<p>Cove PREP. Cove PREP has four (4) investigators that have received specialized training in sexual abuse investigations involving juvenile victims.</p> <p>Cove PREP has four (4) trained investigators that received their certificates of completion through the NIC Academy Division. This auditor received the training curriculum and training certificates of the four (4) staff certified as investigators. The certificate states the individual has completed the on-line PREA course: Investigating Sexual Abuse in a Confined Setting presented by the National Institute of Corrections.</p> <p>There were no allegations reported during the past twelve (12) months at Cove PREP.</p> <p>Reviewed documentation to determine compliance:</p> <ul style="list-style-type: none"> • Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Pennsylvania Child Protective Services Law • Pre-Audit Questionnaire • MOU with Pennsylvania State Police • Review of twelve (12) resident files • NIC certificates of Investigation Training • NIC Training Curriculum for Investigations <p>Interviews:</p> <ul style="list-style-type: none"> • Interview with Chief Executive Officer • Interview with PREA Coordinator • Interview with Cove PREP Investigator • Interview with representative from Pennsylvania State Police • Interview with representative from the Westmoreland County Children and Youth Services
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115.372	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a) Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states that Cove PREP shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. Interview with the PREA Coordinator confirmed the process of investigations involving alleged sexual abuse follow these guidelines.

	<p>Cove PREP has four (4) trained investigators that received their certificates of completion through the NIC Academy Division. This auditor received the training curriculum and training certificates of the four (4) staff certified as investigators. The certificate states the individual has completed the on-line PREA course: Investigating Sexual Abuse in a Confined Setting presented by the National Institute of Corrections.</p> <p>There were no allegations reported during the past twelve (12) months at Cove PREP.</p> <p>Reviewed documentation to determine compliance:</p> <ul style="list-style-type: none"> • Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • NIC certificates of Investigation Training • NIC Training Curriculum for Investigations <p>Interviews:</p> <ul style="list-style-type: none"> • Interview with Director of Operations • Interview with PREA Coordinator • Interview with representative from Westmoreland County Children and Youth Services
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115.373	Reporting to residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a-e) Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states juveniles who are currently in the custody of Cove PREP are entitled to know the outcomes of investigations of their allegations.</p> <p>The Chief Executive Officer and PREA Coordinator stated that the resident would continuously be informed as to the on-going status of the investigation, whether it involved another resident or a staff member. They also confirmed that the juveniles who are currently in the custody of Cove PREP are entitled to know the outcomes of investigations of their allegations. The Director of Operations informs the juvenile whether the allegation was determined to be substantiated, unsubstantiated, or unfounded. All notifications or attempted notifications are documented. If the allegation involved a staff member, the facility informs the juvenile whenever the staff member is no longer posted within the juvenile’s unit, when the staff member is no longer employed at the facility, when the staff member has been indicted on a charge related to sexual abuse within the facility, or when the staff member has</p>

	<p>been convicted on a charge related to sexual abuse within the facility. If the allegation involved another juvenile, the facility informs the alleged victim when the alleged abuser has been indicted on a charge related to sexual abuse within the facility or when the alleged abuser has been convicted on a charge related to sexual abuse within the facility. If ChildLine is involved, they would notify the resident, parent/guardian, and the facility upon the completion of the investigation of the outcome.</p> <p>There were no allegations of sexual abuse that was reviewed during the twelve (12) months at Cove PREP.</p> <p>Reviewed documentation to determine compliance:</p> <ul style="list-style-type: none"> • Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Pennsylvania Department of Human Services 3800 Child Care Regulations • Pre-Audit Questionnaire <p>Interview:</p> <ul style="list-style-type: none"> • Interview with Chief Executive Officer • Interview with Director of Operations • Interview with the PREA Coordinator
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115.376	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states Cove PREP employees who violate agency sexual abuse and/or sexual harassment policies or who engage in behavior that contributes to sexual abuse and/or sexual harassment of residents shall be subject to disciplinary sanctions up to and including termination. Sexual misconduct perpetrated by staff is contrary to the policies of Cove PREP and professional ethical principles that all employees are bound to uphold. There is no consensual sex in a custodial or supervisory relationship as a matter of law. A sexual act with a resident by a person in a position of authority over the resident is a felony subject to criminal prosecution. Retaliation against a resident who refuses to submit to sexual activity or retaliation against individuals (including witnesses) because of their involvement in the reporting or investigation of sexual misconduct is also prohibited and grounds for disciplinary action including termination and criminal prosecution.</p> <p>b-d) Failure of employees to report incidents of sexual misconduct is cause for</p>

	<p>disciplinary action up to and including termination. All dismissals for violations of the Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy or resignations by staff who would have been dismissed or subject to dismissal proceedings if not for their resignation must be reported to law enforcement agencies unless the activity was clearly not criminal and reported to any relevant licensing bodies.</p> <p>The Pre-Audit Questionnaire indicated that no staff members were terminated for violating any sexual abuse or sexual harassment policies during the past twelve (12) months. This was confirmed during the interviews with the Chief Executive Officer and interview with the Human Resource staff.</p> <p>Reviewed documentation to determine compliance:</p> <ul style="list-style-type: none"> • Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Pennsylvania Protective Law • Pre-Audit Questionnaire • Randomly selected staff files <p>Interview:</p> <ul style="list-style-type: none"> • Interview with Chief Executive Officer • Interview with PREA Coordinator • Interview with Human Resource staff
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115.377	Corrective action for contractors and volunteers
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>a) Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states that any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with resident and shall be reported to law enforcement agencies and to relevant licensing bodies. Pennsylvania Child Protective Services Law prohibits contact with residents if a contractor or volunteer has a Founded or Indicated child abuse.</p> <p>The Pre-Audit Questionnaire indicated that there were no contractors or volunteers reported to law enforcement for engaging in sexual abuse or sexual harassment of residents during the past twelve (12) months.</p> <p>b) The Chief Executive Officer stated that the facility would immediately remove the contractor or volunteer from the facility, would contact appropriate authorities, and</p>

	<p>would not allow them to return until the completion of an investigation. There were no reported instances of sexual assault or sexual harassment by the approved contractors or volunteers during the past twelve (12) months; therefore, there was no documentation to review regarding this standard. This was verified by the Human Resource staff during their interview.</p> <p>Reviewed documentation to determine compliance:</p> <ul style="list-style-type: none"> • Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Pre-Audit Questionnaire • PA Child Protective Services Law • Signed training acknowledgement of a contractor <p>Interview:</p> <ul style="list-style-type: none"> • Interview with the Chief Executive Officer • Interview with the Human Resource staff • Interview with the PREA Coordinator • Interview with a contractor
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115.378	Interventions and disciplinary sanctions for residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a-b) Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states that a resident may 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, resident-on-resident sexual activity, or following a criminal finding of guilt for resident-on-resident sexual abuse. Any resident that violates these policies is subject to disciplinary sanctions commensurate with the nature and circumstances of the incident in accordance with Cove PREP level system.</p> <p>c) Consideration will be taken into the nature and circumstances of the incident, resident history, mental health or disabilities, and precedent of sanctions imposed under similar circumstances. Residents are subjected to disciplinary sanctions for contact with staff, if upon investigation, it is determined that the staff member did not consent to such contact. Disciplinary action must be administered in a fair, impartial, and expeditious manner.</p> <p>d) Consideration must also be given to providing the offending resident therapy, counseling, or other interventions for the abuse. Cove PREP has a youth handbook that outlines the behavioral treatment program response for such violations. Based</p>

upon the therapeutic nature of these programs, the general tenor of responses was therapeutic in nature.

Interview with the Clinical Director confirmed that a resident's mental health is always considered when discipline is imposed for incidents of sexual abuse. In addition, the Clinical Director stated the resident's mental health diagnosis is reviewed and considered during Sexual Abuse Incident Reviews following a substantiated or unsubstantiated finding to ensure appropriate discipline was imposed.

Consideration must be given to providing the offending youth therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse. However, the facility may not require participation in such interventions as a condition of access to general programming or education.

Interview with Clinical Director was conducted by this auditor during the on-site portion of this audit. The interview confirmed Cove PREP offer mental health services for any resident found to have engaged in resident-on-resident sexual abuse. The Clinical Director stated the resident's participation in therapy sessions is not always required as a condition of access to reward-based incentives.

e) The Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states the facility may only discipline a youth for sexual contact with staff upon a finding that the staff member did not consent to such contact. Interviews with the Chief Executive Officer confirmed a resident would only be disciplined for sexual contact with a staff member upon finding the staff member did not consent to the sexual contact. There were no incidents of resident-on-staff sexual abuse during the past twelve (12) months. The Chief Executive Officer also confirmed that residents are not disciplined for reports of sexual abuse made in good faith, even if the investigation did not establish evidence sufficient to substantiate the allegation. The Chief Executive Officer also noted that any suspicion of possible sexual abuse is reported to the ChildLine / Blackburn Center hotline immediately for investigation.

There were no allegations of resident-on-resident sexual abuse during the past twelve (12) months at Cove PREP.

f) Interview with the Chief Executive Officer and the PREA Coordinator confirmed that the facility does not use isolation and the underlying issues related to the incident would be addressed in therapy. They also stated that a resident making a report in good faith cannot be disciplined according to the Zero- Tolerance of Sexual Abuse and/or Sexual Harassment Policy.

g) The Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states that sexual activity between youth is prohibited, however for such activity to constitute sexual abuse, there must be no assent to the activity, or it must be forcible or coerced.

Reviewed documentation to determine compliance:

	<ul style="list-style-type: none"> • Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Pennsylvania Department of Human Services 3800 Child Care Regulations • Pennsylvania Child Protective Services Law • Pre-Audit Questionnaire • Youth Handbook <p>Interview:</p> <ul style="list-style-type: none"> • Interview with Chief Executive Officer • Interview with PREA Coordinator • Interview with Clinical Director • Interview with therapist
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115.381	Medical and mental health screenings; history of sexual abuse
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a-c) Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy requires that if a resident’s intake assessment indicates that they have experienced any prior sexual victimization or have perpetrated sexual abuse, whether it occurred in an institution setting or in the community, the resident will be offered a follow-up meeting with the psychologist, psychiatrist, and/or mental health staff within 14 days of the intake screening. Documentation of such shall be noted on the resident’s Vulnerability Assessment Instrument.</p> <p>Policy and practice require every resident who is admitted to be seen by the nurse upon admission and receive a physical within seventy-two (72) hours of intake. All residents see a therapist within a week of admission, some the same day.</p> <p>There were twenty-seven (27) residents admitted during the past twelve (12) months who disclosed prior sexual victimization during risk screening at intake. All twenty-seven (27) residents were referred to mental health practitioners for follow up services. During the on-site audit four (4) resident who disclosed prior sexual victimization during risk screening were interviewed. All four (4) residents stated that they had been victimized in the community and disclosed this upon intake. All four (4) residents stated that they did meet with their therapist immediately and continue to have therapy sessions. This was confirmed by reviewing the residents’ clinical case notes.</p> <p>Interview with the Clinical Director confirmed any information from the intake screen is limited to medical, mental health staff, or other staff as necessary to implement treatment plans, security, and management decisions including housing, bed, and</p>

program assignments. This information is not accessible to direct care staff.

d) During the interview with the PREA Coordinator, it was noted they are mandated reporters and are required by law to report any information they receive from a resident relating to sexual abuse. All staff members interviewed stated they inform the resident upon intake of their reporting duties.

During interview with the Clinical Director, she indicated they are aware that residents reporting prior sexual victimization or prior sexual aggression are to be referred for a follow up meeting with medical and mental health staff within fourteen (14) days of intake. She indicated that services that are offered include evaluations, developing a treatment plan, and offering on-going services. She was also aware that the residents have the right to refuse a follow-up meeting. All residents received physicals within fourteen (14) days of admission. There were four (4) residents that disclosed during screening that they were sexually abused in the community; all of the four (4) residents stated they received follow-up therapy sessions.

A review of all resident files noted there were twenty-two (22) current resident who had disclosed prior victimization during screening. Four (4) residents that disclosed prior sexual victimization during risk screening were interviewed. All four (4) stated that they did have therapy sessions with their therapist. Per the clinical staff interview, youth have access to medical services in the community. When a disclosure of prior abuse occurs, and services are offered by clinical staff, which is documented in the resident's case file. Access to these files is restricted. All youth interviewed confirmed that they were seen by the nurse shortly after arrival at the facility.

A review of twelve (12) resident files noted there were four (4) current residents who disclosed prior victimization during screening. If a resident discloses prior victimization during the screening, a safety plan is developed to keep the resident safe at the facility. Per medical staff interview, youth have access to all the same medical services available to youth in the community. When a disclosure of prior abuse occurs, and services are offered by medical and mental health staff, this is documented in the resident file. Access to the resident files is restricted. All youth interviewed confirmed that they were seen by medical shortly after arrival at the facility.

Reviewed documentation to determine compliance:

- Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy
- Pre-Audit Questionnaire
- Secondary medical documentation
- Vulnerability Assessments of twelve (12) residents
- Files of twelve (12) residents
- Log of Admissions for past twelve (12) months

Interviews:

	<ul style="list-style-type: none"> • Interview with PREA Coordinator • Interview with Clinical Director • Interview with Nursing Coordinator • Interviews with four (4) residents with prior reported sexual victimization
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115.382	Access to emergency medical and mental health services
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	Auditor Overall Determination: Meets Standard
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	Auditor Discussion
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a) Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states that resident victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis prevention services. It is noted that the resident will be immediately transported to Excelsa Health Latrobe Hospital for a forensic medical exam. The outside medical facility's trained Sexual Assault Nurse Examiner (SANE) will make the final determination regarding evidence collection.

Staff who can provide support to the victim must accompany the youth. If a youth refuses to be examined at the hospital, such refusal must be properly documented on the appropriate form(s).

Cove PREP has a MOU in place with Excelsa Health Latrobe Hospital to have a forensic examination completed by a Sexual Assault Nurse Examiner (SANE) and provide medical/mental health services at no cost to the victim. This MOU was provided to this auditor for review. In addition, this auditor contacted a representative from Excelsa Health Latrobe Hospital to confirm resident victims are referred to their facility and receive the services noted in the MOU.

There were no residents at the facility who reported sexual abuse involving penetration during the past twelve (12) months. Therefore, there were no residents sent to Excelsa Health Latrobe Hospital for a forensic examination.

b) The Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy and Reporting/Responding to Allegations of Sexual Abuse Policy state if no qualified medical or mental health practitioners are on duty at the time of the report of recent abuse is made, staff first responders shall take preliminary steps to protect the victim and shall immediately notify the appropriate medical and mental health practitioner. In addition, first responders will not allow the youth to engage in any activities such as hygiene, washing, bathing, showering, eating, drinking, brushing teeth, chewing gum, and eating or drinking (unless medically necessary). Youth should also be discouraged from urinating or defecating as that may destroy evidence prior to being presented at a hospital for the gathering of such evidence.

All staff members interviewed confirmed the duties of a first responder and were

able to describe their responsibilities if they are a first responder to an allegation of sexual abuse.

c) The Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states victims of sexual abuse are offered timely information about sexually transmitted infections prophylaxis. This is in accordance with professionally accepted standards of care, where medically appropriate.

This auditor interviewed the Clinical Director, during the on-site portion of the audit, who stated any resident of sexual abuse would be offered information and timely access to sexually transmitted infections prophylaxis while at Cove PREP, by the medical department, Excelsa Health Latrobe Hospital and/or by Blackburn Center (PCAR).

d) Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy states all medical, mental health, and counseling services must be provided at no cost to the youth.

This auditor was able to interview the PREA Coordinator and Nursing Coordinator during the on-site portion of this audit and a representative from Excelsa Health Latrobe Hospital. All interviewed confirmed that any victim of sexual assault would be referred to Excelsa Health Latrobe Hospital and receive medical and mental health treatment at no cost to the victim.

Cove PREP has a MOU with the Excelsa Health Latrobe Hospital. Blackburn Center (PCAR) is notified by the resident, staff, family and/or the facility. They will send an advocate to the hospital and meet with the victim and guide the victim through the SANE examination, investigation process, interviews, and arrange for counseling and support services for the resident. These services will be at no cost to the resident.

Interviews with the Nursing Coordinator and the PREA Coordinator confirmed that resident victims of sexual abuse are provided timely and unimpeded access to emergency services at no cost to the victim. This was confirmed by this auditor by reviewing the MOU with Excelsa Health Latrobe Hospital, Blackburn Center (PCAR), and speaking to a representative from each.

Reviewed documentation to determine compliance:

- Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy
- Cove PREP Policy- Reporting/Responding to Allegations of Sexual Abuse
- Pre-Audit Questionnaire
- MOU with Excelsa Health Latrobe Hospital
- MOU with Blackburn Center (PCAR)
- Facility Coordinated Response (Institutional Plan)

Interviews:

	<ul style="list-style-type: none"> • Interview with PREA Coordinator • Interview with representative from Excelsa Health Latrobe Hospital • Interview with Director of Blackburn Center (PCAR) • Interview with Clinical Director • Interview with Nursing Coordinator • Interviews with randomly selected staff
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115.383	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states that if the screening indicates that a resident has previously penetrated or experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff shall ensure that the resident is offered a follow-up meeting with a medical or mental health practitioner within 14 days of intake. Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy also states that any resident or resident offender will be assessed and offered follow-up counseling that will be on-going within sixty (60) days of learning about the abuse history. However, the counseling usually occurs the same day staff learn about it. In the event a sexual assault incident was to occur, the victim would receive services from the community provider as outlined in the MOU with the Blackburn Center. Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperated with any investigation arising out of the incident.</p> <p>Interview with the Clinical Director and interview with Nursing Coordinator confirmed all residents are offered a medical and mental health evaluation upon their arrival to the facility (if they have been a victim of sexual abuse in a residential facility or not). It was noted these evaluations are completed during the resident's first week at the facility.</p> <p>b) Medical and mental health evaluations completed on each resident at the facility include a diagnosis and recommendation. Clinical Director interviewed noted if a resident was a victim of sexual abuse in a residential facility, follow-up services would occur more frequently, and recommendations would include more specific follow-up services. Medical evaluations are conducted by the Medical Department.</p> <p>c-h) Interviews with the Clinical Director and Nursing Coordinator confirmed any resident who is a victim of sexual abuse at the facility would be offered timely follow-up for sexually transmitted diseases as part of the follow-up with the</p>

	<p>community medical provider. This would occur if the victim was tested at the hospital or not.</p> <p>Interview with the Clinical Director confirmed the above-mentioned process occurs as detailed in this standard. In addition, they stated the level of the care that a resident receives is consistent with the community level of care. The youth would have the option of community providers for ongoing mental health services.</p> <p>Reviewed documentation to determine compliance:</p> <ul style="list-style-type: none"> • Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Pre-Audit Questionnaire • Files of twelve (12) residents <p>Interviews:</p> <ul style="list-style-type: none"> • Interview with PREA Coordinator • Interview with Clinical Director • Interview with Nursing Coordinator
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115.386	Sexual abuse incident reviews
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>a-e) Cover PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states that within 30 days of the conclusion of every sexual abuse investigation, the facility shall conduct a Sexual Abuse Incident Review of all allegations (Substantiated or Unsubstantiated), unless the allegation has been determined to be Unfounded. The Chief Executive Officer shall convene a Review Team including upper-level management officials. The Review Team shall obtain input from direct care staff, supervisors, investigators, medical, mental health professionals, and other employees as appropriate. In addition, the Review Team must:</p> <ol style="list-style-type: none"> 1. Consider whether the allegation or investigation indicated 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 perceived race, ethnicity, sex, gender identity, sexual orientation, status, gang affiliation, or motivated by other group dynamics at the facility. 3. Examine the area of the facility where the incident allegedly occurred to access whether the physical layout may enable abuse. 4. Assess the adequacy of staffing levels in that area during different shifts.

5. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff.
6. Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to this section, and any recommendations for improvement and submit such a report to the Director of Operations.
7. The facility must implement the recommendations for improvement or must document its reasons for not doing so.

The PREA Coordinator stated the Incident Review Team consists of upper-level management officials. A member of the Incident Review Team was interviewed during the on-site portion of this audit and was able to describe the review process that would take place in the event an allegation of sexual abuse was either Substantiated or Unsubstantiated. She stated the Incident Review Team would convene within thirty (30) days upon the completion of an investigation. Recommendations would include examining the need to change a policy or practice to better prevent, detect, or respond to sexual abuse or sexual harassment. This Sexual Abuse Incident Review is headed by the Chief Executive Officer.

There were no incidents within the past twelve (12) months that required an incident review. The Sexual Abuse Incident Review Team consists of upper-level management, medical, clinical, PREA Coordinator, and an investigator. All PREA Sexual Abuse Incident Reviews and findings are incorporated into the Annual Report by the PREA Coordinator. The PREA Coordinator stated that the Sexual Abuse Incident Review Team will look at the time of the incident, staff on duty, location of the incident, LGBTI identification, gender issues, gang status or affiliation, race, or other group dynamics, training, change in policy or procedure, review video footage, and physically examine the area.

Cove PREP has a Sexual Abuse Incident Review Form which has been reviewed by this auditor. There have been no allegations reported during the past twelve (12) months, thus there were no Sexual Abuse Incident Review Forms to review.

Reviewed documentation to determine compliance:

- Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy
- Pre-Audit Questionnaire
- Sexual Abuse Incident Review Form

Interviews:

- Interview with Chief Executive Officer
- Interview with Director of Operations who is a member of the Incident Review Team
- Interview with PREA Coordinator

115.387	Data collection
	<p data-bbox="280 188 983 224">Auditor Overall Determination: Meets Standard</p> <p data-bbox="280 264 564 300">Auditor Discussion</p> <p data-bbox="280 340 1477 667">a-f) Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states that the PREA Coordinator collects uniform data for all allegations of sexual abuse based on incident reports, investigation files, and incident reviews. The PREA Coordinator shall aggregate 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. Upon requests, Cove PREP shall provide all such data from the previous calendar year to the Department of Justice no later than June 30th.</p> <p data-bbox="280 707 1477 945">An interview with PREA Coordinator indicated that she needs to keep detailed records for all incidents to generate the annual report and/or data required by the United States Department of Justice. There were no allegations of sexual abuse during the past twelve (12) months. The facility has not been asked to submit the Annual Sexual Violence form during the past twelve (12) months by the Department of Justice.</p> <p data-bbox="280 985 1445 1142">This auditor was able to review the agency website and reviewed the 2023 Annual Report that is posted on its website. The facility had to be asked to submitted the 2023 Annual Report both prior to the audit and during the on-site portion of the audit before it was posted on the Cove PREP website.</p> <p data-bbox="280 1182 1477 1509">The 2023 annual report had not been submitted or posted on the agency website until the second day of the on-site portion of the audit. This auditor determined that the facility was not in compliance with this standard. The facility has failed to post reports prior to 2023. Cove PREP will be placed on a 120-day Corrective Acton to collect and maintain data, review with the Administrative Team, and compile the information to be utilized in the Annual Report which must be posted each year. The facility will be required to submit Monthly Meeting Minutes to this auditor containing data collection review during the 120-day Corrective Action period.</p> <p data-bbox="280 1550 1477 1917">The PREA Coordinator has submitted monthly minutes of administrative meetings noting that they had discussed PREA related information during the monthly meeting. There were no allegations or grievances submitted during the corrective action period. The minutes of this meeting have been uploaded into the portal. Cove PREP has completed and uploaded the 2023 Annual Report on its website. This was reviewed and confirmed by this auditor. The PREA Coordinator has created a secure file cabinet to maintain all PREA related documents which is kept locked at all times. The PREA Coordinator was interviewed during the corrective action period to confirm this process. Cove PREP is now in compliance with this standard.</p> <p data-bbox="280 1957 1011 1993">Reviewed documentation to determine compliance:</p>

	<ul style="list-style-type: none"> • Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Pre-Audit Questionnaire • 2023 Annual PREA Report • Agency Website <p>Interview:</p> <ul style="list-style-type: none"> • Interview with Chief Executive Officer • Interview with PREA Coordinator
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115.388	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>a) Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy states Cove PREP shall meet, no less than annually, to review information collected from all Sexual Abuse Incident Reviews and aggregated data included on the Survey of Sexual Violence Summary in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training including:</p> <ol style="list-style-type: none"> 1. Identifying problem areas 2. Taking corrective action on an on-going basis 3. Preparing an annual report of its findings and corrective actions for Cove PREP after corrective actions <p>Such a report shall include a comparison of the current year’s data and corrective actions with those from the prior years and shall provide an assessment of Cove PREP’s progress in addressing sexual abuse.</p> <p>Cove PREP is not in compliance with this standard due to not meeting regularly and reviewing data collect regarding any sexual abuse or sexual harassment.</p> <p>b-c) The annual report shall be approved by the Chief Executive Officer and made readily available to the public through its website. Specific material is redacted from the reports when publication would present a clear and specific threat to the safety and security of the facility but must indicate the nature of the material redacted. Cove PREP shall also remove all personal identifiers from the report. The most recent Annual PREA Report (2023) is posted on its website and was reviewed by this auditor.</p> <p>d) Upon request, Cove PREP provides all program specific data from the previous</p>

	<p>calendar year to the Department of Justice in the form of the Survey of Sexual Victimization. This has not been requested by the Department of Justice.</p> <p>Cove PREP will be placed on a 120-day Corrective Action period. During this time, they will be required to meet monthly to document and review data collected regarding any sexual abuse or sexual harassment. PREA Coordinator will be required to submit monthly documentation to this auditor during the 120-day Corrective Action period.</p> <p>The PREA Coordinator has submitted monthly minutes of administrative meetings noting that they had discussed PREA related information during the monthly meeting. There were no allegations or grievances submitted during the corrective action period. The minutes of this meeting have been uploaded into the portal. Cove PREP has completed and uploaded the 2023 Annual Report on its website. This was reviewed and confirmed by this auditor. The PREA Coordinator was interviewed by this auditor during the corrective action period to confirm this. Cove PREP is now in compliance with this standard.</p> <p>Reviewed documentation to determine compliance:</p> <ul style="list-style-type: none"> • Cove PREP Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy • Pre-Audit Questionnaire • PREA Annual Report (2023) • Cove PREP website <p>Interviews:</p> <ul style="list-style-type: none"> • Interview with Chief Executive Officer • Interview with PREA Coordinator
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115.389	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	a-d) Cove PREP Zero-Tolerance for Sexual Abuse and/or Sexual Harassment Policy requires that aggregated sexual abuse data is made readily available to the public at least annually through the agency website. Data collected is retained for twelve (12) years after the initial collection, unless Federal, State, or local law requires otherwise.

The facility's Annual PREA Report is reviewed and approved by the Chief Executive Officer and made available to the public through its website. The PREA Coordinator noted that no personally identifiable information is included in the report. The most recent Annual PREA Report (2023) is posted on the Cove PREP website and was reviewed by this auditor. This report was posted on the second day of the on-site portion of the audit.

The 2023 annual report had not been submitted or posted on the agency website until the second day of the on-site portion of the audit. This auditor determined that the facility was not in compliance with this standard. The facility has failed to post reports prior to 2023. Cove PREP will be placed on a 120-day Corrective Acton to collect and maintain data, review with the Administrative Team, and compile the information to be utilized in the Annual Report which must be posted each year. The facility will be required to submit Monthly Meeting Minutes to this auditor containing data collection review during the 120-day Corrective Action period.

The PREA Coordinator has submitted monthly minutes of administrative meetings noting that they had discussed PREA related information during the monthly meeting. There were no allegations or grievances submitted during the corrective action period. The minutes of this meeting have been uploaded into the portal. Cove PREP has completed and uploaded the 2023 Annual Report on its website. This was reviewed and confirmed by this auditor. The PREA Coordinator has created a secure file cabinet to maintain all PREA related documents which is kept locked at all times. The PREA Coordinator was interviewed during the corrective action period to confirm this process. Cove PREP is now in compliance with this standard.

Reviewed documentation to determine compliance:

- Zero-Tolerance of Sexual Abuse and/or Sexual Harassment Policy
- Pre-Audit Questionnaire
- PREA Annual Report (2023)
- Cove PREP website

Interviews:

- Interview with Chief Executive Officer
- Interview with PREA Coordinator

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

	<p>a-n) Cove PREP was first audited October 2015, during the second year of the first three-year cycle. The facility was re-audited on August 5, 2019, third year of the second three-year cycle and was found to be fully compliant. This re-audit occurred on June 17, 2024 during the second year of the fourth three-year cycle.</p> <p>The facility provided all requested information via e-mail. The audit notification was posted more than six (6) weeks prior to the on-site portion of this audit (posted on March 19, 2024), and pictures of the notifications posted in all common areas, living units, conference room, staff offices, and the front entrance were submitted to the auditor via email. During the tour of the facility, the notifications were still posted and viewed by this auditor. This auditor did not receive any correspondence from staff or residents. This auditor was permitted to and did tour all areas of the facility and was provided a private and confidential area of the facility to complete interviews of residents and staff.</p> <p>The agency has failed to conduct a PREA audit during the last 3-year (2020-2023) cycle citing COVID issues and inability to secure an auditor.</p> <p>Reviewed documentation to determine compliance:</p> <ul style="list-style-type: none"> • Pre-Audit Questionnaire • Tour of facility • Cove PREP website • PREA Audit Notification • Photographs of PREA Audit Notification
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115.403	Audit contents and findings
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Final PREA audit report from 2020 is posted on the Cove PREP website. The final PREA reports were posted within ninety (90) days of issuance by the auditor. This was confirmed by reviewing the Cove PREP website and an interview with the PREA Coordinator.</p> <p>Reviewed documentation to determine compliance:</p> <ul style="list-style-type: none"> • Cove PREP website <p>Interview:</p> <ul style="list-style-type: none"> • Interview with PREA Coordinator

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

115.335 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.331? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Do medical and mental health care practitioners contracted by and volunteering for the agency also receive training mandated for contractors and volunteers by §115.332? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	yes
115.341 (a)	Obtaining information from residents	
	Within 72 hours of the resident's arrival at the facility, does the agency obtain and use information about each resident's personal history and behavior to reduce risk of sexual abuse by or upon a resident?	yes
	Does the agency also obtain this information periodically throughout a resident's confinement?	yes
115.341 (b)	Obtaining information from residents	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes
115.341 (c)	Obtaining information from residents	
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Prior sexual victimization or abusiveness?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Any gender nonconforming appearance or manner or identification as lesbian, gay, bisexual, transgender, or intersex, and whether the resident may therefore be vulnerable to sexual abuse?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Current charges and offense history?	yes
	During these PREA screening assessments, at a minimum, does	yes

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

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

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

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

	entity or office that is not part of the agency?	
	Is that private entity or office able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the resident to remain anonymous upon request?	yes
	Are residents detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security to report sexual abuse or harassment?	yes
115.351 (c)	Resident reporting	
	Do staff members accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Do staff members promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.351 (d)	Resident reporting	
	Does the facility provide residents with access to tools necessary to make a written report?	yes
115.351 (e)	Resident reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of residents?	yes
115.352 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address resident grievances regarding sexual abuse. This does not mean the agency is exempt simply because a resident does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
115.352 (b)	Exhaustion of administrative remedies	

	Does the agency permit residents to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an resident to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.352 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: A resident who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	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
115.352 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by residents in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	If the agency determines that the 90 day timeframe is insufficient to make an appropriate decision and claims an extension of time (the maximum allowable extension of time to respond is 70 days per 115.352(d)(3)) , does the agency notify the resident in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the resident does not receive a response within the time allotted for reply, including any properly noticed extension, may a resident consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
115.352 (e)	Exhaustion of administrative remedies	

	Are third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, permitted to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of residents? (If a third party, other than a parent or legal guardian, files such a request on behalf of a resident, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the resident declines to have the request processed on his or her behalf, does the agency document the resident's decision? (N/A if agency is exempt from this standard.)	yes
	Is a parent or legal guardian of a juvenile allowed to file a grievance regarding allegations of sexual abuse, including appeals, on behalf of such juvenile? (N/A if agency is exempt from this standard.)	yes
	If a parent or legal guardian of a juvenile files a grievance (or an appeal) on behalf of a juvenile regarding allegations of sexual abuse, is it the case that those grievances are not conditioned upon the juvenile agreeing to have the request filed on his or her behalf? (N/A if agency is exempt from this standard.)	yes
115.352 (f)	Exhaustion of administrative remedies	
	Has the agency established procedures for the filing of an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging a resident is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes

	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the resident is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.352 (g)	Exhaustion of administrative remedies	
	If the agency disciplines a resident for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the resident filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
115.353 (a)	Resident access to outside confidential support services and legal representation	
	Does the facility provide residents with access to outside victim advocates for emotional support services related to sexual abuse by providing, posting, or otherwise making accessible mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies?	yes
	Does the facility enable reasonable communication between residents and these organizations and agencies, in as confidential a manner as possible?	yes
115.353 (b)	Resident access to outside confidential support services and legal representation	
	Does the facility inform residents, prior to giving them access, of the extent to which such communications will be monitored and	yes

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

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

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

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

	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.367 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.367 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations, such as housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services?	yes
115.367 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report	yes

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

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

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

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

	has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.373 (d)	Reporting to residents	
	Following a resident's allegation that he or she has been sexually abused by another resident, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following a resident's allegation that he or she has been sexually abused by another resident, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes
115.373 (e)	Reporting to residents	
	Does the agency document all such notifications or attempted notifications?	yes
115.376 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes

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

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

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

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

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

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

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

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

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

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