

PREA Facility Audit Report: Final

Name of Facility: Riverside Treatment Center

Facility Type: Community Confinement

Date Interim Report Submitted: NA

Date Final Report Submitted: 09/05/2025

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: Lynni O'Haver	Date of Signature: 09/05/2025

AUDITOR INFORMATION	
Auditor name:	O'Haver, Lynni
Email:	katmai910@icloud.com
Start Date of On-Site Audit:	08/11/2025
End Date of On-Site Audit:	08/12/2025

FACILITY INFORMATION	
Facility name:	Riverside Treatment Center
Facility physical address:	4700 South Riverside Drive, Fort Worth, Texas - 76119
Facility mailing address:	300 E Midway Dr, Euless, Texas - 76039

Primary Contact

Name:	Jenean Bray
Email Address:	jenean.bray@voatx.org
Telephone Number:	817-529-7368

Facility Director	
Name:	Sylvie Wagnon
Email Address:	swagnon@voatx.org
Telephone Number:	817-534-3432

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

Facility Characteristics	
Designed facility capacity:	100
Current population of facility:	97
Average daily population for the past 12 months:	88
Has the facility been over capacity at any point in the past 12 months?	No
What is the facility's population designation?	Both women/girls and men/boys
In the past 12 months, which population(s) has the facility held? Select all that apply (Nonbinary describes a person who does not identify exclusively as a boy/man or a girl/woman. Some people also use this term to describe their gender expression. For	

definitions of “intersex” and “transgender,” please see https://www.prearesourcecenter.org/standard/115-5)	
Age range of population:	19-75
Facility security levels/resident custody levels:	Community
Number of staff currently employed at the facility who may have contact with residents:	33
Number of individual contractors who have contact with residents, currently authorized to enter the facility:	3
Number of volunteers who have contact with residents, currently authorized to enter the facility:	0

AGENCY INFORMATION	
Name of agency:	Volunteers of America Texas
Governing authority or parent agency (if applicable):	
Physical Address:	300 East Midway Drive, Euless, Texas - 76039
Mailing Address:	
Telephone number:	

Agency Chief Executive Officer Information:	
Name:	Angela King
Email Address:	aking@voatx.org
Telephone Number:	8175297358

Agency-Wide PREA Coordinator Information

Name:	Maudrey Jenean Bray	Email Address:	jenean.bray@voatx.org
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Facility AUDIT FINDINGS

Summary of Audit Findings

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

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

Number of standards exceeded:

2

- 115.251 - Resident reporting
- 115.254 - Third party reporting

Number of standards met:

39

Number of standards not met:

0

POST-AUDIT REPORTING INFORMATION

Please note: Question numbers may not appear sequentially as some questions are omitted from the report and used solely for internal reporting purposes.

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2025-08-11
2. End date of the onsite portion of the audit:	2025-08-12

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:	Just Detention International Women's Center Rape Crisis and Victim Services

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	100
15. Average daily population for the past 12 months:	88
16. Number of inmate/resident/detainee housing units:	3
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

23. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	88
25. 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:	8
26. 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:	11
27. 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
28. 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:	1
29. 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:	1
30. 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:	7

<p>31. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>32. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>33. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>34. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>35. 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>No text provided.</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>36. 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>30</p>
<p>37. 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>

38. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	0
39. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	No text provided.
INTERVIEWS	
Inmate/Resident/Detainee Interviews	
Random Inmate/Resident/Detainee Interviews	
40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	12
41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)	<input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input checked="" type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None

<p>42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p>	<p>The Auditor was provided with the facility resident roster for selection of a random representation of residents. The facility roster includes the resident's age, gender, race, ethnicity, date received at facility, tentative release date, program assignments, and housing assignment. This allowed the Auditor to accurately select a random representation of residents for the random interview process.</p>
<p>43. 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>44. 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>No text provided.</p>
<p>Targeted Inmate/Resident/Detainee Interviews</p>	
<p>45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>8</p>
<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>	
<p>47. 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>3</p>

<p>48. 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>1</p>
<p>49. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The facility reported no residents who were visually impaired were at the facility at the time of the on-site. The Auditor was able to confirm this information through the Auditor's observations during the facility tour, through the Auditor's review of resident files, and through the specialized interviews conducted with staff.</p>
<p>50. 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>1</p>
<p>51. 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>1</p>

<p>52. 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>53. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The facility reported no residents who identified as transgender or intersex at the facility at the time of the on-site. The Auditor was able to confirm this information through the Auditor's observations during the facility tour, through the Auditor's review of resident files, and through the specialized interviews conducted with staff.</p>
<p>54. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>

<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The facility reported no residents who reported sexual abuse and sexual harassment at the facility at the time of the on-site. The Auditor was able to confirm this information through the Auditor's observations during the facility tour, through the Auditor's review of resident files and investigative files and through the specialized interviews conducted with staff.</p>
<p>55. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The facility reported no residents who disclosed prior sexual victimization at intake at the facility at the time of the on-site. The Auditor was able to confirm this information through the Auditor's observations during the facility tour, through the Auditor's review of resident files, and through the specialized interviews conducted with staff.</p>
<p>56. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The facility reported no residents were placed in segregated housing/isolation for risk of sexual victimization or who alleged to have suffered sexual abuse. The Auditor was able to confirm this information through the Auditor's observations during the facility tour, through the Auditor's review of resident files, and through the specialized interviews conducted with staff.</p>
<p>57. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>No text provided.</p>
<p>Staff, Volunteer, and Contractor Interviews</p>	
<p>Random Staff Interviews</p>	
<p>58. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>12</p>
<p>59. 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>

60. Were you able to conduct the minimum number of RANDOM STAFF interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No
61. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):	No text provided.
Specialized Staff, Volunteers, and Contractor Interviews	
Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.	
62. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	14
63. Were you able to interview the Agency Head?	<input checked="" type="radio"/> Yes <input type="radio"/> No
64. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	<input checked="" type="radio"/> Yes <input type="radio"/> No
65. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No
66. Were you able to interview the PREA Compliance Manager?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

67. 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
68. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input type="radio"/> Yes <input checked="" type="radio"/> No
69. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input type="radio"/> Yes <input checked="" type="radio"/> No
70. Provide any additional comments regarding selecting or interviewing specialized staff.	No text provided.

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.

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

72. 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
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<p>73. 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)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>74. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>75. Informal conversations with staff during the site review (encouraged, not required)?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>76. 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, the Auditor conducted sixteen informal interviews with residents and inquired to each -</p> <p><i>Length of time at facility</i> <i>Received PREA Education</i> <i>How would you report an incident of PREA?</i> <i>Do you feel safe at this facility?</i></p>
<p>Documentation Sampling</p>	
<p>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>	
<p>77. 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>

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

Documents from resident files (20):

Resident receipt of Resident Handbook
Resident receipt of PREA Education
Initial Risk Assessment and the Reassessment
- verifying initial risk screening assessments and reassessments were completed within the required timeframe.

1 - Investigative file

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.

79. 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	1	0	1	0
Total	1	0	1	0

80. 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.

81. 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

82. 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	1	0	0
Total	0	1	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.

83. 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

84. 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

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

1

<p>86. 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>87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>0</p>
<p>88. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>89. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>Staff-on-inmate sexual abuse investigation files</p>	
<p>90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>1</p>
<p>91. 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>92. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p>Sexual Harassment Investigation Files Selected for Review</p>	
<p>93. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>a. Explain why you were unable to review any sexual harassment investigation files:</p>	<p>The facility reported receiving one allegation (sexual abuse) during the twelve-month reporting period.</p>
<p>94. 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 type="radio"/> No</p> <p><input checked="" 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>95. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>96. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

<p>97. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p>Staff-on-inmate sexual harassment investigation files</p>	
<p>98. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>99. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p>100. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p>101. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</p>	<p>No text provided.</p>

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

102. 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

103. 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

108. Who paid you to conduct this audit?

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

Identify the name of the third-party auditing entity

Corrections Consulting Services

Standards
<p>Auditor Overall Determination Definitions</p> <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)
<p>Auditor Discussion Instructions</p> <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>

115.211	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <p>Riverside Treatment Center PAQ</p> <p>Volunteers of America - Texas, <i>PREA Policy</i></p> <p>Riverside Treatment Center Organizational Chart</p> <p>Interviews conducted with:</p> <p>PREA Coordinator</p> <p>Facility Director</p>

Site Review Observations:

During the tour of the facility, the Auditor witnessed standardized bulletin boards throughout the facility, in multiple locations, consisting of the PREA Zero-Tolerance policy and internal and external reporting information for residents. The Audit Notices were printed on brightly colored paper.

Findings (By Provision):

115.211 (a) - Volunteers of America - Texas, *PREA Policy* states that the agency (Volunteers of America - Texas) and the facility (Riverside Treatment Center) has a zero-tolerance policy towards all forms of sexual abuse and sexual harassment between residents, staff, volunteers, visitors and contractors. The zero-tolerance policy includes education, prevention, detection and responding to sexual abuse and sexual harassment incidents immediately.

115.211 (b) - Volunteers of America - Texas, *PREA Policy* states the agency shall designate an upper-level employee with sufficient time and authority to develop, implement and oversee the agency's efforts to comply with the PREA National Standards and is responsible for oversight of all PREA related activities. The position of PREA Coordinator in the Volunteers of America - Texas (VOATX) organizational structure reflects that the PREA Coordinator is an upper-level position, and the PREA Coordinator reports to the Chief Program Officer.

The Volunteers of America - Texas, *PREA Policy* outlines the role and responsibilities of the PREA Coordinator to include being provided with the time and authority to develop, implement, and oversee the efforts to comply with the PREA standards within the facility. The PREA Coordinator is responsible for coordinating and monitoring PREA related activities.

The Auditor conducted an interview with the PREA Coordinator who verified she has sufficient time and authority in her position to accomplish PREA responsibilities for the facility. The PREA Coordinator reports directly to the Chief Program Officer. A review of the agency's organizational chart provided evidence that the facility has designated an upper-level position as the PREA Coordinator.

The Auditor interviewed the Agency Head and confirmed the responsibilities of the PREA Coordinator overseeing the Riverside Treatment Center. The Agency Head verified that the PREA Coordinator is provided with sufficient time and authority in

	<p>her position to accomplish these responsibilities.</p> <p>Upon review of the policy, the Volunteer of America – Texas (VOATX) organizational chart, and upon completion of interviews, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.</p>
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115.212	Contracting with other entities for the confinement of residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <p>Riverside Treatment Center PAQ</p> <p>Volunteers of America - Texas, <i>PREA Policy</i></p> <p>Findings (By Provision):</p> <p>115.212 (a-b) – Riverside Treatment Center does not contract for the confinement of its residents with private agencies or other entities, including other government agencies. The Auditor conducted separate interviews with the PREA Coordinator and the Agency Head and confirmed the information previously provided by the facility.</p> <p>Upon review of the policy and upon completion of the interviews, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.</p>

115.213	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review:

Riverside Treatment Center PAQ

Volunteers of America - Texas, *PREA Policy*

Volunteers of America - Texas, *Safe Housing Staffing Plan Assessment*

Interviews conducted with:

Facility Director or Designee

PREA Coordinator

Site Review Observations:

Daily operational functions

Findings (By Provision):

115.213 (a) - Volunteers of America - Texas, *PREA Policy* states the facility will develop a staffing plan that provides for expected levels of supervision and monitoring, to ensure the facility is safe and secure. The agency *Safe Housing Staffing Plan Assessment* requires facilities to conduct a yearly staffing plan assessment to determine and document whether adjustments are needed to ensure residents are protected from sexual abuse and sexual harassment. The assessment will include the following

- A review of the facility staffing plan to ensure it provides adequate levels of staffing
- The physical layout of the facility
- Review of the facility monitoring system
- The composition of the resident population
- Numbers and placement of staff supervising residents
- Facility has a policy to ensure intermediate to higher level supervisors complete unannounced rounds
- The prevalence of substantiated and unsubstantiated incidents of sexual abuse
- Any applicable state or local laws, regulations, or standards
- Any other relevant factors.

115.213 (b) - Volunteers of America - Texas, *PREA Policy* states the facility shall make its best effort to comply on a regular basis, with the approved PREA Staffing

Plan and shall document and justify all deviations. Deviations shall be documented and notifications made to Facility Director.

According to the information contained in the PAQ, Riverside Treatment Center reported no deviations from the staffing plan during the auditing period. The Auditor conducted an interview with the Facility Director and the PREA Coordinator and each confirmed there were no deviations from the staffing plan in the 12 months prior to the audit. The average daily number of residents on which the facility-staffing plan was predicted was 100.

115.213 (c) - Volunteers of America - Texas *Safe Housing Staffing Plan Assessment* states the agency requires each facility to conduct a yearly staffing plan assessment to determine and document whether adjustments are needed to ensure residents are protected from sexual abuse and sexual harassment.

During the pre-on-site phase of the audit, the Auditor reviewed the *Riverside Treatment Center Annual Staffing Plan Assessment*. The Riverside Treatment Center Annual Staffing Plan Assessment provided a detailed review of the facility's staffing allocation as well as addressing the required considerations outlined in the agency policy and provision (a) of this standard.

The Auditor conducted an interview with the Facility Director regarding the *Riverside Treatment Center Staffing Plan Assessment*. The Facility Director discussed how the facility develops the staffing levels based on the facility's design, mission, resident population, and custody level. The Facility Director confirmed the PREA Coordinator provide a review of all positions identified in the staffing plans. The Facility Director confirmed when developing a staffing plan, several items are taken into consideration such as internal reviews, components of the physical plant, composition of the resident population, and the prevalence of substantiated and unsubstantiated allegations of sexual abuse. To ensure compliance with the staffing plan, Facility Director and Supervisory Staff conduct rounds throughout the facility for visual verification of staff assignments.

The Auditor conducted an interview with the PREA Coordinator and confirmed the process of developing a staffing plan previously described by the Facility Director. The PREA Coordinator also confirmed that an assessment of the facility-staffing plan is conducted annually, and each are consulted regarding any adjustments to the staffing plan.

	<p>The Auditor reviewed the average daily number of residents' report, staff rosters, facility blueprint, and daily resident activity schedules to verify adequate staff coverage in comparison to resident population, resident movement, and facility size and layout. The Auditor toured the facility and observed the daily operational functions, staff interacting with residents, and general resident movement. These observations provided additional verification of policy and of standard compliance.</p> <p>Upon review of the policies and documentation provided and upon completion of interviews, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.</p>
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115.215	Limits to cross-gender viewing and searches
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Document Review:</p> <p>Riverside Treatment Center PAQ</p> <p>Volunteers of America – Texas, <i>PREA Policy</i></p> <p>Riverside Treatment Center Training Curriculum & Attendance Log</p> <p>Interviews conducted with:</p> <p>Random sample of Residents</p> <p>Random sample of Staff</p> <p>Site Review Observations:</p> <p>Daily operational functions Staff interaction with Residents</p> <p>Resident movement</p> <p>Findings (By Provision):</p> <p>115.215 (a, b, c) – Volunteers of America - Texas, <i>PREA Policy</i> authorizes the</p>

following types of staff searches of resident:

- Metal Detector
- Pat Search - conducted by the same gender. Residents requesting a search conducted by staff of opposite gender must complete written request (Transgender Preference Form) and approved by BOP RRM and Facility Director.
- Frisk Search - conducted by same gender
- Strip Search - ONLY conducted by law enforcement or medical personnel
- Body Cavity Search - conducted by an independent health care provider

The Auditor conducted an interview with the Facility Director and the PREA Coordinator and confirmed that no cross-gender strip searches or cross-gender visual body cavity searches were conducted during the twelve-month auditing period.

The Auditor reviewed the documentation provided to include shift rosters, shift assignments, and daily resident activity schedule. The Auditor observed the facility operations throughout the day, to include continuous resident movement throughout the facility, continuous physical interactions between staff and residents, residents participating in-group activities, and residents performing job assignments throughout the facility. The Auditor also observed opposite gender announcements being conducted throughout the facility tour.

115.215 (d) - Volunteers of America - Texas, *PREA Policy* states residents may shower, perform bodily functions, and change clothing without 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. Staff of the opposite gender announce their presence when entering a resident room or bathroom where residents are likely to be showering, performing bodily functions or changing clothing. Staff of the same gender are used whenever possible. Urinalysis testing will be conducted by staff of the same gender. No exceptions.

The Auditor requested an up-to-date facility resident roster. The facility resident roster provides a list of all residents currently at the facility and is organized by housing unit, provides resident characteristics such as age, gender, race, date received at facility, tentative release date, program assignments, classification level, and housing assignment. This allowed the Auditor to accurately select a random representation of residents for the interview process. All residents selected for interviews were selected under the guidance of the National PREA Resource Center, *PREA Compliance Audit Instrument - Interview Guide for Residents*.

The Auditor conducted twelve resident interviews, and all twelve residents interviewed confirmed they have privacy while showering, changing clothes, or using the bathroom facilities. Additionally, all twelve residents interviewed confirmed staff of the opposite gender announce their presence prior to entering the housing unit. The Auditor inquired to each female resident interviewed if she has ever been unable to participate in activities outside the housing area due to female staff being unavailable to conduct pat-down searches. All female residents denied being refused the opportunity to participate in activities with all residents confirming that a female staff member is always present and available.

115.215 (e) - Volunteers of America - Texas, *PREA Policy* states searches or physical examination of a transgender or intersex resident for the sole purpose of determining the resident's genital status is prohibited. If the resident's genital status is unknown, it may be determined 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.

The Auditor reviewed documentation provided by the facility showed the facility has had zero searches of a transgender or intersex resident for the sole purpose of determining the resident's genital status.

The Auditor requested interviews with transgender or intersex residents. The facility provided the Auditor with documentation which depicted there were no transgender residents in custody at the Riverside Treatment Center, therefore residents in this targeted category were not interviewed.

115.215 (f) - Volunteers of America - Texas, *PREA Policy* states security staff shall receive training on how to conduct cross-gender pat-down searches and searches of transgender and intersex residents, in a manner that is professional, respectful and the least intrusive possible while being consistent with security needs. Riverside Treatment Center will utilize the *Guidance in Cross-Gender and Transgender Pat Searches* training curriculum from the PREA Resource Center to educate and train security staff. This training shall be conducted on a biennial basis. Staff shall receive a Certificate of Completion and sign an acknowledgement of understanding of the training they receive.

The Auditor reviewed the training records and training curriculum provided to staff members that included how to perform cross-gender pat-down searches and

	<p>searches of transgender and intersex residents. Training records indicated staff members receive training on the facility’s PREA policies and how to perform cross-gender pat-down searches annually. The training curriculum outlined the facility’s policy on cross-gender pat-down searches and searches of transgender and intersex residents, policy prohibiting search of residents for the sole purpose of determining the resident’s genital status, defining exigent circumstances, and conducting searches in a professional and respectful manner.</p> <p>The Auditor interviewed random staff members and inquired to each if they have received training on how to conduct cross-gender pat-down searches and searches of transgender and intersex residents in a professional manner, consistent with security needs. Each staff member confirmed receiving training on cross-gender searches and searches of transgender and intersex residents annually during Annual Training. Additionally, staff confirmed receiving refresher training throughout the year.</p> <p>Upon review of staff training records and training curriculum, observations during the on-site visit, and information obtained during interviews, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and with the requirements that complies with the PREA standard.</p>
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<p>115.216</p>	<p>Residents with disabilities and residents who are limited English proficient</p>
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Document Review:</p> <p>Riverside Treatment Center PAQ</p> <p>Volunteers of America - Texas, <i>PREA Policy</i></p> <p>Interviews conducted with:</p> <p>Facility Director</p> <p>Targeted Residents (Limited English Proficient, Hearing, Vision, Physical or Cognitive Impaired)</p> <p>Random sample of Staff</p>

Site Review Observation:

Standardized PREA bulletin boards were observed throughout the facility (English & Spanish)

Findings (By Provision):

115.216 (a) - Volunteers of America - Texas, *PREA Policy* states residents are provided equal opportunities to participate in or benefit from all aspects of VOATX's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. PREA education will be provided in formats accessible to all residents, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as residents who have limited reading skills.

115.216 (b) - Volunteers of America - Texas, *PREA Policy* states to ensure effective communications, all efforts will be made to bring interpreters or other skilled professionals into the program as soon as staff discover any residents with disabilities and/or has limited English proficient. VOATX utilizes Worldwide Interpreters, Inc.

115.216 (c) - Volunteers of America - Texas, *PREA Policy* states residents will not be relied upon to provide interpretation services, act as readers, or provide other types of communication assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-responder duties, or the investigation of the resident's allegations. In these exceptions or limited circumstances, documentation of all such cases shall be documented. In the last 12 months the facility has had zero instances where residents were used as interpreters.

The Auditor conducted interviews with random staff members. Each staff member confirmed the agency policy prohibiting the use of a resident to provide translation services except in limited circumstances where an extended delay in obtaining an interpreter could compromise the resident's safety; all staff members acknowledged the use of either the language line (interpreter services) or contacting another staff member to translate.

The Auditor interviewed targeted residents with either a physical, hearing, vision, or

cognitive impairment or who were Limited English Proficient. Each resident acknowledged receiving PREA information during the intake process. Each resident described receiving the comprehensive PREA orientation within the first few days after arriving at the facility. Additionally, each resident acknowledged the information was provided to him in an accessible format specific to his individual needs.

The Auditor conducted an interview with the PREA Coordinator regarding how the facility takes appropriate steps to ensure that all residents have an equal opportunity to participate in the facility’s efforts to prevent, detect, and respond to sexual abuse and sexual harassment. The PREA Coordinator detailed the efforts made by the facility to ensure impaired residents are provided opportunities and benefits equal to those of unimpaired residents. Residents with either impairments or LEP residents are provided with alternatives to accommodate participation in the PREA program such as videos and brochures tailored to their primary language. Additionally, every effort is made to provide all training in a format that will be easily understood by residents who have a physical or developmental impairment or who have limited English proficiency.

Upon review of the policies, resident intake procedures, and upon completion of interviews, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

115.217	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <p>Riverside Treatment Center PAQ</p> <p>Volunteers of America - Texas, <i>PREA Policy</i></p> <p>Interviews conducted with:</p> <p>Administrative / Human Resources Staff</p> <p>Site Review Observation:</p>

Documentation reviewed demonstrated completed background checks upon hire and every five years thereafter. Administrative questions are asked during the application process.

Findings (By Provision):

115.217 (a) - Volunteers of America - Texas, *PREA Policy* prohibits hiring or promoting anyone who may have contact with residents, and prohibits enlisting the services of any contractor who may have contact with residents who:

- Has engaged in sexual abuse in a prison, jail, lock up, community confinement facility, juvenile facility, or another jurisdiction;
- Has been convicted of engaging or attempting to engage in any type of 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; and/or
- Has been civilly or administratively adjudicated to have engaged in any sexual abuse.

115.217 (b) - Volunteers of America - Texas, *PREA Policy* states the facility shall also 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.

115.217 (c, d) - Volunteers of America - Texas, *PREA Policy* states before any new employee, who may have contact with residents is hired residents, the facility shall perform a criminal background records check, contact all prior institutional employers for any information regarding sexual abuse or alleged sexual abuse, and best efforts are made to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse in consistent with federal, state, and local laws.

Riverside Treatment Center reported, in the twelve months prior to the audit, seventeen criminal background checks were performed of persons hired or promoted who may have contact with residents.

115.217 (e) - Volunteers of America - Texas, *PREA Policy* states the facility shall

conduct criminal background records checks at least every five years of current employees and contractors who may have contact with residents or have a system in place for otherwise capturing such information for current employees and contractors.

115.217 (f) – Volunteers of America - Texas, *PREA Policy* states the facility shall ask all applicants and staff who may have contact with residents directly about previous misconduct in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current employees.

115.217 (g) – Volunteers of America - Texas, *PREA Policy* states material omissions or the provision of materially false information regarding sexual abuse shall be grounds for termination.

115.217 (h) – Volunteers of America - Texas, *PREA Policy* states unless prohibited by law, the facility shall provide information on substantiated allegations of sexual abuse involving a former staff upon receiving a request from an institutional employer for whom the staff has applied to work.

The Auditor conducted an interview with the agency’s Administrative/ Human Resources personnel who confirmed the agency conducts the required criminal background checks prior to hiring a new staff, staff who are considered for promotions, or enlisting the services of a contractor or volunteer and at least once every five years. The HR Staff Member confirmed the agency’s requirement imposed upon all staff to disclose any previous misconduct and the agency’s requirement to provide information regarding the former staff upon request of another institution or agency. Background checks are performed by VOA – Texas in accordance with Texas criminal background guidelines, program mandates, and all applicable state and local laws.

Upon review of the policies and review of personnel files and upon completion of the interview conducted with the Human Resources Staff, the Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

115.218	Upgrades to facilities and technology
	Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

Riverside Treatment Center PAQ

Volunteers of America - Texas, *PREA Policy*

Interviews conducted with:

Agency Head

Facility Director

115.218 (a) - The Riverside Treatment Center PAQ states the facility has not acquired a new facility or made substantial expansions or modifications to existing facilities since the last PREA audit.

115.218 (b) - The Riverside Treatment Center PAQ states the facility has installed additional cameras and/or updated the video monitoring system since the last PREA audit.

The Auditor conducted an interview with the Agency Head and discussed if the agency considers how modifications or expansions to a facility affects the ability to protect residents from sexual abuse. The Agency Head explained how facility modification has always been focused on providing safety to both staff and residents. Modifications or expansions that are not in the best interest of the facility are not given consideration.

The Auditor conducted an interview with the Facility Director who confirmed that prior to designing or acquiring any new facility or when planning any substantial expansion or modification, of existing facilities, the facility shall consider the effect of the design, acquisition, expansion, or modification might have upon the facility's ability to protect residents from sexual abuse.

The Facility Director also confirmed that prior to the installation of cameras the facility shall consider how the addition of such technology would enhance the agency's ability to protect residents from sexual abuse. The Facility Director confirmed to the Auditor that Riverside Treatment Center has not undergone modifications or expansions to the facility since the last audit, however, the Facility

	<p>Director confirmed the facility expanded the video monitoring system which now provides full coverage of all areas accessible to residents, excluding resident bathrooms and living areas.</p> <p>Upon review of the policy and upon completion of the interviews conducted with the Agency Head and the Facility Director, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.</p>
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115.221	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <p>Riverside Treatment Center PAQ</p> <p>Volunteers of America - Texas, <i>PREA Policy</i></p> <p>VOATX, Riverside Treatment Center MOU w/ The Women’s Center Rape Crisis & Victim Services</p> <p>SANEs / SAFEs Uniform Evidence Protocol</p> <p>Interviews conducted with:</p> <p>Random sample of Staff</p> <p>Victim Advocate</p> <p>Findings (By Provision):</p> <p>115.221 (a) - Volunteers of America - Texas, <i>PREA Policy</i> states the investigating agency shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.</p> <p>115.221 (b) - Volunteers of America - Texas, <i>PREA Policy</i> states the protocol shall be,</p>

as appropriate, adapted from or otherwise based on the most recent edition of the Department of Justice's Office on Violence against Women publication, *A National Protocol for Sexual Assault Medical Forensic Examinations, Adults or similarly comprehensive and authoritative protocols developed after 2011.*

The Auditor interviewed random staff members regarding his/her role as a First Responder to an allegation of sexual abuse. The staff members provided specific details of their responsibilities as a First Responder. These responsibilities include separating the victim and abuser, preserving, and protecting the crime scene, requesting that the alleged victim not take any actions that could destroy physical evidence, ensuring the alleged abuser does not take any actions, which would destroy physical evidence, and to immediately notify Medical and Mental Health. In addition, each staff member acknowledged the importance of the agency's response protocol to a sexual abuse allegation as well as his or her role as a First Responder.

115.221 (c) - Volunteers of America - Texas, *PREA Policy* states the investigating entity shall offer all victims of sexual abuse access to forensic medical examination. Resident victims would be transported to a local hospital, with the victim's permission, where he/she may receive a forensic medical exam by medical personnel without financial cost to the victim. Such examinations shall be performed by SAFE or SANE where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners.

The Auditor reviewed the Texas Senate Bill (SB-1191) which requires health care facilities to be equipped to conduct medical forensic exams for sexual abuse victims. Senate Bill 1191 also requires hospitals not designated a forensic exam facility are required to train personnel in the basic sexual assault forensic evidence collection.

According to the information previously reported in the PAQ, there were no forensic exams completed during the twelve months prior to the audit. The Auditor conducted an interview with the PREA Coordinator who provided the Auditor with an overview of the procedures if a forensic exam was needed, such services are provided at the nearest local hospital with the forensic exam being completed by a certified SANE Nurse. The PREA Coordinator and the Facility Director also confirmed there were no forensic examinations completed within the past twelve months for Riverside Treatment Center.

115.221 (d, h) - Volunteers of America - Texas, *PREA Policy* states the facility shall

attempt to make available to the victim a victim advocate from a rape crisis center. If a rape crisis center is not available to provide victim advocate services, the agency shall make available to provide these services a qualified staff member from a community-based organization or a qualified agency staff member. Agencies shall document efforts to secure services from rape crisis centers.

115.221 (e) - Volunteers of America - Texas, *PREA Policy* states as requested by the victim, either the victim advocate, a qualified investigating entity staff member, or qualified community-based organization staff member shall accompany and support the victim through the forensic medical examination process and investigatory interviews and shall provide emotional support, crisis intervention, information and referrals.

The Auditor reviewed the existing MOU between Riverside Treatment Center and the Women's Center Rape Crisis & Victim Services. The agreement uses clear and concise language, provides the agency's responsibilities, the advocacy's responsibilities, and the reporting and documentation requirements for each.

The Women's Center Rape Crisis & Victim Services is an organization established to provide crisis intervention and advocacy services to victims of domestic and sexual violence. The Women's Center Rape Crisis & Victim Services provides services for victims of domestic violence and sexual assault in Tarrant County. The Women's Center Rape Crisis & Victim Services provides immediate access to 24/7 crisis hotline, crisis intervention and advocacy, emotional support, safety planning, 24-hour rape crisis support through hospital advocates which provide advocacy, case management and support to sexual assault survivors.

The Auditor conducted an interview with an advocate from the Women's Center Rape Crisis & Victim Services, and she confirmed the existing agreement and responsibilities within the agreement and provided an overview of services provided to resident victims of sexual abuse. The services provided to resident victims of sexual abuse include emotional support services, crisis counseling, victim advocate upon request for advocacy accompaniment during forensic exams or investigatory interviews, and victim referrals for follow-up support services.

The Auditor requested interviews with residents who reported an incident of sexual abuse or sexual harassment during the twelve-month auditing period. The facility provided documentation which reflected the residents were no longer in custody, therefore, residents in this targeted category were not interviewed.

	<p>115.221 (f) - Volunteers of America - Texas, <i>PREA Policy</i> states allegations of sexual abuse, the Program Director shall notify the local law enforcement department as soon as possible and the contracting agency for investigation. The Program Director must ensure that all protocols are followed for crime scene preservation in order to enable the local authorities to conduct a proper investigation of all allegations of sexual abuse.</p> <p>115.221 (g) - This provision does not apply.</p> <p>Upon review of the policies, documentation, and observations made during the facility tour, and upon completion of interviews conducted prior to and during the on-site visit, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.</p>
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115.222	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <p>Riverside Treatment Center PAQ</p> <p>Volunteers of America - Texas, <i>PREA Policy</i></p> <p>Interviews conducted with:</p> <p>Agency Head</p> <p>Investigative Staff</p> <p>Site Review Observation:</p> <p>SA/SH Investigation files (1)</p> <p>Findings (By Provision):</p>

115.222 (a) - Volunteers of America - Texas, *PREA Policy* states the facility shall ensure that an administrative investigation and a referral for a criminal investigation, where appropriate, is completed for all allegations of sexual abuse and sexual harassment.

115.222 (b, c) - Volunteers of America - Texas, *PREA Policy* states the facility shall have in place a policy to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. The Program Director shall notify the local law enforcement department as soon as possible and any contracting agency. The program shall request that the investigating agency abide by all PREA requirements/standards.

The Auditor conducted an interview with the Agency Head regarding how the agency ensures that an administrative or criminal investigation is completed for allegations of sexual abuse or sexual harassment. The Agency Head explained that allegations of sexual abuse or sexual harassment are investigated either by designated facility investigators for administrative investigations, or the local Police Department for criminal investigations, and the Program Director would also notify the contracting agency.

115.222 (d) - The Auditor is not required to audit this provision.

115.222 (e) - The Auditor is not required to audit this provision.

The Auditor conducted an interview with a Facility Investigator and requested an overview of the investigative process and the documentation required in a case when an allegation of sexual abuse or sexual harassment incident occurs within the facility.

The Facility Investigator explained upon receiving notification of a sexual abuse or sexual harassment incident, the investigation is initiated promptly and is completed thoroughly and objectively by a qualified investigator who has received training and education and has the authority to conduct such investigations.

The Facility Investigator confirmed that allegations are investigated, initially by a facility investigator, and if during the initial fact-finding process there is an indication that a criminal act was committed, the allegation would be immediately referred to the local law enforcement for investigation.

The Facility Investigator explained that if an allegation is referred to local law enforcement for criminal investigation, the Riverside Treatment Center investigator would continue with the administrative investigation with a focus on determining if policies and staff actions were appropriate and effective. The administrative investigation is considered a fact-finding exercise in order to make appropriate operational and housing changes to maintain a safe and secure environment, focusing on potential policy violations or employee misconduct, gathering evidence through interviews and document, review to form findings and support disciplinary actions.

The Facility Investigator provided the Auditor with an overview to include that the initial process includes notifying and consulting with the PREA Coordinator, gathering information from the initial reports, ensuring the resident victim receives victim advocacy support services, forensic medical exam, if appropriate, collecting evidence, photographs, interview staff, witnesses, review unit documentation pertaining to the investigation, and interviewing the victim - depending on emotional and physical state.

The Facility Investigator also provided an overview of the various documents contained in each case file to include but not limited to the initial incident reports, notifications, medical and mental health forms, resident rosters, advocacy information, witness statements, victim and alleged aggressor statements, investigative report, and notification of case disposition to resident (resident acknowledgement).

The Auditor reviewed the investigation file from the twelve-month auditing period. The Auditor reviewed the investigation thoroughly and systematically to ensure the case contained all the correct procedures, completed documentation, and that all processes were completed as required.

The investigative file contained all the appropriate documentation, and the incident was investigated promptly, thoroughly, and objectively by a qualified investigator who has the training and the authority to conduct such investigations. The file contained documentation to include but not limited to the initial incident reports - summary of the allegation, demographics of involved staff or resident(s) to include

	<p>advocacy acceptance or refusal, victim, witness, and alleged aggressor statements, investigative summary, investigative findings, and notification of case disposition to resident.</p> <p>Upon review of the policies, documentation, and upon completion of the interviews, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.</p>
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115.231	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <p>Riverside Treatment Center PAQ</p> <p>Volunteers of America - Texas, <i>PREA Policy</i></p> <p>Riverside Treatment Center Staff Training Roster / Proof of Completion</p> <p>Interviews conducted with:</p> <p>Random sample of Staff</p> <p>Site Review Observations:</p> <p>PREA Awareness Training</p> <p>Findings (By Provision):</p> <p>115.231 (a - d) - Volunteers of America - Texas, <i>PREA Policy</i> states all current employees shall be trained in the PREA standards (requirements), and VOATX shall provide these employees with refresher training every year to ensure that these employees know VOATX's current sexual abuse and sexual harassment policies and procedures. The VOATX shall document through employee signature that they understand the training they have received. PREA training shall be tailored to the gender of the residents at the facility. All staff will be trained in the following:</p>

- The zero-tolerance policy on sexual abuse and sexual harassment
- How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures
- Resident rights to be free from sexual abuse and sexual harassment
- The right of residents and staff to be free from retaliation for reporting sexual abuse and sexual harassment
- The dynamics of sexual abuse and sexual harassment in confinement
- The common reactions of sexual abuse and sexual harassment victims
- How to detect and respond to signs of threatened & actual sexual abuse
- How to avoid inappropriate relationships with residents
- How to communicate effectively and professionally with residents, including LGBTI and gender nonconforming residents
- How to comply with laws relevant to mandatory reporting of sexual abuse to outside authorities

The Auditor reviewed training curriculum and documentation (electronic acknowledgements) verifying training comprehension and attendance. The training curriculum outlined the staff member's responsibilities in preventing, detecting, and response to resident sexual abuse and sexual harassment. The curriculum also provided staff with communicating effectively and professionally with residents, understanding that residents have the right to be free from sexual abuse and sexual harassment.

The Riverside Treatment Center PREA training curriculum provided to the Auditor provides a complete overview and a staff's role within the facility. The curriculum also included a resident's right to be free from sexual abuse and sexual harassment, including the right to be free from retaliation for reporting, prevention, detection, response and reporting of sexual abuse and sexual harassment, professional boundaries, and effective and professional communication with residents. The training also included the appropriate method to introduce/announce "opposite gender" staff and into an all-male or all-female housing unit and how to conduct cross-gender pat-down searches and searches of transgender and intersex residents in a professional and respectful manner consistent with security correctional environments. The training curriculum was extremely detailed with discussions of the required PREA standards, instruction videos, and group discussion scenarios.

The Auditor conducted random staff interviews, and each staff member articulated the agency's zero tolerance policy on sexual abuse and sexual harassment, their role and responsibilities regarding sexual abuse and sexual harassment prevention, detection, reporting, and response, how to communicate effectively and professionally with residents, and a resident right to be free from sexual abuse and

	<p>sexual harassment. All staff members acknowledged receiving the training every year during his/her In-service training.</p> <p>Upon review of the policies and training documentation listed above and previously discussed, and after completion of interviews, in addition to the files reviewed during the on-site visit, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.</p>
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115.232	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <p>Riverside Treatment Center PAQ</p> <p>Volunteers of America - Texas, <i>PREA Policy</i></p> <p>Findings (By Provision):</p> <p>115.232 (a, b) – Volunteers of America - Texas, <i>PREA Policy</i> states the facility shall ensure that all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency’s sexual abuse and sexual harassment prevention, detection, and response policies and procedures. 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, but all volunteers and contractors who have contact with residents shall be notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.</p> <p>115.232 (c) – Volunteers of America - Texas, <i>PREA Policy</i> states the agency shall maintain documentation confirming volunteers and contractors understand the training received.</p> <p>The Auditor reviewed the training curriculum for contract and volunteer staff which reflected the training was tailored based on the services they provide and the level</p>

	<p>of contact they have with residents and included the facility's zero-tolerance policy regarding sexual abuse and sexual harassment along with how to report such incidents.</p> <p>The facility has a very limited number of contract staff (three) and no volunteer staff that are authorized to enter the facility. At the time of the on-site, there were no contract staff available for the Auditor to conduct interviews.</p> <p>Upon review of the policy and after completion of interviews, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.</p>
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115.233	Resident education
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <p>Riverside Treatment Center PAQ</p> <p>Volunteers of America - Texas, <i>PREA Policy</i></p> <p>Riverside Treatment Center Resident Handbook (multiple languages)</p> <p>VOATX PREA Handbook – Reporting Sexual Misconduct (multiple languages)</p> <p>Riverside Treatment Center Acknowledgement of Receipt of PREA Education & PREA Handbook</p> <p>Interviews conducted with:</p> <p>PREA Coordinator</p> <p>Intake Staff</p> <p>Random Sample of Residents</p> <p>Targeted Residents (Limited English Proficient, Hearing, Vision, Physical or Cognitive Impaired)</p>

Site Review Observations:

Resident files - Comprehensive PREA Education

PREA Informational Signage posted throughout facility

Findings (By Provision):

115.233 (a, b) - Volunteers of America - Texas, *PREA Policy* states during the intake process all residents will receive information explaining the VOATX's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. Within 30 days of intake the VOATX shall provide comprehensive education to residents to include:

- VOATX's zero-tolerance policy on sexual abuse and sexual harassment
- Definitions of sexually abusive behavior and sexual harassment.
- Methods of prevention, detection, and reporting sexually abusive behaviors and sexual harassment.
- Treatment options and programs available to resident victims of sexually abusive behavior and sexual harassment.
- How to avoid inappropriate relationships with residents;
- How to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming residents
- Their right to be free from sexual abuse and sexual harassment;
- Their right to be free from retaliation for reporting sexual abuse and sexual harassment
- Resident's right to be free from sexual abuse and sexual harassment;
- The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment

The Auditor reviewed the comprehensive PREA education, provided in multiple languages, which is given to all residents upon intake into the facility. During the pre-on-site phase of the audit, the Auditor reviewed documentation of residents received into the facility during the twelve-month auditing period, and verification each resident was provided with comprehensive PREA education. The comprehensive documentation included Residents Acknowledgement of PREA Education & Handbook which included resident signatures and acknowledgment of understanding.

During the on-site, the Auditor reviewed twenty additional documents (Resident

Acknowledgement of PREA Education & Handbook) from the files of residents which were selected for the targeted and random interviews. All forms included the residents' signature and acknowledgment of understanding. This review provided additional verification that the facility maintains documentation of resident participation in PREA education.

The Auditor requested an up-to-date facility resident roster. The facility resident roster provides a list of all residents currently at the facility and is organized by housing unit, provides resident characteristics such as age, gender, race, date received at facility, tentative release date, program assignments, classification level, and housing assignment. This allowed the Auditor to accurately select a random representation of residents for the interview process. All residents selected for interviews were selected under the guidance of the National PREA Resource Center, *PREA Compliance Audit Instrument - Interview Guide for Residents*.

The Auditor conducted twelve resident interviews and inquired if each resident had received PREA education upon arrival at the facility. All twelve residents interviewed recalled receiving both the initial PREA orientation and the comprehensive (video) orientation. All residents interviewed acknowledged the zero-tolerance policy on sexual abuse sexual harassment and the various ways to report such incidents.

Residents referred to utilizing the PREA informational bulletins, pamphlets, and brochures, which are posted throughout the facility, as a source of information. All twelve residents interviewed referred to notifying a staff member, counselor, or family member as the most direct method to report or inquire about PREA information. All residents interviewed also referred to calling a family member as their source outside the facility and all twelve residents interviewed confirmed knowledge of third-party reporting. Nine of the twelve residents interviewed were aware of the availability of submitting an anonymous PREA report. During interviews (formal and informal) with resident interviewed confirmed owning a cell phone and the ability to make a phone call at any time without restrictions. Each resident interviewed felt comfortable and reassured in the ability to contact a family member or friend to report a PREA incident if necessary.

115.233 (c) - Volunteers of America - Texas, *PREA Policy* states staff shall provide resident education in formats accessible to all residents, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled as well as residents who have limited reading skills. To ensure effective communications, all efforts will be made to bring interpreters or other skilled professionals into the program as soon as staff discover any residents with disabilities and/or has limited English proficient. VOATX utilizes Worldwide Interpreters, Inc.

The Auditor interviewed targeted residents with either a physical, hearing, vision, or cognitive impairment or who were Limited English Proficient. Each resident acknowledged receiving PREA information during the intake process. Each resident described receiving the comprehensive PREA orientation within the first few days after arriving at the facility. Additionally, each resident acknowledged the information was provided to him in an accessible format specific to his individual needs.

115.233 (d) - Volunteers of America - Texas, *PREA Policy* states the facility shall maintain documentation of resident participation in educational sessions pertaining to sexual abuse and sexual harassment. Documentation and verification of resident orientation and education on PREA will be completed with the Residents Acknowledgement of PREA Education & Handbook form.

115.233 (e) - Volunteers of America - Texas, *PREA Policy* states in addition to providing such education, the facility shall ensure that key information is continuously and readily available and visible to residents through posters, resident handbooks, or brochures.

The Auditor conducted a tour of the facility and observed PREA informational bulletins. These PREA bulletins are posted in multiple languages, located throughout residential hallways, as well as several informational bulletins were posted in common areas (educational / group activity center) throughout the facility. The bulletins display phone numbers and addresses, advocacy services and are displayed in multiple languages.

The Auditor conducted an interview with the PREA Coordinator and discussed the resident comprehensive PREA orientation and documentation process. The PREA Coordinator provided specific details on the process of educating residents including the initial orientation upon intake into the facility, the comprehensive orientation video, and the continued educational process through PREA informational pamphlets, sexual assault prevention brochures, and the signage posted throughout the facility.

Upon review of the policy and documentation listed above and previously discussed, and after completion of staff and resident interviews, in addition to the observations made throughout the on-site tour, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

115.234	Specialized training: Investigations
	<p data-bbox="280 188 983 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 266 564 300">Auditor Discussion</p> <p data-bbox="280 344 544 378">Document Review:</p> <p data-bbox="280 412 735 445">Riverside Treatment Center PAQ</p> <p data-bbox="280 479 884 512">Volunteers of America - Texas, <i>PREA Policy</i></p> <p data-bbox="280 546 1394 624">Volunteers of America - Texas, <i>PREA Specialized Training Curriculum & Training Certificates</i></p> <p data-bbox="280 748 663 781">Interviews conducted with:</p> <p data-bbox="280 815 541 848">Investigative Staff</p> <p data-bbox="280 949 647 983">Site Review Observations:</p> <p data-bbox="280 1016 616 1050">Training documentation</p> <p data-bbox="280 1173 608 1207">Findings (By Provision):</p> <p data-bbox="280 1308 1469 1476">115.234 (a, b) – Volunteers of America - Texas, <i>PREA Policy</i> states the contractor does not conduct its own criminal investigations into allegations of sexual abuse and sexual harassment. The agency will ensure that an administrative investigation is completed on all allegations of sexual abuse and sexual harassment.</p> <p data-bbox="280 1576 1477 1744">Volunteers of America - Texas, <i>PREA Policy</i> states the agency will provide specialized training for staff who respond to and/or investigate allegations of sexual misconduct. Training will include crime scene management, investigation, victim sensitivity, and crisis intervention.</p> <p data-bbox="280 1845 1410 1924">115.234 (c) – Volunteers of America - Texas, <i>PREA Policy</i> states staff specialized training will be documented in the agency’s personnel and training system.</p> <p data-bbox="280 2024 1382 2069">The Auditor reviewed training records, which included the specialized training</p>

curriculum from the PREA Resource Center, *Human Resources & Administrative Investigations* and training curriculum from the National Institute of Corrections, *Specialized Training: Investigating Sexual Abuse in Confinement Settings* and training certificate of completion verifying investigative staff that conduct sexual abuse investigations attended and completed the required specialized training. The specialized training curriculum is extensive and included, but not limited to, the following topics:

- Techniques for interviewing sexual abuse victims
- Sexual abuse evidence collection in confinement settings
- Proper use of *Miranda* and *Garrity*
- Criteria and evidence required to substantiate a case for administrative action or prosecution referral

The Auditor interviewed an Investigator who confirmed attending and successful completion of the required specialized training. The Investigator clearly articulated the comprehensive training received which included investigating sexual harassment allegations, investigating sexual abuse allegations, understanding the impact of victim trauma, techniques for interviewing sexual abuse victims, preservation of crime scene and evidence collection, proper use of *Miranda* and *Garrity* and the importance of each, and criteria required for administrative action and prosecution referrals. The Investigator provided the Auditor with a complete overview of the investigative process as it relates to sexual abuse and sexual harassment. An allegation of sexual abuse that is deemed possibly criminal in nature, is immediately referred to the local law enforcement agency for investigation and all other allegations are investigated by designated facility investigators.

Upon review of the policy and documentation listed above and previously discussed, and after completion of interviews, in addition to the observations made throughout the on-site visit, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

115.235	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review:

	<p>Riverside Treatment Center PAQ</p> <p>Volunteers of America - Texas, <i>PREA Policy</i></p> <p>Interviews conducted with:</p> <p>Facility Director</p> <p>PREA Coordinator</p> <p>Findings (By Provision):</p> <p>115.235 (a) - This provision of the standard does not apply. Riverside Treatment Center does not have medical or mental health staff.</p> <p>115.235 (b) - This provision of the standard does not apply. Forensic examinations for Riverside Treatment Center are conducted at the local hospital.</p> <p>115.235 (c) - This provision of the standard does not apply. Riverside Treatment Center does not have medical or mental health staff.</p> <p>The Auditor conducted interviews with the Facility Director and the PREA Coordinator who confirmed that Riverside Treatment Center does not employ or contract with medical or mental health personnel.</p> <p>Upon review of the policy and documentation listed above and previously discussed, and after completion of interviews, in addition to the observations made during the on-site visit file review, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.</p>
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115.241	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

Riverside Treatment Center PAQ

Volunteers of America - Texas, *PREA Policy*

Volunteers of America - Texas, *PREA Possible Victim/Predator Screening & Scoring Checklist*

Interviews conducted with:

Random sample of Residents

Staff Responsible for Risk Screening

PREA Coordinator

Site Review Observations:

Risk Assessment

Findings (By Provision):

115.241 (a, b) – Volunteers of America - Texas, *PREA Policy* states all residents arriving at the program shall be assessed during an intake screening (and upon transfer to another facility) for their risk of being sexually abused by other residents or sexually abusive toward other residents, using the PREA Possible Victim/Predator Screening and Scoring Checklist. Intake screening shall ordinarily take place within 72 hours of arrival at the program.

According to information provided in the PAQ, the number of residents entering the facility (either through intake or transfer) within the past 12 months (whose length of stay in the facility was for 72 hours or more) who were screened for risk of sexual victimization or risk of sexually abusing other residents with 72 hours of their entry into the facility was 576, 100% of residents.

The Auditor requested an up-to-date facility resident roster. The facility resident roster provides a list of all residents currently at the facility and is organized by

housing unit, provides resident characteristics such as age, gender, race, date received at facility, tentative release date, program assignments, classification level, and housing assignment. This allowed the Auditor to accurately select a random representation of residents for the interview process. All residents selected for interviews were selected under the guidance of the National PREA Resource Center, *PREA Compliance Audit Instrument - Interview Guide for Residents*.

The Auditor interviewed twelve residents, and ten of the twelve residents recalled the initial risk assessment interview, and ten of the twelve residents confirmed receiving the second risk assessment interview occurring within a few weeks after the initial assessment.

115.241 (c, d, e) - Volunteers of America - Texas, *PREA Policy* states the assessments shall be conducted using an objective screening instrument. The intake screening shall consider, at a minimum, the following criteria to assess residents for risk of sexual victimization:

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

Volunteers of America - Texas, *PREA Policy* states in assessing residents for risk of being sexually abusive, the intake screening shall consider prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to the agency

The Auditor requested interviews with residents who disclosed prior sexual victimization during intake. The facility provided the Auditor with documentation which depicted the residents who disclosed prior sexual victimization at intake were no longer in custody, therefore residents in this targeted category were not interviewed.

115.241 (f, g) - Volunteers of America - Texas, *PREA Policy* states within a set time period, not to exceed 30 days from the resident's arrival at the program, staff will reassess the resident's risk of victimization or abusiveness based upon any additional, relevant information received by the program since the intake screening. A resident's risk level shall also be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the resident's risk of sexual victimization or abusiveness.

The Auditor conducted an interview with the Staff Member responsible for conducting screenings for risk of victimization and abusiveness. The Staff Member provided the Auditor with a complete overview of the resident classification process and the resident risk screening process to include how all residents are screened within 24 hours (or less) of their arrival at the facility. The Staff Member also confirmed that all interviews are conducted privately, and the interviews include the classification and risk assessment process, program opportunities, qualifications for job assignments, and educational opportunities.

During the pre-on-site, the Auditor reviewed *PREA Possible Victim/Predator Screening & Scoring Checklist* forms completed during the auditing period. The Auditor reviewed an additional twenty *PREA Victim/Predator Screening & Scoring Checklist* forms of residents from the random and targeted interviews and residents that risk assessment warranted a referral or reassessment. All forms were filled out accurately and completely and in accordance with agency policy.

115.241 (h) - Volunteers of America - Texas, *PREA Policy* states residents may not be disciplined for refusing to answer, or for not disclosing complete information in response to the questions asked pursuant to:

- Whether the resident has a mental, physical, or developmental disability;
- Whether the resident is or is perceived to be gay, lesbian, bisexual, transgender, intersex or gender nonconforming;
- Whether the resident has previously experienced sexual victimization;
- The resident's own perception of vulnerability.

The Auditor inquired to the Staff Member responsible for conducting the risk screening process what actions are taken against residents who refuse to cooperate or answer the questions in the risk screening process. The Staff Member responded that residents are not required to provide answers, if a resident refuses to answer, another staff member will conduct a follow-up interview. The Staff Member confirmed that residents are not disciplined for refusing to cooperate or answer the questions in the risk screening process.

115.241 (i) - Volunteers of America - Texas, *PREA Policy* states staff shall implement appropriate controls on the dissemination within the program of responses to questions asked pursuant to the intake screening in order to ensure that sensitive information is not exploited to the resident's detriment by staff or other residents. This is accomplished by the screening being completed by only key staff and the information is double locked.

The Auditor inquired to the PREA Coordinator how the facility protects such sensitive information. The PREA Coordinator confirmed access to such information is strictly limited and any information related to sexual victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as necessary, to assist with making treatment plans and informed management decisions (housing, work, education, and program assignments).

The Auditor inquired with the PREA Coordinator about how the facility protects sensitive information, in particular a resident's risk assessment. The PREA Coordinator explained how risk assessments are maintained and stored securely, and access is limited to authorized staff.

Upon review of the policies, on-site file, and documentation review, and upon completion of the interviews, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

115.242	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: Riverside Treatment Center PAQ Volunteers of America - Texas, <i>PREA Policy</i> Riverside Treatment Center <i>PREA Possible Victim/Predator Screening & Scoring Checklist</i>

Interviews conducted with:

PREA Coordinator

Staff Responsible for Risk Screening

Non-heterosexual residents

Site Observation:

Resident initial risk assessment & reassessment

Findings (By Provision):

115.242 (a) - Volunteers of America - Texas, *PREA Policy* states the program uses information from the *PREA Possible Victim/Predator Screening and Scoring Checklist* to inform housing, bed, work, education, and program assignments with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive.

115.242 (b) - Volunteers of America - Texas, *PREA Policy* states the program makes individualized determinations about how to ensure the safety of each resident.

115.242 (c) - Volunteers of America - Texas, *PREA Policy* states the program makes housing and program assignments for transgender or intersex residents in the facility on a case-by-case basis considering whether a placement would ensure the resident's health and safety, and whether the placement would present management or security problems.

115.242 (d, e) - Volunteers of America - Texas, *PREA Policy* states placement and programming assignments for each transgender or intersex resident shall be reassessed at least twice each year. A transgender or intersex resident's own views with respect to his or her own safety shall be given serious consideration.

The Auditor conducted an interview with the Staff Member responsible for conducting screenings for risk of victimization and abusiveness. The Staff Member provided the Auditor with a complete overview of the resident classification process and the resident risk screening process to include how all residents are screened

within 24 hours (or less) of their arrival at the facility.

The Staff Member explained how the facility uses the information obtained from the risk screening assessment interviews to determine housing assignment for each resident, which is done strictly on a case-by- case basis. The Staff Member further explained a transgender or intersex resident's own views on safety is given consideration during this process and if placed in protective custody, such placement is done at the request of the resident or solely based on the resident's classification level.

The Auditor requested an up-to-date resident roster for gay, bisexual, transgender, and intersex residents to conducted targeted resident interviews. All other resident interviews were conducted with the guidance of the National PREA Resource Center, *PREA Compliance Audit Instrument - Interview Guide for Residents*.

The Auditor conducted interviews with residents who identified as gay or bisexual. The residents were questioned whether they were placed in a housing area only for gay, bisexual, transgender, or intersex residents. Each resident acknowledged being housed in a general population housing area for all residents of the same level of classification. The facility provided the Auditor with documentation which depicted there were no transgender or intersex residents in custody at the time of the on-site, therefore residents in this targeted category were not interviewed.

115.242 (f) -Volunteers of America - Texas, *PREA Policy* states transgender and intersex residents shall be afforded the opportunity to shower separately from other residents.

115.242 (g) - Volunteers of America - Texas, *PREA Policy* states the facility is prohibited from placing LGBTQI residents in dedicated units solely on the basis of such identification or status.

The Auditor conducted an interview with the PREA Coordinator and inquired how the agency ensures against placing lesbian, gay, bisexual, transgender, or intersex residents in dedicated facilities or wings. The PREA Coordinator informed the Auditor that agency policy prohibits such placement unless the placement is in a dedicated unit wing established in connection with a consent decree, legal settlement, or legal judgment. The PREA Coordinator confirmed Riverside Treatment Center is not under such legal judgment.

	<p>Upon review of the policies and upon completion of the interviews, Riverside Treatment Center demonstrated facility- wide practices that are consistent with policy and the requirements that complies with the PREA standard.</p>
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115.251	Resident reporting
	<p>Auditor Overall Determination: Exceeds Standard</p> <hr/> <p>Auditor Discussion</p> <p>Document Review:</p> <p>Riverside Treatment Center PAQ</p> <p>Volunteers of America - Texas, <i>PREA Policy</i></p> <p>Riverside Treatment Center Resident Orientation Handbook (English/Spanish)</p> <p>Volunteers of America - Texas, PREA Zero-Tolerance Poster (English/Spanish)</p> <p>Interviews conducted with:</p> <p>Random sample of Residents</p> <p>PREA Coordinator</p> <p>Random sample of Staff</p> <p>Site Observations:</p> <p>PREA informational signage</p> <p><i>End the Silence</i> Brochure (multiple languages)</p> <p>Findings (By Provision):</p> <p>115.251 (a) - Volunteers of America - Texas, <i>PREA Policy</i> states the facility shall provide multiple internal ways for residents to privately report sexual abuse and sexual harassment, retaliation by other residents or staff for reporting sexual abuse</p>

and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.

Riverside Treatment Center offers multiple ways for residents to report sexual abuse and sexual harassment, including reports can be made anonymously. Riverside Treatment Center *End the Silence* brochure and PREA Zero-Tolerance posters, which are provided to each resident upon admission into the facility, outline the multiple reporting methods, which include:

- Report to any staff
- Call the VOA Hotline (800.862.8482) - independently staffed to ensure confidentiality
- Submit a grievance or sick call slip
- Report to the PREA Coordinator or PREA Compliance Manager
- Tell a family member, friend, legal counsel, or anyone else outside the facility. They can report on your behalf by calling 817.529.7368
- Report to an outside entity, Fort Worth PD by calling 817.392.4222 and you can remain anonymous upon request

Volunteers of America - Texas, Resident Orientation Handbook and the *End the Silence* brochure state Riverside Treatment Center has a “zero tolerance” toward all forms of sexual abuse, abuse, or harassment with residents and shall make every effort to maintain a safe environment for staff and residents.

During the facility tour, the Auditor observed PREA Zero-tolerance informational signage and *End the Silence* handout posted in all residential living areas/hallways, resident educational and program buildings, in the religious programs / services building, and resident work areas. The PREA informational signage was posted in multiple languages.

The Auditor conducted informal interviews with residents inside living areas, common areas, various work assignments, and while touring the programs/ educational areas. The Auditor inquired to each resident on the various PREA reporting methods available, and each resident confirmed reporting to any staff member, submitting a grievance, or utilizing an outside reporting method - writing or calling a family member or friend and request a report be submitted on their behalf. During interviews (formal and informal) with resident interviewed confirmed owning a cell phone and the ability to make a phone call at any time without restrictions. Each resident interviewed felt comfortable and reassured in the ability to contact a family member or friend to report a PREA incident if necessary.

The Auditor requested an up-to-date facility resident roster. The facility resident roster provides a list of all residents currently at the facility and is organized by housing unit, provides resident characteristics such as age, gender, race, date received at facility, tentative release date, program assignments, classification level, and housing assignment. This allowed the Auditor to accurately select a random representation of residents for the interview process. All residents selected for interviews were selected under the guidance of the National PREA Resource Center, *PREA Compliance Audit Instrument - Interview Guide for Residents*.

The Auditor conducted twelve resident interviews and inquired to each resident on the PREA reporting methods. All twelve residents interviewed referred to notifying a staff member, counselor, or family member as the most direct method to report or inquire about PREA information. All residents interviewed also referred to contacting a family member as their source outside the facility and all twelve residents interviewed confirmed knowledge of third-party reporting. Nine of the twelve residents interviewed were aware of the availability of submitting an anonymous PREA report.

115.251 (b) - Volunteers of America - Texas, *PREA Policy* states the program shall also provide at least one way for residents to report abuse or harassment to a public or private entity or office that is not part of the facility and that is able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials, allowing the resident to remain anonymous upon request. Residents can make an anonymous report to the Fort Worth PD (817.392.4222).

115.251 (c) - The Volunteers of America - Texas, *PREA Policy* states staff shall accept reports made verbally, in writing, anonymously, and from third parties and shall promptly document and respond to any verbal reports.

115.251 (d) - The Volunteers of America - Texas, *PREA Policy* states the program shall provide a method for staff to privately report sexual abuse and sexual harassment of residents. Staff can report privately to Fort Worth PD (817.392.4222) or the VOA Hotline (800.862.8482) or to agency Human Resources Department.

The Auditor-conducted interviews with random staff members and asked each staff member how a resident can privately report sexual abuse and sexual harassment or retaliation by other residents or staff for previously reporting sexual abuse and sexual harassment.

Each staff member interviewed was able to articulate the various methods a resident may privately report an allegation of sexual abuse or sexual harassment (family member, third party reporting, VOA Hotline, Fort Worth PD). Staff members also explained that reports concerning sexual abuse or sexual harassment, whether reported verbally or in writing, are considered confidential and must be documented immediately.

The Auditor conducted an interview with the PREA Coordinator to verify reporting methods for sexual abuse or sexual harassment allegations that are available for residents and staff. The PREA Coordinator confirmed the multiple methods of reporting available for residents and staff, and these reports can be made either verbally, in writing, by a third party and may be done so in private or anonymously and all reports, no matter of the method used to report, are confidential and handled promptly and professionally.

Upon review of the policies, contracts, staff handbook, Riverside Treatment Center resident handbook, and viewing of the PREA informational brochures and signs and upon completion of interviews conducted, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with and exceeds the PREA standard.

115.252	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <p>Riverside Treatment Center PAQ</p> <p>Volunteers of America - Texas, <i>PREA Policy</i></p> <p>Volunteers of America - Texas, Resident Orientation Handbook</p> <p>Findings (By Provision):</p>

115.252 (a) - Volunteers of America - Texas, *PREA Policy* states the facility ensures a formal administrative process to address resident grievances regarding sexual abuse and sexual harassment.

115.252 (b) - Volunteers of America - Texas, *PREA Policy* states the facility shall not impose a time limit on when a resident may submit a grievance regarding an allegation of sexual abuse or sexual harassment.

115.252 (c) - Volunteers of America - Texas, *PREA Policy* states the facility prohibits an informal grievance process or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse or sexual harassment.

115.252 (d) - Volunteers of America - Texas, *PREA Policy* states the agency shall issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance. Computation of the 90-day time period shall not include time consumed by residents in preparing any administrative appeal. VOATX may claim an extension of time to respond, up to 70 days, if the normal time period for response is insufficient to make an appropriate decision; VOATX shall notify the residents in writing of any such extension and provide a date by which a decision will be made. At any level of the administrative process, including the final level, if the resident does not receive a response within the time allotted for reply, including any properly noticed extension, the resident may consider the absence of a response to be a denial at that level.

The Auditor requested interviews with residents who reported an incident of sexual abuse or sexual harassment during the twelve-month auditing period. The facility provided documentation which reflected the residents were no longer in custody, therefore, residents in this targeted category were not interviewed.

115.252 (e) - Volunteers of America - Texas, *PREA Policy* states if a third party files such a request on behalf of a resident, the agency 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.

115.252 (f) - Volunteers of America - Texas, *PREA Policy* states the agency shall establish procedures for filing an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse. After receiving an emergency

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

115.252 (g) - Volunteers of America - Texas, *PREA Policy* states the facility may discipline a resident for filing a grievance related to alleged sexual abuse only where the agency demonstrates that the resident filed the grievance in bad faith.

During the pre-on-site phase of the audit, the Auditor reviewed the VOXTX Riverside Treatment Center Resident Handbook and confirmed the handbook contains information about the grievance process to include explanation of the two types of grievance, informal and formal. The handbook informs residents that additional and more detailed grievance information is covered during orientation.

Upon reviewing policies, documentation, case files, and of the Riverside Treatment Center Resident Handbook, and upon completion of interviews conducted during the on-site visit, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

115.253	Resident access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <p>Volunteers of America - Texas, <i>PREA Policy</i></p> <p>Volunteers of America - Texas, The Women's Center Rape Crisis & Victim Services</p> <p>Volunteers of America - Texas, Resident Orientation Handbook (English/Spanish)</p> <p>Volunteers of America - Texas, PREA Zero Tolerance Poster (English/Spanish)</p>

Interviews conducted with:

Random sample of Residents

Site Review Observations:

PREA informational signage

PREA / *End the Silence* Handout (multiple languages)

Findings (By Provision):

115.253 (a) - Volunteers of America - Texas, *PREA Policy* states the facility shall provide residents access to outside victim advocates for emotional support services related to sexual abuse by giving residents mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, and national victim advocacy or rape crisis organizations, and by enabling reasonable communication between residents and these organizations, in as confidential a manner as possible.

115.253 (b) - Volunteers of America - Texas, *PREA Policy* states the facility will inform residents, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws.

The Auditor requested an up-to-date facility resident roster. The facility resident roster provides a list of all residents currently at the facility and is organized by housing unit, provides resident characteristics such as age, gender, race, date received at facility, tentative release date, program assignments, classification level, and housing assignment. This allowed the Auditor to accurately select a random representation of residents for the interview process. All residents selected for interviews were selected under the guidance of the National PREA Resource Center, *PREA Compliance Audit Instrument - Interview Guide for Residents*.

The Auditor inquired to each resident interviewed, if needed, are there services available outside of the facility for dealing with sexual abuse. Eight of the twelve residents interviewed confirmed being provided with such information during the comprehensive PREA orientation as well as informational posters being displayed throughout the housing units.

During the tour of the facility, the Auditor conducted informal interviews with residents in the housing dormitories and in various work assignments, and while touring the programs and educational buildings. Throughout the tour, the Auditor noted PREA informational posters and End the Silence brochures displayed in all the above areas and buildings.

115.253 (c) – Volunteers of America - Texas, *PREA Policy* states the facility will maintain or attempt to enter into memoranda of understanding (MOUs) or other agreements with community service providers that are able to provide residents with confidential emotional support services related to sexual abuse.

The Auditor reviewed the existing MOU between Riverside Treatment Center and the Women’s Center Rape Crisis & Victim Services. The contract uses clear and concise language, provides the agency’s responsibilities, the advocacy’s responsibilities, and the reporting and documentation requirements for each.

The Women’s Center Rape Crisis & Victim Services is an organization established to provide crisis intervention and advocacy services to victims of domestic and sexual violence. The Women’s Center Rape Crisis & Victim Services provides services for victims of domestic violence and sexual assault in Tarrant County. The Women’s Center Rape Crisis & Victim Services provides immediate access to 24/7 crisis hotline, crisis intervention and advocacy, emotional support, safety planning, 24-hour rape crisis support through hospital advocates which provide advocacy, case management and support to sexual assault survivors.

The Auditor conducted an interview with an advocate from the Women’s Center Rape Crisis & Victim Services, and she confirmed the existing agreement and responsibilities within the agreement and provided an overview of services provided to resident victims of sexual abuse. The services include emotional support services, crisis counseling, victim advocate upon request for advocacy accompaniment during forensic exams or investigatory interviews, and victim referrals for follow-up support services.

The Auditor requested interviews with residents who reported an incident of sexual abuse or sexual harassment during the twelve-month auditing period. The facility provided documentation which reflected the residents were no longer in custody, therefore, residents in this targeted category were not interviewed.

	<p>Upon review of the policies and upon completion of the interviews, Riverside Treatment Center demonstrated facility- wide practices that are consistent with policy and the requirements that complies with the PREA standard.</p>
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115.254	Third party reporting
	<p>Auditor Overall Determination: Exceeds Standard</p> <hr/> <p>Auditor Discussion</p> <p>Document Review:</p> <p>Riverside Treatment Center PAQ</p> <p>Volunteers of America - Texas, <i>PREA Policy</i></p> <p>Volunteers of America - Texas, Resident Orientation Handbook (multiple languages)</p> <p>Volunteers of America - Texas website https://www.voatx.org/services/re-entry/</p> <p>Volunteers of America - Texas, PREA Zero Tolerance Poster (English / Spanish)</p> <p>Interviews conducted with:</p> <p>Random sample of Residents</p> <p>Site Review Observation:</p> <p>PREA informational signage</p> <p>Findings (By Provision):</p> <p>115.254 (a) - Volunteers of America - Texas, <i>PREA Policy</i> states the program shall also provide at least one way for residents to report abuse or harassment to a public or private entity or office that is not part of the facility and that is able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials, allowing the resident to remain anonymous upon request. Residents can make an anonymous report to the Fort Worth PD (817.392.4222).</p>

Volunteers of America - Texas, publishes methods for reporting allegations of sexual abuse or sexual harassment on behalf of residents on the agency website <https://www.voatx.org/services/re-entry/>

The Auditor requested an updated resident roster, organized by housing unit, provides resident characteristics such as age, gender, race, ethnicity, date received at facility, tentative release date, program assignments, classification level, and housing assignment. This allowed the Auditor to accurately select a random representation of residents for the interview process. All residents selected for interviews were selected under the guidance of the National PREA Resource Center, *PREA Compliance Audit Instrument - Interview Guide for Residents*.

The Auditor conducted twelve resident interviews and inquired if each resident had received PREA education upon arrival at the facility. All twelve residents interviewed recalled receiving both the initial PREA orientation and the comprehensive (video) orientation. All twelve residents interviewed acknowledged the zero-tolerance policy on sexual abuse sexual harassment and the various ways to report such incidents.

When questioned about third party reporting, all twelve residents interviewed acknowledged how to submit a third-party report (ask a family member or friend to submit a report or contact the Fort Worth PD). In addition, several of the residents referred to the informational bulletin posters throughout the facility, which contains directions on how to submit a third-party report. Additionally, each resident interviewed confirmed owning a cell phone and the ability to make a phone call at any time without restrictions. Each resident interviewed felt comfortable and reassured in the ability to contact a family member or friend to report a PREA incident if necessary.

During the pre-on-site phase of the audit, the Auditor visited the agency's website and confirmed the availability for the public to submit a report of sexual abuse or sexual harassment on behalf of a resident. The report may also be submitted anonymously.

Upon review of the policies and upon completion of the interviews, Riverside Treatment Center demonstrated facility- wide practices that are consistent with policy and the requirements that complies with and exceeds the PREA standard.

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

Riverside Treatment Center PAQ

Volunteers of America - Texas, *PREA Policy*

Interviews conducted with:

Random sample of Staff

Facility Director

Site Observations:

Staff reporting documentation of resident information, incident reports and investigations being completed and the review of reports demonstrated allegations are addressed timely.

Findings (By Provision):

115.261 (a) - Volunteers of America - Texas, *PREA Policy* states any staff must immediately report to the Program Director or designee, any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in the program, retaliation against residents or staff who reported an incident of sexual abuse or sexual harassment or any staff neglect or violation of responsibilities that may have contributed to such an incident or retaliation. All allegations of sexual abuse or sexual harassment must be reported to the PREA Coordinator:

The Auditor conducted interviews with a random sample of staff members. Each staff member interviewed articulated the agency's zero tolerance policy on sexual abuse and sexual harassment, their role and responsibilities regarding sexual abuse and sexual harassment prevention, detection, reporting, and response, how to communicate effectively and professionally with residents, and an resident right to be free from sexual abuse and sexual harassment. Staff members also acknowledged that reports concerning sexual abuse or sexual harassment, whether

	<p>reported verbally or in writing, are considered confidential and must be documented immediately.</p> <p>115.261 (b) – Volunteers of America - Texas, <i>PREA Policy</i> states apart from reporting to designated supervisors or agency officials, staff shall not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions.</p> <p>115.261 (c) – Riverside Treatment Center does not have medical or mental health staff, therefore this provision does not apply.</p> <p>115.261 (d) – Riverside Treatment Center does not house residents under the age of 18 nor residents who are considered vulnerable adults.</p> <p>115.261 (e) – Volunteers of America - Texas, <i>PREA Policy</i> states staff must report all allegations of sexual abuse or sexual harassment, including third party and anonymous reports, to the local authorities and all contracting agencies for further investigation immediately.</p> <p>The Auditor inquired to the Facility Director are allegations of sexual abuse and sexual harassment, to include third party and anonymous sources, reported to designated facility investigators. The Facility Director indicated all allegations of sexual abuse and sexual harassment, no matter the origin of reporting, are reported directly to the designated facility investigators for administrative investigations, or to the Fort Worth Police Department for criminal investigations.</p> <p>Upon review of the policies and upon completion of the interviews, Riverside Treatment Center demonstrated facility- wide practices that are consistent with policy and the requirements that complies with the PREA standard.</p>
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115.262	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Document Review:

Riverside Treatment Center PAQ

Volunteers of America - Texas, *PREA Policy*

Interviews conducted with:

Agency Head

Facility Director

Random sample of Staff

Findings (By Provision):

115.262 (a) - Volunteers of America - Texas, *PREA Policy* states when the facility learns that a resident is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the resident.

During the twelve months prior to the audit, the facility reported in the PAQ there was one resident at risk of imminent sexual abuse. During the on-site phase of the audit, the Auditor requested an interview with the resident who was identified at risk of imminent sexual abuse, however the resident was released from the program, therefore was not available for interview.

The Auditor conducted interviews with random staff members and inquired about his/her actions if they received information that a resident was at imminent risk of sexual abuse. Each staff member articulated the agency's response protocol to receiving such information and all staff members interviewed confirmed their priority is ensuring the safety of the residents. Staff indicated they would safeguard the residents and immediately notify their supervisor to investigate the threat to the residents and to find safe housing for the residents.

The Auditor conducted an interview with the Facility Director and inquired as to what action is taken upon learning a resident is subject to a substantial risk of imminent sexual abuse. The Facility Director informed the Auditor that once a staff member receives information that a resident may be at risk for sexual abuse, that resident is immediately removed from the area. The resident victim's housing preference is considered, however the decision on his/her ultimate placement is

	<p>driven by the need for protection from possible abuse and/or retaliation.</p> <p>The Auditor conducted an interview with the Agency Head regarding what action is taken upon learning a resident is subject to a substantial risk of imminent sexual abuse. The Agency Head stated if a resident is at risk of imminent sexual abuse the first thing staff will be responsible for separating the victim from the potential abuser. The potential victims will be given the opportunity to speak with a staff member regarding the situation as well as a program counselor. If necessary, the resident would be placed in a housing unit which ensures his/her safety.</p> <p>Upon review of the policy, observations made during the on-site facility tour, and upon completion of the interviews with staff, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.</p>
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115.263	Reporting to other confinement facilities
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Document Review:</p> <p>Riverside Treatment Center PAQ</p> <p>Volunteers of America - Texas, <i>PREA Policy</i></p> <p>Interviews conducted with:</p> <p>Agency Head</p> <p>Facility Director</p> <p>Findings (By Provision):</p> <p>115.263 (a) - Volunteers of America - Texas, <i>PREA Policy</i> states upon receiving an allegation that a resident was sexually abused or sexually harassed while confined at another facility, the Program Director that received the allegation shall notify the head of the facility or appropriate office of the agency where the alleged abuse or</p>

harassment occurred.

In the twelve months prior to the audit, no allegations were received from a Riverside Treatment Center resident alleging sexual abuse while confined at another facility.

115.263 (b) - Volunteers of America - Texas, *PREA Policy* states such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation.

115.263 (c) - Volunteers of America - Texas, *PREA Policy* states the program shall document that it has provided such notification.

115.263 (d) - Volunteers of America - Texas, *PREA Policy* states if an allegation is received from another facility, the Facility Director will ensure that allegation is investigated.

In the twelve months prior to the audit, Riverside Treatment Center reported receiving no allegations of sexual abuse from another facility.

The Auditor conducted an interview with the Facility Director and asked what the process is when your facility receives an allegation from another facility or agency that an incident of sexual abuse or sexual harassment occurred at the facility. The Facility Director explained that the designated facility investigators would initiate an investigation immediately.

The Auditor conducted an interview with the Agency Head and inquired if another agency or facility refers an allegation of sexual abuse that occurred within one of your facilities if there a designated point of contact. The Agency Head explained that the point of contact for all sexual abuse related incidents is the PREA Coordinator.

Upon review of the policy, documentation, and investigative files, and upon completion of the interviews, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

115.264	Staff first responder duties
	<p data-bbox="280 188 983 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 564 300">Auditor Discussion</p> <p data-bbox="280 340 545 376">Document Review:</p> <p data-bbox="280 412 734 448">Riverside Treatment Center PAQ</p> <p data-bbox="280 483 884 519">Volunteers of America - Texas, <i>PREA Policy</i></p> <p data-bbox="280 622 663 658">Interviews conducted with:</p> <p data-bbox="280 694 999 730">Security Staff / Non-Security Staff First Responders</p> <p data-bbox="280 766 622 801">Random sample of Staff</p> <p data-bbox="280 913 609 949">Findings (By Provision):</p> <p data-bbox="280 1052 1420 1178">115.264 (a, b) – Volunteers of America - Texas, <i>PREA Policy</i> states any employee who discovers or learns of sexual abuse, or an allegation of sexual abuse, shall ensure that the following actions are accomplished:</p> <ul data-bbox="354 1240 1481 1783" style="list-style-type: none"> • Separate the alleged victim and alleged abuser • Do not leave the alleged victim alone • Ensure no one enters the area to preserve and protect the crime scene • Call 911 if warranted • Contact the Person-in-Charge (Program Director or designee) to request the assistance including notifying the contracted entity of incident • Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence; • If the abuse occurred within a time period that would still allow for the collection of physical evidence request that the alleged victim and abuser not take any action that could destroy physical evidence, including washing or showering, drinking or eating (unless medically indicated), brushing teeth, changing clothes, or toileting. <p data-bbox="280 1890 1442 2051">The Auditor conducted random staff interviews and specialized staff interviews regarding his/her role as a First Responder to an allegation of sexual abuse. The Staff Members interviewed provided specific details of his/her responsibilities as a First Responder to include separating the victim and abuser, preserving, and</p>

protecting the crime scene, requesting that the alleged victim not take any actions that could destroy physical evidence, ensuring the alleged abuser does not take any actions, which would destroy physical evidence, and to immediately notify an immediate Supervisor, PREA Coordinator, or Facility Director.

In addition, each Staff Member acknowledged the importance of the agency's response protocol to a sexual abuse allegation as well as his or her role as a First Responder. Each Staff Member interviewed articulated in detail the responsibilities of a First Responder and the importance of his/her responsibility when responding to an incident of sexual abuse or sexual harassment as well as the importance of ensuring the victim is safe.

The Auditor requested interviews with residents who reported an incident of sexual abuse or sexual harassment during the twelve-month auditing period. The facility provided documentation which reflected the residents were no longer in custody, therefore, residents in this targeted category were not interviewed.

Upon review of the policy, documentation, and upon completion of the interviews, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

115.265	Coordinated response
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Document Review:</p> <p>Riverside Treatment Center PAQ</p> <p>Volunteers of America - Texas, <i>PREA Policy</i></p> <p>Volunteers of America - Texas, Coordinated Response Plan</p> <p>Interviews conducted with:</p> <p>Facility Director</p>

Findings (By Provision):

115.265 (a) - Volunteers of America - Texas, *PREA Policy* states the program will work towards providing a coordinated response to all allegations of sexual abuse, including interventions by first responder staff (Custody Staff), medical facility staff, mental health practitioners, local law enforcement, investigators and program staff. This policy and procedure serves as a written plan for providing coordinated actions taken in response to an incident of sexual abuse.

Volunteers of America - Texas, *PREA Policy* states upon learning of an allegation that a resident was sexually abused, the first staff members to respond to the scene must:

- Separate the alleged victim and alleged abuser
- Do not leave the alleged victim alone
- Ensure no one enters the area to preserve and protect the crime scene
- Call 911 if warranted
- Contact the Person-in-Charge (Program Director or designee) to request the assistance including notifying the contracted entity of incident
- Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence.
- If the abuse occurred within a time period that would still allow for the collection of physical evidence request that the alleged victim and abuser not take any action that could destroy physical evidence, including washing or showering, drinking or eating (unless medically indicated), brushing teeth, changing clothes, or toileting.

Volunteers of America - Texas, *PREA Policy* states resident victims of sexual abuse shall receive timely, unimpeded access to emergency treatment and crisis intervention services. The PREA Investigator will offer the resident victim advocacy services through the Women's Center Rape Crisis & Victim Services. The Women's Center Rape Crisis & Victim Services will provide emotional support and crisis intervention services, accompany residents through forensic medical exam and investigatory interviews upon request by the resident.

The Auditor conducted an interview with the Facility Director and inquired about the facility's institutional plan to coordinate actions taken in response to an incident of sexual abuse. The Facility Director provided an overview of the response plan and each staff member's responsibility when responding to an allegation of sexual abuse.

	<p>Upon review of the policies and upon completion of the on-site interview with the Facility Director, the Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.</p>
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115.266	Preservation of ability to protect residents from contact with abusers
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Document Review:</p> <p>Riverside Treatment Center PAQ</p> <p>Interviews conducted with:</p> <p>Agency Head</p> <p>Findings (By Provision):</p> <p>115.266 (a) – Riverside Treatment Center does not have a collective bargaining agreement.</p> <p>The Auditor verified that the facility does not engage in collective bargaining during interviews with the Facility Director, the PREA Coordinator, and Agency Head.</p> <p>Upon review of the policies and upon completion of the interviews, Riverside Treatment Center demonstrated facility- wide practices that are consistent with policy and the requirements that complies with the PREA standard.</p>

115.267	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

Riverside Treatment Center PAQ

Volunteers of America - Texas, *PREA Policy*

Interviews conducted with:

Designated Member Charged with Monitoring Retaliation

Agency Head

Findings (By Provision):

115.267 (a) - Volunteers of America - Texas, *PREA Policy* states starting the date an allegation is made, the facility PREA Compliance Manager is responsible for ensuring residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations are protected from retaliation by other residents or staff.

115.267 (b) - Volunteers of America - Texas, *PREA Policy* states protective measures which can be used are housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.

115.267 (c, e) - Volunteers of America - Texas, *PREA Policy* states for at least 90 days following a report of sexual abuse, the facility shall monitor the conduct and treatment of residents or staff who reported the sexual abuse and of residents who were reported to have suffered sexual abuse. Ensure prompt actions are taken to remedy any identified retaliation. Ensure any other individual who cooperates with an investigation and expresses fear of retaliation is protected from retaliation. The agency's obligation to monitor expires if the investigation determines that the allegation is unfounded.

During the twelve months prior to the audit, the agency reported no allegations of

retaliation were reported nor were there any residents placed in segregated housing due to risk of sexual victimization. Therefore, residents in these targeted categories were not interviewed.

115.267 (d) - Volunteers of America - Texas, *PREA Policy* states the monitoring shall also include periodic status checks of residents and review of relevant documentation. Monitoring may go beyond 90 days if the initial monitoring indicates a continuing need.

The Auditor requested interviews with residents who reported an incident of sexual abuse or sexual harassment during the twelve-month auditing period. The facility provided documentation which reflected the residents were no longer in custody, therefore, residents in this targeted category were not interviewed.

The Auditor conducted an interview with the Facility Staff Member designated with monitoring retaliation. The Staff Member articulated that to prevent retaliation against residents and staff who report sexual abuse or harassment or those who cooperate with an investigation, the Staff Member would monitor those individuals for at least 90 days. The Staff Member reviews disciplinary reports, resident housing or transfers, and negative performance reviews of staff members. If a concern that potential retaliation might occur beyond the 90 days, the Staff Member would continue to monitor conduct and treatment until the issue or threat is resolved.

The Auditor conducted an interview with the Facility Director and inquired on the different measures taken to protect residents and staff from retaliation for reporting allegations of sexual abuse or sexual harassment. The Facility Director confirmed the facility would take all necessary steps to protect any person who reports a sexual abuse / harassment incident from retaliation. The Facility Director explained that housing changes or transfers of residents, disciplinary action against staff members - including possible dismissal - or other means of removal of those who retaliate against someone who reports an allegation.

The Auditor conducted an interview with the Agency Head and inquired how the agency protects residents or staff from retaliation for sexual abuse or sexual harassment allegations. The Agency Head explained that facilities deploy numerous measures including housing, program, and work assignments changes. All residents who report sexual abuse are monitored for retaliation for at least 90 days. Staff members are required to monitor the residents with periodic status checks every 30 days to ensure they are not experiencing any additional problems.

	<p>The Agency Head also explained that staff members might be afforded the opportunity to change assignments to protect them from retaliation. They are also monitored for retaliation for at least 90 days following a report of sexual abuse or sexual harassment.</p> <p>The Auditor inquired to the Agency Head if an individual cooperates with an investigation expresses a fear of retaliation, what measures the agency takes to protect that individual against retaliation. The Agency Head explained the same process previously described is utilized. The resident will also be subject to 90-day monitoring.</p> <p>Upon review of the policy, investigative files, and upon completion of the interviews, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.</p>
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115.271	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <p>Riverside Treatment Center PAQ</p> <p>Volunteers of America - Texas, <i>PREA Policy</i></p> <p>Interviews conducted with:</p> <p>Investigative Staff</p> <p>Site Review Observations:</p> <p>Investigative files (1)</p> <p>Findings (By Provision):</p>

115.271 (a, h) - Volunteers of America - Texas, *PREA Policy* states the facility shall ensure that an administrative investigation and a referral for a criminal investigation, where appropriate, is completed for all allegations of sexual abuse and sexual harassment. The facility shall have in place a policy to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. The Program Director shall notify the local law enforcement department as soon as possible and any contracting agency. The program shall request that the investigating agency abide by all PREA requirements/standards.

The Auditor conducted an interview with the Agency Head regarding how the agency ensures that an administrative or criminal investigation is completed for allegations of sexual abuse or sexual harassment. The Agency Head explained that allegations of sexual abuse or sexual harassment are investigated either by designated facility investigators for administrative investigations, or the local law enforcement for criminal investigations, and the Program Director would also notify the contracting agency

115.271 (b) - Volunteers of America - Texas, *PREA Policy* states in allegations of sexual abuse, the Program Director shall notify the local law enforcement department as soon as possible and any contracting agency. The Program Director must ensure that all protocols are followed for crime scene preservation in order to enable the local authorities to conduct a proper investigation of all allegations of sexual abuse.

115.271 (c) - Volunteers of America - Texas, *PREA Policy* states the Program Director or designee, shall make all witnesses, the scene, and any evidence immediately available to the police investigators. The program shall request that the investigating agency abide by all PREA requirements/standards.

115.271 (d) - This provision of the standard does not apply; criminal investigations are conducted by local law enforcement agencies.

115.271 (e) - Volunteers of America - Texas, *PREA Policy* states the credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person's status as resident or staff. No agency shall require a resident who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation.

The Auditor interviewed an Investigator who confirmed attending and successful completion of the required specialized training. The Investigator provided the Auditor with a complete overview of the investigative process as it relates to sexual abuse and sexual harassment. An allegation of sexual abuse that is deemed possibly criminal in nature, is immediately referred to the local law enforcement (Fort Worth PD) for investigation and all other allegations are investigated by designated facility investigators. The Auditor inquired on what basis do you judge the credibility of an alleged victim, suspect, or witness and if the Investigator would require a resident who reported an allegation of sexual abuse to submit to a polygraph examination as a condition for proceeding with the investigation. The Investigator discussed that the credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and not determined by the person's status in the program or staff. The Investigator denied ever requiring an alleged sexual abuse victim to submit to a polygraph examination.

The Auditor requested interviews with residents who reported an incident of sexual abuse or sexual harassment during the twelve-month auditing period. The facility provided documentation which reflected the residents were no longer in custody, therefore, residents in this targeted category were not interviewed.

115.271 (f) - Volunteers of America - Texas, *PREA Policy* states administrative investigations shall include an effort to determine whether staff actions or failures to act contributed to the abuse. Administrative investigations shall be documented in written reports and include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings, and whether actions and/or failures of staff to act contributed to the incident, including an explanation as to what determined the conclusion.

115.271 (g, l) - Volunteers of America - Texas, *PREA Policy* states for criminal investigations, when outside agencies investigate sexual abuse, the facility shall cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation. The PREA Coordinator or designee will document requests for pertinent information from local law enforcement (Fort Worth PD) or other investigative entity to include this information in the investigation record.

115.271 (i) - Volunteers of America - Texas, *PREA Policy* states all written reports pertaining to an administrative or criminal investigation of alleged sexual abuse or sexual harassment shall be retained for as long as the alleged abused is incarcerated or employed by the agency, plus five years.

115.271 (j) - Volunteers of America - Texas, *PREA Policy* states the departure or removal from the facility or employment of any alleged victim or perpetrator will not be grounds to stop the investigation process.

115.271 (k) - The Auditor is not required to audit this provision.

The facility reported one allegation that was received during the twelve-month reporting period. The Auditor reviewed one staff-on-resident sexual abuse allegation which was closed as unfounded. The Auditor reviewed the investigation thoroughly and systematically to ensure the case contained all the correct procedures, completed documentation, and that all processes were completed as required. At the time of the Auditor's review of investigative files, there were no investigations referred for prosecution.

The investigation was selected and reviewed based upon the initial reporting method, the outcome or investigation status (closed or opened), and the Auditor's requirement to review all the required steps and processes to verify compliance with multiple PREA Standards. The investigative file contained all the appropriate documentation, and the incident was investigated promptly, thoroughly, and objectively by a qualified investigator who has the training and the authority to conduct such investigations. The file contained documentation to include but not limited to the initial incident reports - summary of the allegation, demographics of involved staff or resident(s) to include advocacy acceptance or refusal, victim, witness, and alleged aggressor statements, investigative summary, investigative findings, and notification of case disposition to resident.

Upon review of the policies and documentation listed above, and upon completion of the interviews, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

115.272	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review:

	<p>Riverside Treatment Center PAQ</p> <p>Volunteers of America - Texas, <i>PREA Policy</i></p> <p>Interviews conducted with:</p> <p>Investigative Staff</p> <p>Findings (By Provision):</p> <p>115.272 (a) - Volunteers of America - Texas, <i>PREA Policy</i> states the facility will impose no standard higher than a preponderance of the evidence for determining whether allegations of sexual abuse or sexual harassment allegation are substantiated.</p> <p>The Auditor conducted an interview with an Investigator who provided the Auditor with a complete overview of the investigative process to include verifying specialized training credentials. The Auditor inquired to the Investigator what standard of evidence is required to substantiate allegations of sexual abuse or sexual harassment. The Investigator explained that the agency should impose no standard higher than a preponderance of the evidence.</p> <p>Upon review of the policy and upon completion of the interviews, Riverside Treatment Center demonstrated facility- wide practices that are consistent with policy and the requirements that complies with the PREA standard.</p>
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115.273	Reporting to residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <p>Riverside Treatment Center PAQ</p> <p>Volunteers of America - Texas, <i>PREA Policy</i></p>

Interviews conducted with:

Investigative Staff

Facility Director

Findings (By Provision):

115.273 (a) - Volunteers of America - Texas, *PREA Policy* states following an investigation into a resident's allegation of sexual abuse suffered in a facility, the resident shall be informed as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.

115.273 (b) - Volunteers of America - Texas, *PREA Policy* states if the facility did not conduct the investigation, it shall request the relevant information from the investigative agency in order to inform the resident.

115.273 (c) - Volunteers of America - Texas, *PREA Policy* states following a resident's allegation that a staff member has committed sexual abuse against the resident, the facility shall subsequently inform the resident whenever:

- The employee is no longer posted within the residents' unit.
- The employee is no longer employed at the Facility.
- The facility learns that the employee has been indicted or convicted on a charge related to sexual abuse withing the facility.

115.273 (d) - Volunteers of America - Texas, *PREA Policy* states if an allegation involved sexual assault by another resident, the facility shall subsequently inform the alleged victim it is learned that the alleged abuser has been indicated on or convicted of any charge related to sexual abuse.

115.273 (e) - Volunteers of America - Texas, *PREA Policy* states all such notifications or attempted notifications shall be documented. Residents will be asked to sign notifications to indicate receipt. A copy of the letter provided to the resident will be attached to the original incident report.

115.273 (f) - The Auditor is not required to audit this provision.

The Auditor requested interviews with residents who reported an incident of sexual abuse or sexual harassment during the twelve-month auditing period. The facility provided documentation which reflected the residents were no longer in custody, therefore, residents in this targeted category were not interviewed.

The Auditor inquired the Investigator about the agency's notification procedures, to an alleged victim of sexual abuse, when the case is closed and whether the allegation has a final determination of substantiated, unsubstantiated, or unfounded. The Investigator confirmed such notifications were completed by the PREA Coordinator and is documented upon completion.

The Auditor conducted an interview with the Facility Director and inquired regarding how the facility notifies a resident who makes an allegation of sexual abuse when the case is closed and a determination as to either substantiated, unsubstantiated, or unfounded. The Facility Director confirmed that the PREA Coordinator completes the resident notification process for all investigations.

Upon review of the policies and upon completion of the interviews with specialized staff, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

115.276	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: Riverside Treatment Center PAQ Volunteers of America - Texas, <i>PREA Policy</i> Interviews conducted with: Administrative (Human Resources) Staff

Findings (By Provision):

115.276 (a, b) – Volunteers of America - Texas, *PREA Policy* states staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.

115.276 (c) – Volunteers of America - Texas, *PREA Policy* states disciplinary sanctions for violations of the agency’s policies relating to sexual abuse or sexual harassment, other than actually engaging in sexual abuse, shall be commensurate with the nature and circumstances of the acts committed, the staff’s disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.

115.276 (d) – Volunteers of America - Texas, *PREA Policy* states all terminations for violations of the facility sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.

The facility reported one staff violation, resignation prior to termination, or termination for violating the agency’s sexual abuse or sexual harassment policies during the twelve months prior to the audit. The staff member was terminated for violating agency policy. The Auditor reviewed documentation which confirmed the actions were taken due to the staff’s violation of policy.

The Auditor conducted an interview with Administrative / HR Staff Member who confirmed that Riverside Treatment Center had one staff member violate, resign prior to termination, or be terminated for violating the agency’s policy against sexual abuse or sexual harassment during the past twelve months.

Upon review of the policy, facility documentation, and upon completion of interviews, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

115.277	Corrective action for contractors and volunteers
	<p data-bbox="280 188 983 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 564 300">Auditor Discussion</p> <hr/> <p data-bbox="280 340 545 376">Document Review:</p> <p data-bbox="280 412 734 448">Riverside Treatment Center PAQ</p> <p data-bbox="280 483 880 519">Volunteers of America - Texas, <i>PREA Policy</i></p> <p data-bbox="280 627 663 663">Interviews conducted with:</p> <p data-bbox="280 698 504 734">Facility Director</p> <p data-bbox="280 842 609 878">Findings (By Provision):</p> <p data-bbox="280 985 1461 1191">115.277 (a, b) - Volunteers of America - Texas, <i>PREA Policy</i> states any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with residents and shall be reported to law enforcement agencies and to relevant licensing bodies. Any other violation of the agency's sexual abuse or sexual harassment policies by a civilian or contractor will result in further prohibitions.</p> <p data-bbox="280 1299 1461 1460">The facility reported there have been no contractor or volunteer violations or terminations of the agency's sexual abuse or sexual harassment policies during the twelve months prior to the audit as the contractor resigned prior to allegations being reported.</p> <p data-bbox="280 1568 1477 1854">The Auditor conducted an interview with the Facility Director regarding any violation of the facility's sexual abuse and sexual harassment by a contractor or volunteer. The Facility Director explained that the incident would be reported to local law enforcement, and an investigation would be conducted. If the investigation shows the activity was criminal, then the incident would be reported to any relevant licensing boards, and the contractor or volunteer would be prohibited from any further contact at Riverside Treatment Center.</p> <p data-bbox="280 1962 1455 2078">Upon review of the policy and upon completion of interviews, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.</p>

115.278	Disciplinary sanctions for residents
	<p data-bbox="280 188 983 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 266 564 300">Auditor Discussion</p> <hr/> <p data-bbox="280 344 544 378">Document Review:</p> <p data-bbox="280 412 735 445">Riverside Treatment Center PAQ</p> <p data-bbox="280 479 884 512">Volunteers of America - Texas, <i>PREA Policy</i></p> <p data-bbox="280 546 1158 580">Volunteers of America - Texas, Resident Orientation Handbook</p> <p data-bbox="280 703 663 736">Interviews conducted with:</p> <p data-bbox="280 770 504 804">Facility Director</p> <p data-bbox="280 837 533 871">PREA Coordinator</p> <p data-bbox="280 1061 612 1095">Findings (By Provision):</p> <p data-bbox="280 1196 1477 1397">115.278 (a) – Volunteers of America - Texas, <i>PREA Policy</i> states residents shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the resident engaged in resident-on-resident sexual abuse or following a criminal finding of guilt for resident-on-resident sexual abuse or sexual harassment.</p> <p data-bbox="280 1509 1445 1666">115.278 (b) – Volunteers of America - Texas, <i>PREA Policy</i> states sanctions shall be commensurate with the nature and circumstances of the abuse committed, the resident’s disciplinary history, and the sanctions imposed for comparable offenses by other residents with similar histories.</p> <p data-bbox="280 1778 1445 1935">115.278 (c) – Volunteers of America - Texas, <i>PREA Policy</i> states the disciplinary process shall consider whether a resident’s mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.</p> <p data-bbox="280 2047 1445 2080">115.278 (d) – Volunteers of America - Texas, <i>PREA Policy</i> states if the facility offers</p>

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

115.278 (e) - Volunteers of America - Texas, *PREA Policy* states a resident may be disciplined for sexual contact with a staff member only upon finding that the staff did not consent to such contact.

115.278 (f) - Volunteers of America - Texas, *PREA Policy* states a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.

115.278 (g) - Volunteers of America - Texas, *PREA Policy* states the facility prohibits all sexual activity between residents and may discipline residents for such activity. The department may not, however, deem such activity to constitute sexual abuse if it determines that the activity is coerced or not.

The Auditor conducted an interview with the Facility Director and discussed the facility's policy on disciplinary sanctions for a resident after an administrative or criminal finding that the resident engaged in resident-on-resident sexual abuse. The Facility Director referred to the existing policy that a resident would be subject to disciplinary sanctions, which would be conducted in accordance with the formal disciplinary process to include termination from the program.

The Auditor conducted an interview with the Facility Director and PREA Coordinator and discussed the victim advocacy services available to residents and counseling services available for abusers. Both the Facility Director and PREA Coordinator explained that the services provided include counseling and support groups. These services are offered for victims of sexual abuse or sexual harassment as well as residents of sexual abuse.

Upon review of the policy, Volunteers of America - Texas, Resident Orientation Handbook, and upon completion of interviews, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

115.282	Access to emergency medical and mental health services
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Document Review:</p> <p>Riverside Treatment Center PAQ</p> <p>Volunteers of America - Texas, <i>PREA Policy</i></p> <p>Interviews conducted with:</p> <p>Security Staff / Non-Security Staff First Responders</p> <p>PREA Coordinator</p> <p>Findings (By Provision):</p> <p>115.282 (a) - Volunteers of America - Texas, <i>PREA Policy</i> states resident victims of sexual abuse shall receive timely unimpeded access to emergency medical treatment and crisis intervention services. The nature and scope of such services are determined by medical and mental health practitioners according to their professional judgment.</p> <p>115.282 (b) - Volunteers of America - Texas, <i>PREA Policy</i> states staff first responders will take preliminary steps to protect a resident victim of sexual abuse and shall ensure the resident is transported to the local emergency room for treatment and evaluation. Responding staff shall notify the Facility Director and PREA Coordinator.</p> <p>The Auditor conducted interviews with random staff members regarding his/her role as a First Responder to an allegation of sexual abuse. The staff members provided specific details of their responsibilities as a First Responder. These responsibilities include separating the victim and abuser, preserving, and protecting the crime scene, requesting that the alleged victim not take any action that could destroy physical evidence, ensuring the alleged abuser does not take any actions, which would destroy physical evidence, and to immediately notify the Facility Director and PREA Coordinator. In addition, each staff member acknowledged the importance of the agency's response protocol to a sexual abuse allegation as well as his or her</p>

	<p>role as a First Responder.</p> <p>115.282 (c) – Volunteers of America - Texas, <i>PREA Policy</i> states resident victims of sexual abuse shall be offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate</p> <p>The Auditor requested interviews with residents who reported an incident of sexual abuse or sexual harassment during the twelve-month auditing period. The facility provided documentation which reflected the residents were no longer in custody, therefore, residents in this targeted category were not interviewed.</p> <p>115.282 (d) – Volunteers of America - Texas, <i>PREA Policy</i> states treatment services are provided to every victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>The Auditor conducted an interview with the PREA Coordinator who confirmed resident victims are provided immediate access to medical treatment as well as crisis intervention, therapy, and counseling services. If further medical treatment is necessary, it would be provided at the local hospital, and the Women’s Center Rape Crisis & Victim Services would be contacted for crisis intervention services and accompany the resident during a forensic exam.</p> <p>Upon review of the policy and upon completion of staff interviews, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.</p>
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115.283	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review:

Riverside Treatment Center PAQ

Volunteers of America - Texas, *PREA Policy*

Interviews conducted with:

PREA Coordinator

Findings (By Provision):

115.283 (a) - Volunteers of America - Texas, *PREA Policy* states the facility shall offer medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any criminal justice setting.

115.283 (b) - Volunteers of America - Texas, *PREA Policy* states the evaluation and treatment of such victims includes, 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.

115.283 (c) - Volunteers of America - Texas, *PREA Policy* states the facility provides such victims with medical and mental health services consistent with the community level of care.

115.283 (d, e) - Volunteers of America - Texas, *PREA Policy* states resident victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests. If pregnancy results from an incident of sexual abuse, such victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services.

115.283 (f) - Volunteers of America - Texas, *PREA Policy* states resident victims of sexual abuse shall be offered tests for sexually transmitted infections as medically appropriate.

115.283 (g) - Volunteers of America - Texas, *PREA Policy* states all treatment

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

115.283 (h) - Volunteers of America - Texas, *PREA Policy* states the facility shall attempt to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners.

The Auditor conducted an interview with the PREA Coordinator who confirmed that resident victims are provided immediate access to medical treatment at the local hospital and victim advocacy services are provided through the Women's Center Rape Crisis & Victim Services.

The Auditor requested interviews with residents who reported an incident of sexual abuse or sexual harassment during the twelve-month auditing period. The facility provided documentation which reflected the residents were no longer in custody, therefore, residents in this targeted category were not interviewed.

Upon review of the policy and upon completion of interviews, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

115.286	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: Riverside Treatment Center PAQ <i>Volunteers of America - Texas, PREA Policy</i> Interviews conducted with: Facility Director

Incident Review Team

Findings (By Provision):

115.286 (a, b) – Volunteers of America - Texas, *PREA Policy* states the facility shall conduct a sexual abuse or sexual harassment incident review at the conclusion of every sexual abuse/harassment investigation, unless the allegation has been determined to be unfounded. Such review shall ordinarily occur within thirty (30) days of the conclusion of the investigation.

115.286 (c) – Volunteers of America - Texas, *PREA Policy* states the review team shall include upper-level management officials, with input from line supervisors, investigators, local law enforcement and medical or mental health practitioners.

115.286 (d) – Volunteers of America - Texas, *PREA Policy* states the review team shall

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

115.286 (e) – Volunteers of America - Texas, *PREA Policy* states the facility shall implement the recommendations for improvement or shall document reasons for non-compliance.

The Auditor conducted an interview with a staff member who is a member of the Incident Review Team and inquired if the Incident Review Team considers whether

an incident or allegation was motivated by race, ethnicity, or gender identity and if the Incident Review Team examines the area in the facility where the incident allegedly occurred. The staff member confirmed that the Incident Review Team does consider whether the incident was motivated by race, ethnicity, or gender identity, and gang affiliation. The Incident Review Team also tours the area where the alleged incident occurred as well as considering whether the addition of monitoring technology should be deployed to supplement supervision by staff. The staff member explained how touring the area provides the team with the best possible representation of an incident and assists the Incident Review Team in determining if adding monitoring technology is warranted.

The Auditor conducted an interview with the Facility Director and discussed the incident review process. The Facility Director explained that the Incident Review Team includes upper-level management, Facilities Services Manager, Case Manager Supervisor, Residential Monitor Supervisor, and Resident Counselors with input from Quality & Assurance Compliance, PREA Investigator, and line staff. The Facility Director articulated the process of the incident review, including listing the elements required per the PREA standard. The Facility Director explained how the Incident Review Team uses the information obtained from the review to determine if changes need to be made to the physical plant, policy and procedure or any other change that would improve the safety of the resident population and prevent sexual abuse.

Upon review of the policy and upon completion of interviews, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

115.287	Data collection
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Document Review:</p> <p>Riverside Treatment Center PAQ</p> <p>Volunteers of America - Texas, <i>PREA Policy</i></p> <p>Volunteers of America - Texas, Annual Report</p>

Findings (By Provision):

115.287 (a - c) - Volunteers of America - Texas, *PREA Policy* states the agency shall collect accurate uniform data for every allegation of sexual abuse and sexual harassment at all facilities under its direct control using a standardized instrument and set of definitions. The agency shall aggregate the incident-based sexual abuse data at least annually. 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.

115.287 (d) - Volunteers of America - Texas, *PREA Policy* states the facility shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews in the calendar year.

115.287 (e) - This provision does not apply to Riverside Treatment Center.

115.287 (f) - Volunteers of America - Texas, *PREA Policy* states upon request, VOATX shall provide all such data from the previous calendar year to the Department of Justice no later than June 30.

During the pre-on-site phase of the audit, the Auditor reviewed the Annual Report, which contained sexual abuse data collected with a standardized instrument. The standardized instrument used contained a set of definitions and data collected from incident reports, investigative files, and sexual abuse incident reviews. The Riverside Treatment Center publishes reports on agency website <https://www.voa-tx.org/services/re-entry/>

Upon review of the policy, and Annual Report, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

115.288	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Document Review:

Riverside Treatment Center PAQ

Volunteers of America - Texas, *PREA Policy*

Volunteers of America - Texas, Annual Report

Interviews conducted with:

PREA Coordinator

Agency Head

Findings (By Provision):

115.288 (a) - Volunteers of America - Texas, *PREA Policy* states the facility shall review data collected and aggregated pursuant to §115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training, including:

- Identifying problem areas
- Taking corrective action on an ongoing basis
- Prepare a annual report of its findings from its data review and any corrective actions for each facility as well as the agency as a whole.

The Auditor conducted an interview with the PREA Coordinator and inquired if the agency reviews data collected and aggregated pursuant to §115.287. The PREA Coordinator explained how the facility collects data to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies.

115.288 (b) - Volunteers of America - Texas, *PREA Policy* states such report shall include a comparison between the current data and data from prior years and shall provide an assessment of the agency's progress in addressing sexual abuse.

The Auditor reviewed Annual Report, which contained sexual abuse data collected with a standardized instrument. The standardized instrument used contained a set

of definitions and data collected from incident reports, investigative files, and sexual abuse incident reviews. The Volunteers of America - Texas, publishes the reports on the agency website <https://www.voatx.org/services/re-entry/>

115.288 (c) - Volunteers of America - Texas, *PREA Policy* states annual reports shall be approved by the Agency Head (VOATX CEO) and made readily available to the public through the agency website <https://www.voatx.org/services/re-entry/>

115.288 (d) - Volunteers of America - Texas, *PREA Policy* states the agency may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility but must indicate the nature of the material redacted.

The Auditor conducted an interview with the PREA Coordinator regarding how data is collected pursuant to PREA Standard §115.87. The PREA Coordinator acknowledged that the data collected is securely retained and the agency takes corrective action on an ongoing basis based on the collected data. The PREA Coordinator confirmed the preparation of an annual report, and it is submitted to the Agency Head for review and approval. The PREA Coordinator confirmed the agency redacts sensitive information and all public data information.

The Auditor conducted an interview with the Agency Head and inquired how the agency uses incident-based sexual abuse data to assess and improve sexual abuse prevention, detection, and response policies, practices, and training. The Agency Head explained that sexual abuse data is collected annually and utilized to complete the Survey of Sexual Victimization. The Auditor inquired as to who is responsible for approving annual reports written pursuant to §115.88. The Agency Head confirmed reviewing and approving the annual PREA report.

Upon review of the policy, Annual Reports, and upon completion of interviews, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

115.289	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Document Review:

Riverside Treatment Center PAQ

Volunteers of America - Texas, *PREA Policy*

Volunteers of America - Texas, Annual Report

Interviews conducted with:

PREA Coordinator

Findings (By Provision):

115.289 (a) - Volunteers of America - Texas, *PREA Policy* states the agency shall ensure that data collected pursuant to §115.287 are securely retained.

115.289 (b) - This provision does not apply to Riverside Treatment Center.

115.289 (c) - Volunteers of America - Texas, *PREA Policy* states the states the PREA Team shall make all aggregated sexual abuse data readily available to the public at least annually through its website.

115.289 (d) - Volunteers of America - Texas, *PREA Policy* states the facility PREA Team shall maintain sexual abuse data collected for at least 10 years after the date of the initial collection.

The Auditor conducted an interview with the PREA Coordinator regarding how data is collected pursuant to PREA Standard §115.87. The PREA Coordinator acknowledged that the data collected is securely retained and the agency takes corrective action on an ongoing basis based on the collected data.

Upon review of the policy and upon completion of interviews, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.401 (a) - During the prior three-year audit period, the agency ensured that the facility operated was audited, once.</p> <p>115.401 (b) - Riverside Treatment Center had its last PREA audit conducted on July 27 - 29, 2022; the third year of the third three-year auditing cycle. This PREA audit was conducted on August 11 - 12, 2025; the third year of the fourth three-year auditing cycle.</p> <p>115.401 (h) - The Auditor was granted complete access to, and the ability to observe, all areas of the facility.</p> <p>115.401 (i) - The Auditor was permitted to request and receive copies of any relevant documents (including electronically stored information).</p> <p>115.401 (m) - The Auditor was permitted to conduct private interviews with residents and staff.</p> <p>115.401 (n) - The Auditor verified through resident and staff interviews that residents and staff were permitted to send confidential correspondence to the Auditor in the same manner as if they were communicating with legal counsel.</p> <p>Upon review of the policy and upon completion of interviews, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.403 (f) - Riverside Treatment Center has published the prior PREA Audit Reports

on the agency website. The Auditor reviewed the prior PREA Audit Report (July 2022) for Riverside Treatment Center.

Upon review of the policy and upon completion of interviews, Riverside Treatment Center demonstrated facility-wide practices that are consistent with policy and the requirements that complies with the PREA standard.

Appendix: Provision Findings		
115.211 (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
115.211 (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 community confinement facilities?	yes
115.212 (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
115.212 (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.)	na
115.212 (c)	Contracting with other entities for the confinement of residents	
	If the agency has entered into a contract with an entity that fails to comply with the PREA standards, did the agency do so only in	na

	emergency circumstances after making all reasonable attempts to find a PREA compliant private agency or other entity to confine residents? (N/A if the agency has not entered into a contract with an entity that fails to comply with the PREA standards.)	
	In such a case, does the agency document its unsuccessful attempts to find an entity in compliance with the standards? (N/A if the agency has not entered into a contract with an entity that fails to comply with the PREA standards.)	na
115.213 (a)	Supervision and monitoring	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring to protect residents against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The physical layout of each facility?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the resident population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
115.213 (b)	Supervision and monitoring	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (NA if no deviations from staffing plan.)	na
115.213 (c)	Supervision and monitoring	
	In the past 12 months, has the facility assessed, determined, and documented whether adjustments are needed to the staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility assessed, determined, and documented whether adjustments are needed to prevailing	yes

	staffing patterns?	
	In the past 12 months, has the facility assessed, determined, and documented whether adjustments are needed to the facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility assessed, determined, and documented whether adjustments are needed to the resources the facility has available to commit to ensure adequate staffing levels?	yes
115.215 (a)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting any cross-gender strip searches or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.215 (b)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting cross-gender pat-down searches of female residents, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female residents' access to regularly available programming or other outside opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.)	yes
115.215 (c)	Limits to cross-gender viewing and searches	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female residents?	yes
115.215 (d)	Limits to cross-gender viewing and searches	
	Does the facility have policies that enable residents to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enable residents to shower,	yes

	perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	
	Does the facility require staff of the opposite gender to announce their presence when entering an area where residents are likely to be showering, performing bodily functions, or changing clothing?	yes
115.215 (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 the resident's genital status is unknown, does the facility determine genital status during conversations with the resident, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	yes
115.215 (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
115.216 (a)	Residents with disabilities and residents who are limited English proficient	
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who are blind or have low vision?	yes

	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other (if "other," please explain in overall determination notes.)	yes
	Do such steps include, when necessary, ensuring effective communication with residents who are deaf or hard of hearing?	yes
	Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Have intellectual disabilities?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Who are blind or have low vision?	yes
115.216 (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
115.216 (c)	Residents with disabilities and residents who are limited English proficient	
	Does the agency always refrain from relying on resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-response duties under §115.264, or the investigation of the resident's allegations?	yes
115.217 (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 two questions immediately above ?	yes
	Does the agency prohibit the enlistment of the services of any contractor who may have contact with residents who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of the services of any contractor who may have contact with residents who: Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of	yes

	force, or coercion, or if the victim did not consent or was unable to consent or refuse?	
	Does the agency prohibit the enlistment of the services of any contractor who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the two questions immediately above ?	yes
115.217 (b)	Hiring and promotion decisions	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with residents?	yes
	Does the agency consider any incidents of sexual harassment in determining to enlist the services of any contractor who may have contact with residents?	yes
115.217 (c)	Hiring and promotion decisions	
	Before hiring new employees who may have contact with residents, does the agency: Perform a criminal background records check?	yes
	Before hiring new employees who may have contact with residents, does the agency, 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
115.217 (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
115.217 (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
115.217	Hiring and promotion decisions	

(f)		
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.217 (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
115.217 (h)	Hiring and promotion decisions	
	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
115.218 (a)	Upgrades to facilities and technology	
	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
115.218 (b)	Upgrades to facilities and technology	
	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	yes

	agency's ability to protect residents from sexual abuse? (N/A if agency/facility has not installed or updated any video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012 or since the last PREA audit, whichever is later.)	
115.221 (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
115.221 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth where applicable? (NA if the agency/facility is not responsible for conducting any form of criminal or administrative sexual abuse investigations.)	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? (NA if the agency/facility is not responsible for conducting any form of criminal or administrative sexual abuse investigations.)	yes
115.221 (c)	Evidence protocol and forensic medical examinations	
	Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes

	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.221 (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
115.221 (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
115.221 (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 agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes
115.221 (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? (N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.221(d) above).	yes

115.222 (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
115.222 (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
115.222 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for conducting criminal investigations. See 115.221(a).)	yes
115.231 (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	yes

	residents on: The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	
	Does the agency train all employees who may have contact with residents on: The dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with residents on: The common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with residents on: How to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with residents on: How to avoid inappropriate relationships with residents?	yes
	Does the agency train all employees who may have contact with residents on: How to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming residents?	yes
	Does the agency train all employees who may have contact with residents on: How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
115.231 (b)	Employee training	
	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
115.231 (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,	yes

	does the agency provide refresher information on current sexual abuse and sexual harassment policies?	
115.231 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.232 (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
115.232 (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
115.232 (c)	Volunteer and contractor training	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.233 (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
	During intake, do residents receive information explaining: Their rights to be free from sexual abuse and sexual harassment?	yes

	During intake, do residents receive information explaining: Their rights to be free from retaliation for reporting such incidents?	yes
	During intake, do residents receive information regarding agency policies and procedures for responding to such incidents?	yes
115.233 (b)	Resident education	
	Does the agency provide refresher information whenever a resident is transferred to a different facility?	yes
115.233 (c)	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
115.233 (d)	Resident education	
	Does the agency maintain documentation of resident participation in these education sessions?	yes
115.233 (e)	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
115.234 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.231, does the agency ensure that, to the extent	yes

	the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).	
115.234 (b)	Specialized training: Investigations	
	Does this specialized training include: Techniques for interviewing sexual abuse victims?(N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).	yes
	Does this specialized training include: Proper use of Miranda and Garrity warnings?(N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).	yes
	Does this specialized training include: Sexual abuse evidence collection in confinement settings?(N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).	yes
	Does this specialized training include: The criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).	yes
115.234 (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 criminal or administrative sexual abuse investigations. See 115.221(a).)	yes
115.235 (a)	Specialized training: Medical and mental health care	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	na

	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	na
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to respond effectively and professionally to victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	na
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	na
115.235 (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 does not employ medical staff or the medical staff employed by the agency do not conduct forensic exams.)	na
115.235 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	na
115.235 (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 §115.231? (N/A for circumstances in which a particular status (employee or contractor/volunteer) does not apply.)	na
	Do medical and mental health care practitioners contracted by	na

	and volunteering for the agency also receive training mandated for contractors and volunteers by §115.232? (N/A for circumstances in which a particular status (employee or contractor/volunteer) does not apply.)	
115.241 (a)	Screening for risk of victimization and abusiveness	
	Are all residents assessed during an intake screening for their risk of being sexually abused by other residents or sexually abusive toward other residents?	yes
	Are all residents assessed upon transfer to another facility for their risk of being sexually abused by other residents or sexually abusive toward other residents?	yes
115.241 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.241 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes
115.241 (d)	Screening for risk of victimization and abusiveness	
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: The age of the resident?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: The physical build of the resident?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident has previously been incarcerated?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization:	yes

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

115.241 (g)	Screening for risk of victimization and abusiveness	
	Does the facility reassess a resident's risk level when warranted due to a: Referral?	yes
	Does the facility reassess a resident's risk level when warranted due to a: Request?	yes
	Does the facility reassess a resident's risk level when warranted due to a: Incident of sexual abuse?	yes
	Does the facility reassess a resident's risk level when warranted due to a: Receipt of additional information that bears on the resident's risk of sexual victimization or abusiveness?	yes
115.241 (h)	Screening for risk of victimization and abusiveness	
	Is it the case that residents are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes
115.241 (i)	Screening for risk of victimization and abusiveness	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the resident's detriment by staff or other residents?	yes
115.242 (a)	Use of screening information	
	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes

	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?	yes
	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
115.242 (b)	Use of screening information	
	Does the agency make individualized determinations about how to ensure the safety of each resident?	yes
115.242 (c)	Use of screening information	
	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
115.242 (d)	Use of screening information	
	Are each transgender or intersex resident's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes
115.242 (e)	Use of screening information	
	Are transgender and intersex residents given the opportunity to shower separately from other residents?	yes
115.242	Use of screening information	

(f)		
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing: lesbian, gay, and bisexual residents in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I residents pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing: transgender residents in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I residents pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing: intersex residents in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I residents pursuant to a consent decree, legal settlement, or legal judgement.)	yes
115.251 (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: 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
115.251 (b)	Resident reporting	

	Does the agency also provide at least one way for residents to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the resident to remain anonymous upon request?	yes
115.251 (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
115.251 (d)	Resident reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of residents?	yes
115.252 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address resident grievances regarding sexual abuse. This does not mean the agency is exempt simply because a resident does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	no
115.252 (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 a resident to use any informal grievance process, or to otherwise attempt to resolve	yes

	with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	
115.252 (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
115.252 (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 is 70 days per 115.252(d)(3)), does the agency notify the resident in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the resident does not receive a response within the time allotted for reply, including any properly noticed extension, may a resident consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
115.252 (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 files such a request on behalf	yes

	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.)	
	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
115.252 (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
115.252 (g)	Exhaustion of administrative remedies	
	If the agency disciplines a resident for filing a grievance related to	yes

	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.)	
115.253 (a)	Resident access to outside confidential support services	
	Does the facility provide residents with access to outside victim advocates for emotional support services related to sexual abuse by giving residents mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	Does the facility enable reasonable communication between residents and these organizations, in as confidential a manner as possible?	yes
115.253 (b)	Resident access to outside confidential support services	
	Does the facility inform residents, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.253 (c)	Resident access to outside confidential support services	
	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
115.254 (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
115.261 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or	yes

	information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against residents or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
115.261 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, do staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
115.261 (c)	Staff and agency reporting duties	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform residents of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
115.261 (d)	Staff and agency reporting duties	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
115.261 (e)	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

115.262 (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
115.263 (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
115.263 (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
115.263 (c)	Reporting to other confinement facilities	
	Does the agency document that it has provided such notification?	yes
115.263 (d)	Reporting to other confinement facilities	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
115.264 (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,	yes

	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?	
	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
115.264 (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
115.265 (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
115.266 (a)	Preservation of ability to protect residents from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	no
115.267 (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
115.267 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
115.267 (c)	Agency protection against retaliation	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any resident disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency:4. Monitor resident housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor resident program changes?	yes

	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignment of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.267 (d)	Agency protection against retaliation	
	In the case of residents, does such monitoring also include periodic status checks?	yes
115.267 (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
115.271 (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/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.221(a).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.221(a).)	yes
115.271 (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 as required by 115.234?	yes
115.271 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial	yes

	evidence, including any available physical and DNA evidence and any available electronic monitoring data?	
	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
115.271 (d)	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
115.271 (e)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as resident or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring a resident who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.271 (f)	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
115.271 (g)	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
115.271	Criminal and administrative agency investigations	

(h)		
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.271 (i)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.271(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
115.271 (j)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the facility or agency does not provide a basis for terminating an investigation?	yes
115.271 (l)	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 any form of administrative or criminal sexual abuse investigations. See 115.221(a).)	yes
115.272 (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
115.273 (a)	Reporting to residents	
	Following an investigation into a resident's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
115.273 (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	yes

	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.)	
115.273 (c)	Reporting to residents	
	Following a resident’s allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the resident’s unit?	yes
	Following a resident’s allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following a resident’s allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following a resident’s allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.273 (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	yes

	the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	
115.273 (e)	Reporting to residents	
	Does the agency document all such notifications or attempted notifications?	yes
115.276 (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
115.276 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
115.276 (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
115.276 (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
115.277 (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
115.277 (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
115.278 (a)	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, are residents subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
115.278 (b)	Disciplinary sanctions for residents	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the resident's disciplinary history, and the sanctions imposed for comparable offenses by other residents with similar histories?	yes
115.278 (c)	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
115.278 (d)	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 require the offending resident to participate in such interventions as a	no

	condition of access to programming and other benefits?	
115.278 (e)	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
115.278 (f)	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
115.278 (g)	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
115.282 (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
115.282 (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 security staff first responders take preliminary steps to protect the victim pursuant to § 115.262?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
115.282 (c)	Access to emergency medical and mental health services	
	Are resident victims of sexual abuse offered timely information	yes

	about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	
115.282 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.283 (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
115.283 (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
115.283 (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
115.283 (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. Note: in "all-male" facilities, there may be residents who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.283 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph § 115.283(d), do such victims receive timely and comprehensive	yes

	information about and timely access to all lawful pregnancy-related medical services? (N/A if “all-male” facility. Note: in “all-male” facilities, there may be residents who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	
115.283 (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
115.283 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.283 (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
115.286 (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
115.286 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.286 (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

115.286 (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 §§ 115.286(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.286 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
115.287 (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
115.287 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.287	Data collection	

(c)		
	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
115.287 (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
115.287 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents? (N/A if agency does not contract for the confinement of its residents.)	na
115.287 (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.)	yes
115.288 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes

115.288 (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
115.288 (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
115.288 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
115.289 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.287 are securely retained?	yes
115.289 (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
115.289 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.289 (d)	Data storage, publication, and destruction	
	Does the agency maintain sexual abuse data collected pursuant to § 115.287 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes

115.401 (a)	Frequency and scope of audits	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes
115.401 (b)	Frequency and scope of audits	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	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.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	yes
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 residents?	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	yes

	same manner as if they were communicating with legal counsel?	
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