

PREA Facility Audit Report: Final

Name of Facility: Liberty Place Recovery Center for Women

Facility Type: Community Confinement

Date Interim Report Submitted: NA

Date Final Report Submitted: 05/17/2024

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
Auditor Full Name as Signed: Brian Douglas Bivens	Date of Signature: 05/17/2024

AUDITOR INFORMATION	
Auditor name:	Bivens, Brian
Email:	briandbivens@gmail.com
Start Date of On-Site Audit:	05/02/2024
End Date of On-Site Audit:	05/03/2024

FACILITY INFORMATION	
Facility name:	Liberty Place Recovery Center for Women
Facility physical address:	218 Lake Street, Richmond, Kentucky - 40475
Facility mailing address:	

Primary Contact

Name:	Alisha Wilhoit
Email Address:	alisha.wilhoit@mtcomp.org
Telephone Number:	8596250104

Facility Director	
Name:	Alisha Wilhoit
Email Address:	alisha.wilhoit@mtcomp.org
Telephone Number:	8596250104

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

Facility Characteristics	
Designed facility capacity:	108
Current population of facility:	41
Average daily population for the past 12 months:	48
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Females
Age range of population:	35-44
Facility security levels/resident custody levels:	Community
Number of staff currently employed at the facility who may have contact with	17

residents:	
Number of individual contractors who have contact with residents, currently authorized to enter the facility:	0
Number of volunteers who have contact with residents, currently authorized to enter the facility:	0

AGENCY INFORMATION	
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Name of agency:	Mountain Comprehensive Care Center
Governing authority or parent agency (if applicable):	
Physical Address:	104 South Front Street, Prestonsburg, Kentucky - 41653
Mailing Address:	
Telephone number:	

Agency Chief Executive Officer Information:	
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Name:	
Email Address:	
Telephone Number:	

Agency-Wide PREA Coordinator Information			
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Name:	Alisha Wilhoit	Email Address:	alisha.wilhoit@mtcomp.org
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Facility AUDIT FINDINGS	
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Summary of Audit Findings	
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The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.

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

Number of standards exceeded:

0

Number of standards met:

41

Number of standards not met:

0

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2024-05-02
2. End date of the onsite portion of the audit:	2024-05-03

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:	KASAP Emotional Support Services Regional Provider - Ampersand Sexual Violence Resource Center

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	108
15. Average daily population for the past 12 months:	48
16. Number of inmate/resident/detainee housing units:	40
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

36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	47
38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	0
39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	1
40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	0
41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	0
42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	0
43. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	5

<p>44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</p>	<p>1</p>
<p>47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</p>	<p>The facility's population on the first day of the audit was 47.</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</p>	<p>17</p>
<p>50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</p>	<p>0</p>

51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	0
52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	<p>The facility has not utilized the services of contract employees or volunteers during this audit cycle.</p> <p>Ten of the seventeen staff members were interviewed. Several staff members have multiple titles. The facility does a medically trained staff member, but the employee does not fulfil any medical duties inside the facility. All staff are females.</p>
INTERVIEWS	
Inmate/Resident/Detainee Interviews	
Random Inmate/Resident/Detainee Interviews	
53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	5
54. 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 type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None

<p>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p>	<p>The facility supplied a list client name sorted by housing units, and special designations, as well as a list of facility staff names to the auditor. From these lists the auditor selected, at random, a sampling of clients and to be interviewed during the on-site visit. The sampling size for clients included at least one client from each housing area. This decision was made to ensure all clients throughout the facility were receiving the same information and education related to all Liberty Place Recovery Center for Women of the PREA program instituted at this facility. The range of stay for the interviewees was two weeks to eleven months. Clients were interviewed in the following steps of the program, MT 1, MT 2, Phase I and Phase II.</p>
<p>56. 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>57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>There were no barriers to conducting the random client interviews. There were no refusals. All clients were informed of the auditor's background, PREA training, and confidentiality requirements. Clients were also informed of the auditor's independent status as a private contractor, the nature of the questions, retaliation monitoring procedures, and the importance of being able to speak to a someone if the conversation brought up bad memories or flashbacks from their personal experiences concerning sexual abuse.</p> <p>All clients interviewed stated they had never been patted down or strip searched at the facility. All ten clients stated men were not allowed in their housing area while they were present. All maintenance activities are down during the day when clients are not allowed in their housing area.</p>

Targeted Inmate/Resident/Detainee Interviews	
58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	5
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:	0
a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:	<input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees. <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.
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>According to the Site Director, the facility did not house anyone meeting the definition of this targeted population. The total population of the facility on the first day off the onsite portion of the audit was 47.</p>

<p>61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>1</p>
<p>62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</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>According to the Site Director, the facility did not house anyone meeting the definition of this targeted population. The total population of the facility on the first day off the onsite portion of the audit was 47.</p>
<p>63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</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>According to the Site Director, the facility did not house anyone meeting the definition of this targeted population. The total population of the facility on the first day off the onsite portion of the audit was 47.</p>
<p>64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</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>According to the Site Director, the facility did not house anyone meeting the definition of this targeted population. The total population of the facility on the first day off the onsite portion of the audit was 47.</p>
<p>65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>4</p>
<p>66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</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>According to the Site Director, the facility did not house anyone meeting the definition of this targeted population. The total population of the facility on the first day off the onsite portion of the audit was 47.</p>
<p>67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>According to the Site Director, the facility did not house anyone meeting the definition of this targeted population. The total population of the facility on the first day off the onsite portion of the audit was 47.</p>
<p>68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>1</p>

<p>69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. 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>According to the Site Director, the facility did not house anyone meeting the definition of this targeted population. The total population of the facility on the first day off the onsite portion of the audit was 47.</p> <p>The facility does not have any segregated housing units.</p>
<p>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>There were no barriers to conducting the random client interviews. There were no refusals. All clients were informed of the auditor's background, PREA training, and confidentiality requirements. Clients were also informed of the auditor's independent status as a private contractor, the nature of the questions, retaliation monitoring procedures, and the importance of being able to speak to a someone if the conversation brought up bad memories or flashbacks from their personal experiences concerning sexual abuse.</p> <p>All ten clients interviewed stated they received PREA education and were screened during the intake process. Most mentioned the PREA signage throughout the facility. All ten clients stated they felt safe in the facility.</p>

Staff, Volunteer, and Contractor Interviews

Random Staff Interviews

71. Enter the total number of RANDOM STAFF who were interviewed:

10

72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)

- Length of tenure in the facility
- Shift assignment
- Work assignment
- Rank (or equivalent)
- Other (e.g., gender, race, ethnicity, languages spoken)
- None

73. Were you able to conduct the minimum number of RANDOM STAFF interviews?

- Yes
- No

74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):

All staff interviewed was well versed in their respective areas of responsibility regarding PREA and affirmed compliance with the applicable PREA standards. Staff interviewed was well versed in their responsibilities in reporting sexual abuse, sexual harassment, staff negligence, and retaliation for reporting. When questioned about evidence preservation, all staff responses reflected knowledge of agency policies and procedures. Ten out of the seventeen staff were interviewed.

All staff at Liberty Place are female. Length of employment at the facility ranged from two months to eleven years.

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.

<p>75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</p>	<p>11</p>
<p>76. Were you able to interview the Agency Head?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>78. Were you able to interview the PREA Coordinator?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>79. Were you able to interview the PREA Compliance Manager?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)</p>

80. 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
81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input type="radio"/> Yes <input checked="" type="radio"/> No
82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input type="radio"/> Yes <input checked="" type="radio"/> No
83. Provide any additional comments regarding selecting or interviewing specialized staff.	<p>Ten of the seventeen staff members were interviewed. Several staff members have multiple titles. The facility does a medically trained staff member, but the employee does not fulfil any medical duties inside the facility. Staff members were well informed of the facility's PREA policy, including how to respond to PREA allegations, DNA evidence protection, how to recognize signs and symptoms of victims, how to communicate with LBGTI clients, and the fact that it is mandatory to report sexual abuse in the Commonwealth of Kentucky.</p> <p>If an PREA allegation is reported, a staff member utilizes the facility's PREA Response Checklist to ensure all First Responder steps are completed. The facility has not a PREA allegation in the past twelve months. None of the staff interviewed had received a PREA allegation.</p>

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

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

Yes

No

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

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

Yes

No

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

Yes

No

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

Yes

No

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

Yes

No

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

While touring the facilities the auditor observed the notices of this PREA audit on all floors of the building, as well as posters (Kentucky Department of Corrections Zero Tolerance and NO Means NO posters) that called attention to the agency's Zero Tolerance Policy, Advocacy Services available, and how to report allegations of sexual abuse and sexual harassment. Information was in both English and Spanish.

Signs for Ampersand Victim Advocacy have pull-off telephone numbers for the clients. The phones were tested. Clients can call Ampersand, the PREA Hotline for free. Clients also have the ability to call 911 directly. Clients in Phase II have access to their own cell phones. The facility has not received a PREA allegation in the past twelve months. The facility was very clean and well maintained. Client rooms were also clean and well maintained. Each room has a private bathroom with a toilet and shower (with curtain). Staff conduct rounds every hour. All housing units, common areas, client program areas, administrative area, multiple laundry, dining area, kitchen, outdoor leisure area, vegetable garden, and all other client accessible areas were toured. While touring several clients and staff were questioned about their knowledge of PREA standards, procedures for reporting, services available, and their responsibilities. All staff and clients informally interviewed during the tour acknowledged receiving training and procedures for reporting sexual abuse, sexual harassment, and/or retaliation for reporting.

Documentation Sampling

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

<p>90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p>91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</p>	<p>All client PREA assessments and reassessments are maintained in KOMS (Kentucky Offender Management System). The parent agency Mountain Comprehensive Care Center maintains all employee human resource files. The Site Director maintains all employee training records. The auditor did review the following:</p> <p>Eight - Employee Training and Human Resource Records Ten - Client Orientation/Screening Records</p> <p>The facility has not utilized the services of contract employees or volunteers during this audit cycle. The facility has not had any PREA allegations in the past twelve months; therefore, there were no PREA investigation files to review.</p> <p>All files were well organized.</p>
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SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

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

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
Inmate-on-inmate sexual harassment	0	0	0	0
Staff-on-inmate sexual harassment	0	0	0	0
Total	0	0	0	00

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

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

Sexual Harassment Investigation Outcomes

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

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

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

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

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

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

98. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:	0
a. Explain why you were unable to review any sexual abuse investigation files:	The facility did not receive a PREA allegation in the past twelve months.

<p>99. 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 type="radio"/> No</p> <p><input checked="" 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>100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>0</p>
<p>101. 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>102. 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>103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>0</p>
<p>104. Did your sample of STAFF-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 staff-on-inmate sexual abuse investigation files)</p>

<p>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input 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 abuse investigation files)</p>
<p>Sexual Harassment Investigation Files Selected for Review</p>	
<p>106. 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 did not receive a PREA allegation in the past twelve months.</p>
<p>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input 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>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>109. 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>110. 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>111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>112. 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>113. 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>114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</p>	<p>The facility did not receive a PREA allegation in the past twelve months.</p>

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

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

- Yes
 No

Non-certified Support Staff

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

- Yes
 No

AUDITING ARRANGEMENTS AND COMPENSATION

121. Who paid you to conduct this audit?

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

Standards
<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
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Based on staff interviews, review of documentation provided and review of Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) for Compliance with Prison Rape Elimination Act of 2003 (PREA), auditor observations, informal conversations with clients and staff, Organizational Chart, and signage throughout the facility; the following delineates the audit findings regarding this standard:</p> <p>115.211 (a): Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) page 1 mandates zero tolerance for all forms of sexual abuse and sexual harassment. This policy outlines the agency’s approach to preventing, detecting and responding to such conduct. The procedures for all staff were clearly outlined in The Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA). The onsite portion of the audit, the auditor noticed a culture of zero-tolerance against sexual</p>

	<p>abuse by the signature, interactions between staff and clients, and informal interviews with staff and clients. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.211 (B): The agency employs an upper-level, facility PREA Coordinator, Alisha Wilhoit; effective April 1, 2019. Ms. Wilhoit is also the Facility Director; which enables her to have significant input on all matters pertaining to PREA. She is very knowledgeable of the PREA standards and actively assists the facility with compliance. Ms. Wilhoit as Site Director has the authority to develop, implement, and oversee PREA compliance. A Facility Organizational Chart confirms Ms. Wilhoit's position within the agency. She is actively updating the facility as new FAQ's are published on the PREA Resource Center website. Ms. Wilhoit acknowledged during her interview she had enough time to perform her PREA duties. The facility only has one building and does not have a PREA Manager. Therefore, the facility meets compliance with this part of the standard during this audit.</p>
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115.212	Contracting with other entities for the confinement of residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Based on the Site Director's interview, Auditor observations, review of documentation provided and review of Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) for Compliance with Prison Rape Elimination Act of 2003 (PREA); the following delineates the audit findings regarding this standard:</p> <p>115.12 The Liberty Place Recovery Center for Women is a private provider and does not contract with other agencies for the confinement of its clients. This was confirmed by reviewing Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), interview with the Site Director, and auditor observation during the onsite portion of the audit. Therefore, this standard was found to be compliant during this audit cycle.</p>

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

Based on auditor observation, review of the staffing plan, Site Director interview, informal client and staff interviews, review of documentation provided and review of Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) for Compliance with Prison Rape Elimination Act of 2003 (PREA); the following delineates the audit findings regarding this standard:

115.213 (a) Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) outlines, that the facility has developed, documented, and made its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing as described and required by this standard. The established staffing plan uses the criteria found in the standard 115.213 (a) to include the physical layout of the facility, composition of the clients housed, the prevalence of substantiated and unsubstantiated incidents of sexual abuse, and any other relevant factors identified. Video monitoring has also been deployed and upgraded to assist with the protection of clients against sexual abuse. The staffing levels are monitored daily by review of shift rosters. A review of the plan was last completed in January 2024. During the onsite portion of the audit, the auditor:

- observed the number of staff present and staffing patterns
- observed the line of sight in shared spaces
- observed areas where persons confined in the facility are not allowed to determine whether movement in an out of the spaces are monitored
- observed the level of supervision and frequency of room checks
- observed indirect supervision and camera placements
- held informal conversations with staff regarding supervision practices
- held informal conversations with persons confined in the facility regarding their perception of their own safety and security in the facility.

There were no issues noted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.213 (b) The Liberty Place Recovery Center for Women has procedures in place to ensure all deviations are covered by:

1. Utilization of on-call administrative staff
2. Overtime pay

There have been no deviations reported where the staffing plan has not been complied with in the past twelve months, as confirmed by interview with the Site

	<p>Director. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.213 (c) The staffing plan is reviewed annually by the Intake Director, Site Director and Regional Director and sent to the Kentucky Department of Corrections. The Facility Director approves any recommendations made which would include changes to policy and procedures, physical plant, video monitoring, or staffing levels. The last Annual Staffing Plan assessment was completed January 2024. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</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>Based on auditor observation, Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) for Compliance with Prison Rape Elimination Act of 2003 (PREA), formal and informal client and staff interviews, auditor observations, and documentation provided; the following delineates the audit findings regarding this standard:</p> <p>115.215 (a) Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) prohibits all clients searches and that staff shall not conduct any type of search to include patdowns, cross-gender strip searches or gross-gender visual body cavity searches (meaning a search of the anal or genital opening). Policy specifically states:</p> <p>There will be no cross-gender strip searches, pat downs or visual body cavity searches conducted by Liberty Place staff. Any cross-gender pat down searches will be conducted by Department of Corrections probation officer in accordance with established DOC policy CPP 9.8 and should be limited to searches necessary for officer safety. Liberty Place prohibits staff from searching or physically examining a transgender or intersex resident for the sole purpose of determining the resident’s genital status. (PREA standard 115.215).</p> <p>The review of training curriculums and staff interviews revealed cross-gender strip</p>

searches are prohibited. There have been no documented cross-gender visual body cavity or strip searches reported in the past twelve months. In the event there is a suspicion of contraband or the need for a body search, Facility Director will be notified. The local police department would be notified if the contraband was suspected to be a weapon. If drugs or other contraband is suspected, the Department of Corrections Probation Officer would be contacted. This process was also confirmed during random client interviews. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.215 (b) Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) prohibits all staff from frisk/pat searches of female clients without exception. This was confirmed during ten random staff interviews. The facility is all female staff. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.215 (c) Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) prohibits frisk/pat searches of the female clients by male staff and requires that all cross-gender searches without exception. This was confirmed during random staff interviews. There are no male staff employed at the facility. Ten out of ten clients stated they have never been physically searched during their stay at the Liberty Place Recovery Center for Women. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.215 (d) Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), outlines that clients shall be permitted to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks or genitalia. Ten out of ten clients confirmed during interviews they have privacy when showering, using the toilets and while changing their clothes. Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) also requires staff of the opposite gender to announce their presence prior to entering the housing units. Note: the facility is all female staff. Client and staff interviews revealed that opposite gender announcements were common practice at this facility when escorting males through the facility for any reason. Ten out of ten clients stated males in their living wings are extremely rare and they are always escorted by a female staff member. During the onsite portion of the audit, the auditor:

- observed all areas where confined persons may be in a state of undress, including showers and toilets
- observed if any nonmedical staff of the opposite gender can view confined persons in a state of undress

	<ul style="list-style-type: none"> - observed electronic surveillance monitoring including point, tilt and zoom capabilities - observed announcements of staff entering into client rooms - held informal conversations with staff regarding search procedures - held informal conversations with clients concerning privacy issues <p>There were no issues noted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.215 (e) Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), training curriculum (Kentucky Department of Corrections lesson plan) provided, and staff interviews the facility prohibits staff from physically examining transgender or intersex clients for the sole purpose of determining genital status. If the client’s genital status is unknown, it is determined during conversations with the client, 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. There were no transgender or intersex clients housed at the Liberty Place Recovery Center for Women at the time of the onsite review. Staff training records were reviewed. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.215 (f) Based on Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), and formal and informal staff interviews the facility trains staff not to conduct any type of searches including, patdowns, cross-gender pat-down searches, and searches of transgender and intersex clients. In the event there is a suspicion of contraband or the need for a body search, staff will contact the Site Director for guidance. All ten clients stated they have never been patted down or strip-searched at the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.216	Residents with disabilities and residents who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on interviews with the PREA Coordinator, interviews with screening staff, the

Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), PREA Information Packet, review of the lesson plans, PREA handouts, as well as staff and client interviews; the following delineates the audit findings regarding this standard:

115.216 (a) Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) ensures appropriate steps are taken to provide clients with disabilities (including, for example, clients who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of its efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. PREA handouts, PREA posters, and the PREA Information Packet, are provided in both English and Spanish. The agency has access to a community interpreter when needed. During the onsite portion of the audit, the facility did not have a client who was blind/lor vision, deaf/hard of hearing, limited English proficient, or any physical handicaps. The facility had one cognitive client; the cognitive client displayed a clear understanding of the facility's PREA policy and how to report sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.216 (b) Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) for Compliance with Prison Rape Elimination Act of 2003 (PREA), Clients with disabilities and clients who are limited English proficient and staff takes 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 clients who are limited English proficient, including steps to provide interpreters who can interpret effectively accurately and impartially. The agency has access to a community interpreter when needed. During the onsite portion of the audit, the facility did not have a client who was blind/lor vision, deaf/hard of hearing, limited English proficient, or any physical handicaps. The facility had one cognitive client; the cognitive client displayed a clear understanding of the facility's PREA policy and how to report sexual abuse. Interviews with screening staff also confirmed this statement. Policy states:

For non-English speaking, hard of hearing, deaf or mentally disabled residents, Liberty Place will contact Language Line Solutions (Interpreting of the Commonwealth, LLC.), Fees incurred for use of these services will be paid for by Liberty Place. Liberty Place prohibits the use of 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

	<p>investigation of the resident's allegations. (PREA standard 115.216).</p> <p>The Site Director stated these services have not been needed in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.216 (c) The Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) mandates that Liberty Place Recovery Center for Women does not rely on client interpreters, client readers, or other types of client facility's except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the Client's safety. The agency has access to a community interpreter when needed. During the onsite portion of the audit, the facility did not have a client who was blind/lor vision, deaf/hard of hearing, limited English proficient, or any physical handicaps. The facility had one cognitive client; the cognitive client displayed a clear understanding of the facility's PREA policy and how to report sexual abuse. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.217	Hiring and promotion decisions
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Based on Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), Human Resource staff interviews, the Liberty Place Recovery Center for Women Self-Declaration Forms and eight personnel file reviews; the following delineates the audit findings regarding this standard:</p> <p>115.217 (a) The Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) does not hire or promote anyone who may have contact with clients, and does not enlist the services of any contractor or volunteer who may have contact with clients, who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution, has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or has been civilly or administratively adjudicated to have engaged in the activity described above. During the onsite visit background checks had been conducted by both the Liberty Place Recovery Center for Women (Parent</p>

Agency Mountain Comprehensive Care Center) and the Kentucky Department of Corrections as required on all current staff. Policy states:

Prior to employment, all Liberty Place employees will submit to a routine background check. The check shall include employment histories, references, and NCIC data obtained by designated DOC personnel. Background checks will be used to screen for prior convictions for sex offenses. Criminal background check requests will be performed every 5 years. Prior to hiring and promoting decisions, Liberty Place will also make a reasonable attempt to determine if the candidate has been civilly or administratively adjudicated to have engaged in inappropriate sexual conduct as described in the PREA standard. Contact with prior institutional employers will be made if applicable. Applicants will also be asked about previous misconduct. Material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination. (PREA standard 115.217).

Eight out of eight files illustrated compliance. The new parent agency Mountain Comprehensive Care Center completed new background checks on all employees just prior to January 2, 2024. Therefore, the facility meets compliance with this part of the standard during this audit.

115.217 (b) The Liberty Place Recovery Center for Women considers any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor or volunteer, who may have contact with clients. All applicants and employees must sign the agency's "Self-Declaration of Sexual Abuse/Sexual Harassment" form. The PREA Coordinator supplied the auditor with every "Self-Declaration of Sexual Abuse/Sexual Harassment" form that has been completed in the past twelve months. Each employee, volunteer and contractor signs the form annually. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.217 (c)-1 Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) requires a criminal background records check be completed before hiring any new employee. The Liberty Place Recovery Center for Women requires the following background prior to employment for all staff; the Department of Corrections completed the NCIC checks, and the parent agency completes local criminal histories and CAN (Child Abuse and Neglect search). The parent agency, (Mountain Comprehensive Care Center) of Liberty Place Recovery Center for Women completes background checks every 5 years on all employees, volunteers and contract employees. Mountain Comprehensive Care Center completed new background checks on all employees just prior to January 2, 2024. This was confirmed during file review and during an interview with the Facility Director. Currently the facility does not utilize the services of contract employees or volunteers. Therefore, the facility meets compliance with this part of the standard during this audit.

115.217 (c)-2 The Liberty Place Recovery Center for Women makes their best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any pending investigations of allegation of sexual abuse. The Liberty Place Recovery Center for Women requires the following background prior to employment for all staff; the Department of Corrections completed the NCIC checks, and the parent agency completes local criminal histories and CAN (Child Abuse and Neglect search). . Mountain Comprehensive Care Center completed new background checks on all employees on January 2, 2024. This was confirmed during file review and during an interview with the Facility Director and during the review of eight staff human resource files. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.217 (d) Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) requires a criminal background records check be completed before enlisting the services of any contractor or volunteer who may have contact with the clients. The Liberty Place Recovery Center for Women completes background checks every five years on all employees, volunteers and contract employees. The Liberty Place Recovery Center for Women requires the following background prior to employment for all staff; the Department of Corrections completed the NCIC checks, and the parent agency completes local criminal histories and CAN (Child Abuse and Neglect search). Mountain Comprehensive Care Center completed new background checks on all employees on January 2, 2024. This was confirmed during file review and during an interview with the Facility Director. During the past twelve months, the facility has not utilized the services of volunteers or contract employees. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.217 (e) Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) requires a criminal background records check be completed on all current employees, volunteers, and contractors at least every five years. The Liberty Place Recovery Center for Women requires the following background prior to employment for all staff; the Department of Corrections completed the NCIC checks, and the parent agency completes local criminal histories, and CAN (Child Abuse and Neglect search). Mountain Comprehensive Care Center completed new background checks on all employees just prior to January 2, 2024. During the past twelve months, the facility has not utilized the services of volunteers or contract employees. This was confirmed during file review and during an interview with the Site Director. The facility has meets compliance with this part of the standard.

115.217 (f) The Liberty Place Recovery Center for Women instills upon all employees

	<p>a continuing affirmative duty to disclose any sexual misconduct as required by this standard. A “Self-Declaration of Sexual Abuse/Sexual Harassment” form is completed by all applicants, unescorted contractors or volunteers, employees upon being hired, and employees being considered for a promotion to document this requirement. The PREA Coordinator supplied the audit with every “Self-Declaration of Sexual Abuse/Sexual Harassment” form that has been completed in the past twelve months. Each employee, volunteer and contractor sign the form annually. This was confirmed during file review and during interviews with twelve random staff. During the past twelve months, the facility has not utilized the services of volunteers or contract employees. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.217 (g) The Liberty Place Recovery Center for Women policy mandates that material omissions regarding sexual misconduct, and the provision of materially giving false information, are grounds for termination as required by this standard. According to the Site Director, there has not been such an occurrence in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.217 (h) Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) requires that the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a current or former employee upon receiving a request from an institutional employer for whom such employee has applied to work. During an interview with the PREA Coordinator, it was noted that there has not been such an occurrence in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.218	Upgrades to facilities and technology
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon review of the Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), interview with the Site Director, staff interviews, review of camera placement, and review of documentation provided; the following delineates the audit findings regarding this standard:

	<p>115.218 (a) Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) requires when designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, the agency shall consider the effect of the design, acquisition, expansion, or modification upon the agency’s ability to protect clients from sexual abuse. Policy states:</p> <p>When designing or upgrading new facilities or expanding existing facilities, Liberty Place will consider the effect of the building design or modification on the center’s ability to protect residents from sexual abuse. This consideration should also be made when installing or upgrading video monitoring technology (PREA standard 115.218).</p> <p>Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.218 (b) Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) requires when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the agency shall consider how such technology may enhance the agency’s ability to protect clients from sexual abuse. During this audit cycle the facility has enhanced the video technology throughout the facility. All identified blind spots were addressed and staff as well as clients confirmed during interviews, they felt safer with the changes in place. This was confirmed during an interview with the Site Director. The facility has approximately 40 total cameras for the campus. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.221	Evidence protocol and forensic medical examinations
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Based upon review of the Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), Kentucky State Police General Order OM-C-I, MOU with KASAP Emotional Support Services (Ampersand), investigative staff interviews, and review of documentation provided; the following delineates the audit findings regarding this standard:</p> <p>115.221 (a) and (b) The Liberty Place Recovery Center for Women complies with all</p>

elements of this standard. The agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings. The Kentucky State Police investigates all PREA complaints for potential criminal activity and maintains a close working relationship with the Madison County District Attorney's Office and Site Director on each case. The PREA Coordinator stated there has not been an incident of alleged sexual abuse in this audit cycle. The Kentucky State Police follows their General Order OM-C-I for investigating sexual assaults. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.221 (c) The Liberty Place Recovery Center for Women offers all victims of sexual abuse access to forensic medical examinations at the Baptist Health Hospital without financial cost, where evidentiary or medically appropriate. Such examinations are to be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) as required. The agency has a Memorandum of Understanding with the between the Commonwealth of Kentucky, Justice and Public Safety Cabinet, Department of Corrections, and the Kentucky Association of Sexual Assault Program (KASAP) which agrees to provide outside victim advocacy services to the clients. KASAP subcontracts victim advocacy services by region. Ampersand Sexual Violence Resource Center in Lexington, KY services the greater Richmond, KY area, including the Liberty Place Recovery Center. The PREA Coordinator stated there has not been an incident of alleged sexual abuse in this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.221 (d) The Liberty Place Recovery Center for Women has entered into a Memorandum of Understanding between the Commonwealth of Kentucky, Justice and Public Safety Cabinet, Department of Corrections, and the Kentucky Association of Sexual Assault Program (KASAP) which agrees to provide outside victim advocacy services to the clients. KASAP subcontracts victim advocacy services by region. Ampersand Sexual Violence Resource Center in Lexington, KY services the great Richmond KY are, including the Liberty Place Recovery Center. The services of these victim advocates have not been requested or used by the clients during this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.221 (e) The Liberty Place Recovery Center for Women has entered into a Memorandum of Understanding between the Commonwealth of Kentucky, Justice and Public Safety Cabinet, Department of Corrections, and the Kentucky Association of Sexual Assault Program (KASAP) which agrees to provide outside victim advocacies services to the clients. which agrees to provide outside victim advocacies services to the clients upon request. According to the Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act

of 2003 (PREA), the facility also makes available a victim advocate, upon request by the victim, who will accompany and support the victim through the forensic medical examination process and investigatory interviews and provide emotional support, crisis intervention, information, and referrals as warranted. KASAP subcontracts victim advocacy services by region. Ampersand Sexual Violence Resource Center in Lexington, KY services the greater Richmond, KY area, including the Liberty Place Recovery Center. The PREA Coordinator stated there has not been an incident of alleged sexual abuse in this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.221 (f) The Kentucky State Police is responsible for criminal Investigations. All Kentucky State Police receive training in sexual abuse investigations during basic training at the State Police Academy including techniques for interviewing sexual abuse victims, proper use of Miranda warnings, sexual abuse evidence collection at crime scenes including in confined settings, and the criteria as evidence required to substantiate a case for prosecution referral. There have not been any criminal PREA investigation at the facility during this audit cycle. This was confirmed by the Site Director. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.221 (g) The Kentucky State Police is responsible for criminal Investigations. All Kentucky State Police receive training in sexual abuse investigations during basic training at the State Police Academy including techniques for interviewing sexual abuse victims, proper use of Miranda warnings, sexual abuse evidence collection at crime scenes including in confined settings, and the criteria as evidence required to substantiate a case for prosecution referral. This was confirmed by the Site Director. There have not been any PREA criminal investigations during this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.222	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based upon review of Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), Draft Memorandum of Understanding with the Kentucky State Police, staff interviews, and review of

documentation provided; the following delineates the audit findings regarding this standard:

115.222 (a) Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) requires an administrative or criminal investigation be completed for all allegations of sexual abuse and sexual harassment. The Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) requires that all potential criminal activity is referred to the Kentucky State Police for criminal investigation. All Kentucky State Police receive training in sexual abuse investigations during basic training at the State Police Academy including techniques for interviewing sexual abuse victims, proper use of Miranda warnings, sexual abuse evidence collection at crime scenes including in confined settings, and the criteria as evidence required to substantiate a case for prosecution referral, this was confirmed by a Captain at the Kentucky Law Enforcement Training Academy. The Liberty Place Recovery Center for Women employees does not investigate sexual abuse allegations. During this audit cycle there had been no PREA complaints reported at this facility. The Liberty Place Recovery Center for Women is establishing a Memorandum of Understanding with the Kentucky State Police to investigate all sexual abuse allegations from the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.222 (b) Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) requires that all PREA allegations are investigated for potential criminal activity. If it is determined that the allegation involves potential criminal activity, it is referred to the Kentucky State Police for criminal investigation and prosecution as warranted. This policy is available to the public upon request. The Site Director states that there have not been any investigations in the past twelve months. The Liberty Place Recovery Center for Women is establishing a Memorandum of Understanding with the Kentucky State Police to investigate all sexual abuse allegations from the facility. All Kentucky State Police receive training in sexual abuse investigations during basic training at the State Police Academy including techniques for interviewing sexual abuse victims, proper use of Miranda warnings, sexual abuse evidence collection at crime scenes including in confined settings, and the criteria as evidence required to substantiate a case for prosecution referral, this was confirmed by a Captain at the Kentucky Law Enforcement Training Academy. The facility has three PREA Administrative Investigators that have completed specialized PREA investigation course. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.222 (c) Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) and draft Memorandum of Understanding outlines the responsibilities of Kentucky State Police. The Liberty

	<p>Place Recovery Center for Women is establishing a Memorandum of Understanding with the Kentucky State Police to investigate all sexual abuse allegations from the facility. The Site Director stated that there have not been any investigations in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.222 (d) The Liberty Place Recovery Center for Women is establishing a Memorandum of Understanding with the Kentucky State Police to investigate all sexual abuse allegations from the facility. The Site Director stated that there have not been any investigations in the past twelve months. All Kentucky State Police receive training in sexual abuse investigations during basic training at the State Police Academy including techniques for interviewing sexual abuse victims, proper use of Miranda warnings, sexual abuse evidence collection at crime scenes including in confined settings, and the criteria as evidence required to substantiate a case for prosecution referral, this was confirmed by a Captain at the Kentucky Law Enforcement Training Academy. Therefore, this part of the standard is not applicable.</p>
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115.231	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Based upon review of the Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), the Recovery Kentucky PREA PowerPoint Lesson Plan (45 slides), ten staff interviews, eight random staff training file review, and review of documentation provided (lesson plans, certificates, sign-in sheets, signed acknowledgement forms, training curriculums, and employee handouts); the following delineates the audit findings regarding this standard:</p> <p>115.231 (a) The Liberty Place Recovery Center for Women utilizes a 45-slide PREA PowerPoint lesson plan provide by the Recovery Kentucky to train all their employees who have contact with clients on:</p> <ul style="list-style-type: none"> (1) Its zero-tolerance policy for sexual abuse and sexual harassment; (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures;

- (3) Clients' right to be free from sexual abuse and sexual harassment;
- (4) The right of clients and employees to be free from retaliation for reporting sexual abuse and sexual harassment;
- (5) The dynamics of sexual abuse and sexual harassment in confinement;
- (6) The common reactions of sexual abuse and sexual harassment victims;
- (7) How to detect and respond to signs of threatened and actual sexual abuse;
- (8) How to avoid inappropriate relationships with clients;
- (9) How to communicate effectively and professionally with clients, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming clients; and
- (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

The auditor interviewed ten of the seventeen staff members. Ten out of ten staff were well-versed in the facility's policy and procedure. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.231 (b) The training is tailored for female clients at the Liberty Place Recovery Center for Women. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.231 (c) The training staff provided a report containing all staff that had been PREA trained which confirmed the requirements needed to meet the standard and proved that all current staff was trained within one year of the effective date of the PREA standards. The PREA Coordinator supplied the auditor with a complete list; that showed all employees have been trained on the facility policy and procedure as it pertains to PREA. All staff received PREA training during in-service each year which exceeds the requirements of this standard. The auditor interviewed ten of the seventeen staff members. Ten out of ten staff were well-versed in the facility's policy and procedure. The Liberty Place Recovery Center for Women utilizes a 45-page PREA lesson plan provided by Recovery Center. Review of eight staff training records confirmed compliance. Therefore, the facility meets compliance with this part of the standard during this audit.

115.231 (d) The Liberty Place Recovery Center for Women documents, through employee signature on an acknowledgement form, that all employees understand

	<p>the training they have received. File review confirmed eight out of eight files included the acknowledgment documentation. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.232	Volunteer and contractor training
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Based upon review of Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), 45-PowerPoint Kentucky Department of Corrections Lesson Plan, Site Director interview, random training file review, and review of documentation provided (lesson plan, certificates, sign-in sheets, signed acknowledgement forms, and handouts); the following delineates the audit findings regarding this standard:</p> <p>115.232 (a) The Liberty Place Recovery Center for Women ensures all volunteers and contractors who have contact with clients have been trained on their responsibilities under the Liberty Place Recovery Center for Women sexual abuse and sexual harassment prevention, detection, and response policies and procedures. According to the Site Director there have not been any volunteers inside the facility in the past three years due to Covid-19 concerns. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.232 (b) The level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with clients, but all volunteers and contractors who have contact with clients are notified of Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), regarding sexual abuse and sexual harassment and their requirements to report such incidents. According to the Site Director, there have not been any volunteers inside the facility in the past three years due to Covid-19 concerns. The agency has all training material in place if and when the services of volunteers and/or contract employees are once again utilized. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.232 (c) The Liberty Place Recovery Center for Women documents through volunteer and/or contractor signature on an acknowledgement form that volunteers and contractors understand the training they have received. There have not been any volunteers inside the facility in the past three years due to Covid-19. The agency has all training material in place if and when the services of volunteers and/</p>

	<p>or contract employees are once again utilized. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.233	Resident education
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Based on review of the Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), Facility Orientation, PREA Posters, and the PREA Education Form, interview with ten clients, and an interview with the Intake Coordinator; as well as interviews with random clients and staff; the following delineates the audit findings regarding this standard:</p> <p>115.233 (a) According to Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), during the orientation process, clients receive information explaining the Liberty Place Recovery Center for Women zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment, their rights to be free from sexual abuse and harassment, and to be free from retaliation for reporting such incidents, as well as procedures for responding to these types of incidents. Clients sign for the PREA Orientation Form during orientation. All ten clients interviewed, stated they had received the PREA information during the orientation process on the first or second day at the facility. During the onsite portion of the audit, the auditor:</p> <ul style="list-style-type: none"> - Confirmed who is responsible for conducting client orientation - Tested how the facility provides the necessary PREA information to new clients - Reviewed the PREA information provided to new clients - Reviewed interpreter process - Held informal conversations with a screening staff member concerning the orientation process - Held informal conversations with screening staff concerning the frequency of LEP clients needing interpreter services

There were no issues noted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.233 (b) The agency only operates this facility. Therefore, this part of the standard is not applicable.

115.233 (c) The Liberty Place Recovery Center for Women provides client education in formats accessible to all clients, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to clients who have limited reading skills. During the onsite portion of the audit, the Site Director indicated there were no blind/low vision clients, no deaf/hearing impaired clients, no clients with physical impairments, and no limited English clients housed at the facility. There was one cognitive client housed out the facility during the onsite portion of the audit. The client displayed a clear understanding of the facility's sexual abuse policy and demonstrated five different ways to report sexual abuse and/or sexual harassment. The client stated she had not had any issues at the facility and felt safe there. The facility utilized the Liberty Place PREA Orientation Form. The Site Director stated the facility has not had a LEP client in the past two audit cycles. The facility has access to the Language Line if needed. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.233 (d) There was documentation provided of client's participation in PREA educational sessions as required by this part of the standard. b Review of client training files indicated that ten out of ten clients received PREA education. Each client reviews orientation by their designated screening staff within 48 hours of admittance. Ten out of ten clients interviewed stated they had received PREA information within the first two days of arrival to the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.233 (e) The Liberty Place Recovery Center for Women does provide the clients with posters, pamphlets, and a Client Handbook in English and Spanish outlining the zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. During the onsite portion of the audit, the Site Director indicated there were no blind/low vision clients, no deaf/hearing impaired clients, no clients with physical impairments, and no limited English clients housed at the facility. There was one cognitive client housed out the facility during the onsite portion of the audit. The client displayed a clear understanding of the facility's sexual abuse policy and demonstrated five different ways to report sexual abuse and/or sexual harassment. The client stated she had not had any issues at the facility and felt safe there. The facility has access to the Language Line if needed. During the onsite portion of the audit, the auditor:

	<ul style="list-style-type: none"> -observed whether signage throughout the facility could be easily read -observed whether signage was available in English and Spanish -observed if the sized of the text and formatting was easily seen -observed whether information was accurate and consistent throughout the facility -observed whether key PREA information was readily available throughout the facility -held information conversations with staff and persons confined to the facility regarding PREA signage -held informal conversations with persons confined to the facility concerning their abilities to report PREA allegations <p>There were no issues noted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.234	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Based on review of the Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), as well as the Kentucky Department of Corrections Specialized Investigator Training curriculums provided, Memorandum of Understanding with the Kentucky State Police, investigators training file review and investigative staff interview; the following delineates the audit findings regarding this standard:</p> <p>115.234 (a) In addition to the general training provided to all employees the Liberty Place Recovery Center for Women Kentucky Department of Corrections ensures that their investigator receives training in conducting investigations in confinement settings. All Kentucky State Police receive training in sexual abuse investigations during basic training at the State Police Academy including techniques for interviewing sexual abuse victims, proper use of Miranda warnings, sexual abuse evidence collection at crime scenes including in confined settings, and the criteria as evidence required to substantiate a case for prosecution referral. The training is a</p>

	<p>two-day course, typically taught by the Kentucky Department of Corrections Agency-wide PREA Coordinator. This was confirmed during an interview with the Site Director. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.234 (b) The specialized training included techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. The training is a two-day course, typically taught by the Kentucky Department of Corrections Agency-wide PREA Coordinator. This was confirmed during an interview with the facility's PREA Coordinator. There were no investigations during the past twelve months. The facility has three employees that have completed the PREA Investigator Course. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.234 (c) The Kentucky Department of Corrections maintains documentation the agency investigator has completed the required specialized training in conducting sexual abuse investigations. The facility has three employees that have completed the Specialized PREA Investigator Course. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.234 (d) All Kentucky State Police receive training in sexual abuse investigations during basic training at the State Police Academy including techniques for interviewing sexual abuse victims, proper use of Miranda warnings, sexual abuse evidence collection at crime scenes including in confined settings, and the criteria as evidence required to substantiate a case for prosecution referral. Therefore, this part of the standard is in compliance.</p>
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115.235	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Based on interviews with the Liberty Place Recovery Center Site Director and Intake Coordinator, random staff and random client interviews; the following delineates the audit findings regarding this standard:</p> <p>115.235 (a) There are no full or part-time medical or mental health staff at the</p>

	<p>Liberty Place Recovery Center. The facility does have a trained medical staff member who is the Intake Coordinator, however, the staff member does not perform any medical function inside the facility. This was confirmed by the Site Director, Intake Coordinator, and random staff and client interviews. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.235 (b) There are no medical staff at the Liberty Place Recovery Center who conduct forensic exams. Therefore, this part of the standard is not applicable to this facility.</p> <p>115.235 (c) There are no full or part-time medical or mental health staff at the Liberty Place Recovery Center. The facility does have a trained medical staff member who is the Intake Coordinator, however, the staff member does not perform any medical function inside the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.235 (d) There are no full or part-time medical or mental health staff at the Liberty Place Recovery Center. The facility does have a trained medical staff member who is the Intake Coordinator, however, the staff member does not perform any medical function inside the facility. This was confirmed during interviews with the Site Director, Intake Coordinator, and random staff and client interviews. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.241	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Based on Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) , review of the Kentucky Department of Corrections Screening for Risk of Victimization and Abusiveness tool, Interviews with the Intake Coordinator and PREA Coordinator, ten client and ten staff interviews, ten client file reviews; the following delineates the audit findings regarding this standard:</p> <p>115.241 (a) Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) , ensures that all clients are assessed during intake and upon transfer to another facility for risk of being sexually abused</p>

by other clients or sexually abusive toward other clients. This was confirmed during an interview with the Intake Coordinator. During the onsite portion of the audit, the auditor:

- confirmed who was responsible for risk screenings
- assessed whether the screening process occurs in a setting that ensures as much privacy as possible given the potentially sensitive information that could be discussed
- assess whether screening staff ask screening questions in a manner that fosters comfort and elicits responses
- reviewed the screening instrument
- discussed the confidentiality requirements of the facility
- held informal conversations with staff concerning the how the screening information is utilized
- held informal conversations with clients regarding the screening process

There were no issues noted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.241 (b) The Liberty Place Recovery Center for Women documentation provided mandates that screenings be conducted within 72 hours of arrival at the facility.

Screenings are forwarded their PREA Initial Screening to the PREA Coordinator for final review. Review of ten records confirmed 100% compliance. Ten out of ten clients stated they received orientation within the first 48 hours at the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.241 (c) Based on the documentation provided and client file reviews the facility utilizes an objective screening instrument (the Kentucky Department of Corrections Screening for Risk of Victimization and Abusiveness) that covers all aspects of this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.241 (d) The intake screening instrument used considers, at a minimum, the following criteria to assess clients for risk of sexual victimization:

- (1) Whether the client has a mental, physical, or developmental disability;
- (2) The age of the client;
- (3) The physical build of the client;

(4) Whether the client has previously been incarcerated;

(5) Whether the client's criminal history is exclusively nonviolent;

(6) Whether the client has prior convictions for sex offenses against an adult or child;

(7) Whether the client is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;

(8) Whether the client has previously experienced sexual victimization;

(9) The client's own perception of vulnerability.

Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.241 (e) The initial screening considers prior sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to the Liberty Place Recovery Center for Women, in assessing clients for risk of being sexually abusive. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.241 (f) Within 14 days from the client's arrival, the Liberty Place Recovery Center for Women reassess the client's risk of victimization or abusiveness based upon any additional, relevant information received by The Liberty Place Recovery Center for Women since the intake screening. Screenings are in KOMS (Kentucky Offender Management System). This was confirmed during an interview with the Intake Director. Clients that screen as a possible victim will be marked on internal documentation alerting staff of the risk. Review of ten records confirmed 100% compliance. The majority of the clients stated they received reassessment within the 30-day window at the facility. Therefore, the facility meets compliance with this part of the standard during this audit.

115.241 (g) The Liberty Place Recovery Center for Women will reassess a client's risk level when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the client's risk of sexual victimization or abusiveness. Both screening staff stated they had not received any additional information that would warrant a reassessment. The PREA Coordinator stated the facility has not received any additional information on a client within the past twelve months that would warrant a reassessment. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	<p>115.241 (h) The Liberty Place Recovery Center for Women does not discipline clients for refusing to answer screening questions or not disclosing complete information. This is mandated by Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA). This was confirmed during an interview with the Site Director. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.241 (i) The Liberty Place Recovery Center for Women implements appropriate controls on the dissemination of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the client's detriment by staff or other clients. Accesses to the screenings are limited to administrative staff and are kept KOMS (Kentucky Offender Management System). Based on policy review, interview with the Site Director, and interviews with the staff responsible for completing the screening, all information gathered on the screening instrument is restricted to staff making housing, work and program assignments. Clients that screen as a possible victim will be marked on internal documentation alerting staff of the risk. The Intake Director ensures key staff are aware of important PREA screening results. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.242	Use of screening information
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Based on the Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), Kentucky Department of Corrections Objective Screening Tool, targeted client interviews and ten staff interviews, Interview with the Intake Coordinator and Site Director/PREA Coordinator, and file review; the following delineates the audit findings regarding this standard:</p> <p>115.242 (a) Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), states that Liberty Place Recovery Center for Women uses information from the risk screening to decide housing, bed, work, education, and program assignments with the goal of keeping separate those clients at high risk of being sexually victimized from those at high risk of being sexually abusive. The PREA Coordinator and the Intake Director stated those that screen as potential victims are never housed in the same room as those who screen as potential predators. If screening results in a PREA alert, the Intake Director informs key administrative staff members electronically. Therefore, the facility</p>

demonstrated compliance with this part of the standard during this audit.

115.242 (b) The Liberty Place Recovery Center for Women makes individualized determinations about how to ensure the safety of each client. Clients that screened as a possible risk of victimization and/or of abusiveness are notated on internal documentation by the Intake Coordinator for the Administrative Staff. If needed, potential victims and aggressors could be separated by housing floor. Screenings are stored in KOMS (Kentucky Offender Management System). Staff must have proper credentials to login to KOMS and access the screenings. Clients that screen as a possible victim will be marked on internal documentation alerting staff of the risk. This was confirmed by the Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.242 (c) The Liberty Place Recovery Center for Women outlines the procedures to be followed in deciding whether to assign a transgender client to a facility for female clients, and the process for making housing and programming assignments, on case-by-case basis as required by this standard. There were no transgender clients housed at the Liberty Place Recovery Center for Women. The Site Director advised the facility has not housed a transgender client in the past twelve months. All LBGTI+ clients interviewed stated they felt safe in the facility. During the onsite portion of the audit, there were no clients housed at the facility who had screened at risk of abusiveness. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.242 (d) The Liberty Place Recovery Center for Women requires that a transgender and intersex Client's own views regarding their own safety be given serious consideration. There were no transgender clients housed at the Liberty Place Recovery Center for Women. The Site Director advised the facility has not housed a transgender client in the past twelve months. All LBGTI+ clients interviewed stated they felt safe in the facility. During the onsite visit, there were no clients that had screened at risk of abusiveness housed at the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.242 (e) The Liberty Place Recovery Center for Women requires that transgender and intersex clients be given the opportunity to shower separately from other clients. There were no transgender clients housed at the Liberty Place Recovery Center for Women. The Site Director advised the facility has not housed a transgender client in the past twelve months. All LBGTI+ clients interviewed stated they felt safe in the facility. During the onsite portion of the audit, there were no clients housed at the facility who had screened at risk of abusiveness. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

	<p>115.242 (f) The Liberty Place Recovery Center for Women does not place lesbian, gay, bisexual, transgender, or intersex clients in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such clients. This was confirmed by the Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.251	Resident reporting
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Based on auditor observations, MOU with KASAP, Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), PREA Orientation Form, PREA Signage, formal and informal interviews with clients, and auditor observations; the following delineates compliance with the standard.</p> <p>115.251 (a) The Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), outlines multiple internal ways for clients to report incidents of sexual abuse, sexual harassment, and retaliation by other clients or staff for reporting sexual abuse, sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. Clients have access to phone banks on each floor and staff for emergencies. Clients in Phase II have access to their own cell phones. During informal client interviews, clients have access to writing materials. The agency also has a grievance process. Clients can report by:</p> <p>Inform a Staff Member verbally, in writing or anonymously</p> <p>Kentucky Association of Sexual Assault Program (KASAP) 24-Hour Hotline at 1-800-656-HOPE</p> <p>Write Ampersand Sexual Violence Resource Center at 2025 Regency Road, Lexington, KY 40503</p> <p>Tell a Family Member or Friend (Third Party)</p> <p>Dial 911</p> <p>File a Grievance</p>

Notify the Kentucky Department of Corrections by letter or phone

During the onsite portion of the audit, the auditor:

- Observed whether PREA reporting signage throughout the facility could be easily read and understood
- Observed whether PREA signage was provided in multiple languages
- Observed whether the information was accurate and consistent with agency policy
- Tested both internal and external reporting procedures
- Held informal conversations with staff and clients concerning reporting procedures
- Assessed the clients access to writing materials
- Reviewed the facility's client mail procedures
- Tested the phones to ensure they were in good working order
- Held informal conversations with staff concerning the agency policy and procedure for responding to PREA Allegations.

There were no significant issues noted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.251 (b) The Liberty Place Recovery Center for Women provides at least four ways for clients to report abuse or harassment to a public or private entity or office that is not part of the Liberty Place Recovery Center for Women, and that is able to receive and immediately forward client reports of sexual abuse and sexual harassment to agency officials, allowing the client to remain anonymous upon request. The Liberty Place Recovery Center for Women has entered into a Memorandum of Understanding between the Commonwealth of Kentucky, Justice and Public Safety Cabinet, Department of Corrections, and the Kentucky Association of Sexual Assault Program (KASAP) which agrees to provide outside victim advocacies services to the clients. KASAP subcontracts victim advocacy services by region. Ampersand Sexual Violence Resource Center in Lexington, KY services the greater Richmond, KY area, including the Liberty Place Recovery Center.

Each number is posted near the client phones located in a common area, assessable by all clients. The auditor successfully tested each external pre-programmed reporting number.

Inform a Staff Member verbally, in writing or anonymously

Kentucky Association of Sexual Assault Program (KASAP) 24-Hour Hotline at

	<p>1-800-656-HOPE</p> <p>Ampersand Sexual Violence Resource Center at 2025 Regency Road, Lexington, KY 40503</p> <p>Tell a Family Member or Friend (Third Party)</p> <p>File a Grievance</p> <p>Call 911</p> <p>Notify the Kentucky Department of Corrections by letter or phone</p> <p>The auditor observed numerous PREA posters throughout the facility. Each phone bank has PREA information posted in the area. Poster have reporting information for sexual abuse and sexual harassment. Therefore, the facility demonstrated compliance for this part of the standard during this audit.</p> <p>115.251 (c) The Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), requires all staff to accept reports made verbally, in writing, anonymously and from third parties. All allegations shall be promptly documented in an incident report and reported to the Site Director. Ten out of ten random staff confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.251 (d) The Liberty Place Recovery Center for Women staff may privately report sexual abuse and sexual harassment to the PREA Hotline or to the Site Director/ PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.252	Exhaustion of administrative remedies
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Based on the Liberty Place Recovery Center for Women PREA Policy, staff interviews, PREA Coordinator interview, and documentation review; the following delineates the audit findings regarding this standard:</p> <p>115.252 (a) According to the Liberty Place Recovery Center for Women PREA Policy,</p>

the agency investigates any report of sexual abuse and takes appropriate actions whether or not such information is received in the form of a grievance. During this audit cycle, Liberty Place Recovery Center for Women has not received a grievance concerning sexual abuse. Interview with the PREA Coordinator confirms this process. The agency is in compliance with this section of the standard.

115.252 (b) The agency does not impose a time limit on when an inmate may submit a grievance regarding an allegation of sexual abuse. During this audit cycle, Liberty Place Recovery Center for Women has not received a grievance concerning sexual abuse. Interview with the PREA Coordinator confirms this practice. Therefore, the agency complies with this section of the standard.

115.252 (c) According to the Liberty Place Recovery Center for Women PREA Policy, the agency will ensure that an inmate alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint. During this audit cycle, the Liberty Place Recovery Center for Women has not received a grievance concerning sexual abuse. Additionally, such grievances will not be referred to the staff member who is the subject of the complaint; this was confirmed during an interview with the PREA Coordinator. Therefore, the agency is in compliance.

115.252 (d) According the Liberty Place Recovery Center for Women PREA Policy, the agency will investigate the matter and render a determination within 90 days. An extension of up to 70 days to issue a determination may be taken if the facts and circumstances require, and the complainant is notified in writing of the extension and the date that a determination will be made. At any level of the administrative process, including the final level, if the complainant does not receive a response within the time allotted for reply, including any properly noticed extension, the inmate complainant may consider the absence of a response to be a denial at this level. During this audit cycle, the Liberty Place Recovery Center for Women has not received a grievance concerning sexual abuse. Policy states:

The agency has a policy and procedure that allows a resident to submit a grievance which would include grievances regarding an allegation of sexual abuse. Grievances may be made regardless of when the incident is alleged to have occurred. Residents will not be required to use an informal grievance process, or otherwise attempt to resolve with staff, an alleged incident of sexual abuse. Residents are allowed to submit a grievance alleging sexual abuse without submitting it to the staff member who is the subject of the complaints and the grievance will not be referred to the staff member who is the subject of the complaint. A decision on the merits of any grievance or portion of a grievance alleging sexual abuse will be made within 90 days of the filing of the grievance. If, and only when necessary, the agency will extend the 90-day period to respond to a grievance. Liberty Place will notify a

resident in writing when the agency extends the 90-day period and will include the date by which a decision will be made. (PREA standard 115.252)

An interview with the PREA Coordinator reiterates this process; therefore, the agency is found to be in compliance with section of the standard.

115.252 (e) The Liberty Place Recovery Center for Women PREA Policy, states third parties including fellow residents, staff members, family members, attorneys and outside advocates, shall be permitted to assist residents in filing requests for administrative remedies related to allegations of sexual abuse and shall also be permitted to file such requests on behalf of residents. If the inmate declines to have the request processed on his or her behalf, the agency shall document the inmate's decision. During this audit cycle, the Liberty Place Recovery Center for Women has not received a grievance concerning sexual abuse. The facility has received any PREA allegations in the past twelve months. The PREA Coordinator confirmed this process. Therefore, the agency complies with this section of the standard.

115.252 (f) The Liberty Place Recovery Center for Women PREA Policy, states when an inmate is subject to a substantial risk of imminent threat of sexual abuse, the inmate may file a grievance through the facility's grievance process and the grievance will be considered an emergency grievance. The initial response to the grievance must be made within 48 hours and the final determination must be made within 5 calendar days, except in circumstances of county holidays and significant events. The agency's immediate focus must be to take action to prevent the potential sexual abuse. Corrective and protective action must be pursued promptly. The Liberty Place Recovery Center for Women PREA Policy mandates that staff must treat the information as confidential, only to be revealed to their supervisors in the chain-of-command to ensure prompt action is taken. During this audit cycle, the Liberty Place Recovery Center for Women has not received a grievance concerning sexual abuse. Interview with the PREA Coordinator confirms this practice; therefore, the agency complies with this standard.

115.253	Resident access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Based on the Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), MOU with KASAP (Ampersand), staff interviews, auditor observations, client interviews and documentation review; the

following delineates the audit findings regarding this standard:

115.253 (a) The Liberty Place Recovery Center for Women has entered into a Memorandum of Understanding between the Commonwealth of Kentucky, Justice and Public Safety Cabinet, Department of Corrections, and the Kentucky Association of Sexual Assault Program (KASAP) which agrees to provide outside victim advocacies services to the clients. KASAP subcontracts victim advocacy services by region. Ampersand Sexual Violence Resource Center in Lexington, KY services the greater Richmond, KY area, including the Liberty Place Recovery Center. The mailing address and telephone number for this agency are made available to all clients at the facility. The Liberty Place Recovery Center for Women enables reasonable communication between clients and these organizations and agencies, in as confidential a manner as possible. The services of these victim advocates have not been requested or used by the clients during this audit cycle, verified by phone call. PREA Posters throughout the facility provide clients with contact information for the Ampersand Sexual Violence Resource Center. During the onsite portion of the audit, the auditor:

- Observed whether PREA reporting signage throughout the facility could be easily read and understood
- Observed whether PREA signage was provided in multiple languages
- Observed whether the information was accurate and consistent with agency policy
- Tested both internal and external reporting procedures
- Held informal conversations with staff and clients concerning reporting procedures
- Assessed the clients access to writing materials
- Reviewed the facility's client mail procedures
- Tested the phones to ensure they were in good working order
- Held informal conversations with staff concerning the agency policy and procedure for responding to PREA Allegations.

There were no significant issues noted. The Ampersand Posters have the agency's phone number on the bottom; clients can tear off the phone number. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.253 (b) The Liberty Place Recovery Center for Women informs clients, 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

	<p>accordance with mandatory reporting laws. Posters located throughout the facility, inform the clients that communications with Ampersand victim advocacy services are free and confidential. If victim advocacy services are requested, Ampersand would have access to the facility by telehealth located in the facility's conference room. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.253 (c) The Liberty Place Recovery Center for Women has entered into a Memorandum of Understanding between the Commonwealth of Kentucky, Justice and Public Safety Cabinet, Department of Corrections, and the Kentucky Association of Sexual Assault Program (KASAP) which agrees to provide outside victim advocacies services to the clients. KASAP subcontracts victim advocacy services by region. Ampersand Sexual Violence Resource Center in Lexington, KY services the greater Richmond, KY area, including the Liberty Place Recovery Center. According to the Site Director/PREA Coordinator, these services have no be requested by any client in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.254	Third party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Based on auditor observations, the old agency's website, Interview with the Site Director/PREA Coordinator, the review of the Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA); as well as a review of the website outlining third party reporting, the following delineates the audit findings regarding this standard:</p> <p>115.254 The Liberty Place Recovery Center for Women provides multiple methods for receiving third-party reports of sexual abuse and sexual harassment on the agency website. The information available on the website (http://foothillscap.org/programs/liberty-place-recovery-center-for-women) explains how to report sexual abuse and sexual harassment on behalf of a client. Effective January 2, 2024, The Mountain Comprehensive Care Center is the parent agency for the Liberty Place Recovery Center. The Mountain Comprehensive Care Center is in the process of adding all Liberty Place Recovery PREA information, including reporting information, annual reports and the DOJ PREA Audits to their website. Until this is completed the previous parent agency has agreed to keep the information on their website. This was confirmed by the Site Director/PREA Coordinator. The facility takes all reports</p>

	<p>seriously no matter how they are received and investigates each reported incident. During the onsite portion of the audit, the auditor:</p> <ul style="list-style-type: none"> - tested a third-party reporting procedures - verified the third-party reporting investigation process - held informal conversations with staff concerning third-party reporting practices <p>There were no issues noted. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.261	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Based on Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), Site Director interview, staff interviews, and documentation provided; the following delineates the audit findings regarding this standard:</p> <p>115.261 (a) The Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of The Liberty Place Recovery Center for Women; retaliation against clients or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. The Site Director stated there has not been a report of sexual harassment or sexual abuse during this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.261 (b) Other than reporting to immediate supervisors and the Kentucky State Police, the Liberty Place Recovery Center for Women staff, volunteers and contractors shall not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in the agency's policy, to make treatment, investigations, and other security and management decisions. Staff shall submit a report of any allegations as soon as practical to the PREA Coordinator. This was confirmed during interviews with random staff. The facility does not currently utilize the services of contract employees or volunteers. The Site</p>

	<p>Director stated there has not been a report of sexual harassment or sexual abuse during this audit cycle. Therefore, this part of the standard is not applicable during this audit.</p> <p>115.261 (c) Kentucky is a mandatory reporting state for sexual abuse. There are no part-time or full-time medical or mental health staffs at the facility. The Site Director stated there has not been a report of sexual harassment or sexual abuse during this audit cycle. Therefore, this part of the standard is not applicable during this audit.</p> <p>115.261 (d) If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, the Liberty Place Recovery Center for Women reports the allegation to the designated state or local services agency. The Site Director stated there has not been a report of sexual harassment or sexual abuse during this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.261 (e) The Liberty Place Recovery Center for Women reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the agency investigator as required. Staff shall submit a report of any allegations as soon as practical to the PREA Coordinator. This was confirmed during interviews with random staff. The Site Director stated there has not been a report of sexual harassment or sexual abuse during this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.262	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Based on Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), ten staff interviews, ten client interviews, and documentation provided; the following delineates the audit findings regarding this standard:</p> <p>115.262 Policy and staff training requires all staff to take immediate action and staff acknowledged during their interviews the requirement of all staff to protect clients when it is learned that a client at the Liberty Place Recovery Center for Women is</p>

	<p>subject to a substantial risk of imminent sexual abuse. Ten random staff interviews confirmed this practice. The Site Director stated there has not been a report of sexual harassment or sexual abuse during this audit cycle. Ten clients interviewed stated they felt safe in the facility. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.263	Reporting to other confinement facilities
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	<p>Auditor Overall Determination: Meets Standard</p>
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	<p>Auditor Discussion</p>
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	<p>Based on The Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), Site Director/PREA Coordinator interview, and documentation provided; the following delineates the audit findings regarding this standard:</p>
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	<p>115.263 (a) According to the Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), upon receiving an allegation that a client was sexually abused while confined at another facility, the Site Director of the Liberty Place Recovery Center for Women that received the allegation notifies the head of the facility or appropriate office where the alleged abuse occurred. The Site Director/PREA Coordinator stated they had not received such an allegation during the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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	<p>115.263 (b) and (c) According to Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), such notification is provided as soon as possible, but no later than 72 hours after receiving the allegation, and all actions are thoroughly documented. The notification is documented. The Site Director/PREA Coordinator stated they had not received such an allegation during the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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	<p>115.263 (d) Upon receiving a call from an outside facility that a client had been sexually abused while in custody of the Liberty Place Recovery Center for Women The allegation is referred immediately to the PREA investigator to be investigated. The Site Director/PREA Coordinator stated they had not received such an allegation during the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.264	Staff first responder duties
	<p data-bbox="280 188 983 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 564 297">Auditor Discussion</p> <p data-bbox="280 340 1449 499">Based on the Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), ten staff interviews, PREA Response Checklist, and documentation provided; the following delineates the audit findings regarding this standard:</p> <p data-bbox="280 609 1430 768">115.264 (a) The Liberty Place Recovery Center for Women Guideline PREA policy, outlines the responsibilities of all security staff members upon learning of an allegation that a client was sexually abused, the first responding security staff member shall follow these guidelines:</p> <ol data-bbox="280 804 1469 1346" style="list-style-type: none"> <li data-bbox="280 804 895 837">(1) Separate the alleged victim and abuser; <li data-bbox="280 875 1422 954">(2) Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence; <li data-bbox="280 992 1430 1151">(3) If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating <li data-bbox="280 1189 1469 1346">(4) If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. <p data-bbox="280 1384 1458 1630">Ten out of ten random staff demonstrated working knowledge of this process, even though they had not received an allegation of sexual misconduct. Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) states they had been trained if the crime scene cannot be secured for some reason, the crime scene will be photographed using a camera made available by the Liberty Place Program.</p> <p data-bbox="280 1668 1430 1865">The Site Director stated they had not received such an allegation during the past twelve months. Staff members have access to the facility's PREA Response Checklist outlining a first responders' response to a sexual abuse allegation. Therefore, the facility meets compliance with this part of the standard during this audit.</p> <p data-bbox="280 1977 1469 2096">115.264 (b) Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) mandates when the first staff responder is not a security staff member, they shall advise the alleged victim not to take any</p>

	<p>actions that could destroy physical evidence, and then notify security staff immediately. The auditor confirmed compliance based on ten staff interviews review of ten training records of staff. The Site Director stated they had not received such an allegation during the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.265	Coordinated response
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Based on Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), PREA Response Checklist form, ten staff interviews, and documentation provided; the following delineates the audit findings regarding this standard:</p> <p>115.265 Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) outlines a written plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators and facility leadership. The plan clearly defines the roles and responsibilities of each person involved and the procedures to be followed in detail. Interviews with Response team members confirmed their knowledge of the response plan. Staff have access to the facility's PREA Response Checklist form; the form is a guide for responding to sexual abuse allegations. The Liberty Place Recovery Center for Women has not received a PREA allegation in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>

115.266	Preservation of ability to protect residents from contact with abusers
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Based on interviews with The Liberty Place Recovery Center for Women Site Director/PREA Coordinator; the following delineates the audit findings regarding this standard:</p> <p>115.266 The Liberty Place Recovery Center for Women does not participate in</p>

	<p>collective bargaining. This was determined during an interview with the Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.267	Agency protection against retaliation
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Based on Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), staff interviews, client interviews, and retaliation monitoring documentation provided; the following delineates the audit findings regarding this standard:</p> <p>115.267 (a) The Liberty Place Recovery Center for Women has a policy outlines the protective measures for all clients and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other clients or staff and designates which staff members or departments are charged with monitoring retaliation. The Site Director is the facility’s Retaliation Monitor. Monitoring is documented on a specific “Retaliation Monitoring Form”. The facility has not received any allegation of sexual abuse during this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.267 (b) The Liberty Place Recovery Center for Women employs multiple protection measures, such as housing changes or transfers for clients, victims or abusers, removal of alleged staff or client abusers from contact with victims, and emotional support services for clients or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. The Site Director is the facility’s Retaliation Monitor. The facility has not received any allegation of sexual abuse during this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.267 (c) and (d) For at least 90 days following a report of sexual abuse, the Liberty Place Recovery Center for Women monitors the conduct and treatment of clients or staff who reported the sexual abuse and of clients who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by clients or staff, and act promptly to remedy any such retaliation.</p>

	<p>There are periodic status checks performed and documented. The Liberty Place Recovery Center for Women monitoring includes any client disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Such monitoring continues beyond 90 days if the initial monitoring indicates a continuing need. A Site Director is the facility's Retaliation Monitor. The facility has not received any allegation of sexual abuse during this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.267 (d) If any other individual who cooperates with an investigation expresses a fear of retaliation The Liberty Place Recovery Center for Women takes appropriate measures to protect that individual against retaliation. This was confirmed during an interview with the Retaliation Monitor. The Site Director is the facility's Retaliation Monitor. The facility has not received any allegation of sexual abuse during this audit cycle. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.271	Criminal and administrative agency investigations
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Based upon review of the Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), investigative staff interviews, training certificates, an agreement with the Kentucky State Police, investigative reports (zero), as well as an interview with the Site Director/PREA Coordinator; the following delineates the audit findings regarding this standard:</p> <p>115.271 (a) Kentucky State Patrol investigators conduct Liberty Place Recovery Center for Women an investigation immediately when notified of an allegation of sexual abuse and sexual harassment. The Liberty Place Recovery Center for Women facility is establishing a Memorandum of Understanding in place with the Kentucky State Police to investigation all criminal sexual abuse allegations. There were no sexual abuse investigation files for the past twelve months. The facility has three specialized training PREA Administrative Investigators. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.271 (b) Based on training curriculums provided, Kentucky State Police Investigators training file review, and investigative staff interviews, it was evident</p>

the facility provided, in addition to the general training received by all employees, specialized training to its investigators. This training included techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. All Kentucky State Police receive training in sexual abuse investigations during basic training at the State Police Academy including techniques for interviewing sexual abuse victims, proper use of Miranda warnings, sexual abuse evidence collection at crime scenes including in confined settings, and the criteria as evidence required to substantiate a case for prosecution referral according to a Captain with the Kentucky State Police Academy. There were no investigation files for the past twelve months. This was confirmed by the Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.271 (c) Kentucky State Police investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; interview alleged victims, suspected perpetrators, and witnesses; and review prior complaints and reports of sexual abuse involving the suspected perpetrator. All Kentucky State Police receive training in sexual abuse investigations during basic training at the State Police Academy including techniques for interviewing sexual abuse victims, proper use of Miranda warnings, sexual abuse evidence collection at crime scenes including in confined settings, and the criteria as evidence required to substantiate a case for prosecution referral according to a Captain with the Kentucky State Police Academy. There were no investigation files for the past twelve months. This was confirmed by the Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.271 (d) When the quality of evidence appears to support criminal prosecution, the Liberty Place Recovery Center for Women refers the case to the Kentucky State Police criminal investigation. This was confirmed by the Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.271 (e) The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and is not determined by the person's status as client or staff. The client who alleges sexual abuse is not required to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation. There were no investigation files for the past twelve months. This was confirmed by the Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.271 (f) Liberty Place Recovery Center for Women administrative investigations include efforts to determine whether staff actions or failures to act contributed to the abuse; and are documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative Liberty Place Recovery Center for Women and findings. There were no investigation files for the past twelve months. This was confirmed by the Site Director/PREA Coordinator. The Facility has three specialized training PREA Administrative Investigators. The auditor was provided training certificates ensuring compliance. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.271 (g) Kentucky State Police criminal investigations are documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible. All Kentucky State Police receive training in sexual abuse investigations during basic training at the State Police Academy including techniques for interviewing sexual abuse victims, proper use of Miranda warnings, sexual abuse evidence collection at crime scenes including in confined settings, and the criteria as evidence required to substantiate a case for prosecution referral according to a Captain with the Kentucky State Police Academy. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.271 (h) The Kentucky State Police refer all sexual abuse investigations to the Madison County District Attorney's Office and prosecution when warranted. There were no investigation files for the past twelve months. This was confirmed by the Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.271 (i) KDOC retains all written reports for as long as the alleged abuser is incarcerated or employed by the Liberty Place Recovery Center for Women plus five years. There were no investigation files for the past twelve months. This was confirmed by the Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.271 (j) The departure of the alleged abuser or victim from employment or control of the Liberty Place Recovery Center for Women or agency does not provide a basis for terminating an investigation. There were no investigation files for the past twelve months. This was confirmed by the Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard

during this audit.

115.271 (k) The Kentucky State Police conduct Liberty Place Recovery Center for Women criminal sexual abuse investigations pursuant to the requirements of this standard. The Liberty Place Recovery Center for Women PREA Policy outlines the requirements of the criminal investigation and complies with all Liberty Place Recovery Center for Women of this standard. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.271 (l) Liberty Place Recovery Center for Women refers all criminal cases to the Kentucky State Police and cooperates with their investigators during the entire investigation. The facility remains informed of the progress of the investigation through communication between the agency investigator and the Kentucky State Police agent handling the case. All Kentucky State Police receive training in sexual abuse investigations during basic training at the State Police Academy including techniques for interviewing sexual abuse victims, proper use of Miranda warnings, sexual abuse evidence collection at crime scenes including in confined settings, and the criteria as evidence required to substantiate a case for prosecution referral according to a Captain with the Kentucky State Police Academy. There were no investigation files for the past twelve months. This was confirmed by the Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.272	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Based upon review of the Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), and an interview with the Site Director/PREA Coordinator; the following delineates the audit findings regarding this standard:</p> <p>115.272 The Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), outlines that the agency imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated. All Kentucky State Police receive training in sexual abuse investigations during basic training at the State Police Academy including techniques for interviewing sexual abuse</p>

	<p>victims, proper use of Miranda warnings, sexual abuse evidence collection at crime scenes including in confined settings, and the criteria as evidence required to substantiate a case for prosecution referral according to a Captain with the Kentucky State Police Academy. This was confirmed during an interview with Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.273	Reporting to residents
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Based upon review of Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), PREA Notification Forms, and Site Director/PREA Coordinator interview; the following delineates the audit findings regarding this standard:</p> <p>115.273 (a) Based on the Liberty Place Recovery Center for Women policy it was confirmed that following an investigation into a client’s allegation she suffered sexual abuse in the facility, the client was to be informed whether the allegation had been determined to be substantiated, unsubstantiated, or unfounded. The documentation provided confirmed that clients will be provided this notification on the “Notification of Alleged Abuse” form. The clients will be required to sign the form documenting acknowledgement of this notification as required. However, there were no PREA incidents reported during this audit cycle, so compliance was determined on policy and sample forms. This was confirmed by the Site Director/ PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.273 (b) The agency will request all relevant information from the criminal investigation conducted by the Kentucky State Police in order to inform the client as required by this standard. The Site Director/PREA Coordinator revealed there were no PREA investigation for the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.273 (c) Based on the Liberty Place Recovery Center for Women policy and documentation provided, it was confirmed that following a client’s allegation that a staff member has committed sexual abuse against the Client, the agency shall subsequently inform the client (unless the agency has determined that the allegation is unfounded) whenever:</p>

- (1) The staff member is no longer posted within the client's unit;
- (2) The staff member is no longer employed at the facility;
- (3) The agency learns that the staff member has been indicted on a charge related to sexual abuse within the Liberty Place Recovery Center for Women, Inc.; or
- (4) The agency learns that the staff member has been convicted on a charge related to sexual abuse within The Liberty Place Recovery Center for Women

The documentation provided confirmed the clients will be provided this notification on the "Notification of Alleged Abuse" form. The clients are required to sign the form documenting acknowledgement of this notification as required. The Site Director/PREA Coordinator stated there were no PREA investigations during the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.273 (d) Following a client's allegation they had been sexually abused by another client, the Liberty Place Recovery Center for Women subsequently informs the alleged victim whenever the facility learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or the Liberty Place Recovery Center for Women learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility. The documentation provided confirmed that clients will be provided this notification on the "Notification of Alleged Abuse" form. The clients are required to sign the form documenting acknowledgement of this notification as required. The Site Director/PREA Coordinator stated there were no PREA investigations during the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.273 (e) All such notifications or attempted notifications are documented, based on the "Notification of Alleged Abuse" form. The Site Director/PREA Coordinator stated there were no PREA investigations during the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.273 (f) Policy outlines the agency's obligation to report under this standard terminates if the client is released from the Liberty Place Recovery Center for Women custody. The Site Director/PREA Coordinator stated there were no PREA investigations during the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

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115.276	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Based upon review of the Liberty Place Recovery Center for Women PREA policy, OAS documentation provided, Site Director/PREA Coordinator interview; the following delineates the audit findings regarding this standard:</p> <p>115.276 (a) and (b) Staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse. This is outlined in the Liberty Place Recovery Center for Women PREA Policy. The Site Director/PREA Coordinator stated there were no PREA investigations during the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.276 (c) Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are commensurate with the nature and circumstances of the offense committed, the staff member’s disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. The Site Director/PREA Coordinator stated there were no PREA investigations during the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.276 (d) All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement, unless the activity was clearly not criminal, and to any relevant licensing bodies. The Site Director/PREA Coordinator stated there were no PREA investigations during the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>

115.277	Corrective action for contractors and volunteers
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	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Based upon review of The Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), OAS documentation provided, and Site Director/PREA Coordinator interview; the following delineates the audit findings regarding this standard:</p> <p>115.277 (a) Any contractor or volunteer who engages in sexual abuse is prohibited from contact with clients and are reported to law enforcement, unless the activity was clearly not criminal, and to relevant licensing bodies. During an interview with the Site Director/PREA Coordinator, it was determined the Liberty Place Recovery Center for Women has not had a volunteer or contract by accused of any form of sexual misconduct. The Site Director/PREA Coordinator stated there were no PREA investigations during the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.277 (b) The Liberty Place Recovery Center for Women takes appropriate remedial measures, and considers whether to prohibit further contact with clients, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. During an interview with the Site Director/PREA Coordinator, it was determined the Liberty Place Recovery Center for Women has not had a volunteer or contract by accused of any form of sexual misconduct. The Site Director/PREA Coordinator stated there were no PREA investigations during the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>

<p>115.278</p>	<p>Disciplinary sanctions for residents</p>
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Based upon review of The Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), OAS documentation provided, and Site Director/PREA Coordinator interview; the following delineates the audit findings regarding this standard:</p> <p>115.278 (a) Clients are subject to disciplinary sanctions pursuant to a formal</p>

disciplinary process following an administrative finding that the client engaged in client-on-client sexual abuse or following a criminal finding of guilt for client-on-client sexual abuse. During an interview with the Site Director/PREA Coordinator, it was determined The Liberty Place Recovery Center for Women has not had a client by accused of any form of sexual misconduct. The facility has not received any PREA allegations in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.278 (b) Sanctions are commensurate with the nature and circumstances of the abuse committed, the Client's disciplinary history, and the sanctions imposed for comparable offenses by other clients with similar histories. The Site Director/PREA Coordinator stated there were no PREA investigations during the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.278 (c) The disciplinary process considers whether a client's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed. The Site Director/PREA Coordinator stated there were no PREA investigations during the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.278 (d) There is no therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse offered at the facility. During an interview with the Site Director/PREA Coordinator, it was determined the Liberty Place Recovery Center for Women has not had a client by accused of any form of sexual misconduct. Therefore, this part of the standard was found to be non-applicable to this facility during this audit cycle.

115.278 (e) The Liberty Place Recovery Center for Women disciplines a client for sexual contact with staff only upon a finding that the staff member did not consent to such contact. During an interview with the Site Director/PREA Coordinator, it was determined the Liberty Place Recovery Center for Women has not had a client by accused of any form of sexual misconduct. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.278 (f) The Site Director reported that a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred does not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation. During an interview with the Site Director/PREA Coordinator, it was determined the Liberty Place

	<p>Recovery Center for Women has not had a client by accused of any form of sexual misconduct. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.278 (g) The Liberty Place Recovery Center for Women prohibits all sexual activity between clients and may discipline clients for any such activity. This was confirmed during an interview with the Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.282	Access to emergency medical and mental health services
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Based on the Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA), Site Director/PREA Coordinator interview; the following delineates the audit findings regarding this standard:</p> <p>115.282 (a) The Liberty Place Recovery Center for Women has an agreement with the Baptist Health Hospital to ensure client 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. An interview with the Site Director/PREA Coordinator confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.282 (b) The Liberty Place Recovery Center for Women PREA Policy outlines the procedures to be followed in the event of a sexual abuse at the facility. There are no qualified medical or mental health practitioners at the facility, these services are provided by medical - Baptist Health. Security staff first responders take preliminary steps to protect the victim and shall immediately notify the appropriate medical and mental health practitioners and arrange transport to the Baptist Health Hospital for treatment. he PREA Coordinator confirmed this practice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.282 (c) The Liberty Place Recovery Center for Women ensures client victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis,</p>

	<p>in accordance with professionally accepted standards of care, where medically appropriate. These services would be offered at Baptist Health Hospital according to the Site Director/PREA Coordinator. The Liberty Place Recovery Center for Women has not had an allegation of sexual abuse during this audit cycle according to the Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.282 (d) The Liberty Place Recovery Center for Women requires that all treatment services provided to the victim are without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. The Liberty Place Recovery Center for Women has not had an allegation of sexual abuse during this audit cycle according to the Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.283	Ongoing medical and mental health care for sexual abuse victims and abusers
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Based on the Site Director/PREA Coordinator interview, Memorandum of Understanding with KASAP (Ampersand), OAS documentation provided, and the Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA); the following delineates the audit findings regarding this standard:</p> <p>115.283 (a) The Liberty Place Recovery Center for Women offers medical and mental health evaluations at the Baptist Health Hospital and, as appropriate, treatment to all clients who have been victimized by sexual abuse in any facility. This was confirmed during an interview with the Site Director/PREA Coordinator. There have not been any sexual abuse allegations in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.283 (b) The Liberty Place Recovery Center for Women mandates that the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their</p>

transfer to, or placement in, other facilities, or their release from custody. The Liberty Place Recovery Center for Women has not had an allegation of sexual abuse during this audit cycle according to the Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.283 (c) The Liberty Place Recovery Center for Women provides all victims with medical and mental health services at Baptist Health Hospital that is a community level of care facility. The Liberty Place Recovery Center for Women has not had an allegation of sexual abuse during this audit cycle according to the Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.283 (d and e) The Liberty Place Recovery Center for Women ensures female victims of sexual abuse are given pregnancy test when vaginal penetration took place. If a pregnancy results from the sexual abuse, The Liberty Place Recovery Center for Women ensures the victim receives timely and comprehensive information about timely access to emergency contraception, lawful pregnancy related services. The Liberty Place Recovery Center for Women has not had an allegation of sexual abuse during this audit cycle according to the Site Director. The agency has a Memorandum of Understanding with the between the Commonwealth of Kentucky, Justice and Public Safety Cabinet, Department of Corrections, and the Kentucky Association of Sexual Assault Program (KASAP) which agrees to provide outside victim advocacy services to the clients. KASAP subcontracts victim advocacy services by region. Ampersand Sexual Violence Resource Center in Lexington, KY services the greater Richmond, KY area, including the Liberty Place Recovery Center. Therefore, the facility demonstrates compliance with this part of the standard during this audit.

115.283 (f) The Liberty Place Recovery Center for Women provides client victims of sexual abuse while incarcerated tests for sexually transmitted infections as medically appropriate. These services are provided at Baptist Health Hospital as determined by the treating physician. The Liberty Place Recovery Center for Women has not had an allegation of sexual abuse during this audit cycle according to the Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.283 (g) The Liberty Place Recovery Center for Women provides treatment services 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. The Liberty Place Recovery Center for Women has not had an allegation of sexual

	<p>abuse during this audit cycle according to the Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.283 (h) The Liberty Place Recovery Center for Women will attempt to have a mental health evaluation conduct on all known client-on-client abusers within 60 days of learning such abuse history and offer treatment when deemed appropriate by the mental health practitioners. However, as of this audit there have been no sexual abuse cases reported requiring these services. The Liberty Place Recovery Center for Women has not had an allegation of sexual abuse during this audit cycle according to the Site Director/PREA Coordinator. KASAP subcontracts victim advocacy services by region. Ampersand Sexual Violence Resource Center in Lexington, KY services the greater Richmond, KY area, including the Liberty Place Recovery Center. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.286	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Based on interviews with the Site Director/PREA Coordinator, Investigator, MT Coordinator, Phase II Coordinator, and OAS documentation provided; as well as the Liberty Place Recovery Center for Women Policy; the following delineates the audit findings regarding this standard:</p> <p>115.286 (a) The Liberty Place Recovery Center for Women will 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. There have been no incidents of sexual abuse reported during the audit cycle to document a review. Policy states:</p> <p><i>An incident review of each sexual abuse incident will occur within 30 days, unless the allegations are determined to be unfounded. The team will include the agency PREA Coordinator (Liberty Place Facility Director), certified PREA investigator(s) (Facility Director, MT Coordinator, and Phase II Coordinator) and input from facility staff involved. A report will be filed and recommendations followed up on in a reasonable amount of time.</i></p> <p>Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>

115.286 (b) The Liberty Place Recovery Center for Women will ensure that these reviews occur within 30 days of the conclusion of the investigation and shall document the review on the "PREA Sexual Abuse Incident Review" form. Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) states the committee will be made up of the agency PREA Coordinator (Liberty Place Facility Director), certified PREA investigator(s) (Facility Director, MT Coordinator, and Phase II Coordinator) and input from facility staff involved. However, there have been no incidents of sexual abuse reported during the audit cycle to document a review. This was confirmed by the Site Director/PREA Coordinator and by the PREA administrative investigator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.286 (c) Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA) states the committee will be made up the agency PREA Coordinator (Liberty Place Facility Director), certified PREA investigator(s) (Facility Director, MT Coordinator, and Phase II Coordinator) and input from facility staff involved. The PREA Coordinator confirmed, the Liberty Place Recovery Center for Women has not had a PREA incident to review in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.

115.286 (d) The review team considers whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; 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; and they examine the area in the Liberty Place Recovery Center for Women, 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. The agency has deployed an excellent PREA after action review form which addresses all elements of the standard. The Site Director/PREA Coordinator confirmed, the Liberty Place Recovery Center for Women has not had a PREA incident to review in the past twelve months. Policy states:

Considerations - the review team will consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect or respond to abuse. Consider whether the incident was motivated by race, ethnicity, gender identity, LGBT identification, status or perceived status, or gang affiliation. Examine the area in the facility where the incident occurred to assess whether physical barriers may enable abuse. Assess staffing levels, monitoring

	<p>technology and possible changes needed in either.</p> <p>Therefore, the facility exceeds the intent of this part of the standard.</p> <p>115.286 (e) The Liberty Place Recovery Center for Women shall implement the recommendations for improvement or shall document its reasons for not doing so. The Site Director/PREA Coordinator confirmed that the Liberty Place Recovery Center for Women has not had a PREA incident to review in the past twelve months. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.287	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Based on an interview with the Site Director/PREA Coordinator, and OAS documentation provided; as well as the Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA); the following delineates the audit findings regarding this standard:</p> <p>115.287 (a), (b) and (c) The Liberty Place Recovery Center for Women collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions and aggregates the incident-based sexual abuse data at least annually. The incident-based data collected is based on the most recent version of the Survey of Sexual Violence conducted by the Department of Justice. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.287 (d) The Liberty Place Recovery Center for Women Agency maintains, reviews, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. This was confirmed during an interview with the Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.287 (e) The Liberty Place Recovery Center for Women does not contract its</p>

	<p>clients to other facilities. This was confirmed by the Site Director/PREA Coordinator. Therefore, this part of the standard was found not applicable during this audit cycle.</p> <p>115.287 (f) Upon request, the Liberty Place Recovery Center for Women Agency provides all such data from the previous calendar year to the Department of Justice no later than June 30 when required. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.288	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Based on an interview with the Site Director/PREA Coordinator, and OAS documentation provided as well as the Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA); the following delineates the audit findings regarding this standard:</p> <p>115.288 (a) The Liberty Place Recovery Center for Women Agency reviews data collected to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including identifying problem areas; taking corrective action on an ongoing basis; and preparing an annual report of its findings and corrective actions for the facility. This was confirmed during an interview with the Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.288 (b) Such reports include a comparison of the current year’s data and corrective actions with those from prior years and provide an assessment of the Liberty Place Recovery Center for Women progress in addressing sexual abuse. This was confirmed during an interview with the Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.288 (c) The Liberty Place Recovery Center for Women’s report is approved by the Regional Director and made readily available to the public through its website. This was confirmed during an interview with the Site Director/PREA Coordinator. Effective January 2, 2024, The Mountain Comprehensive Care Center is the parent</p>

	<p>agency for the Liberty Place Recovery Center. The Mountain Comprehensive Care Center is in the process of adding all Liberty Place Recovery PREA information, including reporting information, annual reports and the DOJ PREA Audits to their website. Until this is completed the previous parent agency has agreed to keep the information on their website. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.288 (d) The Liberty Place Recovery Center for Women Agency may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of the facility but must indicate the nature of the material redacted. Effective January 2, 2024, The Mountain Comprehensive Care Center is the parent agency for the Liberty Place Recovery Center. The Mountain Comprehensive Care Center is in the process of adding all Liberty Place Recovery PREA information, including reporting information, annual reports and the DOJ PREA Audits to their website. Until this is completed the previous parent agency has agreed to keep the information on their website. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>
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115.289	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Based on an interview with the Site Director/PREA Coordinator, and OAS documentation provided as well as the Liberty Place Recovery Center for Women Policy for Compliance with Prison Rape Elimination Act of 2003 (PREA); the following delineates the audit findings regarding this standard:</p> <p>115.289 (a) through (d) The Liberty Place Recovery Center for Women agency Staff makes all aggregated sexual abuse data, from facilities under direct control readily available to the public at least annually through its agency's website. Effective January 2, 2024, The Mountain Comprehensive Care Center is the parent agency for the Liberty Place Recovery Center. The Mountain Comprehensive Care Center is in the process of adding all Liberty Place Recovery PREA information, including reporting information, annual reports and the DOJ PREA Audits to their website. Until this is completed the previous parent agency has agreed to keep the information on their website. All reports are securely retained and maintained for at least 10 years after the date of the initial collection unless Federal, State, or Local law requires otherwise. This was corroborated during an interview with the Site Director/PREA Coordinator. Therefore, the facility demonstrated compliance with this</p>

	part of the standard during this audit.
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115.401	Frequency and scope of audits
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>115.401 (a) and (b) The Liberty Place Recovery Center for Women did have an audit during the first and second audit cycles. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.401 (h) The auditor has full access to all location/areas of the Liberty Place Recovery Center for Women. A complete tour of the facility was conducted on the first morning of the onsite audit. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.401 (i) The auditor did obtain all necessary copies of audit items. Copies have been uploaded in the PREA Resources Center's Online Audit System (OAS). Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.401 (m) The auditor was allowed to interview clients in a private setting. All interviews were conducted in the facility's conference room. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p> <p>115.401 (n) The auditor did not receive any correspondence from any The Liberty Place Recovery Center for Women clients, staff, or anyone one else. Audit notices were observed in every housing floor, as well as all common areas. Therefore, the facility demonstrated compliance with this part of the standard during this audit.</p>

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

115.403 The agency has made the final report during the second audit cycle through posting on the agency's website (<http://foothillscap.org/programs/liberty-place-recovery-center-for-women>)

Note: Effective January 2, 2024, The Mountain Comprehensive Care Center is the parent agency for the Liberty Place Recovery Center. The Mountain Comprehensive Care Center is in the process of adding all Liberty Place Recovery PREA information, including reporting information, annual reports and the DOJ PREA Audits to their website. Until this is completed the previous parent agency has agreed to keep the information on their website.

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).	na

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.)	na
	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.)	na
	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.)	na
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.	yes
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?	yes
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	yes

	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.)	na
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.)	yes
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	na
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with 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