

PREA Facility Audit Report: Final

Name of Facility: Wichita Transitional Center

Facility Type: Community Confinement

Date Interim Report Submitted: NA

Date Final Report Submitted: 03/15/2022

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
Auditor Full Name as Signed: Karen d. Murray	Date of Signature: 03/15/2022

AUDITOR INFORMATION	
Auditor name:	Murray, Karen
Email:	kdmconsults1@gmail.com
Start Date of On-Site Audit:	02/14/2022
End Date of On-Site Audit:	02/16/2022

FACILITY INFORMATION	
Facility name:	Wichita Transitional Center
Facility physical address:	701 E 21st St North, Wichita, Kansas - 67214
Facility Phone	
Facility mailing address:	

Primary Contact	
Name:	Miriam Ruiz
Email Address:	miriam.ruiz@csgprograms.com
Telephone Number:	(956) 579-1705

Facility Director	
Name:	Miriam Ruiz
Email Address:	miriam.ruiz@csgprograms.com
Telephone Number:	9565791705

Facility PREA Compliance Manager	
Name:	Myra Rodriguez
Email Address:	myra.rodriquez@csgprograms.com
Telephone Number:	O: 9565799621
Name:	Miriam Ruiz
Email Address:	miriam.ruiz@csgprograms.com
Telephone Number:	O: (956) 579-1705

Facility Characteristics	
Designed facility capacity:	85
Current population of facility:	53
Average daily population for the past 12 months:	69
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Both females and males
Age range of population:	18-99
Facility security levels/resident custody levels:	low
Number of staff currently employed at the facility who may have contact with residents:	21
Number of individual contractors who have contact with residents, currently authorized to enter the facility:	1
Number of volunteers who have contact with residents, currently authorized to enter the facility:	0

AGENCY INFORMATION	
Name of agency:	Correctional Solutions Group, LLC.
Governing authority or parent agency (if applicable):	
Physical Address:	305 S. Broadway St., Tyler, Texas - 75702
Mailing Address:	P.O. Box 7760, Tyler, Texas - 75711
Telephone number:	(903) 630-6291

Agency Chief Executive Officer Information:	
Name:	John Forren
Email Address:	forren@aol.com
Telephone Number:	(619) 249-9816

Agency-Wide PREA Coordinator Information			
Name:	Carol Powell	Email Address:	carol.powell@csgprograms.com

SUMMARY OF AUDIT FINDINGS

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

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

Number of standards exceeded:	
3	<ul style="list-style-type: none"> • 115.215 - Limits to cross-gender viewing and searches • 115.221 - Evidence protocol and forensic medical examinations • 115.234 - Specialized training: Investigations
Number of standards met:	
38	
Number of standards not met:	
0	

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2022-02-14
2. End date of the onsite portion of the audit:	2022-02-16

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
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a. Identify the community-based organization(s) or victim advocates with whom you communicated:	<p>The facility provided a Wichita Police Department Victim Assistance Unit brochure. The brochure speaks to the 10 Kansas Crime Victims Bill of Rights, provides a physical address, phone number and email address for victims. Victims can also call or text 911.</p> <p>The facility provided an email communication to the Facility Director/PREA Manager from the Forensic Nursing Department, SANE/SART program at the Ascension Via Christi St. Joseph. The communications states,</p> <p>"Thank you for reaching out to me regarding our SANE/SART program at Ascension Via Christi St. Joseph. Our program does examinations, evidence collection, and forensic photography on patients that have been sexually assaulted. In order to collect evidence, we need to see the patient within five days of being assaulted. Beyond that we are not able to collect evidence.</p> <p>We also see patients that are victims of Domestic Violence, Assault, Human Trafficking, Elder Abuse, and Child Abuse. In order for a patient to be seen by our Forensic Nursing Department they need to check in through the Emergency Department. We are located at 3600 E. Harry. We have a Forensic Nurse available 24 hours a day seven days a week.</p> <p>As discussed in our conversation, via patient is needing post assault counseling, we recommend contacting the Wichita Area Sexual Assault Center (WASAC). They provide advocacy and many other programs that are nice for the patients. They have a 24hr7day a week hotline. That number is 316.263.3002.</p> <p>Signed, Cathy Manlier, BSN, RN Sexual Assault Nurse Examiner Via Christi Forensic Nursing Department 3600 E. Harry Wichita, KS 67208 316.689.5252</p> <p>The facility provided a Memorandum of Understanding with the Wichita Area Sexual Assault Center. The memorandum states the following services will be provided:</p> <ul style="list-style-type: none">· Advocacy on a walk-in basis during office hours 8:30 – 5:00 Monday-Friday· 24/7/365 Crisis Hotline· Emergency Shelter, short-term assistance immediately following a sexual assault· Hospital Accompaniment/Medical Advocacy (available 24/7 all year round) include medical Forensic Exams conducted by a
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SANE medical staff.

- Court/Law enforcement advocacy regarding sexual assault
- Assistance with Crime Victim Compensation
- Information of Community Resource
- Emotional Support
- And the most important, making sure no one goes through this alone.

In addition, I would like to add that if the facility were to have a case involving PREA/RAPE cases, and one of the residents would be referred to your agency, the facility would provide transportation to and from. For additional security, the facility would send (2) staff of the same sex to accompany the identified victim.”

On February 1, 2022 at 7:52 pm, the Auditor phoned the Wichita Area Sexual Assault Center at 316.263.3002. After one ring, the operator answered the call. The Auditor explained the reason for the call. The operator stated she would need to connect me with an advocate. Once connected with the advocate, the Auditor explained the reason for the call and the advocate stated her role was to talk with victims and or tell them to go to the nearest SANE/SAFE location and she would meet them there. Upon the Auditor asking her what she would do if the caller was a resident reporting abuse, she stated she would need to connect me with the Jail Advocate. The Advocate took down the Auditor’s name and phone number and had the Jail Advocate return the call.

At 8:01 pm on February 1, 2022, an advocate, Maria W, stated she was the Jail Sexual Assault Advocate. The Auditor explained the reason for the call and thanked her for calling back so quickly. The Advocate stated as far as the MOU was concerned, they have an initial MOU in place and she hasn’t worked with WTC in any capacity. The Advocate then explained the agencies procedure is that the jail would take them to the hospital and run a kit. A normal advocate would meet the victim at the hospital and sit with them through the exam. The Advocate explained they always do follow up for the survivor and she would go visit them a day or two later. When the Auditor asked the Advocate if she would report to the facility for the victim, the Advocate stated she is under no obligation to report for them and would not contact the facility because of the confidentiality agreement. The Advocate explained she would encourage the victim to call the hospital or an inmate coordinator and let the facility know about the abuse and the Advocate would meet the victim at the hospital.

On February 1, 2022, at 8:30 pm, the Auditor completed an online Third Party Report. On February 4, 2022, I received the following email response: “This is XXXX with Correctional Solutions Group, I saw your message about PREA reporting. If you have questions fell free to contact me or our PREA Coordinator Carol Powell her cell is 903.805.7016 and her email is carol.powell@csgprograms.com.” The Auditor responded to the email on Monday, February 7, 2022 and left a voice mail for a call back on Friday, February 11, 2022.

On Friday, February 11, 2022 at 4:30 pm, the Auditor received the following email from the agency PREA Coordinator.

This is Carol Powell, PREA Coordinator. As the Coordinator, I am responsible for initiating a PREA investigation when a third-party submits a complaint through the company website. The allegation serves to notify both Mr. S, and Ms. C, but is a call to action to me. Ms. C also contacts me to ensure that I received the complaint. At this point, I call the Facility Administrator – regardless of the time of day or night and they initiate an investigation at the facility. In addition to the company’s website page “Reporting Prison Rape”, each facility has an individual page which provides information about how to report a PREA violation directly to the

facility or to the contracting agency.
Please feel free to contact me with any additional PREA questions.
Thank you, Carol!"

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	85
15. Average daily population for the past 12 months:	55
16. Number of inmate/resident/detainee housing units:	12
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	43
38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:	0
39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:	0
40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:	0
41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:	1
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:	1
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:	1
44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	0
45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	0

46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	0
47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	No text provided.

Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit

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:	21
50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	0
51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	0
52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	No text provided.

INTERVIEWS

Inmate/Resident/Detainee Interviews

Random Inmate/Resident/Detainee Interviews

53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	12
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 checked="" 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 had 12 dorms, one for females and the 11 for males. Four of the dorms were not in use. The facility had only one female. The female was chosen and one to two residents each were chosen from the open dorms. Three targeted residents for a total of 16 interviews.</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>No text provided.</p>
<p>Targeted Inmate/Resident/Detainee Interviews</p>	
<p>58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>3</p>
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
<p>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:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The facility did not have any targeted residents of this category.</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>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>The facility did not have any targeted residents of this category.</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>The facility did not have any targeted residents of this category.</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>1</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>1</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>1</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>The facility did not have any targeted residents of this category.</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>The facility did not have any targeted residents of this category.</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>This facility does not have seclusion</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>No text provided.</p>
<p>Staff, Volunteer, and Contractor Interviews</p>	
<p>Random Staff Interviews</p>	

71. Enter the total number of RANDOM STAFF who were interviewed:	5
72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)	<input checked="" type="checkbox"/> Length of tenure in the facility <input checked="" type="checkbox"/> Shift assignment <input checked="" type="checkbox"/> Work assignment <input type="checkbox"/> Rank (or equivalent) <input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken) <input type="checkbox"/> None
73. Were you able to conduct the minimum number of RANDOM STAFF interviews?	<input type="radio"/> Yes <input checked="" type="radio"/> No
a. Select the reason(s) why you were unable to conduct the minimum number of RANDOM STAFF interviews: (select all that apply)	<input type="checkbox"/> Too many staff declined to participate in interviews. <input checked="" type="checkbox"/> Not enough staff employed by the facility to meet the minimum number of random staff interviews (Note: select this option if there were not enough staff employed by the facility or not enough staff employed by the facility to interview for both random and specialized staff roles). <input type="checkbox"/> Not enough staff available in the facility during the onsite portion of the audit to meet the minimum number of random staff interviews. <input type="checkbox"/> Other
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):	No text provided.
Specialized Staff, Volunteers, and Contractor Interviews	
Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.	
75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	10
76. Were you able to interview the Agency Head?	<input checked="" type="radio"/> Yes <input type="radio"/> No
77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	<input checked="" type="radio"/> Yes <input type="radio"/> No

78. Were you able to interview the PREA Coordinator?	<input type="radio"/> Yes <input checked="" type="radio"/> No
a. Explain why it was not possible to interview the PREA Coordinator:	Interviewed the PREA Compliance Manager
79. Were you able to interview the PREA Compliance Manager?	<input checked="" type="radio"/> Yes <input type="radio"/> No <input 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)</p>	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Agency contract administrator <input checked="" type="checkbox"/> Intermediate or higher-level facility staff responsible for conducting and documenting unannounced rounds to identify and deter staff sexual abuse and sexual harassment <input type="checkbox"/> Line staff who supervise youthful inmates (if applicable) <input type="checkbox"/> Education and program staff who work with youthful inmates (if applicable) <input type="checkbox"/> Medical staff <input type="checkbox"/> Mental health staff <input type="checkbox"/> Non-medical staff involved in cross-gender strip or visual searches <input checked="" type="checkbox"/> Administrative (human resources) staff <input type="checkbox"/> Sexual Assault Forensic Examiner (SAFE) or Sexual Assault Nurse Examiner (SANE) staff <input checked="" type="checkbox"/> Investigative staff responsible for conducting administrative investigations <input type="checkbox"/> Investigative staff responsible for conducting criminal investigations <input checked="" type="checkbox"/> Staff who perform screening for risk of victimization and abusiveness <input type="checkbox"/> Staff who supervise inmates in segregated housing/residents in isolation <input checked="" type="checkbox"/> Staff on the sexual abuse incident review team <input checked="" type="checkbox"/> Designated staff member charged with monitoring retaliation <input type="checkbox"/> First responders, both security and non-security staff <input type="checkbox"/> Intake staff <input type="checkbox"/> Other
<p>81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<p>82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<p>83. Provide any additional comments regarding selecting or interviewing specialized staff.</p>	<p>The facility does not employ medical or mental health staff and or utilize contractors to fill these roles. The facility does not utilize contractors or volunteers.</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: discussions related to testing critical functions are expected to be included in the relevant Standard-specific overall determination narratives.

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. Reviewing/examining all areas of the facility in accordance with the site review component of the audit instrument?

Yes

No

86. Testing and/or observing all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., intake process, risk screening process, PREA education)?

Yes

No

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

Yes

No

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

Yes

No

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

No text provided.

Documentation Sampling

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

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

Yes

No

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

No text provided.

SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

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

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

	Ongoing	Referred for Prosecution	Indicted/Court Case Filed	Convicted/Adjudicated	Acquitted
Inmate-on-inmate sexual abuse	0	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0	0
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 has been open for a total of 14 months and has not experienced a sexual abuse allegation to date.
99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)

Inmate-on-inmate sexual abuse investigation files

100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:	0
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<p>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p> <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files) </p>
<p>102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p> <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files) </p>
Staff-on-inmate sexual abuse investigation files	
<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 <input type="radio"/> No <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 <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files) </p>
Sexual Harassment Investigation Files Selected for Review	
<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 has been open for a total of 14 months and has not experienced a sexual abuse allegation to date.</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 <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files) </p>
Inmate-on-inmate sexual harassment investigation files	
<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 <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files) </p>
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<p>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p> <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files) </p>
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Staff-on-inmate sexual harassment investigation files

<p>111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
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<p>112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</p>	<p> <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files) </p>
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<p>113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p> <input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files) </p>
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<p>114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</p>	<p>The facility has been open for a total of 14 months and has not yet experienced any type of sexual abuse or harassment allegations.</p>
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SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

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

<p>116. Did you receive assistance from any NON-CERTIFIED SUPPORT STAFF at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</p>	<p> <input type="radio"/> Yes <input checked="" type="radio"/> No </p>
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AUDITING ARRANGEMENTS AND COMPENSATION

121. Who paid you to conduct this audit?	<p><input type="radio"/> The audited facility or its parent agency</p> <p><input type="radio"/> My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)</p> <p><input checked="" type="radio"/> A third-party auditing entity (e.g., accreditation body, consulting firm)</p> <p><input type="radio"/> Other</p>
Identify the name of the third-party auditing entity	PREA Auditors of America

Standards

Auditor Overall Determination Definitions

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

Auditor Discussion Instructions

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

115.211	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated 3. Wichita Transitional Center Organizational Chart, dated 2021 4. Correctional Solutions Group Organizational Chart, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random residents 2. Targeted residents 3. Random staff 4. Facility Director/PREA Manager/PREA Manager <p>Through interviews with residents and staff and review of resident and staff files, it is evident that this facility interweaves requirements for this standard in their daily protocols. Both residents and staff could speak to facility PREA practices and protocols being used as is described in the agency's PREA policy. The Facility Director/PREA Manager/PREA Manager could attest to having the required time to implement PREA protocols. The Facility Director/PREA Manager/PREA Manager stated she had ongoing support from the Regional Director of Reentry Services and the Corporate office.</p> <p>Site Review Observation:</p> <p>During the tour of the facility, the Auditor witnessed PREA Zero-tolerance, Audit Notices and Crisis Intervention posters in day rooms and in each of the 12 Dorms on site. PREA posters included information on third party, internal and external reporting to include contact and address information for advocates. During the tour and informal interviews with a residents demonstrated knowledge of PREA, reporting options and feeling safe in the program.</p> <p>(a) The Wichita Transitional Center PAQ states the facility mandates zero-tolerance toward all forms of sexual abuse and sexual harassment in the facility it operates and those directly under contract. The facility has a written policy outlining how it will implement the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment. The policy includes definitions of prohibited behaviors regarding sexual abuse and sexual harassment. The policy includes sanctions for those found to have participated in prohibited behaviors. The policy includes a description of agency strategies and responses to reduce and prevent sexual abuse and sexual harassment of residents.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 20, section 115.211 a-b., states, “</p> <p>(a) An agency shall have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlining the agency's approach to preventing, detecting, and responding to such conduct.</p> <p>(b) An agency shall employ or designate an upper-level, agency-wide PREA coordinator, with enough time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its community confinement facilities.”</p> <p>(b) The Wichita Transitional Center PAQ states the PREA Coordinator has sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its community confinement facilities. The position of the PREA Coordinator in the agency's organizational structure who reports to the Chief Operating Officer.</p> <p>Through such reviews, the facility met the standards requirements.</p>

115.212	Contracting with other entities for the confinement of residents
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Document Review: 1. Wichita Transitional Center PAQ</p> <p>Interviews: 1. Facility Director/PREA Manager/PREA Manager</p> <p>During the pre-audit phase, the Facility Director/PREA Manager conveyed the agency did not have privatized contracts.</p> <p>(a) The Wichita Transitional Center PAQ states agency does not contract with private agencies for confinement services of their residents.</p> <p>Through such reviews, the facility meets this standards requirements.</p>

115.213	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated 3. Wichita Transitional Center Staffing Plan, dated 2.14.2022 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random residents 2. Targeted residents 3. Random staff 4. Facility Director/PREA Manager <p>Staff and residents interviewed could attest to supervisory staff conducting unannounced rounds, each hour of each day. Staff attested to completing rounds at random times and through random direction.</p> <p>Site Review Observations:</p> <p>Unannounced Rounds are documented on the facilities electronic Shift Report, and on an individual Unannounced Round Log. The log has entries for every hour throughout the day. The Wichita Transitional Center began their program in December of 2020; therefore, this the facility recently celebrated their one-year anniversary. Due to the facility being established within the last 14 months, moving forward, the staffing plan annual review will occur February of each subsequent year.</p> <p>(a) The Wichita Transitional Center PAQ states the facility requires the facility to develop, document and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect residents against abuse. Since August 20, 2012, or last PREA audit, whichever is later, the average daily number of residents is 69. Since August 20, 2012, or last PREA audit, whichever is later, the average daily number of residents on which the staffing plan was predicated is 69.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 20, section 115.213 a., states, "For each facility, the agency shall develop and document a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect residents against sexual abuse. In calculating adequate staffing levels and determining the need for video monitoring, agencies shall take into consideration:</p> <ol style="list-style-type: none"> (1) The physical layout of each facility; (2) The composition of the resident population; (3) The prevalence of substantiated and unsubstantiated incidents of sexual abuse; and (4) Any other relevant factors." <p>The facility provided a Wichita Transitional Center Staffing Plan. The staffing plan includes the following components:</p> <ol style="list-style-type: none"> 1. Section I. Assessment of Needs <ol style="list-style-type: none"> a. Facility description and offender population (Campus Description & Offender Population) b. Regulatory Requirements c. Video surveillance (Camera placement grid) 2. Documentation of relief and compliance with the plan <ol style="list-style-type: none"> a. Documentation of relief and compliance with this plan b. Staffing Plan Deviation (Planned and unplanned time off) (Comprehensive staff schedule) 3. Staffing plan deviations 4. Staffing Plan reviews and updates <p>The Staffing Plan is signed by the PREA Compliance Manager/Facility Director/PREA Manager and the Agency PREA Coordinator.</p> <p>(b) The Wichita Transitional Center PAQ states the facility documents each time the staffing plan is not complied with, the facility documents and justifies deviations. The facility had zero deviations from the required ratios of their staffing plan.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 20, section 115.213 b., states, "In circumstances where the staffing plan is not complied with, the facility shall document and justify all deviations from the plan."</p> <p>(c) The Wichita Transitional Center PAQ states at least once every year the facility, reviews the staffing plan to see whether adjustments are needed in (1) the staffing plan, (2) prevailing staffing patterns, (3) the deployment of video monitoring systems and other monitoring technologies, or (4) the allocation of facility/agency resources to commit to the staffing plan to ensure compliance with the staffing plan.</p>

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 20, section 115.213 c, states, "Whenever necessary, but no less frequently than once each year, the facility shall assess, determine, and document whether adjustments are needed to:

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

Through such reviews, the facility met the standards requirements.

115.215	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Exceeds Standard
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random residents 2. Targeted residents 3. Random staff 4. Intake staff 5. Facility Director/PREA Manager <p>Interviews with staff demonstrated cross-gender searches had been trained; however, staff interviewed stated they had performed cross-gender searches. When asked where a cross-gender search would be documented, staff interviewed stated all searches are logged on the facility search log. Each resident interviewed reported their initial and any subsequent searches were completed respectfully.</p> <p>Site Review Observation:</p> <p>During the tour of the facility the Auditor observed the 'picket' which also serves as the only entrance and exit to the facility. (Emergency exits exist; however, those exits are used for emergency purposes only.) When residents return from the community, they wait in the 'picket' waiting room as 'picket' staff intercom for a 'Male' or 'Female' pat search. Once residents are searched they may gain entry into the residential programmatic areas of the facility.</p> <p>(a) Wichita Transitional Center PAQ states the facility does not conduct cross-gender strip or cross-gender visual body cavity searches of their Residents. In the past 12 months the facility has conducted zero cross-gender strip or cross-gender visual body cavity searches of residents. In the past 12 months, the number of cross-gender strip or cross-gender visual body cavity searches of residents was zero. In the past 12 months, the number of cross-gender strip or cross-gender visual body cavity searches of residents that did not involve exigent circumstances or were performed by non-medical staff was zero.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 21, section 115.215 a., states, "The facility shall not conduct cross-gender strip searches or cross-gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent circumstances or when performed by medical practitioners."</p> <p>(b) Wichita Transitional Center PAQ states the facility does not permit cross-gender pat-down searches of female residents, absent exigent circumstances. The facility does not restrict female residents' access to regularly available programming or other outside opportunities in order to comply with this provision. The number of pat-down searches of female residents that were conducted by male staff was zero. The number of pat-down searches of female residents conducted by male staff that did not involve exigent circumstance(s) was zero. The number of pat-down searches of female residents conducted by male staff that did not involve exigent circumstance(s) was zero.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 21, section 115.215 b., states, "As of August 20, 2015, or August 20, 2017 for a facility whose rated capacity does not exceed 50 residents, the facility shall not permit cross-gender pat-down searches of female residents, absent exigent circumstances. Facilities shall not restrict female residents' access to regularly available programming or other outside opportunities in order to comply with this provision. N/A-All CSG/WICHITA TRANSITIONAL CENTER Facilities exceed 50 residents."</p> <p>(c) Wichita Transitional Center PAQ states the facility policy does require that all cross-gender strip searches, cross-gender visual body cavity searches, and cross-gender pat-down searches be documented and justified as cross-gender strip searches and body cavity searches are not allowed.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 21, section 115.215 c., states, "The facility shall document all cross-gender strip searches and cross-gender visual body cavity searches and shall document all cross-gender pat-down searches of female residents."</p> <p>(d) Wichita Transitional Center PAQ states the facility has implemented policies and procedures that enable residents to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks (this includes viewing via video camera). Policies and procedures 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.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 21, section 115.215 d., states, "The</p>

facility shall implement policies and procedures that enable residents to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. Such policies and procedures shall require staff of the opposite gender to announce their presence when entering an area where residents are likely to be showering, performing bodily functions, or changing clothing. “

(e) The Wichita Transitional Center PAQ states the facility has a policy prohibiting staff from searching or physically examining a transgender or intersex resident for the sole purpose of determining the resident's genital status. Such searches (described in 115.215(e)-1) occurred in the past 12 months was zero.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 21-22, section 115.215 e., states, “The facility shall not search or physically examine a transgender or intersex resident for the sole purpose of determining the resident's genital status. If the resident's genital status is unknown, it may be determined during conversations with the resident, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner.”

(f) The Wichita Transitional Center PAQ states 100 percent of all security staff who received training on conducting cross-gender pat-down searches and searches of transgender and intersex residents in a professional and respectful manner, consistent with security needs.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 22, section 115.215 f., states, “The agency shall train security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex residents, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.”

Through such reviews, of the facility never conducting cross gender searches, the facility exceeds this standards requirements.

115.216 Residents with disabilities and residents who are limited English proficient

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

- 1. Wichita Transitional Center PAQ
- 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated
- 3. LanguageLine Account for Personal Interpreter, not dated
- 4. Wichita Transitional Center Residential Re-entry Center Resident Handbook in English and Spanish

Interviews:

- 1. Targeted residents
- 2. Senior Case Manager
- 3. Facility Director/PREA Manager

During interviews with staff, each stated residents were not used for translation services. Barriers were not apparent during interviews and or on the facility tour. Of the residents interviewed, one interview was conducted with a Spanish speaking resident in the presence of her Senior Case Manager at the Auditors request. The interview revealed the resident understood PREA protocols at the facility.

(a) The Wichita Transitional Center PAQ states the agency has established procedures to provide disabled residents 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.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 22, section 115.216, a., states, "The agency shall take appropriate steps to ensure that residents with disabilities (including, for example, residents who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Such steps shall include, when necessary to ensure effective communication with residents who are deaf or hard of hearing, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. In addition, the agency shall ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities, including residents who have intellectual disabilities, limited reading skills, or who are blind or have low vision. An agency is not required to take actions that it can demonstrate would result in a fundamental alteration a service, program, or activity, or in undue financial and administrative burdens, as those terms are used in regulations promulgated under title II of the Americans with Disabilities Act, 28 CFR 35.164."

The facility provided a Wichita Transitional Center Residential Re-entry Center Resident Handbook in English and Spanish. Page 6-9, section Prison Rape Elimination Act (PREA) is what residents represents resident PREA Education and includes the following topics.

- An explanation of the enactment of PREA
 - Zero Tolerance
 - What is Sexual Assault
 - Definitions Related to Sexual Assault
 - o Sexual abuse by another resident
 - o Sexual abuse by an Employee, Contractor, or Volunteer
 - o Sexual Harassment Includes
 - o Voyeurism by an Employee, Contractor, or Volunteer
 - o Examples of sexual abuse
 - o Examples of sexual harassment
 - Reporting Sexual Assaults
 - o Staff
 - o Residents
 - o Family and Friends
 - o Reporting Allegations
- Reporting Sexual Abuse or Sexual Harassment
CSG's PREA Coordinator
P.O. Box 7760
Tyler, TX 75711
903.630.6291 ext 301
www.csgporgams.com

National Sexual Assault Hotline

1.800.656.4673 toll free

(b) The Wichita Transitional Center PAQ states the agency has established procedures to provide residents with limited English proficiency 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. The facility addresses compliance in provision (a) of this standard.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 22, section 115.216, b., states, "The agency shall take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to residents who are limited English proficient, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary."

During the pre-audit phase, the Auditor suggested the facility create an account with LanguageLine to ensure services were established before a need arose. The facility provided a LanguageLine document demonstrating an account had been established. The document demonstrates as dial in phone number and personalized Pin number have been assigned.

(c) The Wichita Transitional Center PAQ states the agency policy prohibits 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 investigation of the resident's allegations. (Please note, the on line PAQ was marked yes. During the pre-survey phase, the Auditor clarified this answer should have been no.) In the past 12 months, the number of instances where resident interpreters, readers, or other types of resident assistants have been used and it was not the case that an extended delay in obtaining another interpreter could compromise the resident's safety, the performance of first-response duties under § 115.264, or the investigation of the resident's allegations was zero.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 22, section 115.216, b., states, "The agency shall not rely on resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-response duties under § 115.264, or the investigation of the resident's allegations."

Through such reviews, the facility met this standards requirements.

115.217	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated 3. Correctional Solutions Group Hiring/Promotion/Performance Review PREA Questionnaire, dated 2.2017 4. 115.217 Supporting Email and Facility Procedure Change, dated 2.15.2022 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Accounting Clerk – Human Resources staff <p>Interviews with the Accounting Clerk – Human Resources staff demonstrated applicants determined to have been convicted of sexual abuse or sexual harassment charges were screened out during the application review process. All though these practices were currently in place for new hire employees, the facility had yet to implement this practice for promoted staff.</p> <p>Site Review Observation:</p> <p>During review of the 12 staff personnel files reviewed, this Auditor noted institutional references are completed for each new applicable applicant. Files reviewed demonstrated each had criminal and applicable background checks conducted upon hire, upon promotion and every five years of employment thereafter.</p> <p>During the onsite file review the Auditor observed Administrative Adjudication questions had not been asked of promoted employees. On 2.15.2022, the Facility Director/PREA Manager provided a memo, via email, to the staff accountant, who also serves as the Human Resource Clerk, instructing her to implement the following: "In order to be in compliance with PREA Standards, please make sure the Hiring/Promotion/Performance Review PREA Questionnaire is conducted;</p> <ol style="list-style-type: none"> 1. All new hires 2. Employees that received a promotion 3. During each employee Performance Review" <p>(a) The Wichita Transitional Center PAQ states agency policy prohibits hiring or promoting anyone who may have contact with residents and prohibits enlisting the services of any contractor who may have contact with residents who: (1) 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); (2) 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 (3) Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 22, section 115.217, a., states, "The agency shall not hire or promote anyone who may have contact with residents, and shall not enlist the services of any Wichita Transitional Center who may have contact with residents, who—</p> <ol style="list-style-type: none"> (1) 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); (2) 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 (3) Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section." <p>(b) The Wichita Transitional Center PAQ states agency policy requires the consideration of any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with residents.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 23, section 115.217, b., states, "The agency shall consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any Wichita Transitional Center, who may have contact with residents."</p> <p>(c) The Wichita Transitional Center PAQ states the agency policy requires that before it hires any new employees who may have contact with residents, it (a) conducts criminal background record checks, and (b) consistent with federal, state, and local law, makes 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. In the past 12 months, the number of persons hired who may have contact with residents who have had criminal background record checks is 36.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 23, section 115.217, c., states, "Before hiring new employees who may have contact with residents, the agency shall:</p>

(1) Perform a criminal background records check; and
(2) 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.”

(d) The Wichita Transitional Center PAQ states the agency policy requires that a criminal background record check be completed before enlisting the services of any contractor who may have contact with residents. In the past 12 months, the number of contracts for services where criminal background record checks were conducted on all staff covered in the contract who might have contact with residents is one.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 23, section 115.217, d., states, “The agency shall also perform a criminal background records check before enlisting the services of any Wichita Transitional Center who may have contact with residents.”

(e) The Wichita Transitional Center PAQ states the agency policy requires that either criminal background record checks be conducted at least every five years for current employees and contractors who may have contact with residents or that a system is in place for otherwise capturing such information for current employees.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 23, section 115.217, e., states, “The agency shall either conduct criminal background records checks at least every five years of current employees and Wichita Transitional Centers who may have contact with residents or have in place a system for otherwise capturing such information for current employees.”

(f) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 23, section 115.217, f., states, “The agency shall also ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions and in any interviews or written self- evaluations conducted as part of reviews of current employees. The agency shall also impose upon employees a continuing affirmative duty to disclose any such misconduct.”

The facility provided a Correctional Solutions Group Hiring/Promotion/Performance Review PREA Questionnaire. This questionnaire asks applicants the following questions.

- Have you engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility or other institution?
- Have you 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?
- Have you been civilly or administratively adjudicated to have engaged in the activity described in (the above two questions.)
- Have you had sexual harassment allegations made against you?

(g) The Wichita Transitional Center PAQ states Agency policy states that material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 23, section 115.217, g., states, “Material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.”

(h) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 23, section 115.217, h., states, “Unless prohibited by law, the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.”

Through such reviews, the facility meets this standards requirements.

115.218	Upgrades to facilities and technology
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Document Review: 1. Wichita Transitional Center PAQ</p> <p>Interviews: 1. Facility Director/PREA Manager The Facility Director/PREA Manager attested to this being the first year of service for this program.</p> <p>Site Review Observation: Cameras were found to be throughout the facility. Camera placement was observed in each hallway, entry, day room, utility closets, hygiene closet, dining hall, kitchen, dry storage and the administrative suite.</p> <p>(a) The Wichita Transitional Center PAQ states the agency has not acquired a new facility or made substantial expansions or modifications to existing facilities since the last PREA audit.</p> <p>Through such reviews, the facility meets this standards requirements.</p>

115.221	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Exceeds Standard
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated 3. Wichita Police Department Victim Assistance Unit Brochure, not dated 4. Email communication – Forensic Nursing Department, dated 6.29.2021 5. Memorandum of Understanding Wichita Area Sexual Assault Center, dated 11.10.2021 6. Safety When Preparing to Leave Brochure, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random Residents 2. Targeted Residents 3. Random staff 4. Specialized staff 5. Advocate 6. Senior Case Manager/Facility Administrative Investigator 7. Facility Director/PREA Manager <p>Interviews with all residents and staff interviewed demonstrated all were clearly aware of reporting protocols for sexual harassment and abuse. Of those interviewed, each were comfortable reporting internally and understood the processes for reporting externally.</p> <p>Every staff interviewed clearly articulated first responder duties to include protecting, preserving and reporting. When each were asked where this information was located, responses included postings on the bulletin boards in the day rooms and available through the URL scanning system. The investigator clearly articulated protocols for investigation processes and demonstrated immediate action for sexual harassment and sexual abuse allegations.</p> <p>Site Review Observation:</p> <p>There were zero administrative investigations in the 14 months of operations at the facility. The Auditor also witnessed URL codes for reporting, throughout the facility. Staff demonstrated opening their camera applications on their cell phones, placing the URL code in the center of the face of the phone and the Case Manager for the associated resident had immediate access to contact information, reporting information, filing a grievance and or an internal I-60 used for resident complaints.</p> <p>During the tour of the facility, various residents addressed the Facility Director/PREA Manager demonstrating they not only knew her, but felt comfortable approaching her, as well.</p> <p>(a) The Wichita Transitional Center PAQ states the agency/facility is responsible for conducting administrative sexual abuse investigations (including resident-on-resident sexual abuse or staff sexual misconduct). The agency/facility is not responsible for conducting criminal sexual abuse investigations (including resident-on-resident sexual abuse or staff sexual misconduct).</p> <p>The Wichita Police Department completes criminal investigations. The Facility Director/PREA Manager provided a letter requesting an MOU to the Chief of the Wichita Police Department. The letter requests the following: My name is Miriam Ruiz and I'm the Facility Director/PREA Manager for the Wichita Transitional Center. Attached is letter requesting an MOU from WPD in order to be in compliance with the National Prison Rape Elimination Act Standards. Let me know if you have any questions and feel free to contact me." Attached to the letter is a Program Statement for the Wichita Transitional Center and all required language for Standard 115.221.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 23, section 115.221 a., states, "To the extent the agency is responsible for investigating allegations of sexual abuse, the agency shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions."</p> <p>(b) The Wichita Transitional Center PAQ states the protocol being developmentally appropriate for is not applicable as the facility does not house youthful offenders. The protocol was adapted from or otherwise based on the most recent edition of the DOJ'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.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 24, section 115.221 b., states, "The protocol shall be developmentally appropriate for youth where applicable, and, as appropriate, shall be adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly</p>

comprehensive and authoritative protocols developed after 2011.”

(c) The Wichita Transitional Center PAQ states the facility offers all residents who experience sexual abuse access to forensic medical examinations. Forensic medical examinations are offered without financial cost to the victim. Where possible, examinations are conducted by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs). When SANEs or SAFEs are not available, a qualified medical practitioner performs forensic medical examinations. The facility documents efforts to provide SANEs or SAFEs. The number of forensic medical exams conducted during the past 12 months is zero. The number of SANEs/SAFEs during the past 12 months was zero. The number of exams performed by a qualified medical practitioner during the past 12 months was zero.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 24, section 115.221 c., states, “The agency shall offer all victims of sexual abuse access to forensic medical examinations whether on-site or at an outside facility, without financial cost, where evidentiary or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. The agency shall document its efforts to provide SAFEs or SANEs.”

The facility provided a Wichita Police Department Victim Assistance Unit brochure. The brochure speaks to the 10 Kansas Crime Victims Bill of Rights, provides a physical address, phone number and email address for victims. Victims can also call or text 911.

The facility provided an email communication to the Facility Director/PREA Manager from the Forensic Nursing Department, SANE/SART program at the Ascension Via Christi St. Joseph. The communications states,

“Thank you for reaching out to me regarding our SANE/SART program at Ascension Via Christi St. Joseph. Our program does examinations, evidence collection, and forensic photography on patients that have been sexually assaulted. In order to collect evidence, we need to see the patient within five days of being assaulted. Beyond that we are not able to collect evidence.

We also see patients that are victims of Domestic Violence, Assault, Human Trafficking, Elder Abuse, and Child Abuse. In order for a patient to be seen by our Forensic Nursing Department they need to check in through the Emergency Department. We are located at 3600 E. Harry. We have a Forensic Nurse available 24 hours a day seven days a week.

As discussed in our conversation, if a patient is needing post assault counseling we recommend contacting the Wichita Area Sexual Assault Center (WASAC). They provide advocacy and many other programs that are nice for the patient's. They have a 24hr7day a week hotline. That number is 316.263.3002.

Signed, Cathy Manlier, BSN, RN
Sexual Assault Nurse Examiner
Via Christi Forensic Nursing Department
3600 E. Harry
Wichita, KS 67208
316.689.5252

(d) The Wichita Transitional Center PAQ states the facility attempts to make available to the victim a victim advocate from a rape crisis center, either in person or by other means. The efforts are documented. If and when a rape crisis center is not available to provide victim advocate services, the facility provides a qualified staff member from a community-based organization or a qualified agency staff member.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 24, section 115.221 d., states, ““The agency shall attempt to make available to the victim a victim advocate from a rape crisis center. If a rape crisis center is not available to provide victim advocate services, the agency shall make available to provide these services a qualified staff member from a community-based organization or a qualified agency staff member. Agencies shall document efforts to secure services from rape crisis centers. For the purpose of this standard, a rape crisis center refers to an entity that provides intervention and related assistance, such as the services specified in 42 U.S.C. 14043g(b)(2)(C), to victims of sexual assault of all ages. The agency may utilize a rape crisis center that is part of a governmental unit if the center is not part of the criminal justice system (such as a law enforcement agency) and offers a comparable level of confidentiality as a nongovernmental entity that provides similar victim services.”

The facility provided a Memorandum of Understanding with the Wichita Area Sexual Assault Center. The memorandum states the following services will be provided:

- Advocacy on a walk-in basis during office hours 8:30 – 5:00 Monday-Friday
- 24/7/365 Crisis Hotline
- Emergency Shelter, short-term assistance immediately following a sexual assault
- Hospital Accompaniment/Medical Advocacy (available 24/7 all year round) include medical Forensic Exams conducted by a

SANE medical staff.

- Court/Law enforcement advocacy regarding sexual assault
- Assistance with Crime Victim Compensation
- Information of Community Resource
- Emotional Support
- And the most important, making sure no one goes through this alone.

In addition, I would like to add that if the facility were to have a case involving PREA/RAPE cases, and one of the residents would be referred to your agency, the facility would provide transportation to and from. For additional security, the facility would send (2) staff of the same sex to accompany the identified victim.”

(e) The Wichita Transitional Center PAQ states a qualified staff or community member accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provides emotional support, crisis intervention, information and referrals.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 24, section 115.221 e., states, “As requested by the victim, the victim advocate, qualified agency staff member, or qualified community-based organization staff member shall accompany and support the victim through the forensic medical examination process and investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals.”

(f) The Wichita Transitional Center PAQ states the agency is not responsible for investigating allegations of sexual abuse and relies on another agency to conduct these investigations, the agency has requested that the responsible agency follow the requirements of paragraphs §115.221.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 24, section 115.221 f., states, “To the extent the agency itself is not responsible for investigating allegations of sexual abuse, the agency shall request that the investigating agency follow the requirements of paragraphs (a) through (e) of this section.”

The facility provided a Safety When Preparing to Leave brochure. The brochure speaks to leaving CAN be the most dangerous time and explains ensuring the victim has a safe place to go and to call the Wichita Police Department for more information and or help. The brochure also speaks to safety tips during an explosive incident.

Through such reviews, of the URL code providing access to Case Manager contact information, reporting information, filing a grievance and or an internal I-60 used for resident complaints. the facility meets exceeds this standards requirements.

115.222	Policies to ensure referrals of allegations for investigations
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated 3. Correctional Solutions Group PREA Community Confinement Standards, Policy and Procedure Manual Agency Web address is: f35ce3_168242c293c7461ab89f4b99aad85090.pdf (correctionalsolutionsgroup.com) <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random Residents 2. Targeted Residents 3. Random staff 4. Facility Investigator <p>Resident and staff interviews demonstrated each can report incidents of sexual abuse and sexual harassment through the grievance process, verbally reporting to a staff, using URL Code completing a kite or I-60, using their personal cell phones or telling a family member. Each stated being comfortable reporting incidents of sexual harassment and assault. Staff reported separating victims and abusers, reporting allegations of sexual abuse or sexual harassment to their supervisor and preserving the residents and the area reported in the allegation. Random staff reported taking limited information from victims and reporting that information to the Facility Director/PREA Manager and or Senior Case Manager who then reports to applicable agency and law enforcement personnel. The facility Investigator interviewed described investigation protocols and addressing investigations immediately.</p> <p>(a) The Wichita Transitional Center PAQ states the agency ensures that an administrative or criminal investigations are completed for all allegations of sexual abuse and sexual harassment. In the past 12 months the facility has had zero allegations of sexual abuse and sexual harassment that were received. In the past 12 months zero allegations resulted in an Administrative Investigation.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 24, section 115.222 a., states, "The agency shall ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment."</p> <p>(b) The Wichita Transitional Center PAQ states the agency has a policy that requires that allegations of sexual abuse or sexual harassment be referred for investigation to an agency with the legal authority to conduct criminal investigations, including the agency if it conducts its own investigations, unless the allegation does not involve potentially criminal behavior.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 25, section 115.222 b., states, "The agency shall have in place a policy to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. The agency shall publish such policy on its website or, if it does not have one, make the policy available through other means. The agency shall document all such referrals."</p> <p>(c) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 25, section 115.222 c., states, "If a separate entity is responsible for conducting criminal investigations, such publication shall describe the responsibilities of both the agency and the investigating entity."</p> <p>The agency PREA Community Confinement Standards, Policy and Procedure Manual is posted on the agency website at f35ce3_168242c293c7461ab89f4b99aad85090.pdf (correctionalsolutionsgroup.com)</p> <p>Through such reviews the facility meets this standards requirements.</p>

115.231	Employee training
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated 3. PREA Introduction and Overview Booklet, dated 2017 4. Wichita Transitional Center, In-Service Training, dated 2021 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random staff 2. Specialized staff 3. Accounting Clerk - Human Resource/Training <p>Interviews with random staff demonstrated each were aware of and received initial and annual PREA training. Interviews with specialized staff demonstrated each had received training mandated for all employees.</p> <p>Site Observation:</p> <p>Review of the 12 personnel files demonstrated random staff have received initial and annual training; and investigator and mental health staff had received training also mandated by this standard. All training had been completed in Relias. Each file reviewed had a printout of the employee's initial and annual training. Each employee completes three separate PREA modules within at pre-service and annually. During the file review, the Accounting Clerk demonstrated each training completed in Relias required staff to sign an acknowledgment of receipt and understanding of the training completed.</p> <p>(a) The Wichita Transitional Center PAQ states the agency trains all employees who may have contact with residents on the agency's zero-tolerance policy for sexual abuse and sexual harassment.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 25, section 115.231 a., states, "The agency shall train all employees who may have contact with residents on:</p> <ol 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) Residents' right to be free from sexual abuse and sexual harassment; (4) The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment; (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 residents; (9) How to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming residents; and (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities." <p>The facility provided a Relias PREA Introduction and Overview Booklet. The overview of PREA training includes:</p> <ul style="list-style-type: none"> • Section 1: Introduction <ul style="list-style-type: none"> o About This Course o Learning Objectives • The Prison Rape Elimination Act <ul style="list-style-type: none"> o The Prison Rape Elimination Act Defined o Purpose of PREA o The PREA National Standards o Who Must Follow the Standards? o Other Forms of PREA Standards o Knowledge Check o Section Summary • Liabilities, Policies and Requirements <ul style="list-style-type: none"> o Assess Your Knowledge o Federal Criminal Liability o State Criminal Liability o Civil Liability o Constitutional Liability

- o Professional Liability
- o Zero-Tolerance Policy
- o PREA Training Requirements
- o Let's Review
- o Section Summary
- Defining Sexual Abuse
- o Assess Your Knowledge
- o Sexual Abuse Defined
- o Correctional Agencies Definitions
- o Exigent Circumstances
- o Abuse or Note Abuse: That is the Question
- o Section Summary
- Conclusion
- o Summary
- o Course Contributors
- o Resource
- o Congratulations!
- o Exam
- o Brain Sparks

The facility provided a In-Service and Pre-Service Training spreadsheet. The spreadsheet includes the following PREA related topics:

- Sexual Harassment
- Administrative Remedy Program
- Searches / Contraband
- Diversity
- Offender Rights
- Ethics in Corrections
- PREA
- Communication Skills
- Social and Cultural Lifestyles of the Resident Population
- Interpersonal Relations
- Cross Gender and Transgender Pat Searches

(b) The Wichita Transitional Center PAQ states training is tailored to the gender of the residents at the facility. Employees who are reassigned from facilities housing the opposite gender are given additional training. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 25, section 115.231 b., states, "Such training shall be tailored to the gender of the residents at the employee's facility. The employee shall receive additional training if the employee is reassigned from a facility that houses only male residents to a facility that houses only female residents, or vice versa."

(c) The Wichita Transitional Center PAQ states between trainings the agency provides employees who may have contact with residents with refresher information about current policies regarding sexual abuse and harassment. The frequency with which employees who may have contact with residents receive refresher training on PREA requirements annually.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 25, section 115.231 c., states, "All current employees who have not received such training shall be trained within one year of the effective date of the PREA standards, and the agency shall provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures. In years in which an employee does not receive refresher training, the agency shall provide refresher information on current sexual abuse and sexual harassment policies."

(d) The Wichita Transitional Center PAQ states the agency documents that employees who may have contact with residents understand the training they have received through employee signature or electronic verification.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 25, section 115.231 d., states, "The agency shall document, through employee signature or electronic verification, that employees understand the training that they received."

Through such reviews, the facility meets this standards requirements.

115.232	Volunteer and contractor training
	<p data-bbox="242 145 738 174">Auditor Overall Determination: Meets Standard</p> <p data-bbox="242 210 451 239">Auditor Discussion</p> <p data-bbox="242 271 435 300">Document Review:</p> <ol data-bbox="242 304 1161 398" style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated 3. Prison Rape Elimination Act (PREA) Notice to Contractors/Volunteers, not dated <p data-bbox="242 430 352 459">Interviews:</p> <p data-bbox="242 463 1485 524">The facility does not have any contractors providing services directly to residents. No volunteers are being used during times of COVID-19.</p> <p data-bbox="242 555 1490 714">(a) The Wichita Transitional Center PAQ states all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response. The number of volunteers and contractors, who may have contact with residents, who have been trained in agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response is one.</p> <p data-bbox="242 745 1474 871">Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 26, section 115.232 a., states, "The agency shall ensure that all volunteers and Wichita Transitional Centers who have contact with residents have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures."</p> <p data-bbox="242 902 1474 963">The facility provided a Prison Rape Elimination Act (PREA) Notice to Contractors/Volunteers training acknowledgment. The Acknowledgment includes the following discussion topics:</p> <ul data-bbox="242 967 775 1128" style="list-style-type: none"> • The Prison Rape Elimination Act of 2003 • Correctional Solutions Group Zero Tolerance Policy • Definitions • Contractor/Volunteer Requirements • Reporting Sexual Abuse/Sexual Harassment <p data-bbox="242 1133 1485 1193">The acknowledgement is to be signed by the Contractor or Volunteer with the following affirmation. "By my signature below, I acknowledge receipt of a copy of this document and that it was explained to me by the staff member below."</p> <p data-bbox="242 1225 1490 1350">(b) The Wichita Transitional Center PAQ states 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 residents. All volunteers and contractors who have contact with residents have been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.</p> <p data-bbox="242 1382 1490 1541">Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 26, section 115.232 b., states, "The level and type of training provided to volunteers and Wichita Transitional Centers shall be based on the services they provide and level of contact they have with residents, but all volunteers and Wichita Transitional Centers who have contact with residents shall be notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents."</p> <p data-bbox="242 1572 1401 1632">(c) The Wichita Transitional Center PAQ states the agency maintains documentation confirming that volunteers and contractors who have contact with residents understand the training they have received.</p> <p data-bbox="242 1664 1453 1756">Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 26, section 115.232 c., states, "The agency shall maintain documentation confirming that volunteers and Wichita Transitional Centers understand the training they have received."</p> <p data-bbox="242 1787 935 1816">Through such reviews, the facility meets this standards requirements.</p>

115.233	Resident education
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated 3. Wichita Transitional Center Residential Re-entry Center Resident Handbook, dated 8.2021 4. PREA Educational Manual for Residents, not dated 5. 'Accessible Education' email directive to all staff, dated 2.8.2022 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random Residents 2. Targeted Residents 3. Random staff 4. Intake staff 5. Accounting Clerk – Human Resource staff <p>Interviews with the 13 random and three targeted residents, each reported their knowledge of PREA, reporting options to staff, third parties and or phone numbers posted throughout the facility.</p> <p>Site Observation:</p> <p>Of the 16 resident files reviewed, each demonstrated evidence of PREA education within 72 hours of intake.</p> <p>(a) The Wichita Transitional Center PAQ states residents receive information at time of intake about the zero-tolerance policy, how to report incidents or suspicions of sexual abuse or harassment, their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. The number of residents admitted during past 12 months who were given this information at intake was 243.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 26, section 115.233 a., states, "During the intake process, residents shall receive information explaining the agency's zero- tolerance policy regarding sexual abuse and sexual harassment, how to report incidents or suspicions of sexual abuse or sexual harassment, their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents."</p> <p>The facility provided a PREA Education Manual for Residents. This manual includes the following:</p> <ul style="list-style-type: none"> • Introduction – Safety Message • What is sexual assault • Cross gender pat searches • Definitions Related to Sexual Abuse <ul style="list-style-type: none"> o Sexual abuse by another resident o Sexual abuse by an employee, contractor, or volunteer o Sexual harassment includes <ul style="list-style-type: none"> o Voyeurism by an employee, contractor, or volunteer • Examples of sexual abuse • Examples of sexual harassment • What about consensual sexual relationships • Definitions of Sexual Activity • Prevention • Reporting and Investigations (includes hotline numbers) • What to expect after you report • Sexual abuse grievances • Emergency grievances • Contact information <ul style="list-style-type: none"> o Wichita Police Department: 316.268.4111 o Bureau of Prisons Residential Reentry Office: 913.551.1115 o Wichita Area Sexual Assault Center (Victim Advocate): 316.263.3002 o The Crisis Center (PREA Hotline): 1.800.586.9431 (attempted to dial this number and was found as not valid.) Once the Auditor brought this to the attention of the facility, the number was removed and new postings were posted throughout the facility. o CSG PREA Coordinator (Third Party Reporting): 903.630.6291 Ext: 301 o Acknowledgment of receipt of PREA educational manual, which has the reader initial the following:

- I hereby acknowledge receipt...
 - I understand that...
 - I have been informed...
 - I understand that I may also report allegations or suspicions of sexual abuse that have occurred in other facilities prior to having arrived.
 - Reporting, to include third party
 - I understand PREA rights
 - Resident Signature/Name/Reg#/Date
 - Witnessed by: Name/Title/Signature/Date
- o Resident Handbook / Reentry Handbook Acknowledgment, which states, "I, ___ Reg#: ___ on this date, ___ have received a copy of the Wichita Transitional Center Resident Handbook which includes a copy of the Bureau of Prison Prohibited Acts. In addition, I also received a copy of the Residential Reentry Handbook (Reentering Your Community: A Handbook)." Resident signature and date/Staff signature and date.

The facility provided a Wichita Transitional Center Residential Re-entry Center Resident Handbook. Page 6-9, section Prison Rape Elimination Act (PREA) includes the following topics.

- An explanation of the enactment of PREA
 - Zero Tolerance
 - What is Sexual Assault
 - Definitions Related to Sexual Assault
 - o Sexual abuse by another resident
 - o Sexual abuse by an Employee, Contractor, or Volunteer
 - o Sexual Harassment Includes
 - o Voyeurism by an Employee, Contractor, or Volunteer
 - o Examples of sexual abuse
 - o Examples of sexual harassment
 - Reporting Sexual Assaults
 - o Staff
 - o Residents
 - o Family and Friends
 - o Reporting Allegations
- Reporting Sexual Abuse or Sexual Harassment
 CSG's PREA Coordinator
 P.O. Box 7760
 Tyler, TX 75711
 903.630.6291 ext 301
 www.csgporgams.com

National Sexual Assault Hotline
 1.800.656.4674 toll free

- Administrative Remedies Procedures

(b) The Wichita Transitional Center PAQ states the facility provides residents who are transferred from a different community confinement facility with refresher information referenced in 115.233(a)-1. The number of residents transferred from a different community confinement facility during the past 12 months was zero. The number of residents transferred from a different community confinement facility, during the past 12 months, who received refresher information was zero.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 26, section 115.233 b, states, "The agency shall provide refresher information whenever a resident is transferred to a different facility."

(c) The Wichita Transitional Center PAQ states Resident PREA education is available in formats accessible to all residents, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled and those who have limited reading skills.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 26, section 115.233 c, states, "The agency shall provide resident education in formats accessible to all residents, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled as well as residents who have limited reading skills."

The facility provided an email notification, from the facility Case Manager, to all staff regarding the facilities procedures for 'Assessable Education' for disabled residents. "All WTC staff will be providing a level of support for any limited English, limited reading or comprehension skills, deaf, visually impaired and/or otherwise disabled residents. Staff will assist with the reading of educational documents for those that are visually impaired and/or have limited reading skills. Bilingual staff will assist with the translating of any facility documents to those who are limited English. Staff will break down any educational

form for those that have limited comprehension skills or are disabled for better understanding. Staff will assist any deaf residents by notating or highlighting any important information. Every case is different. For further information or concerns feel free to contact me.”

(d) The Wichita Transitional Center PAQ states the agency maintains documentation of resident participation in PREA education sessions. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 26, section 115.233 d, states, “The agency shall maintain documentation of resident participation in these education sessions.”

(e) The Wichita Transitional Center PAQ states the agency ensures that key information about the agency's PREA policies is continuously and readily available or visible through posters, resident handbooks, or other written formats.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 26, section 115.233 d, states, “In addition to providing such education, the agency shall ensure that key information is continuously and readily available or visible to residents through posters, resident handbooks, or other written formats.”

Through such reviews, the facility meets this standards requirements.

115.234	Specialized training: Investigations
	Auditor Overall Determination: Exceeds Standard
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated 3. Investigator Training Certificates dated 2020 and 2021 4. Investigator Training Overview, dated 2019 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Facility Investigator 2. Accounting Clerk – Human Resource staff 3. Facility Director/PREA Manager <p>Interviews with the investigator and the Human Resource staff demonstrated investigators have completed specialized investigator training course. The Facility Director/PREA Manager stated investigator training is an annual requirement for the agency.</p> <p>(a) The Wichita Transitional Center PAQ states agency policy requires that investigators are trained in conducting sexual abuse investigations in confinement settings.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 26, section 115.234 a., states, “In addition to the general training provided to all employees pursuant to § 115.231, the agency shall ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings.”</p> <p>The facility provided two investigator training certificates. Training for the two investigators was completed on 11.19.2020 and 10.14.2021.</p> <p>The facility provided investigator training overview which includes the following topics:</p> <ul style="list-style-type: none"> • Section1: Introduction <ul style="list-style-type: none"> o About this course o Learning objectives • Section 2: Overview of the Prison Rape Elimination Act <ul style="list-style-type: none"> o The Prison Rape Elimination Act o Purpose of PREA o The PREA National Standards o Who Must Follow the Standards? o Other Forms of PREA Standards o Definitions of Sexual Abuse and Harassment o Correctional Agencies Definitions o Review o Summary • Section 3: First Responder at the Point of an Allegation <ul style="list-style-type: none"> o Officer Kale o Who is a First Responder o Ways You May Receive Information About an Allegation o Responsibilities of a First Responder: Allegation of Sexual Abuse o Responsibilities of a First Responder: Allegation of Sexual Harassment o First Responder Legal Liabilities o Officer Kale Revisited o Review o Summary • Section 4: The Investigative Process <ul style="list-style-type: none"> o Types of PREA Investigations o State Law May Drive the Type of Investigation o Steps in PREA Investigation o Sexual Harassment Investigations o First Responder Role in a PREA Investigation o What if I am the Subject of an Allegation? o Summary • Section 5: Conclusion

(b) "Specialized training includes techniques for interviewing sexual abuse victims, Miranda and Garrity warnings, evidence collection in confinement settings and criteria and evidence required to substantiate a case for administrative action or prosecution referral.

(c) The Wichita Transitional Center PAQ states the agency maintains documentation showing that investigators have completed the required training. The number of investigators currently employed who have completed the required training is two.

Through such reviews of investigator training being an annual requirement for the agency, the facility exceeds this standards requirements.

115.235	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Program Director <p>Interviews with the Program Director/PREA Compliance Manager demonstrate the facility does not have medical and or mental health staff or contractors.</p> <p>Site Observation:</p> <p>Medical and mental health staff were not observed at the Wichita Transitional Center.</p> <p>(a) The Wichita Transitional Center PAQ states the facility does not have medical and or mental health staff or contractors.</p>

115.241	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated 3. Wichita Transitional Center PREA Risk Assessment, dated 4. PREA Risk Assessment, dated 9.14.2021 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random residents 2. Targeted residents 3. Case Manager <p>Interviews with the Case Manager demonstrated that risk assessments are completed with each resident within 72 hours of intake; however, within 2 hours of intake. Residents attested to answering questions on the risk assessment and feeling comfortable at the facility.</p> <p>Site Observation:</p> <p>During review of 16 resident files, this Auditor noted each resident had received screening within 72 hours of admission, primarily on the day of admission. Of the 16 files reviewed, each were reassessed within 30 days of admission.</p> <p>(a) The Wichita Transitional Center PAQ states the agency has a policy that requires screening (upon admission to a facility or transfer to another facility) for risk of sexual abuse victimization or sexual abusiveness toward other residents.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 27, section 115.241 a., states, "All residents shall be assessed during an intake screening and upon transfer to another facility for their risk of being sexually abused by other residents or sexually abusive toward other residents."</p> <p>The facility provided a Wichita Transitional Center PREA Risk Assessment. The risk assessment considers the following areas:</p> <ol style="list-style-type: none"> 1. Have you ever been approached for sex/threatened with sexual assault while incarcerated? 2. Have you ever been the victim of sexual assault? 3. Do you have any reason to fear placement in general populations? 4. Younger or elderly resident? (/=65) 5. Small physical stature (men 5'6 and <120 lbs.) (women:5'0" and <118lbs.) 6. Does the resident have a developmental/mental/physical disability? 7. Do you wish to identify as Lesbian, Gay, Bisexual, Transgender, Intersex or Gender Nonconforming? 8. First time offender? 9. Criminal history of sex offenses with adult/child victims? 10. History of consensual sex while incarcerated (add 1 point per incident) 11. History of prior sexual victimization while incarcerated. <p>Score of 3 or more on items 1-11 OR Yes to questions 2, 9, 11= "at risk of victimization"</p> <p>At Risk of Abusiveness</p> <ol style="list-style-type: none"> 12. Convicted sex offender with adult or child victim 13. History of domestic violence as a perpetrator 14. Prior crimes of violence (excluding sex offenses, domestic violence) 15. Incident reports for violent offenses while incarcerated (excluding sexual misconduct) 16. Incident reports for sexual misconduct while incarcerated 17. History of prior sexual abuse perpetration while incarcerated <p>Score of 3 or more on items 12-17 OR Yes to question 12 or 17 = "at risk of abusiveness"</p> <p>(b) The Wichita Transitional Center PAQ states the agency policy requires that residents be screened for risk of sexual victimization or risk of sexually abusing other residents within 72 hours of their intake. The number of residents entering the facility (either through intake or transfer) within the past 12 months (whose length of stay in the facility was for 72 hours or more) who were screened for risk of sexual victimization or risk of sexually abusing other residents within 72 hours of their entry into the facility was 255.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 27, section 115.241 b., states, "Intake screening shall ordinarily take place within 72 hours of arrival at the facility."</p> <p>(c) The Wichita Transitional Center PAQ states the risk assessment is conducted using an objective screening instrument.</p>

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 27, section 115.241 c., states, "The intake screening shall consider, at a minimum, the following criteria to assess residents for risk of sexual victimization:

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

(e) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 28, section 115.241 e., states, "The intake screening shall consider prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to the agency, in assessing residents for risk of being sexually abusive."

(f) The Wichita Transitional Center PAQ states the policy requires that the facility reassess each resident's risk of victimization or abusiveness within a set time period, not to exceed 30 days after the resident's arrival at the facility, based upon any additional, relevant information received by the facility since the intake screening. The number of residents entering the facility (either through intake or transfer) within the past 12 months whose length of stay in the facility was for 30 days or more who were reassessed for their risk of sexual victimization or of being sexually abusive within 30 days after their arrival at the facility based upon any additional, relevant information received since intake was 243, 100%.

The facility provided an electronic version of the PREA Risk Assessment. The risk assessment includes the following information:

- Date of Intake
- Date of Reassessment (30 days after Intake Assessment)
- Date of Reassessment Based on Need
- Risk of Sexual Victimization Factors
 - o Has the Client previously experienced sexual victimization?
 - o Is the Client under 21 years of age or over 65 years of age?
 - o Is the Clients height less than 5'6" and weight less than 140 lbs?
 - o Is this the Clients first incarceration that has lasted longer than 30 days?
 - o Is the Clients criminal history exclusively non-violent?
 - o Does the Client have prior convictions for sex offenses against an adult or child?
 - o Is the Client perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming?
 - o Does the Client have a mental, physical, or developmental disability?
 - o Does the Client perceive himself/herself as vulnerable?
- Risk of Sexual Predator Factors
 - o Does the Client have a history of institutional predatory sexual behavior within the past 10 years?
 - o Does the Client have a history of prior sexual abuse (regardless of conviction)?
 - o Does the Client have a history of convictions for violent offenses within the past 10 years?
 - o Has the Client committed acts of violence within an institution during the past 10 years?
 - o Has the Client committed an act of sexual behavior while incarcerated within the last 10 years (no evidence of coercion or force)?
- What the risk factors indicate:
- What the Predator Risk Factors Indicate:
- 0 "Yes" answers indicate: Non-Victim
- 0k "Yes" answers indicate: Non-Predator
- 1 "Yes" answer indicates: Known Victim
- 1 "Yes" answer indicates: Known Predator
- 2 or more "Yes" answers indicate: Potential Victim
- 2 or more "Yes" answers indicate: Potential Predator
- *If the Client is a Known Victim or Known Predator, Housing Considerations are Needed*
- Were housing considerations needed?
- Signature of person conducting assessment.
- Signed by a Case Manager.

(g) The Wichita Transitional Center PAQ states the policy requires that a resident's risk level be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the resident's risk of sexual victimization or abusiveness.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 28, section 115.241 g., states, "A

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

(h) The Wichita Transitional Center PAQ states the policy prohibits disciplining residents for refusing to answer (or for not disclosing complete information related to) the questions regarding: (a) whether or not the resident has a mental, physical, or developmental disability; (b) whether or not the resident is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender non-conforming; (c) Whether or not the resident has previously experienced sexual victimization; and (d) the resident's own perception of vulnerability.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 28, section 115.241 h., states, "Residents may not be disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section."

(i) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 28, section 115.241 i., states, "The agency shall implement appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the resident's detriment by staff or other residents."

Through such reviews, the facility meets this standards requirements.

115.242	Use of screening information
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated 3. Wichita Transitional Center Memo, dated 9.2021 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Targeted residents 2. Random residents 3. Case Manager <p>Interviews with the Case Manager demonstrated once resident risks are completed, the risk is shared with appropriate departments and not the reason for the risk level. Residents interviewed reporting feeling safe and believing they were not housed based on identification. Although the program had only one gay resident at the time of the onsite, the Case Manager, staff interviewed, and residents spoke of a transgender who was recently released. The transgender was said to have her own private dorm a shower schedule so she could shower when other residents were not and was able to use the UA toilet as it is a private bathroom with just one toilet.</p> <p>(a) The Wichita Transitional Center PAQ states the agency/facility uses information from the risk screening required by §115.241 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 28, section 115.242 a., states, "The agency shall use information from the risk screening required by § 115.241 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive."</p> <p>The facility provided a memorandum, dated on 9.2021, from the Program Director that states the following: "the Wichita Transitional Center will make housing bed, and program assignments based on a case by case, the goal of the facility is keeping separate those residents with a high risk of being sexually victimized from those at high risk of being sexually abusive."</p> <p>(b) The Wichita Transitional Center PAQ states the agency/facility makes individualized determinations about how to ensure the safety of each resident. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 28, section 115.242 b., states, "The agency shall make individualized determinations about how to ensure the safety of each resident."</p> <p>(c) The Wichita Transitional Center PAQ states the agency/facility makes housing and program assignments for transgender or intersex residents in the facility on a case-by-case basis. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 28, section 115.242 c., states, "In deciding whether to assign a transgender or intersex resident to a facility for male or female residents, and in making other housing and programming assignments, the agency shall consider on a case-by-case basis whether a placement would ensure the resident's health and safety, and whether the placement would present management or security problems."</p> <p>(d) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 28, section 115.242 d., states, "A transgender or intersex resident's own views with respect to his or her own safety shall be given serious consideration."</p> <p>(e) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 28, section 115.242 e., states, "Transgender and intersex residents shall be given the opportunity to shower separately from other residents."</p> <p>(f) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 28, section 115.242 f., states, "The agency shall not place lesbian, gay, bisexual, transgender, or intersex residents in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated facility unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such residents."</p> <p>Through such reviews, the facility meets this standards requirements</p>

115.251	Resident reporting
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated 3. No Means No Flyer, not dated 4. Revised No Means No Flyer without toll free and advocate phone numbers 5. Wichita Police Department Victim Assistance Unit Flyer, not dated 6. Sexual Harassment, Sexual Activity, & Sexual Abuse Emergency Action Plan, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random residents 2. Targeted residents 3. Random staff <p>Staff and residents were comfortable reporting verbally to any staff. As reported, residents demonstrated being comfortable talking with the Facility Director/PREA Manager. Each resident interviewed stated he or she would report to staff verbally and or through the numbers posted in the Dorms. PREA posters with internal, external and advocate information were posted in each day room and in each Dorm. Residents are allowed to have their cell phones at all times and may use those phones for reporting purposes.</p> <p>Site Observations:</p> <p>Residents are able to use their cell phones at any time during the day.</p> <p>(a) The Wichita Transitional Center PAQ states the agency has established procedures allowing for multiple internal ways for residents to report privately to agency officials about: (a) sexual abuse or sexual harassment; (b) retaliation by other residents or staff for reporting sexual abuse and sexual harassment; and (c) staff neglect or violation of responsibilities that may have contributed to such incidents.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 28, section 115.251 a., states, "The agency shall provide multiple internal ways for residents to privately report sexual abuse and sexual harassment, retaliation by other residents or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents."</p> <p>The facility provided a No Means No flyer. The flyer speaks to having the right to report and how to report. Reporting options include:</p> <ul style="list-style-type: none"> • Call Wichita Area Sexual Assault Center at 316.263.3002 or advocate@wichitasac.com (removed from revised flyer) • Report to ant staff, volunteer, contractor, or medical or mental health staff. • Submit a grievance or an I-60 form. • Report to the PREA Coordinator or PREA Compliance Manager <ul style="list-style-type: none"> o Corporate PREA Manager 903.630.6291 Ext: 301 / 903.805.7016 o www.csgprograms.com • Tell a family member, friend, legal counsel, or anyone else outside the facility. They can report for on your behalf by calling 316.236.3002. (number now revised to 911) • You can also submit a report on someone's behalf, or someone at the facility can report for you using the ways listed here. <p>The facility provided a revised No Means No flyer as the Auditor discovered the advocate would not report for residents. Residents and staff are now aware they must call 911 to report to an outside agency.</p> <p>Victim Support Services</p> <p>Wichita Transitional Center has partnered with Wichita Area Sexual Assault Center to provide survivors of sexual abuse with emotional support services. To access these services, contact 316.263.3002 or send a letter to: 355 N. Waco, Suite 100 Wichita, KS 67202.</p> <p>On February 1, 2022 at 7:46 pm, the Auditor accessed the www.csgprogram.com website, navigated to the PREA option. Once in the screen, an area exists for Correctional Solutions Group, LLC Zero Tolerance Policy titled PREA Reporting. In the four existing fields, the Auditor completed her name, email address, subject and a message regarding the Auditor's role and to please return the message with an email or phone call explaining the organizations procedure once a report has been submitted through this option.</p> <p>On February 1, 2022 at 7:52 pm, the Auditor phoned the Wichita Area Sexual Assault Center at 316.263.3002. After one ring, the operator answered the call. The Auditor explained the reason for the call. The operator stated she would need to</p>

connect me with an advocate. Once connected with the advocate, the Auditor explained the reason for the call and the advocate stated her role was to talk with victims and or tell them to go to the nearest SANE/SAFE location and she would meet them there. Upon the Auditor asking her what she would do if the caller was a resident reporting abuse, she stated she would need to connect me with the Jail Advocate. The Advocate took down the Auditor's name and phone number and had the Jail Advocate return the call.

At 8:01 pm on February 1, 2022, an advocate, Maria W, stated she was the Jail Sexual Assault Advocate. The Auditor explained the reason for the call and thanked her for calling back so quickly. The Advocate stated as far as the MOU was concerned, they have an initial MOU in place and she hasn't worked with WTC in any capacity. The Advocate then explained the agencies procedure is that the jail would take them to the hospital and run a kit. A normal advocate would meet the victim at the hospital and sit with them through the exam. The Advocate explained they always do follow up for the survivor and she would go visit them a day or two later. When the Auditor asked the Advocate if she would report to the facility for the victim, the Advocate stated she is under no obligation to report for them and would not contact the facility because of the confidentiality agreement. The Advocate explained she would encourage the victim to call the hospital or an inmate coordinator and let the facility know about the abuse and the Advocate would meet the victim at the hospital.

On February 1, 2022, at 8:30 pm, the Auditor completed an online Third Party Report. On February 4, 2022, I received the following email response: "This is XXXX with Correctional Solutions Group, I saw your message about PREA reporting. If you have questions fell free to contact me or our PREA Coordinator Carol Powell her cell is 903.805.7016 and her email is carol.powell@csgprograms.com." The Auditor responded to the email on Monday, February 7, 2022 and left a voice mail for a call back on Friday, February 11, 2022.

On Friday, February 11, 2022 at 4:30 pm, the Auditor received the following email from the agency PREA Coordinator.

This is Carol Powell, PREA Coordinator. As the Coordinator, I am responsible for initiating a PREA investigation when a third-party submits a complaint through the company website. The allegation serves to notify both Mr. S, and Ms. C, but is a call to action to me. Ms. C also contacts me to ensure that I received the complaint. At this point, I call the Facility Administrator – regardless of the time of day or night and they initiate an investigation at the facility.

In addition to the company's website page "Reporting Prison Rape", each facility has an individual page which provides information about how to report a PREA violation directly to the facility or to the contracting agency.

Please feel free to contact me with any additional PREA questions.

Thank you, Carol"

(b) The Wichita Transitional Center PAQ states the agency provides at least one way for residents to report abuse or harassment to a public or private entity or office that is not part of the agency.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 28, section 115.251 b., states, "The agency shall also inform residents of at least one way to report abuse or harassment to a public or private entity or office that is not part of the agency and that is able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials, allowing the resident to remain anonymous upon request."

The facility provided a Wichita Police Department Victim Assistance Unit Flyer. The flyer speaks to:

- The Kansas Crime 10 Victims Bill of Rights
- A hotline number of 316.268.4274
- Email address: mblunck@wichita.gov

(c) The Wichita Transitional Center PAQ states the agency has a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 28, section 115.251 c., states, "Staff shall accept reports made verbally, in writing, anonymously, and from third parties and shall promptly document any verbal reports."

(d) The Wichita Transitional Center PAQ states the agency has established procedures for staff to privately report sexual abuse and sexual harassment of residents. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 28, section 115.251 d., states, "The agency shall provide a method for staff to privately report sexual abuse and sexual harassment of residents."

The facility provided a Sexual Harassment, Sexual Activity, & Sexual Abuse Emergency Action Plan. Page three, section b., states, "Employees reporting Sexual Abuse or Sexual Harassment shall be afforded the opportunity to report such information to the Facility Director/PREA Manager or other facility management privately if requested."

Through such reviews, the facility meets this standards requirements.

115.252	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated 3. Sexual Harassment, Sexual Activity, & Sexual Abuse Emergency Action Plan, not dated 4. Correctional Solutions Group Resident Grievance, Policy 3-A-18, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random Residents 2. Targeted Residents 3. Facility Director/PREA Manager <p>Residents interviewed were aware of the grievance procedures and understood they could complete a grievance.</p> <p>Site Observation:</p> <p>There were zero grievances filed in the last 12 months.</p> <p>(a) The Wichita Transitional Center PAQ states the agency has an administrative procedure for dealing with resident grievances regarding sexual abuse.</p> <p>(b) The Wichita Transitional Center PAQ states the agency policy or procedure allows a resident to submit a grievance regarding an allegation of sexual abuse at any time, regardless of when the incident is alleged to have occurred.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 29, section 115.252 b., states,</p> <ol style="list-style-type: none"> 1. "The agency shall not impose a time limit on when a resident may submit a grievance regarding an allegation of sexual abuse. 2. The agency may apply otherwise-applicable time limits on any portion of a grievance that does not allege an incident of sexual abuse. 3. The agency shall not require a resident to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse. 4. Nothing in this section shall restrict the agency's ability to defend against a lawsuit filed by a resident on the ground that the applicable statute of limitations has expired." <p>The facility provided a Sexual Harassment, Sexual Activity, & Sexual Abuse Emergency Action Plan. The plan includes the following directives to personnel:</p> <ul style="list-style-type: none"> • Order of Responsibility • Command Post • Lines of Authority During Emergencies • Preparedness • Sexual Activity, Sexual Harassment, Sexual Abuse <ul style="list-style-type: none"> o Sexual Activity o Sexual ABUSE by another resident includes o Sexual ABUSE by an Employee, Contractor, or Volunteer • Staff Responsibilities <ul style="list-style-type: none"> o Responsibilities for Reporting All Allegations o Responsibilities When Sexual Activity is Observed o Responsibilities When Sexual Abuse is Discovered o Responsibilities for Evidence Protocol – Medical o Responsibilities for Involving Mental Health Professional(s) o Responsibilities When Allegation of Sexual Abuse Is Reported o Responsibilities for Confidentiality of Information • Required Reporting to Company and Customer Entities • Deactivation Phase • Posting <p>(c) The Wichita Transitional Center PAQ states the agency's policy and procedure allows a resident to submit a grievance alleging sexual abuse without submitting it to the staff member who is the subject of the complaint. The agency's policy and procedure requires that a resident grievance alleging sexual abuse not be referred to the staff member who is the subject of the complaint.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 29, section 115.252 c., states, "The</p>

agency shall ensure that—

1. A resident who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and
2. Such grievance is not referred to a staff member who is the subject of the complaint.”

(d) The Wichita Transitional Center PAQ states the agency policy and procedure requires that a decision on the merits of any grievance or portion of a grievance alleging sexual abuse be made within 90 days of the filing of the grievance. In the past 12 months, the number of grievances filed that alleged sexual abuse was zero.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 29, section 115.252 d., states, “

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

(e) The Wichita Transitional Center PAQ states agency policy and procedure permits third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse and to file such requests on behalf of residents. Agency policy and procedure requires that if a resident declines to have third-party assistance in filing a grievance alleging sexual abuse, the agency documents the resident’s decision to decline. The number of grievances alleging sexual abuse filed by residents in the past 12 months in which the resident declined third-party assistance, containing documentation of the resident’s decision to decline was zero.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 29, section 115.252 e., states, “

1. 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 relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of residents.
2. If a third-party file such a request on behalf of a resident, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.
3. If the resident declines to have the request processed on his or her behalf, the agency shall document the resident’s decision.”

(f) The Wichita Transitional Center PAQ states the agency has a policy and established procedures for filing an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse. Agency policy and procedure for emergency grievances alleging substantial risk of imminent sexual abuse requires an initial response within 48 hours. The number of emergency grievances alleging substantial risk of imminent sexual abuse that were filed in the past 12 months was zero. The agency’s policy and procedure for emergency grievances alleging substantial risk of imminent sexual abuse requires that a final agency decision be issued within 5 days. The number of grievances alleging substantial risk of imminent sexual abuse filed in the past 12 months that reached final decisions within 5 days was zero.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 29, section 115.252 f., states, “

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

Correctional Solutions Group Resident Grievance, Policy 3-A-18, page 3, section Emergency Grievances, states,

“Processing for emergency grievances will begin with the initial determination by the designated grievance coordinator that the issue raised is a life-threatening situation. Emergency grievances will be given top priority and will be investigated and responded to within twenty-four hours of the date of receipts.

Page 3, section PREA Requirements states, “The following is required for processing and handling PREA related grievances filed on behalf of sexual abuse/sexual harassment concerns. These requirements supersede requirement in this policy for

non-PREA related grievances.

1. There is no time limit imposed on when a resident may submit a grievance regarding an allegation of sexual abuse.
2. Residents shall not be required to use any informal process to resolve the grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse.

(g) The Wichita Transitional Center PAQ states the agency has a written policy that limits its ability to discipline a resident for filing a grievance alleging sexual abuse to occasions where the agency demonstrates that the resident filed the grievance in bad faith. In the past 12 months, the number of resident grievances alleging sexual abuse that resulted in disciplinary action by the agency against the resident for having filed the grievance in bad faith was zero.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 29, section 115.252 f., states, "The agency may discipline a resident for filing a grievance related to alleged sexual abuse only where the agency demonstrates that the resident filed the grievance in bad faith.

Through such reviews, the facility meets this standards requirements.

115.253	Resident access to outside confidential support services
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated 3. Wichita Transitional Center Residential Re-entry Center Resident Handbook, dated 8.2020 4. Memorandum of Understanding with the Wichita Area Sexual Assault Center, dated 11.15.2021 5. No Means No Flyer, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random residents 2. Targeted residents 3. Random staff <p>Staff and residents interviewed informally and formally were aware of outside advocates. Residents reported being quite thankful that such a service was provided to them.</p> <p>(a) The Wichita Transitional Center PAQ states the facility provides residents with access to outside victim advocates for emotional support services related to sexual abuse. The facility provides residents with access to such services by giving residents mailing addresses and telephone numbers (including toll-free hotline numbers where available) for local, state, or national victim advocacy or rape crisis organizations. The facility provides residents with access to such services by enabling reasonable communication between residents and these organizations in as confidential a manner as possible.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 29, section 115.253 a., states, "The facility shall provide residents with access to outside victim advocates for emotional support services related to sexual abuse by giving residents mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations, and by enabling reasonable communication between residents and these organizations, in as confidential a manner as possible."</p> <p>The facility provided a Wichita Transitional Center Residential Re-entry Center Resident Handbook. Page 9 of the handbook provides residents the National Sexual Assault Hotline with a toll free number of 1.800.656.4673.</p> <p>The facility provided a No Means No flyer. The flyer contains the following information:</p> <ul style="list-style-type: none"> • Call Wichita Area Sexual Assault Center at 316.263.3002 or advocate@wichitasac.com (removed from revised flyer) • Report to ant staff, volunteer, contractor, or medical or mental health staff. • Submit a grievance or an I-60 form. • Report to the PREA Coordinator or PREA Compliance Manager <ul style="list-style-type: none"> o Corporate PREA Manager 903.630.6291 Ext: 301 / 903.805.7016 o www.csgprograms.com • Tell a family member, friend, legal counsel, or anyone else outside the facility. They can report for on your behalf by calling 316.236.3002. (number now revised to 911) • You can also submit a report on someone's behalf, or someone at the facility can report for you using the ways listed here. <p>The facility provided a revised No Means No flyer as the Auditor discovered the advocate would not report for residents. Residents and staff are now aware they must call 911 to report to an outside agency.</p> <p>(b) The Wichita Transitional Center PAQ states the facility informs residents, prior to giving them access to outside support services, of the extent to which such communications will be monitored.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 29, section 115.253 b., states, "The facility shall inform residents, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws."</p> <p>The facility provided the facility provided a Wichita Transitional Center Residential Re-entry Center Resident Handbook. Page 9, second paragraph states, "The facility resident phone system is a regular phone system, not an inmate phone system (monitored call system), therefore calls to any of the above organizations are not monitored. Calls made to National Sexual Assault Hotline for outside victim advocate support or to report sexual abuse/sexual harassments are free trough their toll-free number."</p> <p>The facility provided a No Means No flyer. The flyer has the following advocate information: Wichita Area Sexual Assault Center 355 N. Waco, Suite 100</p>

Wichita, KS 67202
316.263.3002

(c) The Wichita Transitional Center PAQ states the agency or facility maintains memorandum of understanding (MOUs) or other agreements with community service providers that are able to provide residents with emotional support services related to sexual abuse.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 29, section 115.253 c., states, "The agency shall maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide residents with confidential emotional support services related to sexual abuse. The agency shall maintain copies of agreements or documentation showing attempts to enter into such agreements."

The facility provided a Memorandum of Understanding (MOU) with the Wichita Area Sexual Assault Center. Although the MOU is currently dated 11.15.2021 and states they will provide Emotional Support, a phone call to an Advocate demonstrated they would not report due to confidentiality purposes. This has been discussed with facility and agency staff. The agency has changed No Means No flyers and made facility staff and residents aware 911 must be dialed to report abuse if internal options are not used.

Through such reviews, the facility meets this standards requirements.

115.254	Third party reporting
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated 3. No Means No Flyer, not dated 4. Revised No Means No Flyer, not dated 5. Agency web address is: www.csgprograms.com <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random residents 2. Targeted residents 3. Random staff 4. Shift Supervisor's <p>Residents and staff interviewed demonstrated their reporting knowledge of third party reporting stating that resident family members, friends and or legal counsel could report sexual harassment or sexual abuse allegations.</p> <p>Site Observation:</p> <p>During tours of visitation areas PREA Zero-tolerance flyers were present. Flyers included contact information and instruction for third party reporting. Family members can also scan the URL code which gives them access to both the residents case manager and the facility website for PREA reporting.</p> <p>(a) The Wichita Transitional Center PAQ states the agency or facility provides a method to receive third-party reports of resident sexual abuse or sexual harassment. The agency or facility publicly distributes information on how to report resident sexual abuse or sexual harassment on behalf of residents.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 31, section 115.254 a., states, "The agency shall establish a method to receive third-party reports of sexual abuse and sexual harassment and shall distribute publicly information on how to report sexual abuse and sexual harassment on behalf of a resident."</p> <p>The facility provided a No Means No flyer. The flyer has the following third party reporting information.</p> <ul style="list-style-type: none"> • Report to the PREA Coordinator or PREA Compliance Manager: <ul style="list-style-type: none"> o Corporate PREA Manager 903.630.6291 Ext. 301 / 903.805.7016 o www.csgprograms.com – (Program was emailed on 2.1.2022 no response.) • Tell a family member, friend, legal counsel, or anyone else outside the facility. They can report on your behalf by calling 316.263.3002 – Not a good number as advocate will not report. (see notes below for revisions) • You can also submit a report on someone's behalf, or someone at the facility can report for you using the ways listed here. <p>The facility provided a revised No Means No flyer as the Auditor discovered the advocate would not report for residents. Residents and staff are now aware they must call 911 to report to an outside agency.</p> <ul style="list-style-type: none"> • Call Wichita Area Sexual Assault Center at 316.263.3002 or advocate@wichitasac.com (removed from revised flyer) • Report to ant staff, volunteer, contractor, or medical or mental health staff. • Submit a grievance or an I-60 form. • Report to the PREA Coordinator or PREA Compliance Manager <ul style="list-style-type: none"> o Corporate PREA Manager 903.630.6291 Ext: 301 / 903.805.7016 o www.csgprograms.com • Tell a family member, friend, legal counsel, or anyone else outside the facility. They can report for on your behalf by calling 316.236.3002. (number now revised to 911) • You can also submit a report on someone's behalf, or someone at the facility can report for you using the ways listed here. <p>The agency web address is www.csgprograms.com</p> <p>Through such reviews, the facility meets this standards requirements.</p>

115.261	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated 3. Correctional Solutions Group Employee Sexual Misconduct Acknowledgment, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random residents 2. Targeted residents 3. Random staff 4. Specialized staff 5. Senior Case Manager 6. Facility Director/PREA Manager <p>Interviews with each staff and residents interviewed demonstrated each actively practices and understood the importance of immediately reporting all allegations of sexual abuse and sexual harassment.</p> <p>Site Observations:</p> <p>Staff reporting documentation of resident information, incident reports and investigations being completed in the facility database demonstrated reports of allegation would be addressed timely.</p> <p>(a) The Wichita Transitional Center PAQ states the agency requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency. The agency requires all staff to report immediately and according to agency policy retaliation against residents or staff who reported such an incident. The agency requires all staff to report immediately and according to agency policy any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 31, section 115.261 a., states, "The agency shall require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency; retaliation against residents or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation."</p> <p>The facility provided a Correctional Solutions Group Employee Sexual Misconduct Acknowledgment. The acknowledgment stipulates the following for employees:</p> <ul style="list-style-type: none"> • Employees are required to report any and all incidents of sexual misconduct or alleged sexual misconduct immediately to their supervisor or available manager. The Director will be made aware of all allegations of sexual misconduct within 24 hours of the time of the incident is reported. • Offenders are encouraged to report or relate concerns regarding any incident or allegation of sexual misconduct immediately to any Department employee without fear of retaliation. • Retaliation against any employee or offender for filing a complaint, reporting an incident or allegations, or participating in an investigation is strictly prohibited. Violations will result in disciplinary action, as set forth in this policy. <p>(b) The Wichita Transitional Center PAQ states, apart from reporting to designated supervisors or officials and designated state or local services agencies, agency policy prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 31, section 115.261 b., states, "Apart from reporting to designated supervisors or officials, staff shall not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions."</p> <p>(c) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 31, section 115.261 c., states, "Unless otherwise precluded by Federal, State, or local law, medical and mental health practitioners shall be required to report sexual abuse pursuant to paragraph (a) of this section and to inform residents of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services."</p> <p>(d) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 31, section 115.261 d., states, "If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable person's statute, the</p>

agency shall report the allegation to the designated State or local services agency under applicable mandatory reporting laws.”

(e) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 31, section 115.261 e., states, “The facility shall report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility’s designated investigators.”

Through such reviews, the facility meets this standards requirements.

115.262	Agency protection duties
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Senior Case Manager 2. Facility Director/PREA Manager <p>Interviews with the Facility Director/PREA Manager and facility investigators demonstrated the facility staff would act promptly and properly respond at the discovery of an incident.</p> <p>(a) The Wichita Transitional Center PAQ states when the agency or facility learns that a resident is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the resident. In the past 12 months, the number of times the agency or facility determined that a resident was subject to a substantial risk of imminent sexual abuse was zero.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 31, section 115.262 a., states, "When an agency learns that a resident is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the resident.</p> <p>Through such reviews the facility meets this standards requirements.</p>

115.263	Reporting to other confinement facilities
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Facility Director/PREA Manager <p>The interview with the Facility Director demonstrated that she was aware that upon receiving an allegation that a resident was sexually abused while confined at another facility, she had the responsibility to notify the head of the facility where the allegation occurred.</p> <p>(a) The Wichita Transitional Center PAQ states the agency has a policy requiring that, upon receiving an allegation that a resident was sexually abused while confined at another facility, the head of the facility must notify the head of the facility or appropriate office of the agency or facility where sexual abuse is alleged to have occurred. During the past 12 months, the number of allegations the facility received that a resident was abused while confined at another facility was three.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 31, section 115.263 a., states, "Upon receiving an allegation that a resident was sexually abused while confined at another facility, the head of the facility that received the allegation shall notify the head of the facility or appropriate office of the agency where the alleged abuse occurred."</p> <p>(b) The Wichita Transitional Center PAQ states the agency policy requires the facility head to provide such notification as soon as possible, but no later than 72 hours after receiving the allegation.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 31-32, section 115.263 b., states, "Such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation."</p> <p>(a) The Wichita Transitional Center PAQ states the agency or facility documents that it has provided such notification within 72 hours of receiving the allegation.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 32, section 115.263 c., states, "The agency shall document that it has provided such notification."</p> <p>(b) The Wichita Transitional Center PAQ states the agency or facility policy requires that allegations received from other facilities and agencies are investigated in accordance with the PREA standards. In the past 12 months, the number of allegations of sexual abuse the facility received from other facilities was zero.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 32, section 115.263 d., states, "The facility head or agency office that receives such notification shall ensure that the allegation is investigated in accordance with these standards."</p> <p>Through such reviews the facility meets this standards requirements.</p>

115.264	Staff first responder duties
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random staff 2. Specialized staff 3. Senior Case Manager/Facility Investigator <p>Interviews with each staff interviewed demonstrated they were aware of their first responder responsibilities. Staff stated reporting information is posted in day rooms and they have access to the Emergency Action Manual. The Senior Case Manager/Facility Investigator concurred when staff and report allegations of abuse, each would respond as is designed through facility protocols.</p> <p>Site Observation:</p> <p>There were no reports of abuse at the facility since opening in December of 2020.</p> <p>(a) The Wichita Transitional Center PAQ states the agency has a first responder policy for allegations of sexual abuse. The policy requires that, upon learning of an allegation that a resident was sexually abused, the first security staff member to respond to the report shall be required to separate the alleged victim and abuser. The policy requires that, upon learning of an allegation that a resident was sexually abused, the first security staff member to respond to the report shall be required to preserve and protect any crime scene until appropriate steps can be taken to collect any evidence. The policy requires that, upon learning of an allegation that a resident was sexually abused and the abuse occurred within a time period that still allows for the collection of physical evidence, the first security staff member to respond to the report shall be required to request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. The policy requires that, upon learning of an allegation that a resident was sexually abused and the abuse occurred within a time period that still allows for the collection of physical evidence, the first security staff member to respond to the report shall be required to ensure that the alleged abuser not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. The PAQ states the facility has not had any allegations of abuse.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 32, section 115.264 a., states, "Upon learning of an allegation that a resident was sexually abused, the first security staff member to respond to the report shall be required to:</p> <ol style="list-style-type: none"> 1. Separate the alleged victim and abuser; 2. Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence; 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; and 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>(b) The Wichita Transitional Center PAQ states the facility's' policy requires that if the first staff responder is not a security staff member, that responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and notify security staff. Of the allegations that a resident was sexually abused made in the past 12 months, the number of times a non-security staff member was the first responder was zero.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 32, section 115.264 b., states, "If the first staff responder is not a security staff member, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and then notify security staff."</p> <p>Through such reviews, the facility meets this standards requirements.</p>

115.265	Coordinated response
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random staff 2. Investigative staff 3. Facility Director/PREA Manager <p>Interviews with the random and specialized staff demonstrated the response to allegations of sexual assault is written in the Emergency Action Manual to coordinate actions taken in response to sexual abuse and sexual harassment incidents.</p> <p>(a) The Wichita Transitional Center PAQ states the facility has developed a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 32, section 115.265, states, "The facility shall develop a written institutional plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators, and facility leadership."</p> <p>Through such reviews, the facility meets this standards requirements.</p>

115.266	Preservation of ability to protect residents from contact with abusers
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated <p>(a) The Wichita Transitional Center PAQ states the agency, facility, or any other governmental entity is not responsible for collective bargaining on the agency's behalf has not entered into or renewed any collective bargaining agreement or other agreement since August 20, 2012, or since the last PREA audit, whichever is later.</p> <p>Through such reviews, the facility meets this standards requirements.</p>

115.267	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Facility Director/PREA Manager <p>The interview with the Facility Manager/PREA Manager demonstrated she would complete retaliation monitoring for the agency. The Facility Director/PREA Manager stated she would check in once a month for at least 90 days and or as long as was necessary and document those notes in the resident program plan.</p> <p>(a) The Wichita Transitional Center PAQ states the agency has a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff. The agency designates staff member(s) or charges department(s) with monitoring for possible retaliation. Monitoring is completed by the Program Director.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 33, section 115.267 a., states, "The agency shall establish a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff and shall designate which staff members or departments are charged with monitoring retaliation."</p> <p>(b) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 33, section 115.267 b., states, "The agency shall employ multiple protection measures, such as housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations."</p> <p>(c) The Wichita Transitional Center PAQ states the facility monitors the conduct or treatment of Residents or staff who reported sexual abuse and of residents who were reported to have suffered sexual abuse to ascertain if there are any changes that may suggest possible retaliation by Residents or staff. The facility will monitor conduct or treatment until the Resident is discharged. The facility acts promptly to remedy any such retaliation. In the past 12 months, the facility has had zero incidents of retaliation.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 33, section 115.267 c., states, "For at least 90 days following a report of sexual abuse, the agency shall monitor the conduct and treatment of residents or staff who reported the sexual abuse and of residents who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff, and shall act promptly to remedy any such retaliation. Items the agency should monitor include any resident disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. The agency shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need."</p> <p>(d) The Wichita Transitional Center PAQ states the agency/facility monitors the conduct or treatment of residents or staff who reported sexual abuse and of residents who were reported to have suffered sexual abuse to see if there are any changes that may suggest possible retaliation by residents or staff. The number of times an incident of retaliation occurred in the past 12 months was zero.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 33, section 115.267 d., states, "In the case of residents, such monitoring shall also include periodic status checks. "</p> <p>(e) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 33, section 115.267 e., states, "If any other individual who cooperates with an investigation expresses a fear of retaliation, the agency shall take appropriate measures to protect that individual against retaliation."</p> <p>(f) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 33, section 115.267 f., states, "An agency's obligation to monitor shall terminate if the agency determines that the allegation is unfounded."</p> <p>Through such reviews, the facility meets this standards requirements.</p>

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

1. Wichita Transitional Center PAQ
2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated

Interviews:

1. Senior Case Manager/Facility Investigator
2. Facility Director/PREA Manager

The investigator clearly articulated processes required during an investigation, to include a thorough review and in-depth documentation process.

Site Observation:

There were no reports of abuse at the facility since opening in December of 2020.

(a) The Wichita Transitional Center PAQ states the agency/facility has a policy related to criminal and administrative agency investigations.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 33, section 115.271 a., states, "When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, it shall do so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports."

(b) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 33, section 115.271 b., states, "Where sexual abuse is alleged, the agency shall use investigators who have received special training in sexual abuse investigations pursuant to § 115.234."

(c) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 33-34, section 115.271 c., states, "Investigators shall gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator."

(d) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 34, section 115.271 d., states, "When the quality of evidence appears to support criminal prosecution, the agency shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution."

(e) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 34, section 115.271 e., states, "The credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person's status as resident or staff. No agency shall require a resident who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation."

(f) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 34, section 115.271 f., states, "Administrative investigations:

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

(g) The Wichita Transitional Center PAQ states substantiated allegations of conduct that appear to be criminal are referred for prosecution. The number of substantiated allegations of conduct that appear to be criminal that were referred for prosecution since the last PREA audit, was zero.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 34, section 115.271 g., states, "Criminal investigations shall be 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."

(h) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 34, section 115.271 h, states, "Substantiated allegations of conduct that appears to be criminal shall be referred for prosecution."

(i) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 34, section 115.271 i., states, "The agency shall retain all written reports referenced in paragraphs (f) and (g) of this section for as long as the alleged abuser is incarcerated or employed by the agency, plus five years."

(j) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 34, section 115.271 j., states, "The departure of the alleged abuser or victim from the employment or control of the facility or agency shall not provide a basis for terminating an investigation."

(k) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 34, section 115.271 k. states, "Any State entity or Department of Justice component that conducts such investigations shall do so pursuant to the above requirements."

(l) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 34, section 115.271 l., states, "When outside agencies investigate sexual abuse, the facility shall cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation."

Through such reviews, the facility meets this standards requirements.

115.272	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Facility Investigator <p>The interview with an agency investigator demonstrated the facility shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>(a) The Wichita Transitional Center PAQ Bureau states the agency imposes a standard of a preponderance of the evidence or a lower standard of proof for determining whether allegations of sexual abuse or sexual harassment are substantiated. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 34, section 115.272, states, "The agency shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated."</p> <p>Through such reviews, the facility meets this standards requirements.</p>

115.273	Reporting to residents
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated 3. Correctional Solutions Group PREA Investigational Summary Report, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Senior Case Manager/Facility Investigator 2. Facility Director/PREA Manager <p>Interviews with a Senior Case Manager/Facility Investigator and the Facility Director/PREA Manager demonstrated notification requirements to victims would be provided in writing with documentation of each notification.</p> <p>(a) The Wichita Transitional Center PAQ states the agency has a policy requiring that any resident who makes an allegation that he or she suffered sexual abuse in an agency facility is informed, verbally or in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation by the agency. The number of criminal and/or administrative investigations of alleged resident sexual abuse that were completed by the agency/facility in the past 12 months was zero.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 34-35, section 115.273 a., states, "Following an investigation into a resident's allegation of sexual abuse suffered in an agency facility, the agency shall inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded."</p> <p>The facility provided a Correctional Solutions Group PREA Investigational Summary Report template. The template instructs the facility investigator to complete and ensure the following:</p> <ul style="list-style-type: none"> • Resident Name:/Admission Date: • Investigation Start Date • Investigation Conclusion Date • Investigation Staff: Name/Title/CSG • Report completed by: Name/Title • Report Distribution: Date of distribution and Name, Title of persons distributed to: Instruction to distribute to CSG's COO, Facility Administrator, Facility Assistant Administrator, PREA Coordinator, Contracting Agency's designated management staff • Relevant PREA Standards and definitions • Allegation details to include names of victims, abuser(s), witnesses and dates • Summary of Investigation • Conclusion • Notation: Include other pertinent information such as the alleged victim or perpetrator is no longer at the facility, release date, and reason for release • Corrective Action • Law Enforcement involvement • Determination of staff actions or failures to act or contribute • Resident access to confidential outside support services; Offering mental health care for sexual abuse victims • Informing residents victims of sexual abuse of the Investigation findings • Sexual Abuse Incident Review <p>(b) The Wichita Transitional Center PAQ states an outside entity conducts such investigations; the agency requests the relevant information from the investigative entity in order to inform the resident of the outcome of the investigation. The number of investigations of alleged resident sexual abuse in the facility that were completed by an outside agency in the past 12 months was four. Of the outside agency investigations of alleged sexual abuse that were completed in the past 12 months, the number of residents alleging sexual abuse in the facility who were notified verbally or in writing of the results of the investigation was zero. The facility refers all criminal investigations to the Wichita Police Department.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 35, section 115.273 b., states, "If the agency did not conduct the investigation, it shall request the relevant information from the investigative agency in order to inform the resident."</p> <p>(c) The Wichita Transitional Center PAQ states following a resident's allegation that a staff member has committed sexual abuse against the resident, the agency/facility subsequently informs the resident (unless the agency has determined that the allegation is unfounded) whenever: (a) the staff member is no longer posted within the resident's unit; (b) the staff member is</p>

no longer employed at the facility; (c) the agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or (d) the agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility.

There has been zero substantiated or unsubstantiated complaint of sexual abuse committed by a staff member against a resident in an agency facility in the past 12 months.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 35, section 115.273 c., states, "Following a resident's allegation that a staff member has committed sexual abuse against the resident, the agency shall subsequently inform the resident (unless the agency has determined that the allegation is unfounded) whenever:

1. The staff member is no longer posted within the resident'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 facility; or
4. The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility."

(d) The Wichita Transitional Center PAQ states following a resident's allegation that he or she has been sexually abused by another resident in an agency facility, the agency subsequently informs the alleged victim whenever: (a) the agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or (b) the agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 35, section 115.273 d., states, "Following a resident's allegation that he or she has been sexually abused by another resident, the agency shall subsequently inform the alleged victim whenever:

1. The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or
2. The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility."

(e) The Wichita Transitional Center PAQ states the agency has a policy that all notifications to residents described under this standard are documented. In the past 12 months, there has been six notifications to a resident, pursuant to this standard. Of those motivations, in the past 12 months, six were documented.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 35, section 115.273 e., states, "All such notifications or attempted notifications shall be documented."

Through such reviews, the facility meets this standards requirements.

115.276	Disciplinary sanctions for staff
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Facility Director/PREA Manager <p>Through review of investigations with the Facility Director/PREA Manager demonstrated there were zero staff who were disciplined for violation of an agency sexual abuse or sexual harassment policy.</p> <p>(a) The Wichita Transitional Center PAQ states staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 35, section 115.276 a., states, "Staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies."</p> <p>(b) The Wichita Transitional Center PAQ states in the last 12 months, there has been zero staff from the facility that had violated agency sexual abuse or sexual harassment policies.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 35, section 115.276 b., states, "Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse."</p> <p>(c) The Wichita Transitional Center PAQ states 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 acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. In the past 12 months there have zero staff requiring discipline for sexual abuse or sexual harassment. Policy compliance can be found in provision (a) of this standard.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 35, section 115.276 c., states, "Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than engaging in sexual abuse) shall be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories."</p> <p>(d) The Wichita Transitional Center PAQ states 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 agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies. In the past 12 months, zero staff have been terminated for sexual abuse or harassment. Policy compliance can be found in provision (a) of this standard.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 35, section 115.276 d., states, "All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies."</p> <p>Through such reviews, the facility meets this standards requirements.</p>

115.277	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated <p>Site Observation:</p> <p>The facility did not have any volunteers or contractors subject to disciplinary action due to violating sexual abuse or sexual harassment policies. Currently the facility does not have any contractors or volunteers.</p> <p>(a) The Wichita Transitional Center PAQ states agency policy requires that any contractor or volunteer who engages in sexual abuse be reported to law enforcement agencies (unless the activity was clearly not criminal) and to relevant licensing bodies. Agency policy requires that any contractor or volunteer who engages in sexual abuse be prohibited from contact with residents. In the past 12 months, contractors or volunteers have not been reported to law enforcement agencies and relevant licensing bodies for engaging in sexual abuse of residents. In the past 12 months, the number of contractors or volunteers reported to law enforcement for engaging in sexual abuse of residents was zero.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 36, section 115.277 a., states, "Any Wichita Transitional Center or volunteer who engages in sexual abuse shall be prohibited from contact with residents and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies."</p> <p>(b) The Wichita Transitional Center PAQ the facility takes appropriate remedial measures and considers whether to prohibit further contact with Residents in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 36, section 115.277 b., states, "The facility shall take appropriate remedial measures and shall consider whether to prohibit further contact with residents, in the case of any other violation of agency sexual abuse or sexual harassment policies by a Wichita Transitional Center or volunteer."</p> <p>Through such reviews, the facility meets this standards requirements.</p>

115.278	Disciplinary sanctions for residents
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Facility Director/PREA Manager <p>An interview with the Facility Director/PREA Manager demonstrated residents who falsely reported PREA allegations would be moved back to in care custody.</p> <p>(a) The Wichita Transitional Center PAQ states residents are subject to disciplinary sanctions only pursuant to a formal disciplinary process following an administrative finding that a resident engaged in resident-on-resident sexual abuse. Residents are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for resident-on-resident sexual abuse. In the past 12 months, the number of administrative findings of resident-on-resident sexual abuse that have occurred at the facility was zero. In the past 12 months, the number of criminal findings of guilt for resident-on-resident sexual abuse that have occurred at the facility was zero.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 36, section 115.278 a., states, "Residents shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the resident engaged in resident-on-resident sexual abuse or following a criminal finding of guilt for resident-on-resident sexual abuse."</p> <p>(b) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 36, section 115.278 b., states, "Sanctions shall be commensurate with the nature and circumstances of the abuse committed, the resident's disciplinary history, and the sanctions imposed for comparable offenses by other residents with similar histories. "</p> <p>(c) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 36, section 115.278 c., states, "The disciplinary process shall consider whether a resident's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed."</p> <p>(d) The Wichita Transitional Center PAQ states 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 agencies (unless the activity was clearly not criminal) and to any relevant licensing bodies. In the past 12 months, the number of staff from the facility that have been reported to law enforcement or licensing boards following their termination has been zero.</p> <p>(e) The Wichita Transitional Center PAQ states the agency disciplines residents for sexual conduct with staff only upon finding that the staff member did not consent to such contact.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 36, section 115.278 e., states, "The agency may discipline a resident for sexual contact with staff only upon a finding that the staff member did not consent to such contact."</p> <p>(f) The Wichita Transitional Center PAQ states the agency prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 36, section 115.278 f., states, "For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence enough to substantiate the allegation. "</p> <p>(g) The Wichita Transitional Center PAQ states the agency prohibits all sexual activity between residents. The agency deems such activity to constitute sexual abuse only if it determines that the activity is coerced."</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 36, section 115.278 g., states, "An agency may, in its discretion, prohibit all sexual activity between residents and may discipline residents for such activity. An agency may not, however, deem such activity to constitute sexual abuse if it determines that the activity is not coerced."</p> <p>Through such reviews, the facility meets this standards requirements.</p>

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

1. Wichita Transitional Center PAQ
2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated
3. Memorandum of Understand with the Wichita Area Sexual Assault Center, dated 11.10.2021
4. Forensic Nursing Department Agreement Email Notification, dated 6.29.2021

Interviews:

1. Case Manager
2. Facility Director/PREA Manager

Interviews with specialized staff demonstrated disclosure reports are reported to the Facility Director/PREA Manager and Case Managers. Documentation of disclosures and follow up appointments would be documented in resident program plans.

Site Observation:

A review of resident files demonstrated resident disclosures are documented and follow up medical and or mental health appointments are offered and documented.

(a) The Wichita Transitional Center PAQ states resident victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. The nature and scope of such services are determined by medical and mental health practitioners according to their professional judgment.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 37, section 115.282 a., states, "Resident victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment."

The facility provided a Memorandum of Understand with the Wichita Area Sexual Assault Center/ The advocacy center attests to providing the following for the Wichita Transitional Center:

1. Advocacy on a walk-in basis during office hours 8:30 – 5:00 pm Monday – Friday
2. 24/7/365 Crisis Hotline
3. Emergency Shelter, short-term assistance immediately following a sexual assault
4. Hospital Accompaniment/Medical Advocacy (available 24/7 all year round) include medical Forensic Exams conducted by a SANE medical staff.
5. Court/Law enforcement advocacy regarding sexual assault
6. Assistance with Crime Victim Compensation
7. Information of Community Resource
8. Emotional Support
9. And the most important, making sure no one goes through this alone.

The facility provided a Forensic Nursing Department Agreement Email Notification. The email notification states, "Thank you for reaching out to me regarding our SANE/SART program at Ascension Via Christi St. Joseph. Our program does examinations, evidence collection, and forensic photography on patients that have been sexually assaulted. In order to collect evidence, we need to see the patient within five days of being assaulted. Beyond that we are not able to collect evidence.

We also see patients that are victims of Domestic Violence, Assault, Human Trafficking, Elder Abuse, and Child Abuse. In order for a patient to be seen by our Forensic Nursing Department they need to check in through the Emergency Department. We are located at 3600 E. Harry. We have a Forensic Nurse available 24 hours a day seven days a week.

As discussed in our conversation, if a patient is needing post assault counseling, we recommend contacting the Wichita Area Sexual Assault Center (WASAC). They provide advocacy and many other programs that are nice for the patients. They have a 24hr7dayy a week hotline. That number is 316.263.3002.

Signed, Cathy Manlier, BSN, RN
Sexual Assault Nurse Examiner
Via Christi Forensic Nursing Department
3600 E. Harry
Wichita, KS 67208
316.689.5252

(b) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 37, section 115.282 b., states, "If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders shall take preliminary steps to protect the victim pursuant to § 115.262 and shall immediately notify the appropriate medical and mental health practitioners."

(c) The Wichita Transitional Center PAQ states, resident victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 37, section 115.282 c., states, "Resident victims of sexual abuse while incarcerated shall be offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate."

(d) The Wichita Transitional Center PAQ states, treatment services are provided to every victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 37, section 115.282 d., states, "Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident."

Through such reviews, the facility meets this standards requirements.

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>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Targeted residents 2. Random staff 3. Case Manager <p>Interviews with specialized and random staff and residents demonstrated that each interviewed are aware of access to emergency medical and mental health services. Of the one resident who disclosed, he was already scheduled for weekly counseling pertaining to the disclosure and facility staff were aware this was part of the residents' transition plan.</p> <p>(a) The Wichita Transitional Center PAQ states the facility offers 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.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 37, section 115.283 a., states, "The facility shall offer medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility."</p> <p>(b) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 37, section 115.283 b., states, "The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody."</p> <p>(c) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 37, section 115.283 c., states, "The facility shall provide such victims with medical and mental health services consistent with the community level of care."</p> <p>(d) The Wichita Transitional Center PAQ states female victims of sexually abusive vaginal penetration while incarcerated are offered pregnancy tests.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 37, section 115.283 d., states, "Resident victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests."</p> <p>(f) The Wichita Transitional Center PAQ states resident victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 37, section 115.283 f., states, "Resident victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections as medically appropriate."</p> <p>(g) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 37, section 115.283 g., states, "Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident."</p> <p>(h) This Wichita Transitional Center PAQ states the facility does not attempt to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offers treatment when deemed appropriate by mental health practitioners.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 37, section 115.283 h., states, "The facility shall attempt to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners."</p> <p>Through such reviews, the facility meets this standards requirements.</p>

115.286	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated 3. Correctional Solutions Group PREA Investigational Summary Report, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Senior Case Manager/Facility Investigator 2. Facility Director/PREA Manager <p>The team on-site clearly articulated how they would review of all incidents reported and investigations of sexual harassment and sexual abuse.</p> <p>(a) The Wichita Transitional Center PAQ states the facility conducts a sexual abuse incident review at the conclusion of every criminal or administrative sexual abuse investigation, unless the allegation has been determined to be unfounded. In the past 12 months there has been seven criminal and or administrative investigations of alleged sexual abuse completed at the facility,</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 38, section 115.286 a., states, "The facility shall conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded."</p> <p>The facility provided a Correctional Solutions Group PREA Investigational Summary Report template. Page 3, last paragraph states, "PREA Standard 115.286 states a sexual abuse incident review will be conducted within 30 days of the conclusion of every sexual abuse investigation, unless the allegation was determined to be unfounded. The review team shall include upper-level management officials, with input from line supervisors, investigators (including law enforcement if applicable and willingness to participate), and medical or mental health practitioners. The findings of sexual abuse being (substantiated; unsubstantiated-whichever applies) with this incident, will necessitate this incident review to be conducted. The review will be coordinated and conducted by names of staff no later than date, 30 days from the conclusion of the investigation. They will prepare a report with the findings to include any recommendations for improvement and submit the report to (name of PREA Coordinator, CSG's COO, and name of contracting agency contact person) no later than date (two weeks after the 30-day deadline for conducting the review). The report will cover all parameters specifically stated in PREA standard 115.286 (d)(1)(2)(3)(4) and (5)."</p> <p>(b) The Wichita Transitional Center PAQ states sexual abuse incident reviews are ordinarily conducted within 30 days of concluding the criminal or administrative investigation. In the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility that were followed by a sexual abuse incident review within 30 days, excluding only "unfounded" incidents were zero.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 38, section 115.286 b., states, "Such review shall ordinarily occur within 30 days of the conclusion of the investigation."</p> <p>(c) The Wichita Transitional Center PAQ states the sexual abuse incident review team includes upper-level management officials and allows for input from line supervisors, investigators, and medical or mental health practitioners.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 38, section 115.286 c., states, "The review team shall include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners."</p> <p>(d) The Wichita Transitional Center PAQ states the facility prepares a report of its findings from sexual abuse incident reviews, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1)-(d)(5) of this section, and any recommendations for improvement and submits such report to the facility head and PREA Coordinator.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 38, section 115.286 d., states, "The review team shall:</p> <ol style="list-style-type: none"> 1. Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; 2. Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility; 3. Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may

enable abuse;

4. Assess the adequacy of staffing levels in that area during different shifts;

5. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and

6. Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1)-(d)(5) of this section, and any recommendations for improvement, and submit such report to the facility head and PREA compliance manager.”

(e) The Wichita Transitional Center PAQ states, the facility implements the recommendations for improvement or documents its reasons for not doing so.

Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 38, section 115.286 e., states, “The facility shall implement the recommendations for improvement or shall document its reasons for not doing so.”

Through such reviews, the facility meets this standards requirements.

115.287	Data collection
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated 3. Correctional Solutions Group, LLC PREA Annual Report 2021 dated, 1.27.2021 4. Correctional Solutions Group, LLC PREA Annual Report 2020, dated 1.27.2021 <p>(a) The Wichita Transitional Center PAQ states the agency collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 38, section 115.287 a., states, “The agency shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions.”</p> <p>The agency provided PREA Annual Reports for years 2020 and 2021. Annual reports capture the following data for all four of their programs:</p> <ul style="list-style-type: none"> • Sexual Harassment Resident on Resident <ul style="list-style-type: none"> o Facility/Substantiated/Unsubstantiated/Unfounded outcomes • Staff Sexual Harassment <ul style="list-style-type: none"> o Facility/Substantiated/Unsubstantiated/Unfounded outcomes • Sexual Abuse-Resident on Resident Nonconsensual Sexual Acts <ul style="list-style-type: none"> o Facility/Substantiated/Unsubstantiated/Unfounded outcomes • Sexual Abuse Resident on Resident Abuse Sexual Contact <ul style="list-style-type: none"> o Facility/Substantiated/Unsubstantiated/Unfounded outcomes • Staff Sexual Misconduct <ul style="list-style-type: none"> o Facility/Substantiated/Unsubstantiated/Unfounded outcomes <p>(b) The Wichita Transitional Center PAQ states the agency aggregates the incident-based sexual abuse at least annually.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 38, section 115.287 b., states, “The agency shall aggregate the incident-based sexual abuse data at least annually.”</p> <p>(c) The Wichita Transitional Center PAQ states the standardized instrument includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 38, section 115.287 c., states, “The incident-based data collected shall include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice. “</p> <p>(d) The Wichita Transitional Center PAQ states the agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 38, section 115.287 d., states, “The agency shall maintain, review, and collect data as needed from all available incident- based documents including reports, investigation files, and sexual abuse incident reviews.”</p> <p>(e) The Wichita Transitional Center PAQ states the agency obtains incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 38, section 115.287 e., states, “The agency also shall obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents.”</p> <p>This program is recently completing their first of services.</p> <p>(f) This provision is not applicable as Wichita Transitional Center as DOJ has not requested agency data.</p> <p>Through such reviews, the facility meets this standards requirements.</p>

115.288	Data review for corrective action
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated 3. Correctional Solutions Group, LLC PREA Annual Report 2021 dated, 1.27.2021 4. Correctional Solutions Group, LLC PREA Annual Report 2020, dated 1.27.2021 <p>(a) The Wichita Transitional Center PAQ states the agency reviews data collected and aggregated pursuant to §115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training, including: (a) identifying problem areas; (b) taking corrective action on an ongoing basis; and (c) preparing an annual report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 39, section 115.288 a., states, “The agency shall 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:</p> <ol style="list-style-type: none"> 1. Identifying problem areas;□ 2. Taking corrective action on an ongoing basis; and 3. Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole.” <p>(b) The Wichita Transitional Center PAQ states the annual report includes a comparison of the current year’s data and corrective actions to those from prior years. The annual report provides an assessment of the agency’s progress in addressing sexual abuse.</p> <p>This program is recently completing their first of services.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 39, section 115.288 b., states, “Such report shall include a comparison of the current year’s data and corrective actions with those from prior years and shall provide an assessment of the agency’s progress in addressing sexual abuse.”</p> <p>(c) The Wichita Transitional Center PAQ states the agency makes its annual report readily available to the public, at least annually, through its website. Annual reports are approved by the agency head.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 39, section 115.288 c, states, “The agency’s report shall be 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.”</p> <p>Annual reports from 2016 through 2021 can be found on the agency web site at Reporting Prison Rape -corsol (correctionalsolutionsgroup.com).</p> <p>(d) The Wichita Transitional Center PAQ states when the agency redacts material from an annual report for publication, the redactions are limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 39, section 115.288 d, states, “The agency may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility but must indicate the nature of the material redacted.”</p> <p>Through such reviews, the facility meets this standards requirements.</p>

115.289	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Wichita Transitional Center PAQ 2. Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, not dated <p>(a) The Wichita Transitional Center PAQ states the agency ensures that incident-based and aggregate data are securely retained. The PREA Coordinator retains all facility PREA documentation.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 39, section 115.289 a., states, "The agency shall ensure that data collected pursuant to § 115.287 are securely retained."</p> <p>(b) The Wichita Transitional Center PAQ states agency policy requires that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public at least annually through its website.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 39, section 115.289 b., states, "The agency shall make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means."</p> <p>(c) The Wichita Transitional Center PAQ states before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers.</p> <p>Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 39, section 115.289 c., states, "Before making aggregated sexual abuse data publicly available, the agency shall remove all personal identifiers."</p> <p>(d) Correctional Solutions Group Prison Rape Elimination Act (PREA) Policy 6-A-1, page 39, section 115.289 d., states, "The agency shall 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."</p> <p>Through such reviews, the facility meets this standards requirements.</p>

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	<p data-bbox="229 192 1509 255">Auditor Discussion</p> <p data-bbox="229 255 1509 318">(a) During the prior three-year audit period, the agency ensured that each applicable facility operated was audited, once.</p> <p data-bbox="229 318 1509 380">(b) This is the first audit cycle for the Wichita Transfer Center and the third year of the third audit cycle.</p> <p data-bbox="229 380 1509 443">(h) The Auditor was granted complete access to, and the ability to observe, all areas of the facility.</p> <p data-bbox="229 443 1509 506">(i) The Auditor was permitted to request and receive copies of any relevant documents (including electronically stored information).</p> <p data-bbox="229 506 1509 568">(m) The Auditor was permitted to conduct private interviews with residents.</p> <p data-bbox="229 568 1509 667">(n) Residents permitted to send confidential information or correspondence to the Auditor in the same manner as if they were communicating with legal counsel.</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The agency has posted the current PREA audit report, 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 emergency circumstances after making all reasonable attempts to find a PREA compliant private agency or other entity to confine residents? (N/A if the agency has not entered into a contract with an entity that fails to comply with the PREA standards.)	na
	In such a case, does the agency document its unsuccessful attempts to find an entity in compliance with the standards? (N/A if the agency has not entered into a contract with an entity that fails to comply with the PREA standards.)	na
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 staffing patterns?	yes
	In the past 12 months, has the facility assessed, determined, and documented whether adjustments are needed to the facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility assessed, determined, and documented whether adjustments are needed to the resources the facility has available to commit to ensure adequate staffing levels?	yes
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, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering an area where residents are likely to be showering, performing bodily functions, or changing clothing?	yes

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 force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of the services of any contractor who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the two questions immediately above ?	yes
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 (f)	Hiring and promotion decisions	
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current 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 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.)	na
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.)	na
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 residents on: The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: The dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with residents on: The common reactions of sexual abuse and sexual harassment victims?	yes
	Does the agency train all employees who may have contact with residents on: How to detect and respond to signs of threatened and actual sexual abuse?	yes
	Does the agency train all employees who may have contact with residents on: How to avoid inappropriate relationships with residents?	yes
	Does the agency train all employees who may have contact with residents on: How to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming residents?	yes
	Does the agency train all employees who may have contact with residents on: How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
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, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
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 the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).	yes
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 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.)	na
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: Whether the resident's criminal history is exclusively nonviolent?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident has prior convictions for sex offenses against an adult or child?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the resident about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the resident is gender non-conforming or otherwise may be perceived to be LGBTI)?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: The resident's own perception of vulnerability?	yes
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 (f)	Use of screening information	
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing: lesbian, gay, and bisexual residents in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I residents pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing: transgender residents in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I residents pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing: intersex residents in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I residents pursuant to a consent decree, legal settlement, or legal judgement.)	yes
115.251 (a)	Resident reporting	
	Does the agency provide multiple internal ways for residents to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: Retaliation by other residents or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
115.251 (b)	Resident reporting	
	Does the agency also provide at least one way for residents to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the resident to remain anonymous upon request?	yes
115.251 (c)	Resident reporting	
	Do staff members accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Do staff members promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.251 (d)	Resident reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of residents?	yes

115.252 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address resident grievances regarding sexual abuse. This does not mean the agency is exempt simply because a resident does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	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 with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
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 of a resident, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the resident declines to have the request processed on his or her behalf, does the agency document the resident's decision? (N/A if agency is exempt from this standard.)	yes

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 alleged sexual abuse, does it do so ONLY where the agency demonstrates that the resident filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
115.253 (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 information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against residents or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
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, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
115.264 (b)	Staff first responder duties	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.265 (a)	Coordinated response	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes
115.266 (a)	Preservation of ability to protect residents from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	no
115.267 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.267 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, such as housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes

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

115.271 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes
115.271 (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 (h)	Criminal and administrative agency investigations	
	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 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.)	na
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 the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	yes
115.273 (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 condition of access to programming and other benefits?	yes
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 about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.282 (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 information about and timely access to all lawful pregnancy-related medical services? (N/A if “all-male” facility. Note: in “all-male” facilities, there may be residents who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
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 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.287 (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.)	yes
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.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	yes
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with residents?	yes
115.401 (n)	Frequency and scope of audits	
	Were inmates, residents, and detainees permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
115.403 (f)	Audit contents and findings	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes