

# PREA Facility Audit Report: Final

**Name of Facility:** Bonner County Juvenile Detention Center

**Facility Type:** Juvenile

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 07/10/2025

## Auditor Certification

The contents of this report are accurate to the best of my knowledge.



No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.



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.



**Auditor Full Name as Signed:** Robert Palmquist

**Date of Signature:** 07/10/2025

## AUDITOR INFORMATION

**Auditor name:** Palmquist, Robert

**Email:** robobem@gmail.com

**Start Date of On-Site Audit:** 06/17/2025

**End Date of On-Site Audit:** 06/18/2025

## FACILITY INFORMATION

**Facility name:** Bonner County Juvenile Detention Center

**Facility physical address:** 4002 Samuelson Avenue, Sandpoint, Idaho - 83864

**Facility mailing address:**

## Primary Contact

<b>Name:</b>	Holly Kingery
<b>Email Address:</b>	holly.kingery@bonnercountid.gov
<b>Telephone Number:</b>	208-263-1602

<b>Superintendent/Director/Administrator</b>	
<b>Name:</b>	Ron Stultz
<b>Email Address:</b>	ron.stultz@bonnercountyid.gov
<b>Telephone Number:</b>	2082631602

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

<b>Facility Characteristics</b>	
<b>Designed facility capacity:</b>	27
<b>Current population of facility:</b>	3
<b>Average daily population for the past 12 months:</b>	8
<b>Has the facility been over capacity at any point in the past 12 months?</b>	No
<b>What is the facility's population designation?</b>	Both women/girls and men/boys
<b>In the past 12 months, which population(s) has the facility held? Select all that apply (Nonbinary describes a person who does not identify exclusively as a boy/man or a girl/woman. Some people also use this term to describe their gender expression. For</b>	

<b>definitions of “intersex” and “transgender,” please see <a href="https://www.prearesourcecenter.org/standard/115-5">https://www.prearesourcecenter.org/standard/115-5</a>)</b>	
<b>Age range of population:</b>	10-17
<b>Facility security levels/resident custody levels:</b>	Maximum
<b>Number of staff currently employed at the facility who may have contact with residents:</b>	18
<b>Number of individual contractors who have contact with residents, currently authorized to enter the facility:</b>	5
<b>Number of volunteers who have contact with residents, currently authorized to enter the facility:</b>	0

AGENCY INFORMATION	
<b>Name of agency:</b>	Bonner County Justice Services Department
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	4002 Samuelson Avenue, Sandpoint, Idaho - 83864
<b>Mailing Address:</b>	
<b>Telephone number:</b>	

Agency Chief Executive Officer Information:	
<b>Name:</b>	
<b>Email Address:</b>	
<b>Telephone Number:</b>	

Agency-Wide PREA Coordinator Information
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<b>Name:</b>	Holly Kingery	<b>Email Address:</b>	holly.kingery@bonnercountyid.gov
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## Facility AUDIT FINDINGS

### Summary of Audit Findings

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

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

#### Number of standards exceeded:

0

#### Number of standards met:

43

#### 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:	2025-06-17
2. End date of the onsite portion of the audit:	2025-06-18

#### Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	LillyBrooke Family Justice Center 227 S. First Avenue, Sandpoint, ID, 83864 (208) 265-3586 lillybrooke@bonnercoid.gov Director, Investigations and Victim Services

### AUDITED FACILITY INFORMATION

14. Designated facility capacity:	27
15. Average daily population for the past 12 months:	8
16. Number of inmate/resident/detainee housing units:	3
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

<b>18. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:</b>	5
<b>19. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>20. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>21. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>22. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>23. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>24. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:</b>	0

<b>25. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>26. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>27. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</b>	1
<b>28. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>29. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</b>	On the first day of the audit there were five residents in the facility. The Auditor interviewed all five residents.
<b>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</b>	
<b>30. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</b>	19
<b>31. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b>	3

<b>32. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b>	4
<b>33. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</b>	No text provided.
<b>INTERVIEWS</b>	
<b>Inmate/Resident/Detainee Interviews</b>	
<b>Random Inmate/Resident/Detainee Interviews</b>	
<b>34. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</b>	5
<b>35. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</b>	<div> <input checked="" type="checkbox"/> Age </div> <div> <input checked="" type="checkbox"/> Race </div> <div> <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) </div> <div> <input checked="" type="checkbox"/> Length of time in the facility </div> <div> <input checked="" type="checkbox"/> Housing assignment </div> <div> <input checked="" type="checkbox"/> Gender </div> <div> <input type="checkbox"/> Other </div> <div> <input type="checkbox"/> None </div>
<b>36. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</b>	On the first day of the audit there were five residents in the facility. The Auditor interviewed all five residents.
<b>37. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</b>	<div> <input checked="" type="radio"/> Yes </div> <div> <input type="radio"/> No </div>



<b>38. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b>	On the first day of the audit there were five residents in the facility. The Auditor interviewed all five residents.
<b>Targeted Inmate/Resident/Detainee Interviews</b>	
<b>39. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</b>	1
<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>	
<b>40. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</b>	0
<b>40. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b>	<div data-bbox="818 1467 1469 1630"> <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.         </div> <div data-bbox="818 1675 1469 1756"> <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.         </div>

<b>40. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b>	<p>The Auditor conducted interviews with the entire resident population, none of whom exhibited a physical disability.</p>
<b>41. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</b>	<p>0</p>
<b>41. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b>	<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>
<b>41. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b>	<p>The Auditor conducted interviews with the entire resident population, none of whom exhibited cognitive or functional disabilities.</p>
<b>42. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</b>	<p>0</p>

<b>42. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b>	<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>
<b>42. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b>	<p>The Auditor conducted interviews with the entire resident population, none of whom were Blind or had low vision.</p>
<b>43. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</b>	<p>0</p>
<b>43. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b>	<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>
<b>43. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b>	<p>The Auditor conducted interviews with the entire resident population, none of whom were Deaf or hard of hearing.</p>
<b>44. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</b>	<p>0</p>

<b>44. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b>	<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>
<b>44. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b>	<p>The Auditor conducted interviews with the entire resident population, none of whom were limited English Proficient.</p>
<b>45. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b>	<p>0</p>
<b>45. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b>	<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>
<b>45. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b>	<p>The Auditor conducted interviews with the entire resident population, none of whom identified as lesbian, gay or bisexual.</p>
<b>46. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b>	<p>0</p>

<p><b>46. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>46. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The Auditor conducted interviews with the entire resident population, none of whom identified as transgender.</p>
<p><b>47. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</b></p>	<p>0</p>
<p><b>47. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>47. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The Auditor conducted interviews with the entire resident population, none of whom reported sexual abuse in the facility.</p>
<p><b>48. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</b></p>	<p>1</p>

<b>49. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</b>	0
<b>49. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b>	<div> <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. </div> <div> <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed. </div>
<b>49. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b>	The Auditor conducted interviews with the entire resident population, none of whom were ever placed in segregated housing/isolation for risk of sexual victimization.
<b>50. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</b>	On the first day of the audit there were five residents in the facility. The Auditor interviewed all five residents.
<b>Staff, Volunteer, and Contractor Interviews</b>	
<b>Random Staff Interviews</b>	
<b>51. Enter the total number of RANDOM STAFF who were interviewed:</b>	9

<b>52. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</b>	<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
<b>53. Were you able to conduct the minimum number of RANDOM STAFF interviews?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>54. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b>	The Auditor interviewed all available Juvenile Detention Officers during the onsite visit.
<b>Specialized Staff, Volunteers, and Contractor Interviews</b>	
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.	
<b>55. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</b>	19
<b>56. Were you able to interview the Agency Head?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>57. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No

<b>58. Were you able to interview the PREA Coordinator?</b>	<input checked="" type="radio"/> Yes  <input type="radio"/> No
<b>59. Were you able to interview the PREA Compliance Manager?</b>	<input type="radio"/> Yes  <input type="radio"/> No  <input checked="" type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)



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

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

	<input type="checkbox"/> Other
<b>61. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No
<b>62. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>62. Enter the total number of CONTRACTORS who were interviewed:</b>	1
<b>62. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input type="checkbox"/> Security/detention <input checked="" type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other
<b>63. Provide any additional comments regarding selecting or interviewing specialized staff.</b>	No text provided.

## SITE REVIEW AND DOCUMENTATION SAMPLING

### Site Review

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

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

☒ Yes

☐ No

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

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

☒ Yes

☐ No

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

☒ Yes

☐ No

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

☒ Yes

☐ No

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

☒ Yes

☐ No

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

The Auditor observed, during the onsite visit, the appropriate number of staff supervising residents in compliance with the required PREA ratios. The PREA Coordinator advised that the State of Idaho requires a 1:8 staffing ratio during waking hours, and they are inspected annually for compliance. During the facility tour, the Auditor observed the resident rooms and shower rooms, these areas were not equipped with cameras. Residents are allowed to use a cover over their windows when a resident is in their room, to change clothing or use the toilet. The shower areas provide privacy for residents when in a stage of undress. The auditor was able to observe video monitoring camera views where residents are housed. The camera views in the Observation Cells with toilets had the toilet area blacked out, allowing residents to utilize the toilets without being viewed on camera. Interviews with Random Staff and Random Residents revealed residents can change their clothes, shower, and use the toilet without being viewed by staff of the opposite sex. Random Staff and Random Residents also advised that announcements regarding the gender of staff working are announced every shift and during mealtimes. All records are maintained in secure areas. The Mental Health Records and Medical Records are secured in file cabinets behind locked doors. Electronic information is stored on hard drives that are password protected. Access to computers is password protected. The Auditor participated in a Mock intake. The Intake Officer walked through each procedure, from the initial pat search to completing all paperwork. The Intake (booking) area has a dry holding cell, a wet holding cell and one shower area. The Risk Assessment is completed in a private setting. Information concerning PREA is provided within minutes of arrival; PREA Posters are on the wall and reporting information. The information is easily accessible. Upon completion the Supervisor is contacted to determine housing placement.

## 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.

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

☒ Yes

☐ No

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

The following is a sample of the documents requested during the onsite portion of the Audit. List of staff in the facility for selecting staff for interviews. List of incarcerated individuals by housing unit to select for interviews. Files of persons hired or promoted in the last 12 months to determine whether proper criminal record background checks and questions regarding past conduct were asked and answered. Documentation of background records checks of current employees at five-year intervals. Documentation of sexual abuse and harassment reports and investigations. Records for incarcerated individuals admitted to the facility within the past 12 months for evidence of appropriate screening within 72 hours. Records of initial assessment and reassessment for sexual victimization or abusiveness risk.

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

### Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

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

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

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

## Sexual Abuse and Sexual Harassment Investigation Outcomes

### Sexual Abuse Investigation Outcomes

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

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

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

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

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

### Sexual Harassment Investigation Outcomes

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

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

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

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

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

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

**Sexual Abuse Investigation Files Selected for Review**

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

0

**78. Explain why you were unable to review any sexual abuse investigation files:**

There were no files to review. Bonner County Juvenile Detention Facility has not had a sexual abuse investigation in the past 12 months.



<b>79. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b>	<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)
<b>Inmate-on-inmate sexual abuse investigation files</b>	
<b>80. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b>	0
<b>81. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b>	<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)
<b>82. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b>	<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)
<b>Staff-on-inmate sexual abuse investigation files</b>	
<b>83. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b>	0
<b>84. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b>	<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)

<b>85. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b>	<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)
<b>Sexual Harassment Investigation Files Selected for Review</b>	
<b>86. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</b>	0
<b>86. Explain why you were unable to review any sexual harassment investigation files:</b>	There were no files to review. Bonner County Juvenile Detention Facility has not had a sexual harassment investigation in the past 12 months.
<b>87. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b>	<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)
<b>Inmate-on-inmate sexual harassment investigation files</b>	
<b>88. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b>	0
<b>89. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</b>	<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)

<b>90. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b>	<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)
<b>Staff-on-inmate sexual harassment investigation files</b>	
<b>91. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b>	0
<b>92. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</b>	<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)
<b>93. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b>	<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)
<b>94. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</b>	There were no files to review. Bonner County Juvenile Detention Facility has not had a sexual harassment or sexual abuse investigation in the past 12 months.

## SUPPORT STAFF INFORMATION

### DOJ-certified PREA Auditors Support Staff

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

☐ Yes

☒ No

### Non-certified Support Staff

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

☐ Yes

☒ No

## AUDITING ARRANGEMENTS AND COMPENSATION

97. Who paid you to conduct this audit?

☒ The audited facility or its parent agency

☐ My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)

☐ A third-party auditing entity (e.g., accreditation body, consulting firm)

☐ Other

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

115.311	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>115.311 Policy 11.3 Prison Rape Elimination Act</li> <li>115.311 Policy 1.2 Investigation Protocol</li> <li>115.311 Organizational Chart Bonner County</li> </ol> <p>Interviews conducted with:</p> <ol style="list-style-type: none"> <li>PREA Coordinator</li> </ol> <p>115.311 (a) – The Bonner County Policy 11.3 PREA, Page 1, Section I Policy indicates, sexual abuse, sexual harassment, or sexual activity of any kind will not be</p>

	<p>tolerated. These behaviors, criminal or otherwise, seriously reduce the ability of this facility to accomplish the mission of providing a safe and secure environment for residents. In accordance with the Prison Rape Elimination Act of 2003, the Bonner County Juvenile Detention Center has established a zero-tolerance standard for all forms of sexual abuse and sexual harassment.</p> <p>The Bonner County Juvenile Detention Center has a zero-tolerance policy and training program that meets the requirements for this standard. Policy 11.3 Prison Rape Elimination Act provides the Agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment. It has definitions of prohibited behaviors and sanctions for those prohibited behaviors. The policy provides strategies and responses to reduce and prevent sexual abuse. The policy also includes procedural guidelines, such as screening residents upon intake, training (for both Staff and residents), reporting procedures (both Staff and residents), intervention procedures and investigative guidelines.</p> <p>115.311 (b) - The Bonner County Policy 11.3 PREA, Section IV, paragraph A.2., indicates the Bonner County Juvenile Detention Center will designate a PREA Coordinator and allow that individual sufficient time and authority to develop, implement, and oversee facility efforts to comply with the PREA standards. If, for any reason, the position or assignment of PREA Coordinator is vacant, the Director shall move to fill said position as quickly as possible. This individual is an upper-level member of the management team. She is responsible for the development and implementation of procedures and training to ensure effective compliance with the PREA Standards. (See Organizational Chart)</p> <p>115.311 (c) - The Bonner County Bonner County Juvenile Detention Center is a standalone facility. Therefore, there is no PREA Compliance Manager. The Agency has a PREA Coordinator. The PREA Coordinator indicated she had sufficient time to manage and oversee the implementation of PREA standards. The Supervisors help with PREA implementation and provide input to ensure compliance.</p> <p>Policy 11.3 PREA addresses 115.311 (a).</p> <p>Policy 11.3 PREA, Section IV, paragraph A.2., and the interview with the PREA Coordinator addresses 115.311 (b).</p> <p>The Bonner County Bonner County Juvenile Detention Center is a standalone facility. Therefore, there is no PREA Compliance Manager. The Agency has a PREA Coordinator. The PREA Coordinator indicated she had sufficient time to manage and oversee the implementation of PREA standards addresses 115.311 (c).</p> <p>The Bonner County Juvenile Detention Center complies with 115.311 Zero tolerance of sexual abuse and sexual harassment: PREA Coordinator.</p>
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<b>115.312</b>	<b>Contracting with other entities for the confinement of residents</b>
	<b>Auditor Overall Determination:</b> Meets Standard

	<b>Auditor Discussion</b>
	115.312 (a) - The PREA Coordinator confirmed the facility does not contract with other facilities for resident confinement.
	115.312 (b) - The PREA Coordinator confirmed the facility does not contract with other facilities for resident confinement.
	This standard is not applicable; the Bonner County Juvenile Detention Center does not contract with other agencies for confinement services.

<b>115.313</b>	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 Prison Rape Elimination Act</li> <li>2. Policy 2.02 Staffing</li> <li>3. Policy 7.1 Counts</li> <li>4. Staffing Plan 2025</li> <li>5. Unannounced Log Excel database</li> <li>6. Unannounced Rounds documented Activity Log Samples</li> <li>7. ID Title 20, Chapter 5 Juvenile Corrections Act</li> <li>8. IDAPA 05.01.02</li> <li>9. 2025 IDJC Inspection Report June 2025</li> </ol> <p>Interviews conducted with:</p> <ol style="list-style-type: none"> <li>1. PREA Coordinator</li> <li>2. Detention Manager</li> <li>3. Staff who conduct Unannounced Rounds</li> </ol> <p>The Auditor reviewed Policy 11.3 Prison Rape Elimination Act, Policy 2.02 Staffing, Policy 7.1 Counts, and the Staffing Plan 2025. The Bonner County Juvenile Detention Center implements a staffing plan that provides adequate staffing levels. In addition to staff members, there is video monitoring available to protect residents from sexual abuse.</p> <p>115.313 (a): The Bonner County Juvenile Detention Center staffing plan takes into consideration:</p>

- Generally accepted juvenile detention and correctional/secure residential practice.
- Any judicial findings of inadequacy; None at the time of the development of the staffing plan.
- Any findings of inadequacy from Federal investigative agencies; None at the time of the development of the staffing plan.
- Any findings of inadequacy from internal or external oversight bodies; None at the time of the development of the staffing plan.
- All components of the facility's physical plant (including "blind spots" or areas where staff or residents may be isolated);
- The composition of the resident population.
- The number and placement of supervisory staff.
- Institution programs occurring on a particular shift.
- Any applicable State or local laws, regulations, or standards; (Idaho Administrative Procedures Act section 05.01.02 and Idaho Code 20-chapter 5, Juvenile Corrections Act)
- The prevalence of substantiated and unsubstantiated incidents of sexual abuse.
- Any other relevant factors.

The Bonner County Juvenile Detention Center maintains a minimum ratio of one Staff member to every eight youth during the hour's youth are awake, a minimum ratio of one Staff member to every 16 youth during the hours youth are sleeping. (ID Title 20, Chapter 5 Juvenile Corrections Act, IDAPA 05.01.02, 2025 IDJC Inspection Report June 2025)

115.313 (b): The Bonner County Juvenile Detention Center complies with the staffing plan. The facility's operating procedures require supervisors to maintain a minimum staff-to-resident ratio of one staff to eight residents during hours the residents are awake (6:30 am – 10:00 pm) and one staff to sixteen residents during the hours the residents are asleep (10:00 pm – 6:30 am am). A supervisor must always be present in the facility, or available as on call for immediate response to the facility. A staff member of the same sex as the residents shall be on duty during all shifts. This staff member is responsible for supervision that involves physical contact (pat searches) or activities commonly afforded reasonable protection against opposite-sex observation or supervision (use of toilet/shower facilities). All residents are monitored through constant visual and auditory surveillance. Staff check on residents at least every 20 minutes. Staff members are instructed to monitor for signs of resident depression, family rejection, loneliness, and resistance to staff or programs. When such symptoms are identified, appropriate intervention is necessary, including referrals to Mental Health or Medical Staff. These referrals are documented.

115.313 (c): The Auditor observed, during the onsite visit, the appropriate number of staff supervising residents in compliance with the required PREA ratios. The PREA Coordinator advised that the State of Idaho requires a 1:8 staffing ratio during waking hours, and they are inspected annually for compliance. (2025 IDJC



Inspection)

115.313 (d): Policy 11.3 Prison Rape Elimination Act Page 5, paragraphs 2-5, indicates the management staff in consultation with the PREA coordinator will review policies annually and make recommendations to the Board of County Commissioners for adjustments as needed to: a. The staffing levels and staffing patterns. b. The use of video monitoring systems and other technologies. c. The resources the facility has available to commit to ensure adherence to the staffing plan.

115.313 (e): Policy 7.1 Counts, Page 2, paragraph E., states,

Administrators and Shift Supervisors in the Bonner County Juvenile Detention Facility shall conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment.

- Such rounds shall be conducted approximately 1 time per 12-hour shift both day shift and night shift.
- It shall be prohibited for staff to alert other staff members in any way that these supervisory rounds are occurring, either verbally or through any type of communication, unless such an announcement is related to some legitimate operational function.
- Control room staff shall not announce the presence of the Detention Manager, Shift Supervisor or Director in the building after regular working hours.

The Auditor reviewed the log containing information documenting unannounced rounds. The log contained daily entries from the day and night shifts. All shifts indicated a supervisor had conducted rounds to detect and deter sexual abuse or sexual harassment incidents. The Auditor interviewed three shift supervisors who indicated they had personally conducted unannounced rounds; the rounds were conducted at random times, and the Staff were unaware they were conducting rounds to detect and deter sexual abuse/harassment. The Bonner County Juvenile Detention Center maintains a practice of having intermediate-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment. The procedures for conducting these unannounced rounds are well established in the facility.

The Auditor observed appropriate staffing levels throughout the facility; video monitoring is available to protect residents from sexual abuse. The staffing plan undergoes an annual review conducted collaboratively by the PREA Coordinator and the Detention Manager. Each time the staffing plan is not complied with, the facility documents the deviations. In the past 12 months, the number of times the facility deviated from the staffing ratios of 1:8 security staff during resident waking hours was one. In the past 12 months, the number of times the facility deviated from the staffing ratios of 1:16 during resident sleeping hours was zero. The staff plan review considers physical plant inadequacies, video monitoring systems, the population levels and the behavior of residents, supervisor availability, and any incidents of

	<p>sexual abuse or sexual harassment that may have occurred during the year. Interviews with the Agency Head/Director and the PREA Coordinator indicate that both individuals review the staffing plan.</p> <p>Policy 11.3 Prison Rape Elimination Act, Policy 2.02 Staffing, Staffing Plan 2025 and interviews with Detention Manager and PREA Coordinator addresses 115.313(a).</p> <p>Policy 11.3 Prison Rape Elimination Act, Staffing Plan 2025 and the interview with the Detention Manager addresses 115.313 (b).</p> <p>Policy 11.3 Prison Rape Elimination Act, Policy 2.02 Staffing, Staffing Plan 2025, ID Title 20, Chapter 5 Juvenile Corrections Act, IDAPA 05.01.02, and the interview with the Detention Manager addresses 115.313 (c).</p> <p>Policy 11.3 Prison Rape Elimination Act, Staffing Plan 2025 and the interview with the PREA Coordinator, addresses 115.313 (d).</p> <p>Policy 11.3 Prison Rape Elimination Act, Policy 7.1 Counts, Unannounced Log Excel database, Unannounced Rounds documented Activity Log Samples, interviews with PREA Coordinator, Detention Manager and Staff who conduct Unannounced Rounds addresses 115.313 (e).</p> <p>The Bonner County Bonner County Juvenile Detention Center complies with 115.313 Supervision and monitoring.</p>
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115.315	Limits to cross-gender viewing and searches
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Policy 7.01 Counts</li> <li>2. Policy 7.03 Searches of Juveniles</li> <li>3. Policy 11.3 Prison Rape Elimination Act</li> <li>4. Cross Gender Training Verification Forms</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Random Staff</li> <li>2. Random residents</li> </ol> <p>115.315 (a): The Bonner County Juvenile Detention Center does not perform cross-gender strip searches. In the past three years, no cross-gender searches have been</p>

conducted. All residents are allowed to participate in all programs, and pat searches are conducted by individuals of the same sex. Policy 7.03, Searches of Juveniles, provides guidelines on this subject. According to the policy, detention personnel should perform searches with expertise and a humane attitude. Juveniles should be informed quietly and simply about what will take place, and they should not be touched more than necessary to complete the search. Staff interviewed on this subject indicated awareness and adherence to the policy. They also demonstrated sensitivity to the potential vulnerability of residents during searches. Residents interviewed confirmed that staff of the same sex pat searches them, and random resident interviews revealed that they had never been naked in front of staff members of a different sex.

115.315 (b): Policy 7.03 states that juveniles should be touched only as necessary for comprehensive searches, which must be conducted by staff of the same gender. Cross-gender pat searches are allowed only in emergencies and require an incident report. The facility confirmed no cross-gender searches occurred in the past 12 months. Staff interviews indicated cross-gender pat searches are prohibited unless an emergency situation exists and residents confirmed they have never been searched by opposite-gender staff.

115.315 (c) – As indicated in Policy 7.03, page 2, paragraph 1. b., and page 4, paragraph g., searches of Juveniles require documentation for all cross-gender pat searches, and that cross-gender strip or visual searches are prohibited.

115.315 (d): The Bonner County Juvenile Detention Center has implemented measures to ensure all residents shower, perform bodily functions, and change clothing outside the staff's view. The auditor observed staff members announcing their presence when entering a housing unit. The auditor questioned line staff during the tour about their announcements in the unit. Cross-gender supervision is conducted in a manner that aligns with the facility's mission and goals while providing the highest degree of privacy possible. Policy 7.01 Counts, page 2, paragraph D.2.

During the facility tour, the Auditor noted that resident rooms and shower rooms did not have cameras. Residents may cover their windows when changing or using the toilet in their rooms. Shower areas ensure privacy during undress. The auditor reviewed camera footage from areas where residents are housed. Observation cell cameras blacked out the toilet areas for privacy. Interviews with staff and residents confirmed that residents can change clothes, shower, and use the toilet without being viewed by opposite-sex staff. Staff also announce the gender of on-duty staff every shift and at mealtimes.

115.315 (e): Policy 7.03, Searches of Juveniles, page 6, paragraph C., section b., states “Cross-gender searches of any kind will not be conducted by juvenile detention staff. Staff will be trained in techniques to conduct searches of transgender and intersex residents that is professional and respectful while still meeting security needs.” Additionally, strip searches of transgender or intersex juveniles are not conducted for the sole purpose of determining a resident’s genital

	<p>status. Interviews with Random Staff reflected they are prohibited from searching or physically examining a transgender or intersex resident for the sole purpose of determining the resident's genital status.</p> <p>115.315 (f): The PREA Coordinator provided the training records which indicate specific training on conducting searches. The staff members viewed the video Guidance in Cross Gender and Transgender Pat Searches, (PREA Resource Center, <a href="https://www.youtube.com/watch?v=bV9a0R_f_z0">https://www.youtube.com/watch?v=bV9a0R_f_z0</a>). Interviews with Random Staff revealed they received training in cross-gender pat searches and searches of transgender or intersex residents.</p> <p>Policy 7.03, Searches of Juveniles, page 4, paragraph g., addresses 115.315 (a).</p> <p>Policy 7.03 Searches of Juveniles, page 2, paragraph 1.b., interviews with Random staff and Random residents addresses 115.315 (b).</p> <p>Policy 7.03, Searches of Juveniles, page 2, paragraph 1.b., addresses 115.315 (c).</p> <p>Policy 7.01 Counts, page 2, paragraph D. 2 and 3., interviews with Random staff and Random residents addresses 115.315 (d).</p> <p>Policy 7.03, Searches of Juveniles, page 6, paragraph C. b., and interviews with Random staff addresses 115.15(e).</p> <p>PREA Resource Center, <a href="https://www.youtube.com/watch?v=bV9a0R_f_z0">https://www.youtube.com/watch?v=bV9a0R_f_z0</a>), Cross Gender Training Verification Forms and interview with Random Staff addresses 115.315(f).</p> <p>The Bonner County Bonner County Juvenile Detention Center complies with 115.315 Limits to cross-gender viewing and searches.</p>
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<b>115.316</b>	<b>Residents with disabilities and residents who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 Prison Rape Elimination Act</li> <li>2. Policy 15.3 Resident Orientation Education</li> <li>3. Jan 2025 Approved Court Interpreter</li> <li>4. Bonner County Juvenile Detention Center Site Review</li> </ol> <p>Interviews</p>

1. Intake staff
2. Random Staff
3. Agency Head

115.316 (a): The admitting detention officer should take appropriate measures to ensure that residents with disabilities, including but not limited to those who are deaf or hard of hearing, blind or have low vision, or those with intellectual, psychiatric, or speech disabilities, have an equal opportunity to participate in all aspects of the Bonner County Juvenile Detention programs, especially in efforts to prevent, detect, and respond to sexual abuse and sexual harassment. (Policy 15.3 Resident Orientation Education, page 1, paragraph A.5.) The Bonner County Juvenile Detention Center provides interpreters who can effectively and impartially interpret for residents who are deaf, hard of hearing, have limited English proficiency, or are blind or have low vision. (Bonner County Court interpreters) The Bonner County Juvenile Detention Center provides materials in formats or through methods ensuring effective, age-appropriate communication with residents with disabilities, including those with intellectual disabilities or limited reading skills. When such residents are identified, staff will notify the Director or Detention Manager, who will inform the Special Services department of the Lake Pend Oreille School District. They will assist in ensuring effective communication with residents who have intellectual disabilities, visual and hearing impairments, and speech and language communication deficits. This ensures they have an equal opportunity to participate in or benefit from all aspects of the BCJS efforts to prevent, detect, and respond to sexual abuse and sexual harassment. (Policy 15.3 Resident Orientation Education, page 1, paragraph A.5.)

115.316 (b): Policy 15.3 Resident Orientation Education provides information concerning Residents with disabilities and residents who are limited English proficient. The Bonner County Juvenile Detention Center provides materials in formats or through methods ensuring effective, age-appropriate communication with residents with disabilities, including those with intellectual disabilities or limited reading skills.

115.316 (c): The Bonner County Juvenile Detention Center only uses resident interpreters or assistants in rare cases where a delay in finding an interpreter would risk the resident's safety. The Auditor notes that this type of event has never occurred at the facility. Interviews with Random Staff revealed they would not use a resident to interpret PREA information to another resident and would seek the services of an interpreter either through the Court, or through a bilingual staff member.

Policy 15.3 Resident Orientation Education, Bonner County Juvenile Detention Center Site Review, and interview with Detention Manager addresses 115.316(a).

Policy 15.3 Resident Orientation Education, Bonner County Juvenile Detention Center Site Review, interviews with intake staff and random staff addresses 115.316(b).

	<p>Policy 15.3 Resident Orientation Education., Jan 2025 Approved Court Interpreter, and interviews with Random Staff addresses 115.316(c).</p> <p>The Bonner County Bonner County Juvenile Detention Center complies with 115.316 Residents with disabilities and residents who are limited English proficient.</p>
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<b>115.317</b>	<b>Hiring and promotion decisions</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 3.2 Staff Hiring and Promotion</li> <li>2. Policy 11.3 PREA</li> <li>3. Policy 2.4 Personnel</li> <li>4. Rules of Employee Conduct Policy 400</li> <li>5. PREA Questionnaire Samples</li> <li>6. Bonner County Employee Worksheets 1 and 2</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Administrative (Human Resources)</li> </ol> <p>115.317 (a): The Bonner County Juvenile Detention Center policy prohibits hiring or promoting anyone who may have been previously involved in sexual abuse in a prison, jail, lockup, community confinement facility or juvenile facility. Agency policy requires consideration of sexual harassment issues during hiring. Criminal background checks are required. The entire process for hiring or promoting Staff is coordinated through the Bonner County Juvenile Detention Center Detention Manager and Agency Head.</p> <p>After the initial application, an initial interview, criminal background record checks, and child abuse registry checks are completed. The Bonner County Juvenile Detention Center does not hire, promote, or enlist the services of anyone who:</p> <ul style="list-style-type: none"> <li>• Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997).</li> <li>• Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or</li> <li>• Has been civilly or administratively adjudicated to have engaged in the</li> </ul>

activity described in paragraph (b). (Policy 2.03 Administrative Policies, pages 3-4, paragraph G)

115.317 (b): Policy 3.2 Staff Hiring and Promotion, page 2, section III, paragraph B, states the agency will consider any sexual harassment incidents when hiring or contracting individuals who will interact with residents.

115.317 (c): Policy 3.2 Staff Hiring and Promotion page 2, section III, paragraph A, states all employees, volunteers or contractors that work in the juvenile detention facility and who will have contact with the juvenile residents of the facility, will undergo a thorough background check prior to being allowed to work with or around the residents. In addition, all employees, volunteers, or contractors have background checks with applicable child abuse registries prior to having any contact with the residents.

Thirteen employee files were reviewed; each file contained an initial background check and child abuse registry check. Administrative Staff advised they utilize the Idaho Law Enforcement Telecommunication System (ILETS) to conduct background checks on everyone who is considered for employment and anyone who has contact with residents. Further the Idaho Health and Welfare Registry is consulted on any employee or anyone who has contact with residents, including contractors and volunteers. The Bonner County Juvenile Detention Center utilizes Idaho's Bureau of Criminal Identification for records checks. The Bureau of Criminal Identification is Idaho's central repository of criminal records, fingerprints, and crime statistics. The Bureau of Criminal Identification serves as the control terminal agency for the National Crime Information Center (NCIC). Administrative Staff indicated they verify prior employment, both institutional and non-institutional, as part of the pre-hire process.

115.317 (d): Policy 3.2 Staff Hiring and Promotion page 2, section III, paragraph A, states all employees, volunteers or contractors that work in the juvenile detention facility and who will have contact with the juvenile residents of the facility, will undergo a thorough background check prior to being allowed to work with or around the residents. In addition, all employees, volunteers, or contractors have background checks with applicable child abuse registries prior to having any contact with the residents. The Administrative Staff confirmed that background checks are conducted for all potential hires, contractors, and volunteers.

115.317(e): Policy 3.2 Staff Hiring and Promotion, page 2, section IV., states Bonner County Juvenile Detention shall conduct background checks at least every year on current employees and contractors who may have contact with residents or have in place a system for capturing such information for current employees.

115.317 (f): Policy 3.2 Staff Hiring and Promotion, page 2, section III. D., states Bonner County Juvenile Detention shall ask all applicants and employees who may have contact with residents directly about previous misconduct described in section 115.317, in written applications or interviews for hiring or promotions and in any interviews or written self-evaluations conducted as part of reviews of current

	<p>employees. Employees will also be trained on the continuing affirmative duty to disclose such misconduct.</p> <p>115.317 (g): Administrative staff further indicated making false statements, providing false documentation, or omitting information during the application process may result in termination.</p> <p>115.317 (h): The PREA Coordinator and the Agency head stated they would provide information on substantiated allegations of sexual abuse or sexual harassment involving former employees upon receiving a request from an institutional employer for whom such employee has applied to work.</p> <p>Policy 3.2 Staff Hiring and Promotion, 115.317 Rules of Employee Conduct Policy 400, and the administrative staff interview addresses 115.317 (a).</p> <p>Policy 3.2 Staff Hiring and Promotion and the administrative staff interview addresses 115.317 (b).</p> <p>Policy 3.2 Staff Hiring and Promotion, Bonner County Employee Worksheets 1 and 2 and the administrative staff interview addresses 115.317 (c).</p> <p>Policy 3.2 Staff Hiring and Promotion Bonner County Employee Worksheets 1 and 2 and the administrative staff interview addresses 115.317 (d).</p> <p>Policy 3.2 Staff Hiring and Promotion and the administrative staff interview addresses 115.317 (e).</p> <p>PREA Questionnaire Samples, Bonner County Employee Worksheets 1 and 2, and Administrative Staff interview addresses 115.317 (f)</p> <p>Policy 3.2 Staff Hiring and Promotion, Rules of Employee Conduct Policy 400 and the administrative staff interview addresses 115.317 (g).</p> <p>Administrative Staff interview addresses 115.317 (h).</p> <p>The Bonner County Juvenile Detention Center complies with standard 115.317: Hiring and promotion decisions.</p>
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<b>115.318</b>	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents</p> <p>1. Policy 11.3 PREA</p>



	<p>Interviews</p> <ol style="list-style-type: none"> <li>1. Agency Head</li> <li>2. Detention Manager</li> </ol> <p>115.318 (a) – The facility reported no substantial expansion or modification to existing facilities since the last PREA audit.</p> <p>115.318 (b) – The facility reported at total of sixty-seven cameras located throughout the facility.</p> <p>The Bonner County Juvenile Detention Center has not acquired a new facility or expanded or modified the existing facility since August 20, 2012. The Bonner County Juvenile Detention Center has made minor changes to the video system; specifically, they have repaired cameras and added cameras as needed. The PREA Coordinator indicated these changes were made to improve the Detention Center's ability to protect residents from sexual abuse. Currently, there are sixty-seven cameras; all have recording capability. Individual incidents can be saved in a designated file on the network for documentation purposes. Transfer of video footage to other agencies may only occur if mandated by court order or by approval of the Agency Head. During the Site Review, this auditor was able to observe the location of cameras throughout the facility, as well as the camera views in the facility Control Room. The Bonner County Juvenile Detention Center is currently upgrading the video cameras throughout the facility. There is no change in any camera position, the upgrade is from analog cameras to digital cameras. An additional six cameras will be added to the system to allow for better video coverage in areas where blind spots were identified.</p> <p>Interviews with the Agency Head and Detention Manager address 115.318 (a).</p> <p>Interviews with the Agency Head and Detention Manager address 115.318 (b).</p> <p>The Bonner County Juvenile Detention Center complies with standard 115.318: Upgrades to facilities and technologies.</p>
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115.321	Evidence protocol and forensic medical examinations
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> <li>2. 19-5303 COST OF MEDICAL EXAMS</li> <li>3. Idaho Sexual Assault Response Guidelines</li> </ol>

4. MOU LillyBrooke
5. Victim Advocate Services Team Bonner County
6. MOU Bonner County & Kaniksu

#### Interviews

1. Random Staff
2. PERA Coordinator
3. LillyBrooke Advocate

115.321 (a): The facility reported the Sandpoint Police Department would conduct criminal sexual abuse investigations. Administrative sexual abuse investigations would be conducted by investigators at the Bonner County Juvenile Detention facility and subsequently referred to the Bonner County Prosecutor's Office or the Bonner County Human Resources Department for final administrative action. The Sandpoint Police Department follows the uniform evidence protocol as established in the Idaho Sexual Assault Response Guidelines.

115.321 (b): The Sandpoint Police Department follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for criminal prosecutions and administrative proceedings, which occur after the criminal process is completed. The protocol is developmentally appropriate for young people and minimizes the trauma to the child victim. (Idaho Sexual Assault Response Guidelines page 32).

115.321 (c): Sexual Assault Nurse Examiners (SANEs) at Kaniksu Community Health in conjunction with Bonner Health would conduct forensic examinations for residents at the Bonner County Juvenile Detention Center. Kaniksu Community Health provides forensic examinations for victims of sexual assault in Bonner County. Kaniksu Community Health trains and manages the forensic staff and maintains a 24/7 coverage of Sexual Assault Nurse Examiners. Patients who have been victims of sexual assault are seen by Kaniksu SANE at Bonner Health and with special attention to physical needs, privacy, and emotional support. Proper collection and storage of evidence and documentation are of the utmost importance. (MOU Bonner County & Kaniksu Community Health) If a situation occurred where a SANE was not available at Kaniksu Community Health the resident would be transported to Kootenai Health. Policy 11.3 PREA, Page 6, section IV. A. a., states, "If such examination is not covered for payment by the Sandpoint Police Department, the Bonner County Juvenile Detention Center shall bear the cost of the examination." Additionally, Idaho Title 19 Chapter 53-Section 19-5303 Compensation of Victims of Crimes indicates the cost of forensic and/or medical examinations of alleged victims of sexual assault shall be paid for from the crime victims compensation account. (19-5303 Cost of Medical Exams). The facility reports zero forensic medical examinations have been conducted in the past twelve months.

115.321 (d): The MOU between Bonner County Juvenile Detention Center and LillyBrooke indicates that LillyBrooke will provide victim advocacy as requested by a

resident. LillyBrooke helps survivors of domestic abuse and sexual assault. Individuals can call our 24-hour crisis helpline 365 days a year. LillyBrooke provides immediate advocacy, safety planning, and crisis intervention for survivors. LillyBrooke advocates are on call with Bonner Health and Kootenai Health supporting survivors throughout any medical exams, law enforcement interviews and throughout the legal process. The Auditor interviewed a Sexual Assault Advocate from LillyBrooke. The Advocate indicated a victim of a sexual assault would be provided an advocate and services for intervention and related assistance. The Advocate stated LillyBrooke would support the victim through the forensic examination and investigatory interviews.

LillyBrooke is associated with the Bonner County Victim Advocate Services Team. Based out of the Bonner County Prosecutor's Office, the Victims Advocate Services Team provides direct, immediate services to victims of all crime, though predominantly victims of domestic violence and sexual assault. Including:

- 24 Hour Crisis Intervention to crime victims & Law Enforcement Civil Protection Order information and assistance
- Emergency Temporary Shelter Community Referrals
- Court Advocacy (criminal and civil) Legal referrals
- Transportation assistance Resource Library
- Community Outreach Programs Victim/Witness Coordination
- Spanish Interpreting/Translation services

The PREA Coordinator established an appropriate Memorandum of Understanding that meets the requirements to provide services to sexual abuse or harassment victims.

115.321 (e): As indicated above (115.321(d)), the MOU between Bonner County Juvenile Detention Center and LillyBrooke indicates, a victim advocate will be provided to support the resident through the forensic medical exam process and investigatory interviews, as well as provide emotional support, crisis intervention information, and referrals, as requested by the resident. The Auditor interviewed a Sexual Assault Advocate from LillyBrooke. The Advocate indicated a victim of a sexual assault would be provided an advocate and services for intervention and related assistance. The Advocate stated LillyBrooke would support the victim through the forensic examination and investigatory interviews.

115.321 (f): The Sandpoint Police Department follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for criminal prosecutions and administrative proceedings, which occur after the criminal process is completed. The protocol is developmentally appropriate for young people and minimizes the trauma to the child victim. (Idaho Sexual Assault Response Guidelines)

115.321 (h): LillyBrooke advocates are trained in Crisis Intervention which provides comprehensive skills for assisting individuals in crisis. All volunteers and staff are trained to be equipped to help individuals in sexual assault situations. LillyBrooke

	<p>ensures all victim advocates are screened for appropriateness to be advocates and have received training. The Bonner County Juvenile Detention Center does not provide an agency staff member or a community-based staff member to provide advocacy services. Advocacy services are provided through LillyBrooke.</p> <p>Policy 11.3 PREA, pages 5 and 6, section IV., Idaho Sexual Assault Response Guidelines, and interviews with Random Staff, address 115.321(a).</p> <p>Policy 11.3 PREA, pages 5 and 6, section IV., and Idaho Sexual Assault Response Guidelines addresses 115.321(b).</p> <p>Policy 11.3 PREA, pages 5 and 6, section IV., MOU Bonner County &amp; Kaniksu Community Health and Idaho Sexual Assault Response Guidelines addresses 115.321(c).</p> <p>MOU LillyBrooke, interviews with PREA Coordinator and LillyBrooke Advocate addresses 115.321(d).</p> <p>MOU LillyBrooke, interviews with PREA Coordinator and LillyBrooke Advocate addresses 115.321(e).</p> <p>Idaho Sexual Assault Response Guidelines, address 115.321(f).</p> <p>MOU LillyBrooke and interview with LillyBrooke Advocate addresses 115.321(h).</p> <p>The Bonner County Juvenile Detention Center complies with standard 115.321: Evidence protocol and forensic medical examinations.</p>
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115.322	Policies to ensure referrals of allegations for investigations
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> <li>2. Policy 1.2 Investigation Protocol</li> </ol> <p>Interviews</p> <ol style="list-style-type: none"> <li>1. Agency Head</li> <li>2. Investigator</li> </ol> <p>115.322 (a): The Bonner County Juvenile Detention Center supervisors ensure that an administrative or criminal investigation is completed for all sexual abuse and sexual harassment allegations. The Investigator coordinates administrative and</p>

criminal investigations of alleged incidents of sexual misconduct in cooperation with local law enforcement as needed. Policy 1.2 Investigation Protocol, page 3., D., ensures that allegations of sexual abuse or sexual harassment are referred for investigation to the Investigator (Administrative) or the Sandpoint Police Department (Criminal).

115.322 (b): The Sandpoint Police Department has legal authority to conduct criminal investigations. The Bonner County Juvenile Detention Center has a policy to ensure referrals of allegations for investigations. (Policy 1.2 Investigation Protocol) The facility prohibits all acts of sexual harassment, sexual misconduct, and sexual abuse. All allegations involving sexual harassment or sexual abuse will be investigated. Allegations, other than those which fall under criminal code, will be administratively fully investigated.

115.322 (c) – As indicated in 115.322 (b), Policy 1.2 Investigation Protocol describes the responsibilities of the facility and Sandpoint Police Department in relation to criminal investigations. (Policy 1.2 Investigation Protocol, page 3.D.)

The Bonner County Juvenile Detention Center documents all referrals. The Auditor interviewed the Investigator for the Detention Center. During the interview, the Investigator indicated he would coordinate the release of any documentation, coordinate staff interviews and give the Sandpoint Police Department unlimited access to the facility as needed for conducting a criminal investigation.

The Bonner County Juvenile Detention Center investigator conducts internal investigations of employee misconduct. The Investigator participated in the Impact Justice Training Class "Specialized PREA Investigations – Juvenile Interview Training. This training class was coordinated through the Idaho Department of Juvenile Corrections and the National PREA Resource Center. Interviews with the Superintendent and the PREA Coordinator confirm that referrals and investigations would be completed for any sexual assault or sexual harassment incidents.

The Bonner County Juvenile Detention Center ensures both administrative and criminal investigations are completed for all allegations of sexual abuse and sexual harassment. The facility has procedures requiring investigations by the Sandpoint Police Department. The Juvenile Detention Center management staff have been trained to conduct administrative investigations involving sexual abuse and harassment. If an administrative investigation potentially involves criminal behavior, the investigation is referred to the Sandpoint Police Department. The agency documents all referrals. The Bonner County Juvenile Detention Center website provides information concerning PREA, and the PREA Policy is posted on the Web site <https://www.bonnercountyid.gov/reporting-abuse>.

Policy 1.2 Investigation Protocol, page 3.D., and the interview with the Superintendent address 115.322(a).

Policy 1.2 Investigation Protocol, page 3.D., and the interview with the Investigative Staff address 115.322(b).

	<p>Policy 1.2 Investigation Protocol, page 3.D., and the agency web site <a href="https://www.bonnercountyd.gov/reporting-abuse">https://www.bonnercountyd.gov/reporting-abuse</a>, addresses 115.322 (c).</p> <p>The Bonner County Juvenile Detention Center complies with standard 115.322: Policies to ensure referrals of allegations for investigations.</p>
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<b>115.331</b>	<b>Employee training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> <li>2. Policy 3.1 Staff Training</li> <li>3. Staff Training forms samples</li> <li>4. Cross Gender Training forms samples</li> <li>5. PREA Training PowerPoint</li> <li>6. Bonner County Employee worksheets</li> </ol> <p>Interviews</p> <ol style="list-style-type: none"> <li>1. Random Staff interviews</li> </ol> <p>115.331 (a): Policy 3.1 Staff Training page 4. F.1. d., and page 7. M., specifies the PREA Training requirements. All direct care staff will complete the three (3) hour PREA course, in accordance with PREA 115.331, within the first sixty (60) days of employment. Additionally, all direct care staff will complete a three (3) hour refresher course on PREA on an annual basis. In addition, all employees will review and receive training on the agency's sexual abuse and sexual harassment policy annually. The Bonner County Juvenile Detention Center trains all employees who may have contact with residents on: the zero-tolerance policy for sexual abuse and sexual harassment; how to fulfill their responsibilities pursuant to the PREA Standards; residents' right to be free from sexual abuse and sexual harassment; the right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment; the dynamics of sexual abuse and sexual harassment; the common reactions of victims of sexual abuse and sexual harassment; how to detect and respond to signs of threatened and actual sexual abuse and how to distinguish between consensual sexual contact and sexual abuse between residents; how to avoid inappropriate relationships with residents; how to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender non-conforming residents; and laws related to mandatory reporting of sexual abuse and the age of consent. The training covers both male and female residents. The Bonner County Juvenile</p>

	<p>Detention Center provides employees with refresher training every year.</p> <p>115.331 (b): The facility houses both male and female residents. The facility provides Cross-Gender and Transgender Pat Search Training including a video on the subject. Training is tailored to the unique needs and attributes of residents. Employees are well versed in the Detention Center's current sexual abuse and sexual harassment policies, standard operating procedures, and Cross-Gender/ Transgender Pat Search procedures.</p> <p>115.331(c): All current employees are trained and participate in PREA refresher training on a yearly basis.</p> <p>115.331 (d): The Bonner County Juvenile Detention Center documents that employees understand their training. The Auditor reviewed employee training records, and the PREA Coordinator provided copies of training records for the employees. The Auditor reviewed Employee Training records; each file contained documentation on the hire date, PREA Training Dates and Acknowledgement documents. The training records indicate that PREA Training is provided annually.</p> <p>Nine random staff interviews were conducted. The staff members interviewed by the Auditor indicated a clear understanding of the Prison Rape Elimination Act. The random Staff interviewed were able to recall information from the training, such as the zero tolerance for sexual assault and sexual harassment, professional and gender-specific pat search procedures, how to respond to sexual assaults and the first responder's duties. Staff members recalled how to avoid inappropriate relationships with residents, the dynamics of sexual abuse in prison, and how to detect signs of sexual abuse. All employees have been trained, and the Auditor confirmed the training records of the employees. All Staff interviewed confirmed their participation in PREA training and knowledge of the training curriculum.</p> <p>Policy 3.1 Staff Training page 4. F.1. d., and page 7. M., Staff Training Forms samples, Cross-gender training forms samples, and interviews with Random staff addresses 115.331 (a).</p> <p>PREA Training PowerPoint, and interviews with Random staff addresses 115.331 (b).</p> <p>Cross Gender Training forms samples, Staff Training form Roster Samples, Bonner County Employee worksheets, and interviews with Random staff addresses 115.331 (c).</p> <p>Cross Gender Training forms samples, Staff Training form Samples, Bonner County Employee worksheets, and interviews with Random staff addresses 115.331 (d).</p> <p>The Bonner County Juvenile Detention Center complies with standard 115.331: Employee training.</p>
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<b>115.332</b>	<b>Volunteer and contractor training</b>
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**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Documents

1. Policy 11.3 PREA
2. Policy 3.1 Staff Training and Training Criteria
3. PREA Training PowerPoint
4. Contractor Training Samples
5. Acknowledgement Contractors Vendors Visitors Samples
6. Medical Training verification Training Samples

Interviews:

1. Contractor

115.332 (a): Policy 3.1 Staff Training and Training Criteria, page 6, section V.B., indicates contractors and volunteers receive PREA training based on their contact level with juveniles. Those working individually with juveniles must complete approved PREA training before starting. All other volunteers and contractors must acknowledge the Zero Tolerance policy and reporting requirements related to sexual assault and harassment. Training and documentation are kept in individual files. (Acknowledgement Contractors Vendors Visitors Samples, Contractor Training Samples)

115.332 (b): Volunteers and contractors are informed of the resident's right to be free from sexual abuse and to be free from retaliation for reporting sexual abuse and harassment incidents. Additionally, all volunteers and contractors are informed of the facility's zero tolerance policy regarding sexual abuse and sexual harassment and how to report incidents involving sexual abuse and sexual harassment. (PREA Training PowerPoint)

115.332 (c): The Bonner County Juvenile Detention Center maintains documentation confirming that contractors and volunteers understand their training. (Acknowledgement Contractors Vendors Visitors Samples, Contractor Training Samples, Medical Training verification Training)

The Auditor interviewed one Contractor (Teacher). The Contractors stated she had been trained in sexual abuse and sexual harassment prevention, detection, and response responsibilities. The Contractor stated she had participated in a contractor orientation class. The Contractor further indicated she understood the zero-tolerance policy.

Contractors and Volunteers are informed of the resident's right to be free from sexual abuse and to be free from retaliation for reporting sexual abuse and harassment incidents. The Bonner County Juvenile Detention Center maintains documentation confirming that volunteers and contractors understand their



	<p>training.</p> <p>Policy 3.1 Staff Training and Training Criteria, page 6, section V.B., PREA Training PowerPoint, and interviews with a Contractor, addresses 115.332 (a).</p> <p>Policy 3.1 Staff Training and Training Criteria, page 6, section V.B., PREA Training PowerPoint, and interviews with a Contractor, addresses 115.332 (b).</p> <p>Policy 3.1 Staff Training and Training Criteria, page 6, section V.B., PREA Training PowerPoint, Acknowledgement Contractors Vendors Visitors Samples, Contractor Training Samples, Medical Training verification and interviews with a Contractor, addresses 115.332 (c).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.332: Volunteer and Contractor training.</p>
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115.333	Resident education
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> <li>2. Policy 15.3 Resident Orientation Education</li> <li>3. BCJD Handbook</li> <li>4. Orientation &amp; House Rules</li> <li>5. PREA Test Samples</li> <li>6. PREA Video Resident Education 10-day Sample Rosters</li> <li>7. PREA How to Report</li> <li>8. Resident Understanding of PREA</li> <li>9. Bonner County Site Review</li> <li>10. Resident Worksheets Bonner County (admission dates, orientation dates, and comprehensive education dates)</li> </ol> <p>Interviews</p> <ol style="list-style-type: none"> <li>1. Intake Staff</li> <li>2. Random Resident interviews</li> </ol> <p>115.333 (a) Residents are provided with information regarding the policy of zero tolerance towards sexual abuse and harassment, the procedures for reporting such incidents, their right to be free from sexual abuse and harassment, and their protection against retaliation for reporting these incidents. In addition, residents are informed about how the Bonner County Juvenile Detention Center will respond to</p>

such incidents. Intake Staff interviews verify that residents receive the appropriate information. Interviews with residents confirm that the Detention Center Staff provide information on reporting incidents of sexual abuse. The Agency documents the receipt of this information. The Auditor reviewed fourteen random intake files; each contains documentation concerning the orientation date (intake), screening date, PREA Acknowledgement date, initial education date and comprehensive education date. Five residents were interviewed, all five indicated they received PREA information during intake.

115.333 (b): All residents who remain at the Bonner County Juvenile Detention Center for more than ten days receive comprehensive education on PREA. The facility utilizes the State of Idaho Juvenile Corrections PREA video for their comprehensive resident PREA education. This auditor viewed the PREA video, which provides definitions of sexual abuse and sexual harassment, information on zero tolerance for sexual abuse, sexual harassment, retaliation for reporting, the dynamics of sexual abuse/sexual harassment, how to report incidents of sexual abuse/sexual harassment, how to protect against sexual abuse/sexual harassment, how to preserve evidence of sexual abuse and consequences for filing a false report. The video is a comprehensive PREA education tool that is presented in a clear, age-appropriate manner. A review of fourteen resident files reflected all fourteen residents viewed the PREA video within ten days of intake.

115.333 (c): Comprehensive educational sessions are conducted on Sundays and involve a review of PREA and a video concerning the residents' right to be free from sexual abuse, harassment and retaliation while incarcerated. Residents' participation in these educational classes is documented. All residents receive the comprehensive PREA education within ten days of intake, as the video is shown once a week to every resident. There are no residents who have not received comprehensive PREA education.

115.333 (d): Throughout the facility, information is posted about PREA, Zero Tolerance and how to report incidents of sexual abuse. This information is presented in both Spanish and English. This information is visible and readily available. There is information provided to the residents concerning the services of LillyBrooke. LillyBrooke provides 24-hour crisis line services, legal advocacy, counseling, sexual assault intervention services, prevention education, family advocacy and support for children affected by violence.

The Bonner County Juvenile Detention Center has procedures to provide resident education in formats accessible to all residents. Residents who are limited English proficient, deaf, visually impaired, or otherwise disabled can participate in efforts to prevent and respond to sexual abuse and harassment. The Bonner County Juvenile Detention Center uses written and visual education materials and has interpreters available (through Bonner County District Court) to communicate effectively with residents. In addition, interpreters are available through the Bonner County Sheriff's Department. Residents with non-English-speaking backgrounds or physical impairments may need an interpreter to access important information. Interpreters provide services during arraignments, hearings, trials, interviews with counsel, and

other proceedings. Residents with intellectual disabilities are given extra attention during the intake process to ensure they understand the information. If necessary, a Mental Health staff member aids in this process. The admitting detention officer takes appropriate steps to ensure that residents with disabilities including, but not limited to, 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 Bonner County Juvenile Detention programs, and especially those efforts to prevent, detect, and respond to sexual abuse and sexual harassment.

115.333 (e): The Bonner County Juvenile Detention Center maintains documentation of resident participation in comprehensive education classes. A review of fourteen resident files reflected all fourteen residents viewed the PREA video within ten days of intake. Five residents were interviewed, all five indicated they received PREA information during intake and subsequently participated in comprehensive education.

115.333 (f) – During the Site Review, this auditor observed the "Zero Tolerance" and "How To Report" posters throughout the facility, including resident housing, Medical, Booking, recreation areas, (Multipurpose area) and education. How To Report posters are posted at each telephone available to residents.

Policy 15.3 Resident Orientation Education, page 1. A., Bonner County Site Review, Bonner County Orientation & House Rules, PREA How to Report, Resident Understanding of PREA, PREA Test Samples, interviews with Intake staff and random residents addresses 115.333(a).

Policy 15.3 Resident Orientation Education, page 2. B., BCJD Handbook, Orientation & House Rules, PREA Test Samples, PREA Video Resident Education 10-day Sample Rosters, PREA How to Report, Resident Understanding of PREA, Bonner County Site Review, Resident Worksheets Bonner County (admission dates, orientation dates, and comprehensive education dates), interviews with Intake staff and random residents addresses 115.333(b).

Policy 15.3 Resident Orientation Education, page 2. B., Resident Worksheets Bonner County (admission dates, orientation dates, and comprehensive education dates), interviews with Intake staff and random residents addresses 115.333(c).

Policy 15.3 Resident Orientation Education, page 1. A., BCJD Handbook, Orientation & House Rules, PREA Test Samples, PREA Video Resident Education 10-day Sample Rosters, PREA How to Report, Resident Understanding of PREA, Bonner County Site Review, and Resident Worksheets Bonner County (admission dates, orientation dates, and comprehensive education dates), 115.333(d).

Policy 15.3 Resident Orientation Education, page 1. A., PREA Video Resident Education 10-day Sample Rosters, and Resident Worksheets Bonner County (admission dates, orientation dates, and comprehensive education dates), addresses 115.333(e).

	<p>BCJD Handbook, Orientation &amp; House Rules, PREA How to Report, and Bonner County Site Review addresses 115.333(f).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.333: Resident education.</p>
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<b>115.334</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> <li>2. Investigator Training Certificates</li> <li>3. Investigator Training Curriculum</li> </ol> <p>Interviews</p> <ol style="list-style-type: none"> <li>1. Investigator</li> </ol> <p>115.334 (a) The Bonner County Juvenile Detention Center staff conduct administrative investigations involving sexual abuse and sexual harassment. The Investigator participated in the Impact Justice Training Class "Specialized PREA Investigations - Juvenile Interview Training. This training class was coordinated through the Idaho Department of Juvenile Corrections and the National PREA Resource Center.</p> <p>115.334(b): The training includes the proper use of Miranda and Garrity warnings, evidence collection, and the criteria and evidence required to substantiate a case for administrative action or criminal referral. The Auditor reviewed the training certificate for two investigators and interviewed one Investigator.</p> <p>The Investigator was aware of his responsibilities during an investigation; he indicated that the investigation would begin immediately upon notification of an allegation. Any allegation that is potentially criminal behavior would require police involvement. His training covered all areas of the investigative process, interviewing techniques, evidence collection, evidence protection and victim advocacy. Securing and processing the scene for evidence. Securing all evidence and maintaining the integrity of the evidence. Seeing to the victim's needs and providing advocacy support. The Investigator stated he would review memorandums, collect data, and draft a report. The training reviewed good interpersonal communication skills with resident victims, assailants, and witnesses. Understanding of the dynamics of resident sexual violence. Establishing good working relationships with outside agencies, hospitals, prosecutors, and</p>

	<p>investigators.</p> <p>The Investigator noted that Anonymous or third-party reports would be thoroughly investigated as soon as possible. A third party or an anonymous tip would be treated the same as a direct report. The Investigator indicated he would begin by introducing himself to the victim, and ensuring the victim's immediate health and safety concerns had been addressed. He would then help the victim gain back a sense of control by involving them in the decision of when and where to hold the interview. and then proceed with a normal investigation process.</p> <p>The Investigator indicated that if the incident were criminal in nature, he would not collect specific physical and DNA evidence, he would aid the Sandpoint Police Department by providing victim and perpetrator information such as any pertinent central file information, information concerning prior complaints and reports of prior sexual abuse and he would provide any information on prior investigations involving either the victim or the perpetrator.</p> <p>115.334 (c): The Bonner County Juvenile Detention Center maintains documentation for the training each investigator participated in.</p> <p>Policy 11.3 PREA, page 7, section V. D., the Investigator Training Certificates and the interview with the investigator address 115.334 (a).</p> <p>The interview with the investigator addresses 115.334(b).</p> <p>The Investigator Training Certificates address 115.334 (c).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.334: Specialized training: Investigations.</p>
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<b>115.335</b>	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> <li>2. Medical and Mental Health Specialized Training</li> <li>3. Medical and Mental Health PREA training</li> <li>4. Medical-Mental Health Lesson Plan</li> </ol> <p>Interviews</p>

1. Medical staff interview
2. Mental Health interview

115.335 (a) – The Bonner County Policy 11.3 PREA, Page 8, section V. E. indicates medical and mental health care practitioners who work regularly in the facility are trained in: a. How to detect and assess signs of sexual abuse and sexual harassment, b. How to preserve physical evidence of sexual abuse; c. How to respond effectively and professionally to juvenile victims of sexual abuse and sexual harassment; and d. How and to whom to report allegations or suspicions of sexual abuse and sexual harassment. During the interview with Medical Staff, the Auditor was informed about the Detention Center's standards for Health Care Staff.

Specifically, Medical Staff are required to: provide timely first aid and treatment of visible injuries; preserve potential evidence (including evidence of sexual activity); provide access to forensic examinations performed by a Sexual Assault Nurse Examiner (SANE), trained to examine the victim; provide access to victim advocate for emotional support; remain with the victim until they are escorted outside the facility; ensure and coordinate necessary care such as emergency contraception, HIV testing and counseling and medications that might be given once more information is gathered. The Medical staff member indicated she would work in conjunction with the SANE Staff at Bonner Health. The mental health staff received training on identifying signs of sexual abuse and responding effectively to victims.

Specialized training also included victim identification, interviewing, and interventions.

115.335(b): Medical Staff advised they do not conduct forensic medical examinations at the facility.

115.335(c): The facility provided training documentation for “PREA Medical and Mental Care Standards for the Medical and Mental Health Staff.

115.335 (d): The Bonner County Juvenile Detention Center provides PREA training to the facility's medical and mental health practitioners. The training includes detecting signs of sexual abuse/harassment, preventing the destruction of evidence, responding to victims, and reporting allegations or suspicions of sexual abuse and sexual harassment. The Auditor confirmed that training was provided for Medical and Mental Health staff.

Policy 11.3 PREA, Page 8, section V. E., Medical and Mental Health Specialized Training, Medical and Mental Health PREA training, Medical-Mental Health Lesson Plan, and the interviews with Medical and Mental Health Staff addresses 115.335(a).

Interview with Medical Staff addresses 115.335 (b).

Medical and Mental Health Specialized Training, Medical and Mental Health PREA training and the interviews with Medical and Mental Health Staff addresses 115.335 (c).

Medical and Mental Health PREA training and the interviews with Medical and

	<p>Mental Health Staff addresses 115.335 (d).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.335: Specialized training: Medical and mental health care.</p>
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115.341	Obtaining information from residents
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> <li>2. Policy 15.2 Screening, Intake, Housing, Release</li> <li>3. Policy 4.3 Case Record and Confidentiality</li> <li>4. Vulnerability Assessment Blank</li> <li>5. Vulnerability Assessment Samples</li> <li>6. ACE Questionnaire Blank</li> <li>7. Medical Questionnaire Blank</li> <li>8. Resident Worksheets Bonner County</li> <li>9. Bonner County Site Review</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Staff who perform risk assessments</li> <li>2. PREA Coordinator</li> <li>3. Random Residents</li> </ol> <p>115.341 (a): All residents are provided with Risk Assessments upon intake. The policy provides that assessments are conducted within the first 72 hours; however, the Auditor notes that these assessments are done almost immediately after the initial intake. The assessment includes the mental, physical and developmental disability of the resident, the age of the resident, the physical build of the resident, previous incarcerations, criminal history, prior sex offenses, whether the resident is or is perceived to be gay, lesbian, bisexual, transgender, intersex or gender non-conforming, prior sexual victimization and the resident's perception of their vulnerability.</p> <p>115.341 (b): The Vulnerability Assessment, MASI II, and ACE (Adverse Childhood Experience Questionnaire) assess various vulnerabilities. They consider age, prior placements in locked juvenile facilities, feelings about being in such facilities, perceived risk of attack or abuse, history of threats, harassment, or actual attacks, bullying, unwanted sexual experiences (reported or not), identification as LGBT or intersex, and arrests on sexual or violent offenses. Assessments also evaluate intellectual impairment, learning disabilities, special education needs, or</p>

developmental delays.

115.341 (c): Using the Vulnerability Assessment, MASI II, and ACE screening tools, the Bonner County Juvenile Detention Facility seeks to gather information on:

- Prior sexual victimization or abusiveness
- Gender nonconforming appearance or behavior, or identification as lesbian, gay, bisexual, transgender, or intersex
- Current charges and offense history
- Age
- Emotional and cognitive development
- Physical size and stature
- Mental illness or disabilities
- Intellectual or developmental disabilities
- Physical disabilities
- Resident's perception of vulnerability
- Any other specific needs for supervision, safety precautions, or separation from other residents

Staff Responsible for Risk Screening advised that they consider age, prior placements, whether the resident feels safe, have they been abused before, violence history, sexual offense history, the resident's size, and any disabilities.

115.341 (d) – Both Intake Staff and Staff Responsible for Risk Screening indicated information is obtained during the intake process, medical screening, and mental health screening. Documentation includes reviewing court records, behavioral records MASI II, and ACE Screening Tool results.

115.341 (e) Subject to mandatory reporting laws, any information related to sexual victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as required by facility policy and Federal, State, or local law, to inform treatment plans, security and management decisions, including housing, school, and program assignments.

The PREA Coordinator advised that the Risk Screening forms for current residents are kept in folders in the control booth. The past resident risk assessments are kept in a file cabinet in the supervisor's office. The supervisor's office is locked and is only accessible by supervisors, the Clinician, and the management team. Medical and Mental Health files are stored in locked file cabinets in their respective areas.

All information gathered during intake is shared with only those Staff that needs to know. Sensitive information is not shared unnecessarily. Residents at the Detention Center indicated they had been queried on questions concerning whether they had been victims of sexual abuse or sexual harassment or if they had been arrested or charged with a sex offense. Screening staff affirmatively ask residents about their sexual orientation and gender identity by inquiring if they identify as lesbian, gay, bisexual, transgender, or intersex (LGBTI), in addition to making a subjective determination about perceived status. The screening information is used to assist in decisions regarding a Resident's housing unit, educational needs, and interventions.



	<p>The screening process is designed to encourage Residents to disclose sensitive information about previous sexual abuse and vulnerabilities they may have, including their sexual orientation and gender identity.</p> <p>Interviews with Intake, and Mental Health staff confirmed the use of assessment tools. Intake staff assess all residents, especially those with special needs or feelings of vulnerability, to ensure safe housing and resources. The Auditor reviewed several resident files, which contained signed Intake forms from both officers and residents. The Auditor also examined intake forms from Mental Health staff.</p> <p>Policy 15.2 Screening, Intake, Housing, Release, page 2-3, section 3., the Vulnerability Assessment Form, MAYSI II, the ACE Questionnaire, Resident Worksheets Bonner County and interviews with Staff who perform risk assessments and random residents addresses 115.341 (a).</p> <p>Policy 15.2 Screening, Intake, Housing, Release, page 2-3, section 3., Vulnerability Assessment Form, MAYSI II, ACE Questionnaire, Resident Worksheets Bonner County, address 115.341 (b).</p> <p>Policy 15.2 Screening, Intake, Housing, Release, page 2-3, section 3., the Vulnerability Assessment Form, MAYSI II, the ACE Questionnaire, Resident Worksheets Bonner County, and the interview with Staff who perform risk assessments addresses 115.341 (c).</p> <p>Policy 15.2 Screening, Intake, Housing, Release, page 2-3, section 3., Resident Worksheets Bonner County, and the interview with Staff who perform risk assessments addresses 115.341 (d).</p> <p>Policy 15.2 Screening, Intake, Housing, Release, page 2-3, section 3., X Policy 04.3 Case Record and Confidentiality, page 2, E. 1-6., interviews with the PREA Coordinator and Staff who perform risk assessments address 115.341 (e).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.341: Screening for risk of victimization and abusiveness.</p>
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<b>115.342</b>	<b>Placement of residents</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> <li>2. Policy 15.2 Screening, Intake, Housing, Release</li> <li>3. Policy 9.1 Sanitation and Hygiene</li> </ol>

## Interviews

1. PREA Coordinator
2. Risk of Victimization and Abusiveness
3. Detention Manager
4. Medical RN

115.342 (a): The Bonner County Juvenile Detention Center utilizes the intake information to make decisions on housing assignments. The needs of each resident are taken into consideration. Detention staff indicated they would determine housing on a case-by-case basis and have appropriate facilities available to ensure the safety of all residents.

115.342 (b): Observation cells are utilized only as a last resort when no other methods are available to ensure the safety of the residents or others. Residents placed in observation cells continue to participate in regular programming, including large muscle exercise and educational activities. Additionally, residents in observation cells are seen daily by medical or mental health staff. Bonner County Juvenile Detention Center does not have an isolation unit or segregation unit.

115.342 (c): LGBTQI residents are not assigned housing or beds based on their orientation. All residents at Bonner County Juvenile Detention Center are placed in single cells.

115.342 (d): The PREA Coordinator stated during her interview that the facility would consider a transgender or intersex resident's views concerning safety. More specifically, for youth who identify as transgender or intersex, Mental Health staff would assist in the intake process to ease any challenges perceived by the youth. Preferences concerning housing assignments for LGBTQI youth are always considered. LGBTQI youth receive fair and equal treatment without bias. Mental Health Staff monitors transgender or intersex residents. Any issues concerning residents who may be vulnerable due to their sexual orientation are documented so that supervisors, if necessary, can adjust assignments.

115.342 (e): Placement and programming assignment for each transgender or intersex resident would be reassessed at least twice each year. The Auditor notes that the average sentence at the Bonner Juvenile Detention Center is less than fifteen days.

115.342 (f): The PREA Coordinator stated during her interview that the facility would consider a transgender or intersex resident's views concerning safety. The PREA Coordinator advised they would house a transgender resident with consideration as to whether the placement will ensure the residents health and safety.

115.342 (g): All residents are provided with the opportunity to shower separately from other residents.

115.342 (h) – The facility reported no residents at risk of sexual victimization who were held in isolation in the past 12 months. The Bonner County Juvenile Detention

Facility has all single-occupancy cells in the resident housing pods. As noted in 115.342 (b): Observation cells are utilized only as a last resort when no other methods are available to ensure the safety of the residents or others. Residents placed in observation cells continue to participate in regular programming, including large muscle exercise and educational activities. Additionally, residents in observation cells are seen daily by medical or mental health staff. Bonner County Juvenile Detention Center does not have an isolation unit or segregation unit.

115.342 (i): The Bonner County Juvenile Detention facility does not have isolation or segregation cells. Observation cells are only used as a last resort for safety. Residents in these cells participate in all regular programming, including exercise and education. The facility reviews the need for separation every 30 days. The Auditor further notes that the average length of stay at this facility is less than 15 days. The Auditor confirms there are no isolation or segregation cells at this facility, and Observation cells are not used to isolate residents from others.

Policy 15.2 Screening, Intake, Housing, Release, pages 3-4, paragraph 6, a-f, interviews with the PREA Coordinator and staff who conduct Risk of Victimization and Abusiveness addresses 115.342 (a).

Policy 15.2 Screening, Intake, Housing, Release, pages 3-4, paragraph 6, a-f, interviews with staff who conduct Risk of Victimization and Abusiveness, Detention Manager and Medical RN, addresses 115.342 (b).

Policy 15.2 Screening, Intake, Housing, Release, page 4, paragraph 6, c, and interview with the PREA Coordinator addresses 115.342 (c).

Policy 15.2 Screening, Intake, Housing, Release, pages 3-4, paragraph 6, c-f, and interview with the PREA Coordinator, addresses 115.342 (d).

Policy 15.2 Screening, Intake, Housing, Release, pages 3-4, paragraph 6, e, interviews with the PREA Coordinator and staff who conduct Risk of Victimization and Abusiveness addresses 115.342 (e).

Policy 15.2 Screening, Intake, Housing, Release, pages 3-4, paragraph 6, f, interviews with the PREA Coordinator and staff who conduct Risk of Victimization and Abusiveness addresses 115.342 (f).

Policy 15.2 Screening, Intake, Housing, Release, pages 3-4, paragraph 6, a-e, Policy 9.1 Sanitation and Hygiene, page 1, section 3. B., interviews with staff who conduct Risk of Victimization and Abusiveness addresses 115.342 (g).

Policy 15.2 Screening, Intake, Housing, Release, pages 3-4, paragraph 6, a-e, addresses 115.342 (h).

Policy 15.2 Screening, Intake, Housing, Release, pages 3-4, paragraph 6, a-e, addresses 115.342 (i).

The Bonner County Juvenile Detention Center complies with Standard 115.342: Use of screening information.

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<b>115.351</b>	<b>Resident reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 1.2 Investigation Protocol</li> <li>2. Policy 11.1 Juvenile Grievance Procedure</li> <li>3. Policy 11.3 PREA</li> <li>4. PREA How To Report</li> <li>5. PREA Poster</li> <li>6. BCJD Handbook</li> <li>7. Resident Understanding of PREA Blank</li> <li>8. Bonner County Site Review</li> </ol> <p>Interviews</p> <ol style="list-style-type: none"> <li>1. Random Residents</li> <li>2. Random Staff</li> <li>3. PREA Coordinator</li> </ol> <p>115.351 (a): There are multiple ways for Residents to report sexual abuse and sexual harassment privately. The Resident Handbook provides specific information on reporting to outside agencies. On page 10 of the Handbook the following information is available: If you are a victim of abuse (physical, sexual, neglect, abandonment) You can report the incident to:</p> <ul style="list-style-type: none"> <li>• Lillybrooke (Family Justice Center) 208-265-3586 227 S. 1st Avenue Sandpoint, ID 83864</li> <li>• Kaniksu Community Health 208-265-6252 810 N. 6th Ave. Sandpoint, ID 83864</li> <li>• Safe Passage Violence Prevention Center 208-664-9303 850 N. 4th St. Coeur d'Alene ID, 83814</li> <li>• Boundary County Victim Services 208-267-5211 PO Box 633 Bonners Ferry, ID 83805</li> </ul> <p>Additionally, the Handbook states that residents can report to Juvenile Detention Clinician and that the Clinician can assist residents in finding more resources upon release.</p> <p>During the intake process each resident is informed of the following information:</p>

- If you know that Sexual activity is happening or feel uncomfortable around staff or other youth, it is important that you report what you know. This is for your safety and the safety of others. You can tell this directly to staff, the mental health clinician, medical staff, parents or other people that you may trust. You can also write down what you know on a “grievance form” and put it in the grievance box. This form will be given to the Detention Manager or Justices Services Director. You can also call the National Child Abuse Hotline below. Before signing this form, make sure to ask any questions that you might have.
- National Child Abuse Hotline 1-800-422-4453
- Idaho Child Abuse Hotline 1-855-552-5437
- Lillybrooke (Family Justice Center) 208-265-3586

The Bonner County Juvenile Detention Center provides multiple internal ways for residents to privately report physical abuse, sexual abuse, sexual harassment, retaliation by other juveniles or staff for reporting sexual abuse or sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents, including, but not limited to:

1. Reporting to staff members
2. Reporting to clerical staff
3. Reporting through the C-Tel phone system PREA Hotline
4. Reporting to the Detention Manager or Justice Services Director
5. Reporting via confidential suggestion box(es), which shall be checked on a daily basis. (Policy 1.2, Investigation Protocol, page 2. 4.)

115.351 (b): Residents can call a community victim advocate hotline and may request to remain anonymous. The phone number is posted on all resident phones. (PREA How to Report)

115.351 (c) – Any suspected case of child abuse/neglect or harassment is to be reported immediately, and notification made through the chain of command. All staff are required to report immediately any knowledge, suspicion, or information they receive regarding an incident of retaliation against residents, or staff who reported sexual abuse or harassment; and any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse, harassment or retaliation. This includes reports made verbally, in writing, anonymously, and from third parties. All reported cases of abuse or harassment will be referred to the appropriate investigating authority. Staff shall promptly document all reports. (Policy 1.2, Investigation Protocol page 1, Section III., A. 1.)

115.351 (d): The PREA Coordinator advised the facility provides writing utensils and writing paper for residents.

115.351 (e): The PREA Coordinator advised that staff can privately report to Human Resources. Staff can report privately to all members of the Management Team, including the PREA Coordinator and directly to Human Resource Director. (Policy

	<p>1.02 Investigation Protocol, page 4, E.)</p> <p>Resident interviews confirm knowledge of the reporting procedures. Staff interviews confirm knowledge of reporting procedures.</p> <p>Policy 1.2 Investigation Protocol, pages 1-4, Section III. A-E., BCJD Handbook, PREA How to Report, Bonner Site Review, interviews with Random Residents and Random Staff addresses 115.351 (a).</p> <p>Policy 1.2, Investigation Protocol, page 2. 4., BCJD Handbook, PREA How to Report, Bonner Site Review, interviews with the PREA Coordinator and Random Resident addresses 115.351(b).</p> <p>Policy 1.2, Investigation Protocol page 1, Section III., A. 1., interviews with Random Staff and Random Residents addresses 115.351(c).</p> <p>Interview with PREA Coordinator addresses 115.351(d).</p> <p>Policy 1.2, Investigation Protocol, page 4., E., and interviews with Random Staff addresses 115.351(e).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.351: Resident reporting.</p>
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<b>115.352</b>	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> <li>2. Policy 1.2 Investigation Protocol</li> <li>3. Policy 11.1 Juvenile Grievance Procedure</li> <li>4. BCJD Handbook</li> <li>5. Bonner County Site Review</li> </ol> <p>115.352 (a) - Policy 11.1, Juvenile Grievance Procedure outlines the facility's process for addressing resident grievances.</p> <p>115.352 (b) - Policy 11.1, Juvenile Grievance Procedure does not establish specific timeframes for residents to submit grievances. As detailed on Page 1, Section III, A., "Informal Resolution," juveniles are encouraged to first attempt to resolve concerns involving staff by addressing the issue directly with the on-duty Shift Supervisor. If informal efforts do not resolve the matter, the juvenile should complete a grievance form and submit it to the Detention Manager. Staff members are available to assist</p>

residents in completing or submitting grievance forms as needed. Once a resolution is reached, the outcome will be documented in writing and filed with the original grievance in the juvenile's record. Notably, for grievances pertaining to allegations of sexual harassment or sexual abuse, the informal resolution process is bypassed, and such grievances are reported directly to the Detention Manager and Justice Services Director/PREA Coordinator.

115.352 (c): In accordance with Policy 11.1, Juvenile Grievance Procedure, Page 2, C., 4, if a grievance involves a specific staff member and was not submitted via the grievance/PREA box, it will not be directed to the staff member named in the grievance. Should the grievance concern a Shift Supervisor, it will be forwarded directly to the Detention Manager and Justice Services Director. A review of the Bonner County Juvenile Detention Center Juvenile Handbook verifies that the grievance procedure is clearly articulated, ensuring that residents are informed that grievances alleging sexual abuse or sexual harassment by staff will not be routed to the staff member who is the subject of the complaint.

115.352 (d) – According to Policy 11.1, Juvenile Grievance Procedure, Page 2, D., 1, the Detention Manager is responsible for reviewing grievances within three working days of their submission. The findings must then be communicated to both the juvenile and the Director within an additional three days. Emergency grievances are to be reviewed during the next shift, and grievances involving sexual harassment or sexual abuse are addressed immediately upon filing. The facility reported one grievance alleging sexual abuse within the past 12 months. Upon review by the Auditor, it was determined that the grievance pertained to alleged voyeurism and not sexual abuse. The grievance was submitted on June 18, 2024, and a response was provided on June 25, 2024. The resident expressed satisfaction with the Detention Manager's response.

115.352 (e) – According to Policy 1.2, Investigation Protocol, Page 4, F, third parties—including fellow residents, staff members, family members, attorneys, outside advocates, and others—are permitted to assist residents in filing reports, allegations, grievances, and requests for administrative remedies concerning allegations of sexual abuse. These third parties may also file such requests on behalf of residents.

For third-party reports submitted by individuals other than a parent or legal guardian:

- The facility may require, as a condition for processing the request, that the alleged victim consent to having the request filed on their behalf. The resident may also be required to personally pursue any subsequent steps in the administrative remedy process.
- If the resident chooses not to proceed with the request, the agency must document the resident's decision.
- For third-party reports submitted by a parent or legal guardian:
- If a parent or guardian files a request or appeal on behalf of a resident, the

Bonner County Juvenile Detention Center will process that request or appeal, regardless of whether the juvenile consents to its filing.

The auditor reviewed the agency's website which provides a telephone number and email address for the Agency Head, as well as contact information for the Bonner County Sheriff and the Director of the facility's external support services, enabling third parties to report concerns on behalf of facility residents.

115.352(f) – According to Policy 11.1, Juvenile Grievance Procedure, Page 1, B.3, juveniles who submit emergency grievances—such as those concerning isolation, denial of essential medical care, or allegations of sexual abuse or harassment—must receive prompt action to ensure immediate redress. Policy 11.1, Juvenile Grievance Procedure, Page 2, D.1, further stipulates that the Detention Manager is required to review any grievance within three working days of its submission, with findings communicated to both the juvenile and the Director within an additional three days. However, emergency grievances are to be addressed during the next shift, and those involving sexual harassment or sexual abuse are to be acted upon immediately when filed. The facility reported no grievances alleging substantial risk of imminent sexual abuse within the past 12 months.

115.352 (g): According to Policy 11.1, Juvenile Grievance Procedure, Page 1, Section 1, Juveniles are informed during orientation of their right to file grievances regarding any circumstance, behavior, or disciplinary action by staff or other juveniles. Unresolved grievances, following informal discussions with staff, are to be formally submitted as outlined in the policy. All grievances must be addressed promptly and without any threats or retaliation against the complainant. Additionally, Policy 11.3, PREA, Pages 12-13, Section X., C., 4, stipulates that any report of sexual abuse made in good faith, based on a reasonable belief that the alleged conduct occurred, will not be considered a false report or lying. Such reports cannot form the basis for disciplinary action, even if the subsequent investigation does not yield sufficient evidence to substantiate the allegation.

Policy 11.1, Juvenile Grievance Procedure, and BCJD Handbook addresses 115.352(a).

Policy 11.1, Juvenile Grievance Procedure, Page 1, Section III, A., and BCJD Handbook addresses 115.352(b).

Policy 11.1, Juvenile Grievance Procedure, Page 2, C., 4., and BCJD Handbook, addresses 115.352(c).

Policy 11.1, Juvenile Grievance Procedure, Page 2, D., 1., addresses 115.352(d).

Policy 1.2, Investigation Protocol, Page 4, F., and Bonner County Site Review, addresses 115.352(e).

Policy 11.1, Juvenile Grievance Procedure, Page 1, B.3., and Page 2, D.1, addresses 115.352(f).



	<p>Policy 11.1, Juvenile Grievance Procedure, Page 1, Section 1., addresses 115.352(g).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.352 Exhaustion of Administrative Remedies.</p>
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<b>115.353</b>	<b>Resident access to outside confidential support services and legal representation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> <li>2. Policy 13.2 Juvenile Visiting</li> <li>3. MOU LillyBrooke</li> <li>4. PREA How to Report</li> <li>5. Phone Calls</li> <li>6. Immigration Pamphlet</li> <li>7. Bonner County Site Review</li> </ol> <p>Interviews</p> <ol style="list-style-type: none"> <li>1. Random Residents</li> <li>2. Superintendent</li> <li>3. PREA Coordinator</li> <li>4. LillyBrooke Advocate</li> </ol> <p>Section 115.353(a): The Bonner County Juvenile Detention Center has formalized a Memorandum of Understanding with the LillyBrooke Family Justice Center to provide support related to sexual assault. Residents have access to the mailing address and telephone numbers, including a toll-free number for confidential communication with the Center. The immigration service's contact information is provided to youth detained solely for civil immigration purposes. An interpreter will be provided to assist with the immigration service's contact information. The Auditor notes the Bonner County Juvenile Detention Center does not house individuals detained solely for civil immigration purposes. The Detention Center facilitates reasonable communication between residents and external confidential support services and legal representation.</p> <p>115.353(b): The facility informs residents before access about how communications will be monitored and how abuse reports will be forwarded under mandatory reporting laws. This is stated in the PREA How to Report information that is posted at every phone.</p>

	<p>115.353 (c): The Bonner County Juvenile Detention Center has formalized a Memorandum of Understanding with the LillyBrooke Family Justice Center to provide support related to sexual assault. Residents have access to the mailing address and telephone numbers, including a toll-free number for confidential communication with the Center. The facility's Mental Health Clinician will facilitate access to outside victim advocates for emotional support services related to sexual abuse. Residents have access to community-based victim advocate services.</p> <p>115.353(d): Juveniles are encouraged to visit their families regularly. A resident may make collect calls to parents, legal guardians, foster parents, or custodians. Residents are provided access to Legal representation through visits and phone calls.</p> <p>All residents interviewed indicated they had confidential access to their attorneys before any hearings. Additionally, all residents interviewed stated they are allowed the opportunity to visit with family.</p> <p>Policy 11.3 PREA, page 8, Section VII., C., PREA How to Report, Phone Calls, Bonner County Site Review, and interviews with Random Residents addresses 115.353 (a).</p> <p>Policy 11.3 PREA, page 8, Section VII., C., PREA How to Report, Phone Calls, Bonner County Site Review, and interviews with Random Residents addresses 115.353 (b).</p> <p>MOU LillyBrooke and interview with LillyBrooke Advocate addresses 115.353 (c).</p> <p>Policy 13.2 Juvenile Visiting, (all), BCJD Handbook, PREA How to Report, Phone Calls, interviews with Superintendent, PREA Compliance Manager and Random Residents, address 115.353 (d).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.353: Resident access to outside confidential support services.</p>
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115.354	Third-party reporting
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> <li>2. Policy 1.2 Investigation Protocol</li> <li>3. Bonner Site Review</li> <li>4. Bonner County, ID web page</li> </ol> <p>Interviews</p>

	<p>1. Random Residents</p> <p>115.354 (a): The Bonner County Juvenile Detention Center has implemented a process for receiving third-party reports of sexual abuse. Details regarding this reporting method are available on the Bonner County website <a href="https://www.bonnercountyid.gov/reporting-abuse">https://www.bonnercountyid.gov/reporting-abuse</a>, ensuring public access to procedures for reporting resident sexual abuse or harassment on behalf of residents. Interviews with residents demonstrate a understanding of third-party reporting mechanisms. Most residents indicated that they could inform their attorney, family member, or probation officer, who could then notify a staff member or the Director to formally report an incident.</p> <p>The Bonner County Juvenile Detention Center website meets the requirements of this standard by providing clear instructions to third parties on reporting procedures. Resident interviews further confirm their awareness of these third-party reporting options.</p> <p>Policy 1.2 Investigation Protocol, page 4, F., Bonner County Site Review, Bonner County, ID web page, and interviews with random residents address 115.354 (a).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.354: Third-party reporting.</p>
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115.361	Staff and agency reporting duties
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> <li>2. Policy 1.2 Investigation Protocol</li> <li>3. 16-1605 Idaho State Code</li> </ol> <p>Interviews</p> <ol style="list-style-type: none"> <li>1. Detention Manager</li> <li>2. Mental Health</li> <li>3. Medical RN</li> <li>4. PREA Coordinator</li> <li>5. Random Staff</li> </ol> <p>115.361 (a): The Bonner County Juvenile Detention Center requires all Staff to</p>

immediately report any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment in the facility. Staff members are also required to report any retaliation against residents or Staff who have reported an incident of sexual assault or sexual harassment. Regardless of its source, The Bonner County Juvenile Detention Center employees, contractors, and volunteers who receive information concerning resident-on-resident sexual misconduct at the Detention Center, or who observe an incident of resident-on-resident sexual misconduct or have reasonable cause to suspect a resident is a victim of sexual misconduct, must: Immediately report the information or incident directly to their immediate Supervisor. Should it be required due to alleged criminal behavior, the Director or PREA Coordinator will notify Law Enforcement. Supervisory Staff, Mental Health staff or Medical Staff will report any incident of suspected child abuse or neglect to Child Protective Services. (Policy 1.2, Investigation Protocol, page 4. E.)

115.361 (b): All Bonner County Juvenile Detention Center staff, contractors, and volunteers must report any allegation of sexual abuse as required by mandatory reporting laws (Idaho State Code 16-1605). Residents are informed of the limitations of confidentiality between residents and Staff. (Policy 1.2, Investigation Protocol, page 2., 6. C.)

115.361 (c): Aside from reporting to the designated supervisors or officials and designated State or local service agencies, The Bonner County Juvenile Detention Center 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. (Policy 1.2, Investigation Protocol, page 5, H. 1-2.)

115.361 (d): Medical and Mental Health practitioners must report sexual abuse to designated Supervisors and state or local agencies. (Idaho State Code 16-1605). (Policy 1.2, Investigation Protocol, page 5, H. 1-2.)

115.361 (e): Pursuant to Policy 1.2, Investigation Protocol, page 5, I, 1-3. , the Detention Manager must promptly report any allegation of sexual abuse to the alleged victim's parents or legal guardians unless there is official documentation indicating that the parents/legal guardians should not be notified and if the alleged victim is under the guardianship of the child welfare system, report any allegation of sexual abuse to the alleged victim's caseworker instead of the parents or legal guardians.

115.361 (f): While no public complaints have been received, a procedure is in place for third-party reports to be sent to the Director. If an allegation arises, the Director informs the PREA Coordinator to initiate an investigation. (Policy 1.2, Investigation Protocol, page 5, J, K, and L.)

Any Detention Center employee, contractor, or volunteer who fails to report an allegation or coerces or threatens another person to submit inaccurate, incomplete, or untruthful information with the intent to alter a report, may face disciplinary action up to and including termination of employment.

	<p>Policy 1.2, Investigation Protocol, page 4. E. and interviews with Random staff addresses 115.361 (a).</p> <p>Policy 1.2, Investigation Protocol, page 2., 6. C., Idaho State Code 16-1605, and interviews with Random staff addresses 115.361 (b).</p> <p>Policy 1.2, Investigation Protocol, page 5. H. 1-2., Idaho State Code 16-1605, and interviews with Random Staff addresses 115.361 (c).</p> <p>Policy 1.2, Investigation Protocol, page 5. H. 1-2., Idaho State Code 16-1605, interview with Medical and Mental Health staff addresses 115.631 (d).</p> <p>Pursuant to Policy 1.2, Investigation Protocol, page 5, I, 1-3., interviews with PREA Coordinator and Detention Manager addresses 115.361 (e).</p> <p>Policy 1.2, Investigation Protocol, page 5, J, K, and L., and the interview with the Detention Manager addresses 115.361 (f).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.361: Staff and Agency reporting duties.</p>
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<b>115.362</b>	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> <li>2. Policy 11.1 Juvenile Grievance Procedure</li> </ol> <p>Interviews</p> <ol style="list-style-type: none"> <li>1. Agency Head</li> <li>2. Detention Manager</li> <li>3. Random Staff</li> </ol> <p>115.362 (a): The Bonner County Juvenile Detention Center Policy requires immediate action to protect residents from sexual abuse. Staff interviewed are aware of their reporting requirements and the steps that need to be taken to ensure the residents' safety. All Staff, volunteers and contractors who receive an initial report of sexual misconduct are required to promptly intervene on the alleged victim's behalf to ensure the victim receives prompt medical and mental health, as appropriate to their needs and the circumstances of the alleged offense. (11.1 Juvenile Grievance Procedure, Pages 1-2, B. 1-5)</p>

	<p>Staff interviews revealed that Staff members were formally trained in and understand how to ensure residents are kept safe in the event they are at risk of imminent sexual abuse. Upon receiving information that a resident is subject to a substantial risk of imminent sexual abuse, the Detention Center staff indicated immediate action would be taken. Specifically, at a minimum, housing or programming changes would be initiated to separate or limit a threat between residents. All the random staff interviews indicated a similar answer. In his interview, the Superintendent stated that facility staff would follow a plan of action that immediately eliminates the risk. Facility staff would protect the alleged victim first, and that decisions concerning housing assignments or education assignments would be incident based.</p> <p>11.1 Juvenile Grievance Procedure, Pages 1-2, B. 1-5, interviews with Random Staff, Agency Head and the Detention Manager addresses 115.362 (a).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.362: Agency protection duties.</p>
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115.363	Reporting to other confinement facilities
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 Prison Rape Elimination Act</li> <li>2. Policy 1.2 Investigation Protocol</li> </ol> <p>Interviews</p> <ol style="list-style-type: none"> <li>1. Detention Manager</li> <li>2. Agency Head</li> </ol> <p>115.363 (a): Upon receiving an allegation that a resident was sexually abused while confined at another facility, The Bonner County Juvenile Detention Center policy requires notification to the head of the facility and appropriate Law Enforcement authorities within 72 hours. This notification is documented. Policy 1.2, Investigation Protocol, page 3. 2. a-e., indicates if an allegation is received that a resident was sexually abused before admission while confined at any other facility, the Supervisor on duty or the Director shall notify the head of the facility or the appropriate office of the Agency where the alleged abuse occurred and notify the appropriate investigative Agency for that facility.</p> <p>115.363 (b): Such notification shall be provided as soon as possible but no later than 72 hours after receiving the allegation. (Policy 1.2, Investigation Protocol, page</p>

	<p>3. 2. a-e)</p> <p>115.363 (c): Staff shall document the information, which includes but is not limited to the date and time of calls to the Agency and the investigative Agency; the name of persons spoken to regarding the allegation; the type of details related to the Agency and investigative Agency and finally facilitate a follow-up meeting for the juvenile with a medical or mental health practitioner. . (Policy 1.2, Investigation Protocol, page 3. 2. a-e)</p> <p>115.363 (d): Detention Center staff must report any suspected child abuse, neglect, or harassment immediately through the chain of command. Staff must also report information on retaliation against those who reported sexual abuse or harassment and any staff negligence that may have contributed to such incidents. Reports can be verbal, written, anonymous, or from third parties. All cases will be referred to the appropriate investigative authority. Staff must promptly document all reports. (Policy 1.2, Investigation Protocol, page 3. 2. a-e)</p> <p>In the past 12 months, the number of allegations the facility received that a resident was abused while confined at another facility is zero.</p> <p>In the past 12 months, the number of allegations of sexual abuse the facility received from other facilities is zero.</p> <p>Policy 1.2, Investigation Protocol, page 3. 2. a-e., addresses 115.363 (a).</p> <p>Policy 1.2, Investigation Protocol, page 3. 2. a-e., addresses 115.363 (b).</p> <p>Policy 1.2, Investigation Protocol, page 3. 2. a-e., addresses 115.363 (c).</p> <p>Policy 1.2, Investigation Protocol, page 3. 2. a-e., interviews with the Detention Manager and Agency Head addresses 115.363 (d).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.363: Reporting to other confinement facilities.</p>
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115.364	Staff first responder duties
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> <li>2. PREA Coordinated Response to a Sexual Abuse Incident</li> </ol>

	<p>Interviews</p> <p>1. Random Staff</p> <p>115.364 (a): The Bonner County Juvenile Detention Center staff members were interviewed concerning first responder responsibilities. Staff members are aware of their responsibility in this area. The staff members interviewed indicated a need to separate the victim from the abuser, preserve and protect the crime scene, advise the victim not to take any action that would compromise the evidence, and, if possible, ensure the alleged abuser did not take any action that would compromise any evidence. In addition, staff members were aware that they needed to contact their supervisor, who would contact the Detention Manager. The Staff interviewed indicated they had received training that included the duties of a first responder. Medical Staff and Mental Health staff members were also aware of their responsibilities as first responders and the need to notify security staff.</p> <p>A first responder is required to: Separate the alleged victim and abuser; Preserve and protect the crime scene; request the alleged victim not to destroy evidence and ensure the alleged abuser does not destroy evidence. (Policy 11.3 PREA, Page 9, section VIII. B. 1-2)</p> <p>115.364 (b): A non-security staff responder must first request the victim not destroy evidence and then notify a detention staff member. (Policy 11.3 PREA, Page 9, section VIII. B. 1-2)</p> <p>Interviews with Staff indicate they understand the duties of a first responder. Additionally, Policy 11.3 clearly describes the steps to be taken in response to an allegation of sexual abuse, assault, or harassment.</p> <p>Policy 11.3 PREA, Page 9, section VIII. B. 1-2, PREA Coordinated Response to a Sexual Abuse Incident, and interviews with random staff addresses 115.364 (a).</p> <p>Policy 11.3 PREA, Page 9, section VIII. B. 1-2, PREA Coordinated Response to a Sexual Abuse Incident, and interviews with random staff addresses 115.364 (b).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.364: Staff first responder duties.</p>
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<b>115.365</b>	<b>Coordinated response</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Documents



1. Policy 11.3 PREA
2. PREA Response to a Sexual Abuse Incident
3. PREA Training 2022 pages 36-39

#### Interviews

1. Detention Manager
2. Random Staff

115.365 (a): The Bonner County Juvenile Detention Center has a written plan that includes immediate notification to the Detention Manager, the PREA Coordinator, the Sandpoint Police Department and sexual assault advocates. The Detention Manager stated during his interview that Staff are trained to follow the PREA Response to a Sexual Assault Incident checklist that includes but is not limited to separating the involved individuals, contacting law enforcement, maintaining evidence integrity, contacting the PREA Coordinator, Community Partners, and assisting in transport if necessary.

The Bonner County Juvenile Detention Center's Response to a Sexual Assault Incident checklist includes providing mental health and medical assistance for the alleged victim as soon as possible. Separating the alleged victim from the alleged perpetrator. Taking reasonable measures to identify, isolate, and separate witnesses. Securing the incident scene so items cannot be removed or introduced and allowing only assigned investigators to assess the scene.

First responder training includes the following information: Separate the alleged victim and abuser, preserve and protect the crime scene until steps can be taken to collect evidence, and request that the alleged victim and abuser do not take any actions that could destroy physical evidence to include: brushing teeth, washing, urinating, defecating, drinking or eating. Isolate witnesses notify law enforcement, refer the victim for appropriate medical/mental health care, treat all victims with dignity and respect, and allow the victim to have an advocate present. A first responder should prepare a report regardless of its source. Reports should include observations at the time of the response, the incident's date and time, and the report's date and time. The report should also include who initially reported the allegation.

Policy 11.3 PREA, page 9, section VIII. C. 1. a-e, PREA Response to a Sexual Abuse Incident, PREA Training 2022 pages 36-39, and the interview with the Superintendent and Random staff addresses 115.365 (a).

The Bonner County Juvenile Detention Center complies with Standard 115.365: Coordinated response.

<b>115.366</b>	<b>Preservation of ability to protect residents from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents</p> <p>1. Policy 11.3 PREA</p> <p>Interviews</p> <p>1. Agency Head</p> <p>115.366 (a) - The Bonner County Juvenile Detention Center does not participate in Collective Bargaining.</p> <p>Policy 11.3 PREA, page 9, section VIII. D. and Interview with the Agency Head addresses 115.366 (a).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.366 - Preservation of ability to protect residents from contact with abusers.</p>

<b>115.367</b>	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents</p> <p>1. Policy 11.3 PREA</p> <p>Interviews</p> <p>1. Detention Manager 2. Agency Head 3. Staff who monitor retaliation</p> <p>115.367 (a): The Bonner County Juvenile Detention Center prohibits retaliation against residents and Staff who report sexual abuse or sexual harassment or cooperate with investigations. The facility leadership monitors the conduct or treatment of residents or staff who have reported sexual abuse, or that cooperated with investigations for at least 90 days following their report or cooperation. (Policy 11.3 PREA, pages 9-10, section VIII. E. 1-4)</p>

	<p>115.367 (b): Multiple protection measures are available, including removal of alleged Staff and alleged resident abusers, housing changes and advocate support. (Policy 11.3 PREA, pages 9-10, section VIII. E. 1-4)</p> <p>115.367 (c): Monitoring can last for at least 90 days and includes periodic status checks. The Detention Center staff will act promptly to remedy any such retaliation. The PREA Coordinator and the Detention Manager indicated they would monitor resident disciplinary reports, housing or program change requests, negative performance reviews or reassignments of Staff to determine if monitoring were necessary. (Policy 11.3 PREA, pages 9-10, section VIII. E. 1-4)</p> <p>115.367 (d): Monitoring of residents included periodic status checks. (Policy 11.3 PREA, pages 9-10, section VIII. E. 1-4)</p> <p>115.367 (e): If any other individual who cooperates with an investigation expresses a fear of retaliation, the agency shall respond appropriately to protect that individual against retaliation. (Policy 11.3 PREA, pages 9-10, section VIII. E. 1-4)</p> <p>Policy 11.3 PREA, pages 9-10, section VIII. E. 1-4), addresses 116.367 (a).</p> <p>Policy 11.3 PREA, pages 9-10, section VIII. E. 1-4, interviews with Designated Staff who monitor retaliation, Agency Head and the Detention Manager addresses 115.367 (b).</p> <p>Policy 11.3 PREA, pages 9-10, section VIII. E. 1-4, interviews with Designated Staff who monitor retaliation, and the Detention Manager addresses 115.367 (c).</p> <p>Policy 11.3 PREA, pages 9-10, section VIII. E. 1-4, interviews with Designated Staff who monitor retaliation, and the Detention Manager addresses 115.367 (d).</p> <p>Policy 11.3 PREA, pages 9-10, section VIII. E. 1-4 and interview the Detention Manager and Agency Head addresses 115.367 (e).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.367: Agency protection against retaliation.</p>
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<b>115.368</b>	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> <li>2. Policy 15.2 Screening, Intake, Housing, Release</li> </ol>

	<p>Interviews</p> <ol style="list-style-type: none"> <li>1. Detention Manager</li> <li>2. Medical RN</li> <li>3. Mental Health</li> </ol> <p>115.368 (a): As noted in Policy 15.2, Screening, Intake, Housing, Release, page 4, B., The use of Observation Cells to isolate residents can only be done as a last resort if no other means of keeping them or the other residents safe is available. During any period of isolation, agencies shall not deny residents large muscle exercise and any legally required educational programming or special education services. Residents in isolation shall receive daily visits from a medical or mental healthcare clinician as staffing permits. Residents shall have access to other programs and work opportunities to the extent possible.</p> <p>The Bonner County Juvenile Detention facility does not have isolation or segregation cells. Observation cells are only used as a last resort for safety. Residents in these cells participate in all regular programming, including exercise and education. The facility reviews the need for separation every 30 days. The Auditor further notes that the average length of stay at this facility is less than 10 days. The Auditor confirms there are no isolation or segregation cells at this facility, and Observation cells are not used to isolate residents from others.</p> <p>The PREA Coordinator asserts there were no circumstances within the last 12 months wherein isolation was used to protect a resident who was alleged to have suffered sexual abuse.</p> <p>Policy 15.2, Screening, Intake, Housing, Release, page 4, B., interviews with the Detention Manager, Medical RN and Mental Health Staff addresses 115.368 (a).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.368: Post-allegation protective custody.</p>
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<b>115.371</b>	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> </ol>

2. Policy 1.2 Investigation Protocol
3. Policy 3.1 Staff Training and Training Criteria
4. Idaho Sexual Assault Response Guidelines

#### Interviews

1. Investigator
2. Detention Manager
3. PREA Coordinator

115.371 (a): Policy 11.3, PREA, pages 10-11, IX, A and B, delineates the facility's procedures for conducting criminal and administrative investigations into allegations of sexual abuse and harassment. According to the policy, the Sandpoint Police Department is designated as the primary agency responsible for criminal investigations. Policy 3.1, Staff Training and Training Criteria (Page 7, N), stipulates that administrative investigations of sexual abuse and harassment are conducted by trained investigators from Bonner County Justice Services (Bonner County Juvenile Detention Center). These administrative investigative reports are then reviewed by the Bonner County Prosecutor's Office to determine whether criminal charges are warranted. Further Policy 11.3, PREA, Page 7, D, indicates Bonner County Juvenile Detention Center staff are required to refer all allegations of sexual abuse as specified in Policy 1.2., and staff are not permitted to conduct any investigations beyond the initial administrative inquiry and must act under the direction of the Sandpoint Police Department. In accordance with Policy 1.2, Investigation Protocol, Page 3, D, 2, it is mandated that both the Sandpoint Police Department and the Bonner County Prosecuting Attorney's Office are to be notified and involved in investigations following any report of sexual abuse.

115.371 (b): The Sand Point Police Department will investigate all allegations of sexual abuse. (Policy 11.3, PREA, pages 10-11, IX, A and B.) All correctional agencies or facilities in Idaho shall report any potentially criminal conduct to the appropriate law enforcement agency and, if an external agency is requested for investigation, shall inform that agency of the requirement to use a uniform evidence protocol in the investigation. The investigation shall ensure the healthcare needs of the victim are met and evidence is collected in a manner to properly preserve it, through a coordinated, multi-disciplinary response that is victim-centered, trauma-informed, and that considers the impact of neurobiology of trauma on the victim. The coordinated response will allow the needs of the victim to be met, while promoting the criminal justice system response. (Idaho Sexual Assault Response Guidelines page 34)

115.371 (c): The Sand Point Police Department Investigators would gather and preserve direct and circumstantial evidence, including physical and DNA evidence and electronic monitoring data. The Investigator would interview alleged victims, suspected perpetrators, and witnesses; and review prior complaints and reports of sexual abuse involving the suspected perpetrator. The PREA Coordinator and the Detention Manager would assist the Police Department by providing electronic

monitoring data, coordinating interviews, and providing background information on both the suspect and the victim.

115.371 (d): If a juvenile recants on a reported allegation, the request for an investigation will not be terminated based on that fact alone. (Policy 11.3 PREA, page 12. E.).

115.371 (e): The Bonner County Juvenile Detention Center will provide full cooperation during any investigation and will actively participate in the investigative process at the request of the primary investigative agency. This includes conducting compelled interviews as directed by the Bonner County Prosecuting Attorney's Office or Bonner County Human Resources Department, provided such interviews do not compromise potential criminal prosecution when evidence supports such action. (Policy 11.3 PREA, page 11, IX. A. 3.)

115.371 (f): Credibility in investigations is assessed based on the individual circumstances surrounding each alleged victim, suspect, or witness. The investigation process ensures that credibility is not determined by a person's status as a resident or staff member but rather through an objective evaluation of physical evidence, testimonial accounts, and investigative findings. This approach underscores the commitment to impartiality and fairness, ensuring that every allegation is treated with the seriousness it deserves, regardless of the individual's background or role within the facility. (Policy 11.3, page 10, IX. A. e.)

115.371 (g): Administrative investigations must determine if staff actions or inactions contributed to abuse and document findings in written reports, including physical evidence, credibility assessments, and investigative facts. (Policy 11.3 PREA, page 11, IX., B. 1-4)

115.371 (h): Criminal investigations are recorded in a report with physical, testimonial, and documentary evidence. Copies of necessary documents are attached. (Policy 11.3 PREA, pages 10-11. IX. A. 1-4.)

115.371 (i): Substantiated allegations of conduct that appears to be criminal are referred for prosecution. (Policy 11.3 PREA, page 11, IX., B. 1-4)

115.371 (j): All reports related to alleged sexual abuse and sexual harassment of residents shall be preserved for 10 years beyond the resident's 18th birthday. Reports of alleged sexual abuse or harassment involving employees will be kept by Bonner County Human Resources in the employee's file. (Policy 11.3 PREA, page 11, IX. C. 1-2)

115.371 (k): The investigation shall continue regardless of whether the alleged abuser or victim leaves the facility. (Policy 11.3 PREA, page 12. E.)

115.371 (m): The Bonner County Juvenile Detention Center would cooperate with outside agencies investigating sexual abuse and stay informed about the investigation's progress. (Policy 11.3 PREA, pages 10-11. IX. A. 1-4.)

Where sexual abuse is alleged, and possible criminal activity has occurred, the

Bonner County Juvenile Detention Center will contact the Sandpoint Police Department. The Sand Point Police Department Investigators would gather and preserve direct and circumstantial evidence, including physical and DNA evidence and electronic monitoring data. The Investigator would interview alleged victims, suspected perpetrators, and witnesses; and review prior complaints and reports of sexual abuse involving the suspected perpetrator. The PREA Coordinator and the Detention Manager would assist the Police Department by providing electronic monitoring data, coordinating interviews, and providing background information on both the suspect and the victim. The Bonner County Juvenile Detention Center would not terminate an investigation solely because the source of the allegation recants the allegation. During his interview, the Investigator stated that the credibility of an alleged victim, suspect, or witness would be assessed individually and would not be determined by the person's status as a resident or Staff. The Investigator stated that he would not require a resident to submit to a polygraph examination as a condition for proceeding with the investigation. Finally, the Investigator indicated all administrative investigations: would include an effort to determine whether staff actions or failures to act contributed to the abuse; and would 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. Criminal investigations would be documented according to the Sand Point Police Department guidelines, and substantiated allegations of conduct that appear to be criminal would be referred for prosecution.

The PREA Coordinator reported that, since the last PREA audit, there have been no substantiated allegations of conduct appearing to be criminal that were referred for prosecution.

Policy 11.3, PREA, page 7, D, pages 10-11, IX, A and B., Policy 3.1, Staff Training and Training Criteria, page 7, N, Policy 1.2, Investigation Protocol, Page 3, D, 2, and the interview with the Investigator addresses 115.371(a).

Policy 11.3, PREA, pages 10-11, IX, A and B., Idaho Sexual Assault Response Guidelines page 34, and the interview with the Investigator addresses 115.371(b).

Policy 11.3, PREA, page 7, D, pages 10-11, IX, A and B., and the interview with the Investigator addresses 115.371(c).

Policy 11.3 PREA, page 12. E., and the interview with the Investigator addresses 115.371(d).

Policy 11.3 PREA, page 11, IX. A. 3., and the interview with the Investigator addresses 115.371(e).

Policy 11.3, page 10, IX. A. e., and the interview with the Investigator addresses 115.371(f).

Policy 11.3 PREA, page 11, IX., B. 1-4., and the interview with the Investigator addresses 115.371(g).

	<p>Policy 11.3 PREA, pages 10-11. IX. A. 1-4., and the interview with the Investigator addresses 115.371(h).</p> <p>Policy 11.3 PREA, page11, IX., B. 1-4., and the interview with the Investigator addresses 115.371(i).</p> <p>Policy 11.3 PREA, page11, IX. C. 1-2., and the interview with the Investigator addresses 115.371(j).</p> <p>Policy 11.3 PREA, page 12. E., and the interview with the Investigator addresses 115.371(k).</p> <p>Policy 11.3 PREA, pages 10-11. IX. A. 1-4., and interviews with the PREA Coordinator, Detention Manager and Investigator addresses 115.371(m).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.371: Criminal and administrative agency investigations.</p>
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115.372	Evidentiary standard for administrative investigations
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents</p> <p>1. Policy 11.3 PREA</p> <p>Interviews</p> <p>1. Investigator</p> <p>115.372 (a): Policy 11.3 PREA, page 11, section IX., B. 1-4., specifies that the facility applies a preponderance of the evidence standard when substantiating allegations of sexual abuse or sexual harassment.</p> <p>During the audit, the Investigator at the Bonner County Juvenile Detention Center confirmed that the preponderance of the evidence is the evidentiary standard used in administrative investigations. The Investigator has received specialized PREA training and provided a detailed explanation to the Auditor regarding the procedures followed in conducting PREA-related investigations.</p> <p>Policy 11.3 PREA, page11, IX., B. 1-4, and the interview with the Investigator address 115.372 (a).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.372: Evidentiary standard for administrative.</p>



115.373	Reporting to residents
	<p data-bbox="280 185 981 219"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="280 264 564 297"><b>Auditor Discussion</b></p> <p data-bbox="280 342 443 376">Documents</p> <ol data-bbox="341 443 625 566" style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> <li>2. Interviews</li> <li>3. Investigator</li> </ol> <p data-bbox="280 600 1460 768">115.373 (a): Residents are notified of investigation results. After investigating a resident's sexual abuse allegation, the resident will be informed whether the claim is substantiated, unsubstantiated, or unfounded. (Policy 11.3 PREA, page 11-12 IX., D., 1-4)</p> <p data-bbox="280 801 1460 925">115.373 (b): If the Bonner County Juvenile Detention Center did not conduct the investigation, it would request information from the investigative agency to inform the resident. (Policy 11.3 PREA, page 11-12 IX., D., 1-4)</p> <p data-bbox="280 958 1428 1126">115.373 (c): After a resident alleges sexual abuse by a staff member, the Bonner County Juvenile Detention Center will inform them of whether the staff member works in their unit, the staff member's employment status, any indictments, or convictions. (Policy 11.3 PREA, page 11-12 IX., D., 1-4)</p> <p data-bbox="280 1160 1460 1361">115.373 (d): After a resident alleges sexual abuse by another resident, the agency must inform the alleged victim whenever it learns that the alleged abuser has been indicted or convicted on a charge related to sexual abuse within the facility. Additionally, if the alleged abuser is a resident, the resident victim must be informed of the indictment or conviction. (Policy 11.3 PREA, page 11-12 IX., D., 1-4)</p> <p data-bbox="280 1395 1460 1473">115.373 (e): All notifications are documented. (Policy 11.3 PREA, page 11-12 IX., D., 1-4)</p> <p data-bbox="280 1507 1476 1877">Bonner County Juvenile Detention Center staff will notify the victim as appropriate and document the notification after a criminal investigation. Youth will be informed whether the allegation has been substantiated, unsubstantiated, or unfounded. The Bonner County Juvenile Detention Center will collect relevant information from the investigating Agency to inform the youth if necessary. After an allegation of sexual abuse has been made between a youth and staff member, the Detention Center will inform the youth whenever: the staff member is no longer employed at the facility, the Agency learns that the staff member has been indicted or convicted on a charge of sexual abuse within the facility.</p> <p data-bbox="280 1910 1476 2078">After an allegation of sexual abuse has been made between a youth and another youth, the Bonner County Juvenile Detention Center will inform the youth whenever the alleged abuser has been indicted or convicted on a charge related to sexual abuse within the facility. All attempts to notify will be documented.</p>

	<p>The facility has completed no internal investigations of resident sexual abuse in the past 12 months. Zero investigations were completed by an outside agency.</p> <p>Policy 11.3 PREA, page11-12 IX., D., 1-4., interviews with the Superintendent and the Investigator addresses 115.373(a).</p> <p>Policy 11.3 PREA, page11-12 IX., D., 1-4., addresses 115.373(b).</p> <p>Policy 11.3 PREA, page11-12 IX., D., 1-4., and interview with the Investigator addresses 115.373(c).</p> <p>Policy 11.3 PREA, page11-12 IX., D., 1-4., and interview with the Investigator addresses 115.373(d).</p> <p>Policy 11.3 PREA, page11-12 IX., D., 1-4., and interviews with the Investigator addresses 115.373(e).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.373: Reporting to residents.</p>
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<b>115.376</b>	<b>Disciplinary sanctions for staff</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 2.4 Personnel</li> <li>2. Policy 11.3 PREA</li> <li>3. 18-6110 Idaho State Code</li> </ol> <p>115.376 (a): The Bonner County Juvenile Detention Center staff are subject to disciplinary sanctions, including termination for violating Agency sexual abuse or sexual harassment policies. (Policy 11.3 PREA, page 12., X., A., 1-3) Interviews with the Detention Manager confirm that, if necessary, appropriate sanctions are available for violations of the Bonner County Juvenile Detention Center Policy relating to PREA.</p> <p>115.376 (b): Pursuant to Policy 11.3 PREA, page 12., X., A. termination shall be the presumptive disciplinary sanction for Staff engaged in sexual abuse.</p> <p>115.376 (c): Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other Staff with similar histories. (Policy 11.3 PREA, page 12., X., A.,</p>

	<p>1-3.)</p> <p>115.376 (d): All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by Staff who would have been terminated if not for their resignation, shall be reported to law enforcement agencies, unless the activity was not criminal, and to any relevant licensing bodies. (Policy 11.3 PREA, page 12., X., A., 1-3)</p> <p>Any Bonner County Juvenile Detention Center staff member who commits sexual abuse will be terminated and reported for criminal prosecution under Idaho Code 18-6110. Staff committing sexual harassment will face disciplinary actions based on the severity of the act, their history, and comparable cases.</p> <p>The facility reported no staff violations of sexual abuse or harassment policies, nor any terminations or resignations to avoid termination, in the past 12 months. Disciplinary sanctions for policy violations (excluding active sexual abuse) are proportional to the nature of the act and the staff's record. No staff received disciplinary sanctions for such violations in the past year.</p> <p>Any disciplinary actions or resignations to avoid termination related to sexual abuse or harassment are reported to law enforcement unless the activity is clearly non-criminal, as well as to relevant licensing bodies. All employees, volunteers and contractors are expected to clearly understand that the department prohibits any sexual relationship with an individual under department supervision to be a serious breach of the standards of employee conduct, and these relationships will not be tolerated.</p> <p>In the past 12 months, no staff members have violated the Agency's sexual harassment policy.</p> <p>Policy 11.3 PREA, page 12., X., A., 1-3, addresses 115.376 (a).</p> <p>Policy 11.3 PREA, page 12., X., A., 1-3, addresses 115.376 (b).</p> <p>Policy 11.3 PREA, page 12., X., A., 1-3, addresses 115.376 (c).</p> <p>Policy 11.3 PREA, page 12., X., A., 1-3, addresses 115.376 (d).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.376: Disciplinary sanctions for Staff.</p>
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115.377	Corrective action for contractors and volunteers
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Documents

1. Policy 11.3 PREA

Interviews

1. Detention Manager

115.377 (a): The Bonner County Juvenile Detention Center policy requires that contractors or volunteers who engage in sexual abuse or sexual harassment are reported to law enforcement and relevant licensing bodies. (Policy 11.3 PREA, page 12., X., B. 1.)

115.377 (b): Contractors or volunteers who have been found to have violated the Detention Center PREA Policies are not allowed contact with residents. If the allegation is against a volunteer or individual not employed by the Juvenile Detention Center (Contractor), the PREA Coordinator and Director or designee will be immediately notified. The Director or designee will contact the individual's supervisor, and access to the facility will be restricted. All allegations of abuse will be referred to the Sand Point Police Department. (Policy 11.3 PREA, page 12., X., A., B. 1.)

Any contractor or volunteer who engages in sexual abuse shall be prohibited from accessing the Bonner County Juvenile Detention Center. Such incidents will be reported to law enforcement agencies for potential criminal prosecution and to relevant licensing bodies. The Bonner County Juvenile Detention Center will implement appropriate remedial measures when necessary, including considering whether to prohibit further contact with juveniles in cases of other violations of agency sexual abuse or sexual harassment policies by contractors or volunteers.

Over the past 12 months, the facility has reported no instances in which contractors or volunteers were referred to law enforcement agencies or relevant licensing bodies for engaging in sexual abuse of residents. The Detention Manager stated that any contractor or volunteer alleged to have violated agency policies regarding sexual abuse or sexual harassment is immediately denied facility access pending investigation.

All employees, volunteers, and independent contractors are required to understand that the department strictly prohibits any sexual relationships with individuals under department supervision. Such conduct constitutes a serious violation of employee standards and will not be tolerated. Engagement in personal or sexual relationships with residents will result in immediate termination of contractual or volunteer status.

Policy 11.3 PREA, page 12., X., A., B. 1., and interview with the Detention Manager, addresses 115.377 (a).

Policy 11.3 PREA, page 12., X., A., B. 1., and interview with the Detention Manager, addresses 115.377 (b).

The Bonner County Juvenile Detention Center complies with Standard 115.377:

	Corrective action for contractors and volunteers.
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<b>115.378</b>	<b>Interventions and disciplinary sanctions for residents</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 Prison Rape Elimination Act</li> <li>2. Policy 12.3 Major Rule Violations</li> </ol> <p>Interviews</p> <ol style="list-style-type: none"> <li>1. Mental Health Staff</li> <li>2. Detention Manager</li> </ol> <p>115.378 (a): Residents are subject to disciplinary sanctions following an administrative finding that the resident engaged in resident-on-resident sexual abuse or a criminal finding of resident-on-resident sexual abuse. (Policy 11.3 PREA, pages 12-13., X., C., 1-4, see also Policy 12.3 Major Rule Violations, pages 1-2)</p> <p>115.378 (b): Sanctions will 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. In the event a disciplinary sanction results in the room restriction of a resident, the facility shall not deny the resident daily large-muscle exercise or access to any legally required educational programming or special education services. Observation cells are utilized only as a last resort when no other methods are available to ensure the safety of the residents or others. Residents placed in observation cells continue to participate in regular programming, including large muscle exercise and educational activities. Additionally, residents in observation cells are seen daily by medical or mental health staff. Bonner County Juvenile Detention Center does not have an isolation unit or segregation unit. (Policy 11.3 PREA, pages 12-13., X., C., 1-4).</p> <p>115.378 (c): The disciplinary process shall consider whether a resident’s mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed. (Policy 11.3 PREA, pages 12-13., X., C., 1-4, Policy 12.3 Major Rule Violations, pages 1-2).</p> <p>115.378 (d): The facility does not specifically offer therapy, counselor or other interventions designed to address and correct the underlying reasons or motivations for abuse. During his interview, the Mental Health staff member stated that the facility is unable to provide therapy to alleged perpetrators due to their lack of adjudication. However, once the resident was adjudicated, efforts would be made to</p>

connect them with community programs that address the underlying causes of sexual abuse.

115.378 (e): The facility may discipline a resident for sexual contact with staff only upon a finding that the staff member did not consent to such contact. (Policy 11.3 PREA, pages 12-13., X., C., 1-4).

115.378 (f): For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation. (Policy 11.3 PREA, pages 12-13., X., C., 1-4).

115.378 (g): Sexual activity between residents is prohibited. (Policy 11.3 PREA, pages 12-13., X., C., 1-4, Policy 12.3 Major Rule Violations, pages 1-2).

Appropriate rights and responsibilities are afforded to the resident during the disciplinary hearing. Residents could be disciplined for sexual contact with Staff if the staff member did not consent to such contact. The Bonner County Juvenile Detention Center prohibits all sexual activity between residents and disciplines residents for such activity. However, if sexual activity is consensual the incident would be considered a disciplinary issue and not a PREA sexual abuse violation. The Bonner County Juvenile Detention Center 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 enough to substantiate the allegation. The Agency prohibits all sexual activity between residents and disciplines residents for such activity; the Agency deems such activity to constitute sexual abuse only if it determines that the activity is coerced.

Based on a discussion with the PREA Coordinator and the Detention Manager, the Auditor was satisfied that there is no use of isolation at the Bonner County Juvenile Detention Center. Specifically, there are three single-cell housing units. Residents can be kept separate and still participate in daily activities without being confined to their cells.

There have been no reported sexual abuse or harassment among Detention Center residents in the past 12 months.

Policy 11.3 PREA, pages 12-13., X., C., 1-4, see also Policy 12.3 Major Rule Violations, pages 1-2, addresses 115.378 (a).

Policy 11.3 PREA, pages 12-13., X., C., 1-4, and the interview with the Detention Manager, addresses 115.378 (b).

Policy 11.3 PREA, pages 12-13., X., C., 1-4, see also Policy 12.3 Major Rule Violations, pages 1-2, and the interview with the Detention Manager, addresses 115.378 (c).

The facility does not specifically offer therapy, counselor or other interventions designed to address and correct the underlying reasons or motivations for abuse.

	<p>During his interview, the Mental Health staff member stated that the facility is unable to provide therapy to alleged perpetrators due to their lack of adjudication. However, once the resident was adjudicated, efforts would be made to connect them with community programs that address the underlying causes of sexual abuse addresses 115.378 (d).</p> <p>Policy 11.3 PREA, pages 12-13., X., C., 1-4., addresses 115.378 (e).</p> <p>Policy 11.3 PREA, pages 12-13., X., C., 1-4., addresses 115.378 (f).</p> <p>Policy 11.3 PREA, pages 12-13., X., C., 1-4., addresses 115.378 (g).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.378: Interventions and Disciplinary sanctions for residents.</p>
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115.381	Medical and mental health screenings; history of sexual abuse
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> <li>2. Policy 10.7 Medical Mental Health Evaluation</li> <li>3. Policy 15.2 Screening Intake Housing Release</li> <li>4. 16-1605 Idaho State Code</li> <li>5. Vulnerability Assessment Samples</li> </ol> <p>Interviews</p> <ol style="list-style-type: none"> <li>1. Mental Health staff</li> <li>2. Medical Staff</li> <li>3. Risk of Victimization and Abusiveness</li> </ol> <p>115.381 (a): The Bonner County Juvenile Detention Center provides a follow-up meeting with a medical and mental health practitioner for residents who disclose any prior sexual victimization during screening within 14 days of the intake screening. (Policy 11.3 PREA, page 13, XI. A, Policy 10.7 Medical/Mental Health Evaluation, page 1., II., A-C)</p> <p>115.381 (b): If a resident reveals past sexual abuse, whether in an institution or community, staff must offer a follow-up with a mental health practitioner within 14 days of intake screening. (Policy 11.3 PREA, page 13, XI. A, Policy 10.7 Medical/Mental Health Evaluation, page 1., II., A-C)</p> <p>115.381 (c): Any information related to sexual victimization or abusiveness that</p>

occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff , as required by facility policy and Federal State, or local law, to inform treatment plans, security and management decisions, including housing, school and program assignments. (Policy 11.3 PREA, page 13, XI. A)

115.381 (d): Residents at the Bonner County Juvenile Detention Center are under the age of eighteen. Medical and mental health practitioners do not require informed consent from residents before reporting information about prior sexual victimization that did not occur in an institutional setting. (16-1605 Idaho State Code)

Treatment plans and information related to sexual victimization or abuse are limited to mental health practitioners, as necessary. Appropriate rules concerning private medical information are strictly enforced. Residents are made aware of the reporting requirements and what is considered protected information.

Medical and Mental Health staff work together to collect and monitor information that indicates prior sexual victimization. In addition, if the resident reports being a predator, that information is appropriately documented. Follow-up by Mental Health staff and re-assessment is provided as needed. This follow-up occurs within 14 days of intake. Any information pertaining to victimization or predatory behavior is limited to a need-to-know basis. Classification and Custodial Staff are informed for security and housing.

The Medical staff member indicated during his interview that information related to sexual victimization or abusiveness is provided only to Staff who need to know and is shared in a way that allows for good decision-making. Appropriate Child Protective Agencies would be notified about prior sexual victimization. Relevant information is used to inform mental health treatment plans and security decisions, such as housing, education, and program assignments.

Policy 11.3 PREA, page 13, XI. A, Policy 10.7 Medical/Mental Health Evaluation, page 1., II., A-C, Vulnerability Assessment Samples, interview with resident who disclosed victimization, and the interview with staff who conduct Risk of Victimization and Abusiveness addresses 115.381 (a).

Policy 11.3 PREA, page 13, XI. A, Policy 10.7 Medical/Mental Health Evaluation, page 1., II., A-C, Vulnerability Assessment Samples, and the interview with staff who conduct Risk of Victimization and Abusiveness addresses 115.381 (b).

Policy 11.3 PREA, page 13, XI. A, Vulnerability Assessment Samples addresses 115.381 (c).

16-1605 Idaho State Code, interview with Medical RN and Mental Health addresses 115.381 (d).

The Bonner County Juvenile Detention Center complies with Standard 115.381: Medical and mental health screenings; history of sexual abuse.



115.382	Access to emergency medical and mental health services
	<p data-bbox="280 185 981 219"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="280 264 564 297"><b>Auditor Discussion</b></p> <p data-bbox="280 342 443 376">Documents</p> <ol data-bbox="341 443 1021 560" style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> <li>2. Policy 10.7 Medical Mental Health Evaluation</li> <li>3. 19-5303 Cost of Medical Exams</li> </ol> <p data-bbox="280 600 427 633">Interviews</p> <ol data-bbox="341 701 659 779" style="list-style-type: none"> <li>1. Mental Health staff</li> <li>2. Medical Staff</li> </ol> <p data-bbox="280 819 1468 1021">115.382 (a): 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. (Policy 10.7 Medical/Mental Health Evaluation, page 1., II., D. (a)).</p> <p data-bbox="280 1061 1481 1308">115.382 (b): If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, staff first responders shall take preliminary steps to protect the victim pursuant to 115.362 (PREA Standards) and shall immediately notify the Detention Manager or on call supervisor and the Director and any appropriate medical and mental health practitioners. (Policy 10.7 Medical/ Mental Health Evaluation, page 1., II., D. (b)).</p> <p data-bbox="280 1348 1423 1550">115.382 (c): Resident victims of sexual abuse while incarcerated shall be offered timely information about and timely access to emergency contraception and sexually transmitted infections treatment, in accordance with professionally accepted standards of care, where medically appropriate. (Policy 10.7 Medical/ Mental Health Evaluation, page 1., II., D. (c)).</p> <p data-bbox="280 1590 1468 1747">115.382 (d): 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. (Policy 10.7 Medical/Mental Health Evaluation, page 1., II., D. (d)).</p> <p data-bbox="280 1787 1477 2033">Medical and Mental Health Staff provide access to emergency treatment, as necessary. Upon notification, Medical and Mental Health staff determine a course of action based on their professional judgment. Treatment is timely and in accordance with professionally accepted standards. Treatment is provided without cost, regardless of the cooperation level of the victim. Interviews with Medical Staff confirm adherence to this standard.</p> <p data-bbox="280 2074 1471 2107">The Bonner County Juvenile Detention Center procedure states that residents would</p>

	<p>be taken or referred to Bonner Health for unimpeded access to emergency medical treatment and crisis intervention services. The Bonner Health sexual assault protocol makes it possible for victims of sexual assault to receive prompt and compassionate emergency care from medical professionals who understand victimization and streamline the examination time and the medical evidence-gathering process.</p> <p>Access to information about emergency contraception and sexually transmitted infections prophylaxis would be provided by Medical Staff at the hospital and followed up by Medical Staff at the Bonner County Juvenile Detention Center.</p> <p>Policy 10.7 Medical/Mental Health Evaluation, page 1., II., D. (a)., interviews with Medical RN and Mental Health staff address 115.382 (a).</p> <p>Policy 10.7 Medical/Mental Health Evaluation, page 1., II., D. (b) addresses 115.382 (b).</p> <p>Policy 10.7 Medical/Mental Health Evaluation, page 1., II., D. (c)., interviews with Medical RN and Mental Health staff address 115.382 (c).</p> <p>Policy 10.7 Medical/Mental Health Evaluation, page 1., II., D. (d) and 19-5303 Cost of Medical Exams addresses 115.382 (d).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.382: Access to emergency medical and mental health services.</p>
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<b>115.383</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> <li>2. Policy 10.7 Medical Mental Health Evaluation</li> <li>3. 19-5303 Cost of Medical Exams</li> </ol> <p>Interviews</p> <ol style="list-style-type: none"> <li>1. Mental Health staff</li> <li>2. Medical Staff</li> </ol> <p>115.383 (a): The Bonner County Juvenile Detention Center provides medical and mental health treatment to all residents who have reported sexual victimization. Upon release, residents treated by Mental Health staff are provided with</p>

information and the opportunity to meet with Community Mental Health staff. (Policy 10.7 Medical Mental Health Evaluation, page 2, II., E. (a)).

115.383 (b): The evaluation and treatment of sexual abuse victims shall include 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. (Policy 10.7 Medical Mental Health Evaluation, page 2, II., E. (b)).

115.383 (c): The facility shall provide resident victims of sexual abuse with medical and mental health services consistent with the community level of care. (Policy 10.7 Medical Mental Health Evaluation, page 2, II., E. (c)).

115.383 (d): Resident victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests. (Policy 10.7 Medical Mental Health Evaluation, page 2, II., E. (d)).

115.383 (e): If pregnancy results, such victims shall receive timely information about and access to all pregnancy-related medical services that are lawful in the community. (Policy 10.7 Medical Mental Health Evaluation, page 2, II., E. (e)).

115.383 (f): Resident victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections as medically appropriate. (Policy 10.7 Medical Mental Health Evaluation, page 2, II., E. (f)).

115.383 (g): Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. (Policy 10.7 Medical Mental Health Evaluation, page 2, II., E. (g)).

115.383 (h): The facility shall 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 qualified mental health practitioners. (Policy 10.7 Medical Mental Health Evaluation, page 2, II., E. (h)).

Female victims of sexually abusive vaginal penetration would be offered a pregnancy test. There have been zero cases involving vaginal penetration at the Bonner County Juvenile Detention Center in the previous 12 months. Sexual abuse victims are provided with the opportunity to undergo tests for sexually transmitted diseases. The testing and treatment of sexually transmitted diseases are provided to all residents. A resident does not need to be a victim of sexual abuse to have access to medical treatment for a sexually transmitted disease. There is no cost to the victim for the services provided by Medical and Mental Health Staff. Interviews conducted with Medical and Mental Health staff confirm compliance with this standard.

The Bonner County Juvenile Detention Center provides ongoing medical and mental health care for sexual abuse victims and abusers. Appropriate follow-up services, treatment plans and continuing care upon release from custody are available. If

	<p>necessary, pregnancy tests and follow-up care would be provided. Appropriate STD tests, as medically indicated, would be provided. There would be no cost to the residents for this care.</p> <p>The Bonner County Juvenile Detention Center offers a mental health evaluation for abusers and treatment when deemed appropriate by a Mental Health practitioner. Interviews with Medical and Mental Health staff confirm compliance with this standard.</p> <p>Medical Staff indicated they would offer appropriate treatment services to residents victimized by sexual abuse, including but not limited to tests and education about pregnancy and sexually transmitted diseases.</p> <p>Policy 10.7 Medical Mental Health Evaluation, page 2, II., E. (a) and interviews with Medical RN and Mental Health addresses 115.383 (a).</p> <p>Policy 10.7 Medical Mental Health Evaluation, page 2, II., E. (b), and interviews with Medical RN and Mental Health addresses 115.383 (b).</p> <p>Policy 10.7 Medical Mental Health Evaluation, page 2, II., E. (c), and interviews with Medical RN and Mental Health addresses 115.383 (c).</p> <p>Policy 10.7 Medical Mental Health Evaluation, page 2, II., E. (d), and interviews with Medical RN and Mental Health addresses 115.383 (d).</p> <p>Policy 10.7 Medical Mental Health Evaluation, page 2, II., E. (e), and interviews with Medical RN and Mental Health addresses 115.383 (e).</p> <p>Policy 10.7 Medical Mental Health Evaluation, page 2, II., E. (f), and interviews with Medical RN and Mental Health addresses 115.383 (f).</p> <p>Policy 10.7 Medical Mental Health Evaluation, page 2, II., E. (g), 19-5303 Cost of Medical Exams, and interviews with Medical RN and Mental Health addresses 115.383 (g).</p> <p>Policy 10.7 Medical Mental Health Evaluation, page 2, II., E. (h), and interviews with Medical RN and Mental Health addresses 115.383 (h).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.383: Ongoing medical and mental health care for sexual abuse victims and abusers.</p>
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<b>115.386</b>	<b>Sexual abuse incident reviews</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Documents

1. Policy 11.3 PREA
2. Policy 1.2 Investigation Protocol
3. Incident Review Team Notes - Blank

#### Interviews

1. Incident review team
2. Detention Manager
3. PREA Coordinator

115.386 (a) and (b): The PREA Coordinator shall conduct a sexual abuse incident review at the conclusion (ordinarily within 30 days) of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded. (Policy 1.2 Investigation Protocol, page 6, IV., A-B)

115.586 (c): The review team shall include the Director and Assistant Director, with input from supervisors, investigators, the nurse, and mental health clinician. (Policy 1.2 Investigation Protocol, page 6, IV., C)

115.586 (d) The review team shall:

- Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;
- Consider whether the incident or allegation was motivated by race, ethnicity, sexual orientation, gender identity, status, or perceived status, gang affiliation, or other group dynamics at the facility;
- Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse;
- Assess the adequacy of staffing levels in that area during different shifts;
- Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and
- Prepare a report of its findings and any recommendations for improvement and submit such report to the Director and PREA coordinator. (Policy 1.2 Investigation Protocol, page 6, IV., D)

115.586 (e): The facility shall implement the recommendations for improvement or will document its reasons for not doing so. (Policy 1.2 Investigation Protocol, page 6, IV., E).

The Bonner County Juvenile Detention Center staff reviews final investigative reports within 30 days of the investigation's conclusion. The review team, comprising the Detention Manager, PREA Coordinator, and relevant staff, evaluates whether procedural changes are required due to class affiliation, sexual orientation, or group dynamics. They assess the effectiveness of monitoring technology, physical barriers, and staffing patterns. A final report with recommendations is issued.

	<p>In the past 12 months, the number of criminal or administrative investigations of alleged sexual abuse completed at the facility, followed by a sexual abuse incident review within 30 days, is reported as Zero.</p> <p>Policy 1.2 Investigation Protocol, page 6, IV., A, and Incident Review Team Notes - Blank, addresses 115.386 (a).</p> <p>Policy 1.2 Investigation Protocol, page 6, IV., B, and Incident Review Team Notes - Blank, addresses 115.386 (b).</p> <p>Policy 1.2 Investigation Protocol, page 6, IV., C, Incident Review Team Notes - Blank, interview with Incident review team and the Detention Manager addresses 115.386 (c).</p> <p>Policy 1.2 Investigation Protocol, page 6, IV., D, Incident Review Team Notes - Blank, interview with Incident review team, PREA Coordinator, and the Detention Manager addresses 115.386 (d).</p> <p>Policy 1.2 Investigation Protocol, page 6, IV., E, Incident Review Team Notes - Blank, interview with Incident review team, PREA Coordinator, and the Detention Manager addresses 115.386 (e).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.386: Sexual abuse incident reviews.</p>
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<b>115.387</b>	<b>Data collection</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Documents</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> <li>2. Policy 1.6 Data Collection</li> <li>3. PREA Annual Report 2024</li> <li>4. SSV Data</li> </ol> <p>115.387 (a): The facility shall collect accurate, uniform data for every allegation of sexual abuse using a standardized instrument and set of definitions. (Policy 1.6, Data Collection, page 1, II. A. 1.a.)</p> <p>115.387 (b): The facility shall collect the incident-based sexual abuse data annually. (Policy 1.6, Data Collection, page 1, II. A. 1.a.)</p> <p>115.387 (c): 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</p>

Sexual Violence conducted by the Department of Justice's Bureau of Justice Statistics. (Policy 1.6, Data Collection, page 1, II. A. 1. a.)

115.387 (d): The facility shall collect data from all available sources. (Policy 1.6, Data Collection, page 1, II. A. 2.)

115.387 (e): The Bonner County Juvenile Detention Center is a stand-alone facility.

115.387 (f): Upon request, the facility shall provide all such data from the previous year to the Department of Justice no later than June 30. (Policy 1.6, Data Collection, page 1, II. A. 4.)

The facility has compiled an Annual Survey of Sexual Violence report covering the years 2013-2024. This report provides a detailed account of incidents involving non-consensual youth-on-youth sexual acts, staff sexual misconduct, staff-on-youth sexual harassment, and resident-on-resident sexual harassment for each calendar year. It further delineates whether reported incidents were substantiated, unsubstantiated, unfounded, or remain under investigation. The collected information encompasses the number of each category of incident per year, along with the status of the investigations. The Auditor notes that the facility has not received any formal request from the Department of Justice to submit this data.

The Agency Head explained that the facility does not employ a standardized instrument for quantifying and tracking annual data. Given the historically low number of sexual abuse and harassment incidents, the facility prints and files the relevant documentation for each calendar year. This documentation serves as the basis for the annual data compilation and reporting process.

Policy 1.6, Data Collection, page 1, II. A. 1 a., PREA Annual Report 2024, and SSV Data, addresses 115.387 (a).

Policy 1.6, Data Collection, page 1, II. A. 1 a., PREA Annual Report 2024, and SSV Data, addresses 115.387 (b).

Policy 1.6, Data Collection, page 1, II. A. 1 a., PREA Annual Report 2024, and SSV Data, addresses 115.387 (c).

Policy 1.6, Data Collection, page 1, II. A. 2., PREA Annual Report 2024, and SSV Data, addresses 115.387 (d).

The Bonner County Juvenile Detention Center is a stand-alone facility. 115.387 (e) does not apply.

Policy 1.6, Data Collection, page 1, II. A. 4, PREA Annual Report 2024, and SSV Data, addresses 115.387 (f).

The Bonner County Juvenile Detention Center complies with Standard 115.387 Data Collection.

115.388	Data review for corrective action
	<p data-bbox="280 185 981 219"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="280 264 564 297"><b>Auditor Discussion</b></p> <p data-bbox="280 342 443 376">Documents</p> <ol data-bbox="341 443 751 600" style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> <li>2. Policy 1.6 Data Collection</li> <li>3. PREA Annual Report 2024</li> <li>4. SSV Data</li> </ol> <p data-bbox="280 645 427 678">Interviews</p> <ol data-bbox="341 745 639 824" style="list-style-type: none"> <li>1. PREA Coordinator</li> <li>2. Agency Head</li> </ol> <p data-bbox="280 857 1477 1059">115.388 (a): The facility reviews collected data to assess and improve sexual abuse prevention, detection, and response policies, practices, and training. The review includes a. identifying problem areas; b. taking ongoing corrective action; and c. preparing an annual report of findings and corrective actions taken. (Policy 1.6, Data Collection, page 1, II. C., 1-2)</p> <p data-bbox="280 1104 1465 1216">115.388 (b): The report is a comparison of the current year's data and corrective actions with those from previous years and offers an evaluation of the facility's progress in addressing sexual abuse. (Policy 1.6, Data Collection, page 1, II. C., 1-2)</p> <p data-bbox="280 1261 1474 1373">115.388 (c): The facility's report shall be approved by the Director and made readily available to the public through its Web site. (Policy 1.6, Data Collection, page 1, II. C., 1-2)</p> <p data-bbox="280 1417 1458 1574">115.388 (d): The facility 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. (Policy 1.6, Data Collection, page 1, II. C., 1-2)</p> <p data-bbox="280 1619 1449 1854">The Bonner County Juvenile Detention Center PREA Coordinator and the Detention Manager review the reported sexual abuse and harassment incidents to identify problem areas and make recommendations for improvement. Policy changes are implemented to improve the Detention Center's commitment to the PREA. A copy of the report is made available to the Public online at <a href="https://www.bonnercountyjd.gov/prea">https://www.bonnercountyjd.gov/prea</a>.</p> <p data-bbox="280 1899 1401 1966">Policy 1.6, Data Collection, page 1, II. C., 1-2, PREA Annual Report, Survey Data 2024, and interview with the PREA Coordinator, addresses 115.388 (a).</p> <p data-bbox="280 2011 1449 2078">Policy 1.6, Data Collection, page 1, II. C., 1-2, PREA Annual Report, SSV Data 2024, and interview with the PREA Coordinator addresses 115.388 (b).</p>



	<p>Policy 1.6, Data Collection, page 1, II. A. 5., PREA Annual Report, SSV Data 2024, and interview with the Agency Head addresses 115.388 (c).</p> <p>Policy 1.6, Data Collection, page 1, II. A., 5., a., PREA Annual Report, SSV Data 2024, and interview with the PREA Coordinator addresses 115.388 (d).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.388: Data review for corrective action.</p>
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<b>115.389</b>	<b>Data storage, publication, and destruction</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Documents:</p> <ol style="list-style-type: none"> <li>1. Policy 11.3 PREA</li> <li>2. Policy 1.6 Data Collection</li> <li>3. Bonner County Idaho Official Webpage - PREA</li> </ol> <p>Interviews</p> <ol style="list-style-type: none"> <li>1. PREA Coordinator</li> </ol> <p>115.389 (a): The facility shall ensure that the data collected is securely retained. (Policy 1.6, Data Collection, page 1, II. A., 3.)</p> <p>115.389 (b): The facility shall make all collected sexual abuse data, readily available to the public at least annually through its Web site. (Policy 1.6, Data Collection, page 1, II. A., 5)</p> <p>115.389 (c): Before making collected sexual abuse data publicly available, the facility shall remove all personal identifiers. (Policy 1.6, Data Collection, page 1, II. A., 5)</p> <p>115.389 (d): The facility shall maintain sexual abuse data for at least 10 years after the date of its initial collection unless rules Federal, State, or local law require otherwise. (Policy 1.6, Data Collection, page 1, II. A., 3)</p> <p>Access to data at the Bonner County Juvenile Detention Center is strictly controlled. Only the PREA Coordinator, Detention Manager, and Agency Head are authorized to review files and data. Information made available to the public is carefully redacted to ensure that no personal identifiers are disclosed. All data is retained for ten years from the date of initial collection.</p> <p>Policy 1.6, Data Collection, page 1, II. A., 3., and the interview with the PREA</p>

	<p>Coordinator addresses 115.389 (a).</p> <p>Policy 1.6, Data Collection, page 1, II. A., 5, Bonner County Idaho Official Webpage – PREA, and the interview with the PREA Coordinator addresses 115.389 (b).</p> <p>Policy 1.6, Data Collection, page 1, II. A., 5., and the interview with the PREA Coordinator addresses 115.389 (c).</p> <p>Policy 1.6, Data Collection, page 1, II. A., 3., and the interview with the PREA Coordinator addresses 115.389 (d).</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.389: Data storage, publication, and destruction.</p>
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<b>115.401</b>	<b>Frequency and scope of audits</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>This report represents the fourth Prison Rape Elimination Act (PREA) audit conducted for the Bonner County Juvenile Detention Center. The facility's initial PREA audit was completed in April 2016. It is important to note that Bonner County operates only one such detention facility.</p> <p>The Bonner County Juvenile Detention Center has participated in PREA audits during the following intervals: April 2015, April 2018, May 2022, and most recently, May 2025. In accordance with PREA requirements, beginning August 20, 2013, and at three-year intervals thereafter, the facility has ensured the timely completion of these audits.</p> <p>The assigned auditor conducted a comprehensive review of all applicable policies, facility procedures, reports, and accreditation documentation. For the purposes of the current audit cycle, the auditor was provided with a representative sample of documents relevant to the most recent one-year period.</p> <p>The auditor was granted access to the entirety of the Bonner County Juvenile Detention Center, enabling direct observation of all facility areas. Upon request, the auditor received copies of all pertinent documentation. Interviews were conducted with staff members, supervisory personnel, and facility administrators. Private, confidential interviews with residents were facilitated without restriction. Furthermore, residents were afforded the opportunity to transmit confidential communications or correspondence to the auditor, consistent with the procedures provided for attorney-client communications.</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.401: Frequency and scope of audits.</p>

115.403	<b>Audit contents and findings</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The Bonner County Juvenile Detention Center posted the previous Audit (May 2022) to the facility's website.</p> <p>The Bonner County Juvenile Detention Center complies with Standard 115.403: Audit Contents and findings.</p>

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

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

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

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

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



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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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



	publication would present a clear and specific threat to the safety and security of a facility?	
<b>115.389 (a)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency ensure that data collected pursuant to § 115.387 are securely retained?	yes
<b>115.389 (b)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
<b>115.389 (c)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
<b>115.389 (d)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency maintain sexual abuse data collected pursuant to § 115.387 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
<b>115.401 (a)</b>	<b>Frequency and scope of audits</b>	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	yes
<b>115.401 (b)</b>	<b>Frequency and scope of audits</b>	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	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
<b>115.401 (h)</b>	<b>Frequency and scope of audits</b>	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
<b>115.401 (i)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
<b>115.401 (m)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
<b>115.401 (n)</b>	<b>Frequency and scope of audits</b>	
	Were inmates, residents, and detainees permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
<b>115.403 (f)</b>	<b>Audit contents and findings</b>	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes