

PREA Agency Audit Report: Final

Name of Agency: Douglas County District Court

Facility Type: Juvenile

Date Interim Report Submitted: 11/26/2022

Date Final Report Submitted: 01/29/2023

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
Auditor Full Name as Signed: Kila Jager	Date of Signature: 01/29/2023

AUDITOR INFORMATION	
Auditor name:	Jager, Kila
Email:	kilajager@preauditor.com
Start Date of On-Site Audit:	
End Date of On-Site Audit:	

AGENCY INFORMATION	
Name of agency:	Douglas County District Court
Governing authority or parent agency (if applicable):	
Physical Address:	1038 Buckeye Road, Minden, Nevada - 89423
Mailing Address:	
Telephone number:	7757829860

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

Agency-Wide PREA Coordinator Information			
Name:	Wendy Garrison	Email Address:	wgarrison@douglas.nv.gov

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:

1

- 115.317 - Hiring and promotion decisions

Number of standards met:

8

Number of standards not met:

0

Standards

Auditor Overall Determination Definitions

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

Auditor Discussion Instructions

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

115.311	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.311b, PREA Coordinator:</p> <p>Acronyms:</p> <p>DCDC Douglas County Ninth District Court (Agency) CSYC China Spring Youth camp DCJDC Douglas County Juvenile Detention Center WNRVC Western Nevada Regional Youth Center DCFS: Nevada Division of Child and Family Services</p> <p>Standard Requirement: 115.311 (b): <i>An agency shall employ or designate an upper-level, agency-wide PREA coordinator with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities.</i></p> <p>Compliance Assessment: 115.311</p> <p>Douglas County Ninth District Court (DCDC) is the parent agency of both China Spring Youth Camp (CSYC) and Douglas County Juvenile Detention (DCJDC).</p> <p>DCDC policies/procedures, A.115.311 Agency PREA Coordinator and Tolerance Policy, requires the designation of an Agency PREA Coordinator with sufficient time and authority; and designates the detailed duties of the position that comply with PREA requirements.</p> <p>DCDC appointed an Agency PREA Coordinator (PC), Wendy Garrison. Ms. Garrison is the Director of Juvenile Camp Services and the Director of China Spring Youth Camp. The PREA Coordinator reports to the Douglas County Ninth District Court (DCDC) Judge. The Douglas County Ninth District Court designated the PC with PREA authority over both juvenile facilities, and monitoring of the contracted confinement facility Western Nevada Regional Youth Center (WNRVC).</p> <p>The agency PC ensures all required reports and documentation are sent to the Nevada Division of Child and Family Services (DCFS), as required by the state contract with Douglas County/CSYC, for the confinement of residents.</p> <p>The PC also ensures all required information is received from Western Nevada Regional Youth Center (WNRVC), as required by its contract for the confinement of residents, between the agency and WNRVC.</p> <p>Interviews:</p> <p>The Agency PREA Coordinator affirmed having sufficient authority and time to develop, implement, and oversee agency efforts to comply with the PREA standards.</p>

This includes DCDC facilities China Spring Youth Camp, Douglas County Juvenile Detention Center, and the contracted confinement facility, Western Nevada Regional Youth Center (WNRYS). In addition, the PC confirmed CSYC is a contracted confinement facility of the state, Nevada Division of Child and Family Services (DCFS). The agency PC ensures all contract-required PREA documentation is given to DCFS. The PC confirmed working on weekends and nights to complete the required PC duties. The agency PC confirmed the hiring of an assistant director for CSYC to give the PC more time.

During Corrective Action:

This auditor had concerns about the agency PC having enough time to devote to the requirements of this position; however, during corrective action, China Spring Youth Camp (CSYC) hired an Assistant Director. Due to the Director of CSYC being the agency PREA Coordinator, this freed up more time for the agency PC to develop, implement, and oversee agency efforts to comply with the PREA standards.

DCDC created and implemented a zero-tolerance policy requiring the designation of a PC with sufficient time and authority.

DCDC designated an agency PC and gave the PC PREA authority over both juvenile facilities.

Compliance Statement:

DCDC is compliant with standard 115.311b. DCDC designated an upper-level agency PREA Coordinator, hired a CSYC assistant director, created and implemented the agency Zero-Tolerance policy, and gave the PC PREA authority over both juvenile facilities, ensuring enough time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards.

Documentation Reviewed:

Organizational Chart: Douglas County Ninth District Court (DCDC-Agency); Wendy Garrison - Director of Juvenile Camp Services, Director of CSYC, and the agency PREA Coordinator, reports to Judge Nathan Todd of the Douglas County Ninth District Court. Both judges head the agency, DCDC, and the decision was made to have the PC report to one judge. Judge Nathan Todd Young oversees CSYC, and Judge Thomas Gregory oversees DCJDC for Douglas County Ninth District Court; however, regarding PREA, the PREA Coordinator reports to Judge Nathan Young.

Ninth Judicial District Court Appointment: The DCDC made court appointments for the following required positions: Agency PREA Coordinator: Wendy Garrison; PCM for China Springs: Lesley Keith; and PCM for DCJD: Kris Zehren. The appointment paperwork requires all positions to have sufficient time and authority to complete their designated PREA duties.

Nevada DCFS confinement Contract with China Spring Youth Camp: Page 6: PREA: Be PREA Compliant; by audit results; Provide DCFS with: all PREA allegations and administrative and criminal investigations; Survey of Sexual Victimization

reports as incidents occur; PREA investigations within 30 days of the incident; Staff and contractors complete background checks (FBI and state fingerprint-based background check and Child Abuse and Neglect Registry Check) and every 5 years the FBI and state fingerprint-based background checks, and sign a document attesting to the fact that they have not: Engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution, or have you been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse, or have you been civilly or administratively adjudicated to have engaged in the activity described in any part of this question; been adjudicated as having engaged in any type of inmate Sexual Harassment, which includes as a staff member, volunteer, contractor, or as any type of service provider coming in contact with an inmate in the facilities.; Sexual Harassment includes but is not limited to: i. Repeated verbal comments of a sexual nature to an inmate; or ii. Demeaning references to gender; or iii. Derogatory comments about body or clothing; or iv. Repeated profane or obscene language or gestures.

Interlock Contract between Public Agencies: State of Nevada and Douglas County to WNRYS. (Contracted confinement provider):

WNRYS Contract: Western Nevada Regional Youth Center, date of the current contract - January 24, 2022; multiple counties (including Douglas County) together contract for confinement services at WNRYS; PREA Requirements: within two years of this agreement, be PREA Compliant Audit; comply with all PREA standards; monitor by the contracting agency (DCDC); PREA requirements included in the contract.

Director of Juvenile Camp Services Job Description: (Agency PC): Manages all functions and services of CSYC; Agency PREA Coordinator - Appointed by the 9th Judicial District Court, upper level, requires sufficient time and authority.

PAQ: PREA Coordinator states she has sufficient time and authority. Long hours are required at the start; however, feels she can incorporate them into her other duties.

Agency Zero Tolerance Policy: A: 115.311: requires the assigning of an Agency PREA Coordinator

Agency Employee PREA Policies Signature Form: stating understanding of all 11 training requirements of the PREA standards.

Agency Policy A.115.311b Agency PREA Coordinator: requiring an Agency PREA Coordinator with sufficient time and authority; designating the responsibilities of the agency PC: 1. Have complete and unrestricted access to any facility under the Ninth Judicial District Court control or contract, their programs, offices, records, staff, and youth at any time to conduct, coordinate, or review an investigation; 2. Ensure all facility staff and youth are trained in PREA standards; 3. Ensure policy and procedure are updated as required; 4. Conduct/Ensure annual internal audits at each facility to ensure PREA requirements are being maintained, including requiring

corrective action, as needed; 5. Present a Quarterly Facilities Report aa. To inform the Board of County Commissioners of all PREA allegations and reports of retaliation against anyone who reports sexual abuse and sexual harassment; 6. Annual Report; aa. Require PREA Compliance Managers to gather data on all investigations, include their findings, and include this data in an annual report. bb. The annual report shall be posted on the Ninth Judicial District Courts website; and the Facilities' website; 7. Ensure all federal PREA audits are posted on the Douglas County and Facilities websites; 8. Conduct monthly meetings with facility PREA Compliance Managers to staff cases, discuss findings, identify policy needs, or address any other PREA-related issues; 9. Train PREA Compliance Managers and provide leadership and guidance as required; 10. Audits, aa. Require PREA Compliance Manager to open and coordinate all federal PREA audits for each Douglas County facility every three (3) years, bb. Including contracting with a certified PREA auditor; and cc. Coordinating corrective actions as necessary.

Interviews:

Juvenile Camp Services Director/Agency PREA Coordinator states and has demonstrated, during this audit and corrective action, to have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities. She states that she has competent PREA Compliance Managers in each facility who implement agency PREA policies and facility procedures.

Compliance Determination of 115.311b: The Douglas County Ninth District Court (Agency) is compliant.

115.312	Contracting with other entities for the confinement of residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>115.312 a, b: Contracting with other entities for the confinement of residents:</p> <p>Acronyms used in this report:</p> <ul style="list-style-type: none"> • WNYRC: Western Nevada Regional Youth Center (contracted agency) • CSYC: China Spring Youth Camp • DCJDC: Douglas County Juvenile Detention Center • DCDC: Douglas County District Court (parent Agency) <p>PREA Standard Requirements:</p> <p><i>a: A public agency that contracts for the confinement of its residents with private agencies or other entities, including other government agencies, shall include in any new contract or contract renewal the entity's obligation to adopt and comply with the PREA standards.</i></p> <p><i>b: Any new contract or contract renewal shall provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards.</i></p> <p>Audit Compliance Assessment, 115.312:</p> <p>Paperwork/Policy/Procedures:</p> <p>The parent agency, Douglas County Ninth District Court (DCDC), created and implemented policy A 115.312 Agency Contracting with Other Entities for Confinement of Youth. It included: Policy: A public agency that contracts for the confinement of its residents with private agencies or other entities, including other government agencies, shall include in any new contract or contract renewal the entity's obligation to adopt and comply with the PREA standards. Any new contract or contract renewal shall provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards.</p> <p>Douglas County Ninth District Court (DCDC) has an interlock contract with the Western Nevada Regional Youth Center (WNYRC) for the confinement of residents. This contracted facility has been working towards PREA compliance on an ongoing basis; however, in January of 2022, an addendum was added to the WNYRC contract requiring them to provide a compliant PREA audit report within two years of this amendment; or, be working toward PREA compliance with an identified action plan from a PREA audit. The contract requires WNYRC to be compliant with all PREA requirements.</p> <p>The amendment states that WNYRC will permit assessments, including onsite visits, facility observations, interviews of staff and youth, and reviews of documents and</p>

policies, in non-audit years.

Practice:

WNRYS asserted in the agency monitoring form, they are actively working towards PREA compliance and are almost ready for a PREA audit. They have conducted a PREA internal audit, have their annual report posted on their website (<https://wnryc.org/prea/>), trained their PC in 2021, posted incidents and investigation results on their website, and have budgeted for a PREA audit.

Douglas County Ninth District Court's contract with WNRYS contains the entity's obligation to adopt and comply with all PREA standards and for monitoring by the DCDC PREA Coordinator. The agency monitoring form confirms the practice required for oversight and assistance to WNRYS, documenting WNRYS's progress and budgeting for a PREA audit.

Interviews with the Director of Juvenile Camp Services/DCDC PREA Coordinator, WNRYS PREA Coordinator, and the Douglas County Contract Administrator confirmed the inclusion of the required PREA monitoring and compliance in the WNRYS contract; ongoing monitoring by the DCDC PREA Coordinator; WNRYS's ongoing progress towards PREA compliance; and plans to schedule a PREA audit in 2023/24

Compliance Statement:

Douglas County is compliant with standard 115.312. It has a compliant PREA policy requiring WNRYS to be PREA compliant and allow for monitoring by the DCDC PREA Coordinator-including onsite visits, facility observations, interviews of staff and youth, and reviews of documents and policies, in non-audit years.

Practice is confirmed by the completed agency monitoring form, reporting in the DCDC Annual PREA Report, The 2021 WNRYS PREA report, and interviews.

Douglas County District Court (DCDC) complies with standards 115.312 a, and b.

Documents Reviewed, Standard 115.312 a1 and 2:

Agency Zero Tolerance Policy: A.115.311: Purpose: To ensure the sexual safety of facility(ies) inmates and staff through a comprehensive agency-wide approach to prevention, detection, and response to sexual abuse and sexual harassment in all facilities operated or contracted by the Ninth Judicial District Court. Requires facilities to create Standard Operating Procedures to include: Prevention Planning; Responsive Planning; Training and Education; Screening for Risk for Sexual Victimization and Abusiveness; Reporting; Official Response Following an Inmate, Detainee, or Resident Report; Investigations; Discipline; Medical, and Mental Care; Date and Collection and Review; Audits; and Definitions.

DCDC (Agency) Policy A.115.312, Agency Contracting with Other Entities for Confinement of Youth - Policy: A public agency that contracts for the confinement of its residents with private agencies or other entities, including other government

agencies, shall include in any new contract or contract renewal the entity's obligation to adopt and comply with the PREA standards. Any new contract or contract renewal shall provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards. This policy requires all contracts to contain language in compliance with PREA Standard 115.312; and requires the DCDC PREA Coordinator to monitor and be available to contracted entities for compliance progress, complaints, annual reports, training compliance, and assistance/advice.

PAQ: Stated that DCDC has two contracts; however, only one is contracted by Douglas County. (The other is the State contract with Douglas County/China Spring and is audited in the Nevada State Facility audits; The WNRYS contract has been in place; however, in 2022, an addendum to this contract required WNRYS to comply with PREA within the next two years.

WNRYS First Amended Interlock Agreement: (Interlock Contract between public agencies) WNRYS will work towards PREA Compliance by the following provisions: Be PREA compliant and provide a PREA audit within two years of this amendment, and/or work toward PREA compliance with an identified action plan established by a PREA audit; Ensure a PREA audit is performed every three years; Comply with all applicable PREA requirements; Provide PREA required documentation: PREA audit report, reports of allegations, investigations, and findings, to the agency PC.

Douglas County District Court (DCDC) PREA Compliance Verification Form: WNRYS asserted it is actively and effectively working toward achieving compliance with all required PREA requirements:

The Agency Monitoring Form documents that WNRYS actively working towards PREA compliance and is almost ready for an audit.; Has conducted an internal audit; Includes its annual report on its website.

<https://wnryc.org/prea/>.; Includes substantiated reports on the website
<https://wnryc.org/prea/>; Includes substantiated harassment/abuse reports on the website; Documents training of the PREA Compliance Manager (PCM) on 8/30/21 and 12/17/21; Budgeted an audit for 23/24; Interviews: Juvenile Services Director/ agency PREA Coordinator; WNRYS PREA Coordinator; Agency Contract Administrator

115.317	Hiring and promotion decisions
	<p>Auditor Overall Determination: Exceeds Standard</p> <hr/> <p>Auditor Discussion</p> <p>5.317 Hiring and promotion decisions.</p> <p>Agency Compliance Assessment: Exceeds Compliance: 115.317 a-h</p> <p>Acronyms used in this report:</p> <ul style="list-style-type: none"> • WNYRC: Western Nevada Regional Youth Center (contracted agency) • CSYC: China Spring Youth Camp • DCJDC: Douglas County Juvenile Detention Center • DCDC: Douglas County Ninth District Court (parent Agency) • CAN: Child Abuse Registry <p>115.317 a, and f:</p> <p>Agency Standard Requirements:</p> <p>(a): The agency shall not hire or promote anyone who may have contact with residents, and shall not enlist the services of any contractor who may have contact with residents, who (1) Have engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997); (2) Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or (3) Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.</p> <p>(f): The agency shall also ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions and any interviews or written self-evaluations conducted as part of reviews of current employees. The agency shall also impose upon employees a continuing affirmative duty to disclose any such misconduct.</p> <p>Agency Compliance Assessment, after corrective action:</p> <p>The agency, Douglas County Ninth District Court (DCDC) appointed a new PREA Coordinator (PC) in 2022. DCDC has operational control of two juvenile facilities, Douglas County Juvenile Detention Center (DCJDC) and China Spring Youth Camp (CSYC). DCJDC is a secure detention facility and CSYC is a residential juvenile facility.</p> <p>Policy/Procedure Paperwork:</p> <p>During corrective action, the agency (DCDC) developed and implemented a new agency policy, A 115.317 Employment, Contracting, and Volunteering Practices.</p>

This DCDC policy prohibits hiring or enlisting the services of any contractor 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); Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, coercion, or If the victim did not consent or was unable to consent or refuse; or; Has been civilly or administratively adjudicated to have engaged in the activity described in B; Section B requires determining if any candidate, contractor, volunteer, or intern, has allegations of sexual abuse, allegations of sexual harassment, or violations of sexual contact; Page 2, section E and F requires candidates, and staff to sign the PREA Disclosure Form, during hiring, promotions, and annually, and; page 1, section C prohibits hiring or enlisting the services of any contractor who may have contact with youth who has engaged in the prohibited behavior listed in 1-3, above.

The PREA Acknowledgement Form documents the signature of staff, contractors, and volunteers attesting that they have not participated in the listed (1-3) prohibited behaviors. This form asks the staff, volunteers, contractors, or interns, to certify they have not engaged in the prohibited behaviors listed (1-3) above. Staff, contractors, and volunteers are required to sign the PREA Acknowledgement form during hiring, promotions, and annually.

DCDC and its operated facilities, CSYC and DCJDC, exceed this standard's requirements by also attesting, on this form, that they have not been convicted for domestic violence, child abuse, stalking, any sexual offense, any felony, and substantiated sexual abuse. In addition, notify the Director of Juvenile Camp Services if convicted or the subject of substantiation of any of the above—and will be terminated for any of the above actions.

A spreadsheet for each facility is included in this audit, it includes all staff, volunteers, contractors, and interns. For DCJDC, this spreadsheet includes the date the staff/volunteer/contractor signed the disclosure form. and each subsequent year of reaffirming by signing the form annually. For CSYC, the spreadsheet documents the last date all staff, volunteers, contractors, and interns, signed the PREA Signature Form. (115.317 a, f)

Included in audit documentation are samples of the PREA Acknowledgement Forms: including staff, contractor, volunteer, change of status, 5-year checks, and annually for both operated facilities.

Included in this audit's documentation is the resume for the PREA Background Investigator/PREA Investigator. It includes almost 38 years of law enforcement experience, including Patrol, Crime Scene Investigator/Investigative Division, and Sherriff's Department Background Investigator, he also has seven years as a background investigator at CSYC.

To ensure compliance is maintained, during hiring, promotions, and enlisting the services of contractors and volunteers, the agency PREA Coordinator (PC) instituted and implemented a monthly meeting between the agency PC and the facility PCMs. Included in the documentation for this audit are the completed forms used to

document these monthly meetings Three Monthly PC and facility PCM meeting minutes are included in audit documentation.

Practice Compliance Assessment, 115.317 a, and f:

The PREA Background Investigator is a retired Sherriff's Officer. His background includes almost 38 years of Law Enforcement experience with the Sherriff's Office. This experience includes Patrol, SWAT team leader, Range Master, Field Training Officer, Narcotics Task Force, Gang Task Force, Crime Scene Investigator/ Investigative Division, 8 years as a Department Background Investigator in the Sherriff's Office Investigation Division, and in addition, 7 years as the background investigator at China Spring Youth Camp.

During the hiring process, at 5-year checks, and any change of status (promotion, or when enlisting the services of volunteers, contractors, or interns, the PREA Background Investigator verifies the signing of the PREA Acknowledgement Form. As a retired Law Officer of long-standing, observations and interviews demonstrate that he has a very thorough process.

During corrective action, in addition to China Springs Youth Camp (CSYC), the PREA Background Investigator agreed and was assigned to conduct complete background checks, PREA investigations, and ensure the signing of the PREA Acknowledgement forms, at DCDC-operated facility, Douglas County Juvenile Detention Center (DCJDC). This action ensures that the process is consistent and completed at both DCDC-operated facilities (CSYC and DCJDC). In later standards, his full function as a PREA background investigator and PREA Investigator will be defined.

Practice is confirmed by:

CSYC, four signed PREA Acknowledgement Forms when staff was promoted; Thirteen signed when staff was hired; 12 signed volunteer forms; 2 signed contractor forms; and 10 signed staff forms; and

DCJDC: 8 full-time staff forms, four new hire forms, and one contractor form.

Another practice instituted during corrective action, to ensure compliance is maintained during hiring, promotions, and enlisting the services of contractors and volunteers, included the development and implementation of monthly PC and all facility PCM meetings.

These meetings began on 9/22/2022 and are documented to have occurred every month. Three meetings are included in the audit's documentation. Tasks and documentation contain monthly, quarterly, and yearly tasks that must be completed. The monthly requirements, among others, are hiring/background discussions, and staffing. This ensures all staff hiring practices are being followed, including the signing of the PREA disclosure questions, and background, FBI fingerprint, and child abuse registry checks.

Meeting documentation and interviews confirm the practice of conducting monthly meetings between the agency PC and the Facility PCMs. The tracking form

demonstrates the practice of maintaining a running monthly, quarterly, and yearly assessment and discussion about key PREA issues and actions. In relation to these standards, this form documents the practice of

- Monthly reviews of all hiring and background checks; audit progress; youth needs/services; staffing, and investigations/terminations, for all facilities.;
- Quarterly reviews/assessment/tracking signed Staff Acknowledgement Forms;
- Yearly hiring/background discussion; staffing; and Investigations/terminations.

Interviews:

The PREA Background Investigator described his background as a twenty-five (25) year veteran of law enforcement. Four years as a Military Police Officer in the United States Army with a Top-Secret Security Clearance and twenty-one (21) years in civilian law enforcement. Achieving Basic, Intermediate, and Advanced Peace Officers Standards & Training (P.O.S.T.) Certification from the State of Nevada and hundreds of hours of in-service training during his career. In addition, eight years as a background investigator for the Sheriff's Office, and 7 years as the Background Investigator/PREA Investigator. He confirmed ensuring all candidates, staff, contractors, and volunteers/interns sign the PREA Acknowledgement Form (disclosure questions) at hire, or before access to residents.

An interview with the agency PC confirms monthly meetings from September of 2022, where hiring/background discussions and staffing are reviewed monthly, the signed PREA Acknowledgement form numbers/compliance is reviewed quarterly and hiring/background discussions and staffing is reviewed yearly, for all DCDC facilities.

Compliance statement:

DCDC's policy, Agency Employment, Contracting, and Volunteering Practices is compliant with the requirements of this standard. In addition, documented practice confirms that DCDC ensures staff, volunteers, and contractors sign the PREA Acknowledgement Form at hire, yearly, and at any change of status. In addition, staff also sign the PREA Acknowledgement form at the 5-year background and child abuse registry checks.

In the next standards, further actions taken by the agency, and both juvenile facilities, are outlined. This includes background checks, child abuse registry checks, and FBI fingerprints to ensure all actions are taken to ensure individuals who have contact with residents, have no background charges, or behavior of a sexual nature towards juveniles or adults.

DCDC policy, samples of the completed PREA Acknowledgement forms, spreadsheets documenting the completion of these forms, and interviews are included in this audit's documentation. They demonstrate policy/procedure, and practice that exceeds compliance, after corrective action, and are ingrained in the

culture of the agency, DCDC, and its operated facilities, CSYC and DCJDC.

DCDC is compliant with standard requirements 115.317 a, and f.

115.317 c, d, e, Exceeds Compliance

Standard Requirements:

- b): The agency shall 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.
- c) Before hiring new employees, who may have contact with residents, the agency shall: (1) Perform a criminal background records check; (2) Consults any child abuse registry maintained by the State or locality in which the employee would work; and (3) Consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse.
- d) The agency shall also perform a criminal background records check, and consult applicable child abuse registries, before enlisting the services of any contractor who may have contact with residents.
- e) The agency shall 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.

Compliance Assessment:

Policy/Procedures and Paperwork:

DCDC Policy, Agency Employment, Contracting, and Volunteering Practices, created during corrective action, contains background check requirements for new hires, contractors, volunteers, and employee change of circumstance. Checks are required at hire, every five years, and when there is a change in staff status (promotion, demotion, hours change), include: A criminal history background check (including FBI fingerprints); A review of any child abuse registry maintained at the state or local level. (115.317c, d, e,), and At hire: Contact all prior institutional employers for information on substantiated allegations of sexual abuse or harassment, or any resignation during a pending investigation of an allegation of sexual abuse or harassment.; Prior to an offer of contract, employment or promotion, determine if any candidate, contractor, volunteer, or intern has any: Allegations of sexual abuse; Allegations of sexual harassment, or Any violations of sexual misconduct

Included in audit documentation are spreadsheets documenting the following:

For DCJDC: dates of all required checks, including signed PREA Acknowledgement Forms, child abuse registry checks, background checks, FBI fingerprint checks, and five-year background and child abuse registry checks.

For CSYC: dates of the last signed PREA Acknowledgement Form, the next child abuse registry check due date, the next fingerprint check due date, prior child abuse check results, and prior fingerprint results.

During corrective action, the agency PREA Coordinator (PC) instituted monthly meetings with the facility PCMs. These are documented on a meeting form that includes:

- The monthly requirements, among others, are hiring/background discussions, and staffing. This ensures all staff hiring practices are being followed, including the signing of the PREA disclosure questions, and background, FBI fingerprint, and child abuse registry checks.
- The Quarterly requirements: PREA Training/Staff; Signed Staff Acknowledgement of Training; PREA Training/youth; # youth trained; signed youth training; language plan; disability plan, disability assessment; # of disabled LEP youth that sought services and provision of services.
- The yearly requirements include Internal Audit; External Audit Status/ Timelines; Annual Report/SSV; Staffing Plan reviewed-staff secure facility; Adequate levels of staffing in the non-secure facility; Video monitoring. Documentation of monthly meetings is included in this audit's documentation.

Documentation of the monthly PC and facility PCMs meetings, including the minutes of meetings, beginning in September 2022.

During corrective action, the agency PC developed and implemented the DCDC Institutional Employer Form, for contacting former institutional employers.

Questions include if the former employee has:

- Received a sustained adjudication for sexual abuse of an inmate/offender/youth.
- Received a sustained adjudication for sexual harassment of an inmate/offender/youth.
- Received a criminal referral for sexual abuse of an inmate/offender/youth; and
- Resigned during an ongoing investigation for sexual abuse or sexual harassment of an inmate/offender/youth.

Interviews: Background Investigator, Douglas County HR, PC, PCM's

Practice:

During corrective action, the agency, Douglas County Ninth District Court (DCDC), implemented an agency policy, Agency Employment, Contracting, and Volunteering Practices. In compliance with the agency policy, the PREA Background Investigator conducts background checks for employees, contractors, and volunteers.

The Background Investigator's experience includes Law Enforcement experience

with the Sherriff's Office, including Patrol, SWAT team leader, Range Master, Field Training Officer, Narcotics Task Force, Gang Task Force, Crime Scene Investigator/ Investigative Division, and 8 years as a Department Background Investigator in the Sherriff's Office Investigation Division. In addition, 7 years as a background investigator at DCDC juvenile facility, China Spring Youth Camp (CSYC)

The Background Investigator conducts local and national Background, Child Abuse Registry, and FBI fingerprint checks, for all applicants, staff, contractors, volunteers, and interns. In addition, ensures all staff/contractors/volunteers sign the PREA Acknowledgement/Disclosure Form, and check with staff's former institutional employers, to ensure the applicant does not have any substantiated sexual abuse/ harassment findings.

The above checks are completed before hire, every five years, and at any change of status (promotion). For contractors, volunteers, and interns, the Background Investigator conducts criminal history, FBI fingerprint, and child abuse registry checks before access to residents, and every five years.

Background investigations/checks have been conducted at the DCDC facility, China Spring Youth Camp, by the Background Investigator for seven years. During corrective action, the Background Investigator agreed to conduct all required checks for the DCDC juvenile facility Douglas County Juvenile Detention Center (DCJDC). Previously, Douglas County Human Resources conducted these DCJDC checks; however, for continuity, this process is now the same for both juvenile facilities operated by DCDC.

In addition to the above thorough checks, the PREA background investigator ensures former institutional employers are contacted and asked about any sexual abuse or sexual harassment substantiated incidents, or the staff resigning during the investigation. During corrective action, the agency PC created the DCDC Institutional Employer Contact Form. It is sent to a former institutional employer when an employee applies for employment at a DCDC facility. Included in the documentation for this audit is a completed form, documenting the process and compliance, and a form that was just sent to an institutional employer - waiting for a response.

DCJDC did not have any promotions in the last 12 months, so no Detention updated checks are included in this audit; however, the PREA background investigator checks with all former institutional employers and conducts all required checks for any worker who is promoted. This is verified by interviews, and documentation from four CSYC promotion checks, reviewed by this auditor, and included in this audit's documentation.

This investigator, as proven by his law enforcement career, experience at CSYC, documentation reviewed, and interviews, is thorough, experienced, understands the PREA requirements, and ensures all required checks, forms, and requirements are completed before the applicant has access to residents.

To ensure tracking, discussions, and continuity, Hiring/background discussions occur

during the monthly meeting, by the agency PC and facility PCMs (including the PREA Background Investigator's findings or concerns about sexual harassment/abuse).

This occurs before hiring or enlisting the services of a contractor, volunteer, or intern. It is the agency, and both facilities' policy not to hire or enlist the services of a contractor/intern/volunteer, with substantiated sexual abuse or harassment.

The background investigator/PREA Investigator and the agency PC confirmed as contacts made with former institutional employers. The processes involved in background checks, as well as contact with former institutional employers, confirm that both DCDC juvenile facilities do not hire, promote, or enlist the services of staff, contractors, or volunteers who have a sexual harassment or sexual abuse violations.

Exceeding this standard's requirements, DCDC conducts a yearly check (and before contracts/services) to see if any of their providers are on the exclusions list. If they are, DCDC and its facilities do not use them as a provider. <https://oig.hhs.gov/exclusions/index.asp> Exclusions Program - Office of Inspector General, U.S. Department of Health, and Human Services.

Interviews with the agency PC, CSYC PCM, DCJCD PCM, and CSYC Background Investigator confirm practice, policy, documentation, and secure storage of all files.

Sample documentation included in this audit and reviewed for practice compliance includes:

CSYC documentation:

- Promotion: Four promotions at CSYC: documentation uploaded confirmed all four received child abuse checks, fingerprint checks, and signed new PREA Signature Forms, at the time of promotion.
- New Hire: CSYC hired 13 new staff. The documentation uploaded demonstrates that all 13 went through thorough background checks, including child abuse registry checks and FBI fingerprint checks. All signed the PREA disclosure forms.
- Prior institutional employer check: NEW hire, samples of contact of previous institutional employers. One returned results and three are waiting for a response.
- Volunteer: CSYC: 12 volunteers at CSYC received child abuse registry results, FBI fingerprint checks, and results, and signed the PREA disclosure forms.
- 10 additional staff signed PREA Agreement Forms were uploaded to audit documentation for CSYC.
- Five-year CSYC: Seven CSYC 5-year checks were uploaded and reviewed as documentation. All contained the required checks, Child Abuse Registry, FBI fingerprints, and signed disclosure forms.
- No Hire: One staff applicant, to CSYC, was not hired, as demonstrated by negative fingerprint results.
- CSYC Staff, Contractor, Volunteer, Intern, Checks and Disclosure Checks/ Form Spreadsheet: documents date of PREA Signature Form, when the next

CAN check is due, the date the next FBI fingerprint check is due, and results of the last checks, for all staff, volunteers, contractors, and interns.

Interviews: The Background Investigator confirmed conducting local and national background checks, as well as child abuse registry checks, for all staff, volunteers/ interns, and contractors. In addition, confirmed the current change to include background investigation services at Douglas County Juvenile Detention Center (DCJDC). He confirmed that background checks and child abuse registry checks are conducted upon hire, or before contact with residents for contractors/volunteers/ interns, every 5 years, and if there is a staff change in status (staff promotion, demotion, part-time to full-time...).

DCJDC documentation:

- PREA Acknowledgement Form: 8 full-time staff signed 2022; Four completed staff records checks:-documented on the DCJDC spreadsheet, and files uploaded to the DCJDC audit, currently underway.
- Prior institutional employer check: NEW hire, one new hire had a previous institutional employer that was contacted-about adjudication for sexual abuse, sustained adjudication for sexual harassment, criminal referral for sexual abuse, and resignation during an ongoing investigation for sexual abuse or sexual harassment. The request was sent and is waiting for a response. It is part of the documentation of this audit.

DCDC Policy, Agency Employment, Contracting, and Volunteering Practices, created during corrective action, contains the following background check requirements:

- Page 1. Section II Requirements, A 1-3: A. All new hires, contracts, volunteers, and employees being considered for promotion shall have a background investigation to include: 1. A criminal history background record check: a. At hire; b. Every five (5) Years; and c. Any change in status (promotion, demotion, hours change). 2. A review of any child abuse registry maintained at the state or local level; and 3. Make an effort to contact all prior institutional employers for information on substantiated allegations of sexual abuse or harassment or any resignation during a pending investigation of an allegation of sexual abuse or harassment.
- Page 2. D: D. The Facility shall conduct criminal background checks of current employees, contractors, and volunteers who work within a facility setting every five years.
- Page 1, Section II. B, Requirements: Prior to an offer of contract, employment or promotion, the facility shall determine if any candidate, contractor, volunteer, or intern has any: 1. Allegations of sexual abuse; 2. Allegations of sexual harassment, or 3. Any violations of sexual misconduct; section h: Unless prohibited by law, the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for

whom such employee has applied to work.

Compliance Statement:

The process of conducting background, child abuse registry, and FBI fingerprint checks is an ingrained part of the PREA background investigator's process, as well as contacting former institutional employers, and ensuring all employees, contractors/volunteers/interns sign the PREA Acknowledgement Form (three disclosure questions). In addition to conducting these checks, he also conducts the same checks every 5 years for staff, volunteers, and contractors, and for staff who have a change of status (promotion, etc.,).

This process and practice are ingrained within the policies, practice, and culture of current background checks/investigations practice and documentation, and now is consistent for both juvenile facilities, under the agency's (DCDC) operational control. All results are retained in the secure part of the employee's confidential file.

DCDC exceeds compliance with these PREA Standards, due to their hiring of a former law enforcement officer to conduct all checks, and the high level of the checks conducted. 115.317 c, d, e, and e.

115.317 g:

Requirement: *g) Material omissions regarding such misconduct, or the provision of materially false information shall be grounds for termination.*

Compliance Assessment:

Policy/Paperwork:/Forms

DCDC Agency policy, Agency Employment, Contracting, and Volunteering Practices: section g: Any candidate/employee who has been found to provide false information shall be subject to administrative action including failure from background/termination.

The PREA Acknowledgement form, signed by all applicants, new hires, contractors, volunteers, and interns, states that material omissions are grounds for termination.

Practice:

A review of documentation demonstrated practice when FBI fingerprints disqualified a new hire. (CSYC) One staff applicant was not hired, as demonstrated by negative fingerprint results.

Interviews confirmed that staff is told before hire, and when signing the PREA Acknowledgement form (upon hire and yearly), that material omissions are grounds for termination.

DCDC is compliant with 115.317g.

115.317 h

Requirement: h) Unless prohibited by law, the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.

Compliant Assessment:

Paperwork/Policy/forms:

DCDC Policy, Agency Employment, Contracting, and Volunteering Practices, created during corrective action, required DCDC to 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.

During corrective action, the agency PC developed and implemented the Employment Check by Outside Facility Form, which includes the date of the check, facility requesting, facility Requesting staff, and the facility where the staff was Employed (DCJDC or CSYC), as well as answers to questions about substantiated sexual abuse and sexual harassment. This form is used to document requests from outside institutional employers and the answers provided by DCDC and kept in the employee confidential file.

Practice:

The background investigator/PREA Investigator and the agency PC confirmed contacts are made with former institutional employers, as well as the process when institutional employers contact DCDC.

During corrective action, the agency PC created a new form, the Employment Check by Outside Facility Form, to be used to document the contact, of DCDC, by an institutional employer. Interviews confirm that the requested information is, or will be, shared, about any sexual abuse or sexual harassment adjudication, criminal referral, or resignation during a sexual abuse/harassment investigation.

This information shared by DCDC is required to be documented, sent to the requesting institutional facility, and a copy placed in the employee's confidential file.

Zero institutional agencies have contacted DCDC, CSYC, or DCJDC for PREA-required information on former employees; however, the process is in place for PREA background investigator/PC compliance with this standard requirement, as well as to document the contact.

This process confirms that institutional employers, who hire former staff, have the DCDC information to ensure they do not hire, promote, or enlist the services of staff, contractors, or volunteers, who have a sexual harassment or sexual abuse violation.

Interviews confirm the understanding and use of this form when an institutional employer requests this information.

Compliance Statement:

DCDC is compliant with standard 115.317 h. Policy and Procedures are in place to ensure the understanding of the required actions of responding to an institutional employer, in regard to substantiated allegations of sexual abuse or sexual harassment.

The response is documented in the Employment Check by Outside Facility Form, sent to the enquiring institutional employer, with a copy to the confidential DCDC facility's employee file,

Though there have been zero institutional employer inquiries, the process is in place and the follow-through is documented in interviews.

115.366	Preservation of ability to protect residents from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	115.366 Official Response following a Resident Report: Compliance Assessment: Compliant Nevada is a right-to-work state and has no union negotiations.

115.387	Data collection
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 297">Auditor Discussion</p> <hr/> <p data-bbox="280 340 695 374">115.387: Data Collection:</p> <p data-bbox="280 412 798 445">Compliance Assessment: Compliant.</p> <p data-bbox="280 483 699 517">Acronyms used in this report:</p> <ul data-bbox="352 584 1422 954" style="list-style-type: none"> • WNYRC: Western Nevada Regional Youth Center (contracted agency) • CSYC: China Spring Youth Camp • DCJDC: Douglas County Juvenile Detention Center • DCDC: Douglas County Ninth District Court (parent Agency) • SSV: Survey of Sexual Violence • BJS: Bureau of Justice Statistics • PC: Agency PREA Coordinator • PCM: PREA Compliance Manager (DCJDC) • PCC: PREA Compliance Coordinator (CSYC) <p data-bbox="280 994 711 1028">115.387 a, b, c, d, e, and f:</p> <p data-bbox="280 1066 624 1099">Standard Requirements:</p> <ul data-bbox="352 1167 1477 1827" style="list-style-type: none"> • <i>a) The agency shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions.</i> • <i>b) The agency shall aggregate the incident-based sexual abuse data at least annually.</i> • <i>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 Sexual Violence conducted by the Department of Justice.</i> • <i>d) The agency shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.</i> • <i>e) The agency also shall obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents.</i> • <i>f) Upon request, the agency shall provide all such data from the previous calendar year to the Department of Justice no later than June 30.</i> <p data-bbox="280 1868 676 1901">Compliance Assessment:</p> <p data-bbox="280 1939 424 1973">Practice:</p> <p data-bbox="280 2011 1469 2089">In 2022, Douglas County Ninth District Court (DCDC) appointed a PREA Coordinator to oversee PREA compliance in both DCDC-operated facilities, and the contracted</p>

confinement facility, Western Nevada Regional Youth Center (WNRVC).

Prior to this appointment, both operated juvenile facilities had in place the standardized collection of uniform data, required for every allegation of sexual abuse, using the SSV standardized instrument and set of definitions.

CSYC uses a standardized collection instrument, built into its database, and it includes all categories and definitions listed in the Survey of Sexual Victimization (SSV) form. This practice is documented in completed SSV reports, both cumulative and individual, as well as a completed incident report that contains all required categories. In addition, interviews with the CSYC PREA Compliance Coordinator (PCC), as well as observations of the database, confirmed the use of this database to collect and aggregate sexual abuse allegations.

DCJDC incorporated all SSV questions and definitions into a tracking spreadsheet, used as the DCJDC standardized instrument. This practice is documented in a completed facility SSV report, as well as a spreadsheet containing all required categories. DCJDC has not had any allegations of sexual abuse, so has not completed any individual SSV reports, only the facility SSV report of zero allegations. An interview with the PCM confirmed the use of the standardized instrument and SSV forms to collect and aggregate any sexual abuse allegations.

Both DCDC-operated facilities, China Spring Youth Camp(CSYC), and Douglas County Juvenile Detention Center (DCJDC) collect data about sexual abuse allegations, investigations, and outcomes, using SSV data fields and definitions. CSYC has records back to 2016, and DCJDC, since 2020, verified in individual and cumulative SSV reports and facility annual PREA reports.

During corrective action:

A DCDC (agency) policy was created and implemented, A 115.387 Agency Transparency, Data, and Auditing. It requires its facilities to create standard operating procedures, and collect uniform data for every sexual abuse allegation.

They are required to use a standardized instrument and set of definitions, and to report all data to the agency PREA coordinator.

This DCDC policy requires the agency (PC) to maintain, review, and collect data from all incident-based documents, including reports, investigation files, and sexual abuse incident reviews. In addition, obtain incident bases and aggregate data from every facility, and upon request, provide it to the DOJ.

Information about allegations of sexual abuse or sexual harassment is now reported to the Agency PREA Coordinator immediately. From those incidents, the PC ensures the gathering and maintenance of accurate and uniform data from each facility, including the contracted facility, WNRVC. This information is then reviewed by the PCM and the PC, at their monthly meetings.

The DCDC PREA Coordinator (PC) instituted and implemented monthly meetings with facility PCMs. This ensures ongoing communication and review of incidents, as

well as a review to assess and improve the effectiveness of the prevention, detection, response, practices, policies, and training, in the facilities and agency. In the 9/29/22 meeting, each prior year was reviewed, and a discussion was had on how to align the new process with policy and annual reports. (Verification of these monthly meetings is included in this audit's documentation.)

Both DCDC-operated facilities and the contracted confinement facility have provided this aggregated data to the new agency PC, and it is documented in the facilities' annual PREA reports and the DCDC agency's annual 2021 PREA Report. All reports are posted to the facility and agency website.

<https://douglascountydistrictcourtspreaagency.com/annual-reports/>>

Paperwork/Policy/Procedures/Forms reviewed for compliance:

Douglas County Ninth District Court's (DCDC) Policy: A 115.387 Agency Transparency, Data, and Auditing: Section I. E requires the collection of accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions; Section I. A requires each facility to create Standard Operating Procedures for this policy; Section I.G. requires the agency to maintain, review, and collect data from all incident-based documents, including reports, investigation files, and sexual abuse incident reviews; Section I.C. required data collected including data necessary to answer all questions for the most recent version of the SSV; Section I.D. lists all of the required data to collect; Section IV. A requires the collection of uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions; Section IV. C Data Collection shall include data necessary to answer all questions on the SSV, maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incidents; Section IV.D and E requires the agency to also obtain incident bases and aggregate data from every facility and upon request, provide it to the DOJ.

Agency Incident Report Form: Standardized instrument that contains all answers to SSV questions for every allegation of sexual abuse.

Survey of Sexual Victimization Forms (SSV): Include standardized definitions and uniform data categories required to be collected, on every allegation of sexual abuse, and reported to the Bureau of Justice Statistics (BJS), upon request.

SSV Reports: Completed 2021 cumulative SSV reports for CSYC and DCJDC are included in this audit's documentation.

SSV cumulative Reports: Completed individual and cumulative SSV reports for CSYC, from 2018 and 2019, as well as an email documenting the submission of SSV reports to the BJS.

Agency Meeting Form: Monthly meetings between the agency PREA Coordinator (PC), and facility PREA Compliance Managers (PCM) were instituted, implemented, and tracked.

DCJDC (facility) Data Collection, Review & Storage, Publication & Destruction Procedures 115.387: Page 1:Policy- The staff member, administrative or management personnel of the Detention Facility are required to collect accurate, uniform data for every incident of sexual abuse using the standardized system identified below: Procedures: lists information to be collected (using SSV requirements and definitions); Page 3, 115.388 Data Review for Corrective Action: Policy: Upon request, the Juvenile Probation Department will provide all such data from the previous year to the Department of Justice no later than June 30th of the current year if the request is made; Page 3: An annual report will be submitted to the Juvenile Justice Programs Office by February 15 of each year; Page 3 and 4-115.389 Data Collection, Publication, and Destruction: An annual report conducted by the Detention Facility Supervisor including the current year's sexual abuse and sexual harassment data and the corrective actions taken will be made available to the public. <https://douglascountydistrictcourtspreaagency.com/wp-content/uploads/2023/01/2021-PREA-Annual-Report.pdf>

CSYC Policy 1A.25, A. Facility Duties: The PREA Compliance Manager shall ensure any alleged incident of sexual abuse or sexual harassment is reported timely and appropriately; The PREA Compliance Manager shall review, analyze, and use all sexual abuse and harassment data, including incident-based and aggregated data, to assess and improve the effectiveness of the facility's sexual abuse prevention, detection, response, practices, policies, and training; All information related to sexual abuse and sexual harassment data shall be maintained for ten (10) years from the completion of the investigation; All information related to alleged incidents shall be made available to the PREA Coordinator immediately, based on established timelines; Facility PREA Compliance Managers will participate in the monthly meeting with the PREA Coordinator, if unavailable for the monthly meeting all required documentation shall be provided; All data shall be kept in a secure and confidential manner.

China Spring PREA incident Report-#13: Includes definitions, general, contacts, victim data, perp data, follow-up, conclusion, and evidence (definitions comply with PREA standards) This is the form in the computer system that is completed for every incident. All have the standard definitions and use of this form as CSYC uses this as their uniform data collection tool.

DCDC (agency) Annual PREA 2021 Report:

Aggregated allegations per the SSV definitions since 2016, for operated facilities and the contracted containment facility.

Interviews: Agency PC and Facility PCMs confirm policies/procedures align with the new agency policies. Confirm the use of a standardized instrument to collect information about PREA incidents for SSV reports. Confirmed aggregating facility information annually and posting of annual PREA report on their website. Confirmed that they are prepared to submit SSV information if requested. Confirmed monthly meetings with the agency PC.

Observations: CSYC Database; DCJDC spreadsheet with required categories (zero

allegations)

Compliance Statement:

DCDC Policy is compliant with the requirements of this standard, 115.387

The agency, Douglas County Ninth District Court (DCDC), both operated juvenile facilities, China Spring Youth Camp, Douglas County Juvenile Detention Center, and the contracted facility, Western Nevada Regional Youth Center collects information for every allegation of sexual abuse using uniform collection and definitions.

The agency and both operated facilities, as well as the contracted confinement facility, have aggregated data and posted their annual PREA reports to their websites, as well as completed and submitted SSV reports when requested.

The agency PC and facility PCMs meet monthly to go over allegations and ensure all information is gathered and aggregated; and, the agency PC maintains, reviews, and collects data from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.

The contracted facility, WNRYS, provided information on zero PREA incidents in the last 12 months. CSYC provided documentation of allegations since 2018 and SSV reports, and DCJDC provided SSV reports and documentation for 2021.

The WNRYS PREA report provided information on zero PREA incidents in the last 12 months; CSYC provided documentation of allegations since 2018 and SSV reports, and DCJD provided SSV reports and zero allegation documentation for 2021.

The documentation, interviews, and observations demonstrate paperwork/policy/procedures and practice compliance at CSYC and DCJDC for standard 115.387 a, b, c, d, e, and f, after corrective action.

115.388	Data review for corrective action
	<p data-bbox="280 188 1007 224">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 580 300">Auditor Discussion</p> <hr/> <p data-bbox="280 340 611 376">15.388 Data Review:</p> <p data-bbox="280 416 699 452">Acronyms used in this report:</p> <p data-bbox="280 488 1251 524">WNRYS: Western Nevada Regional Youth Center (contracted agency)</p> <ul data-bbox="352 586 1233 748" style="list-style-type: none"> • CSYC: China Spring Youth Camp • DCJDC: Douglas County Juvenile Detention Center • DCDC: Douglas County Ninth District Court (parent Agency) • SSV: Survey of Sexual Violence <p data-bbox="280 788 671 824">Standard Requirements:</p> <ul data-bbox="352 891 1477 1509" style="list-style-type: none"> • <i>a. The agency shall review data collected and aggregated according to 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including (1) Identifying problem areas; (2) Taking corrective action on an ongoing basis; and (3) Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole.</i> • <i>b. Such a report shall include a comparison of the current year's data and corrective actions with those from prior years and shall provide an assessment of the agency's progress in addressing sexual abuse.</i> • <i>c. The agency's report shall be approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means.</i> • <i>d. The agency may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility but must indicate the nature of the material redacted.</i> <p data-bbox="280 1550 676 1585">Compliance Assessment:</p> <p data-bbox="280 1621 424 1657">Practice:</p> <p data-bbox="280 1693 1477 1980">DCDC-operated facilities, China Spring Youth Camp (CSYC) and Douglas County Juvenile Detention Center (DCJDC), as well as their contracted facility, Western Nevada Regional Youth Center (WNRYS), reviewed data collected and aggregated, according to PREA standard 115.387, and completed their 2021 annual PREA facility reports. All personal identifiers were removed from information used for these reports to ensure the safety and security of the facility, as well as the personal privacy of staff and residents.</p> <p data-bbox="280 2016 1453 2092">CSYC has completed annual reports, since 2016, that include aggregated data, identification of problem areas, and any planned or taken corrective action. CSYC's</p>

annual reports are posted at <https://chinaspringyouthcamp.com/prea/>.

Douglas County Juvenile Detention Center (DCJDC) has completed PREA annual reports, since 2019, that included zero incidents of sexual abuse/sexual harassment, and evaluated technology needs and actions taken. In addition, evaluated their staffing plan, updated policies, and procedures, and planned for a PREA audit.

<https://douglascountydistrictcourtspreaagency.com/wp-content/uploads/2023/01/2021-PREA-Annual-Report.pdf>

WNRYC (contracted facility) posted its PREA report for 2021, which includes zero tolerance, staff, and resident education, PREA progress, data and analysis, actions taken, and a summary, on <https://wnryc.org/prea/>. The prior 2020 report is also posted on their website.

During Corrective Action:

The agency (DCDC) appointed an agency PREA Coordinator to oversee PREA compliance for the agency, the two facilities under its operational control, and its contracted juvenile facility WNRYC.

The agency, DCDC, developed and implemented a new PREA Policy 115.387 Agency Transparency, Data, and Auditing. It requires the agency to collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions. It also requires the agency to aggregate incident-based sexual abuse data at least annually. Additional requirements include the agency's (DCDC) oversight to ensure the compliance of the agency and all three of their facilities' websites., and to ensure that the annual report, and finalized audit reports, are published on the agency and each facility's website annually. Also, the facilities are required to report details of any PREA allegation/investigation to the agency PC, as well as provide the PC with the annual report upon completion.

Agency and facility policies were reviewed to ensure cohesiveness and synchronization with each other. Changes were made to ensure harmonization.

The agency's (DCDC) PREA Coordinator instituted monthly meetings, between the agency PREA Coordinator (PC) and facility PREA Compliance Managers (PCM), ensuring ongoing communication and gathering of required data. These meetings include identifying problem areas, taking corrective action on an ongoing basis, and information sharing, leading to preparing an annual report for the agency and each facility-operated and contracted.

The agency (DCDC) completed a 2021 annual PREA report which describes agency progress, which includes sexual abuse data collected and aggregated since 2016, for both juvenile facilities and its contracted juvenile facility. In addition, contains facility progress information, as well as identified needs and actions taken at each facility. The report includes comparisons to prior years' data, was approved by the agency head, and posted to the agency website. This agency report, as well as all three facility's annual reports, can be accessed at the new agency (DCDC) PREA

page, <https://douglascountydistrictcourtspreaagency.com/annual-reports/>

Interviews with the agency PREA Coordinator and facility PCMs verified the collection and aggregating of incident-based data, and annual reports completed at the facility and agency levels. In addition, ensuring facility information was given to the agency PC for the agency PREA report. Also confirmed monthly meetings with the PC. Documentation reviewed for this compliance determination can be found under Documentation Reviewed, below.

Douglas County Ninth District Court (DCDC) is compliant with standard 115.388.

Documentation Reviewed, Paperwork, Policy/Procedure, Forms:

New DCDC Policy 115.387 Agency Transparency, Data, and Auditing: A. Each Facility shall create a Standard Operating Procedure consistent with this policy, B. The Agency will ensure its website is compliant with this policy, C. The Agency will ensure the Operated/Contracted Facilities Website is compliant with this policy; D. Confidential and personal information shall be redacted from data before being made available to the public; E. Agency shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions; F. The Agency shall aggregate the incident-based sexual abuse data at least annually; G. The agency shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews, H. Upon request, the agency shall provide all such data from the previous calendar year to the Department of Justice no later than June 30.

New Agency Incident Report Form: contains all requirements of the SSV forms, as required by the standard. "Agency shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions," and, "Upon request, the agency shall provide all such data from the previous calendar year to the Department of Justice no later than June 30. The agency shall provide facilities, operated/contracted, to either use the instrument provided or create an instrument that is standardized to the Agency Incident Report."

New DCDC (Agency) 2021 Annual Agency PREA Report: Reports agency progress that includes sexual abuse data collected and aggregated since 2016 for both facilities and the contracted facility.

Douglas County Juvenile Detention (DCJD) 2021PREA annual report: zero sexual abuse or harassment allegations, Assessment of camera needs, corrective action needed; assessment of facility progress. The report was sent to the PREA Coordinator.

China Spring Youth Camp 2021 Annual Report: grievances by topic, including sexual in nature, verbal contact by staff inappropriate physical contact by staff or youth comparing 2020 and 2021; Critical incidents-including sexual harassment, and

criminal activity; identified staff issues; PREA allegations by year and incident type (three years); progress; strategic plan for 2022—third audit cycle, <https://chinaspringyouthcamp.com/prea/>

Facility Policy 1A.25 PREA Policies: Data Collection and Publication, page 40, a, B1.b: A. Facility Duties: 1. The PREA Compliance Manager shall ensure any alleged incident of sexual abuse or sexual harassment is reported timely and appropriately; 2. The PREA Compliance Manager shall review, analyze, and use all sexual abuse and harassment data, including incident-based and aggregated data, to assess and improve the effectiveness of the facility's sexual abuse prevention, detection, response, practices, policies, and training; 3. All information related to sexual abuse and sexual harassment data shall be maintained for ten (10) years from the completion of the investigation; 4. All information related to alleged incidents shall be made available to the PREA Coordinator immediately, based on established timelines; 5. Facility PREA Compliance Managers will participate in the monthly meeting with the PREA Coordinator, if unavailable for the monthly meeting all required documentation shall be provided; 6. All data shall be kept securely and confidentially; B. Agency Duties: The PREA Coordinator shall: a. Gather and maintain accurate and uniform data from the facilities and required contracted entities: aa. The quarterly basis for federal reporting requirements. bb. Annual Aggregate Report Cc. Quarterly reporting to the Board of Commissioners (BOCC). b. Annual Aggregate Report; aa. Entities included in Aggregate Report: 1 Facility under its direct control; 2 Contracted facilities; bb. Review, analyze, and use all sexual abuse and harassment data, including incident-based and aggregated data, to assess and improve the effectiveness of the facility's sexual abuse and harassment prevention, detection, response, practices, policies, and training. cc. Made readily to the public through the Agency website, bb. Completed at least annually; 1. Track, trend, analyze, and present aggregate data to any board or commission as required; Page 43, XII. A, b: TRANSPARENCY AND AUDITING: A. The Agency shall ensure the following are posted on the Operated/Contracted Facility website: 1. PREA Policy; 2. Annual PREA report, for a minimum of three (3) years, to include aggregate data for all DCDC facilities; 3. Federal PREA audits are conducted within the agency and youth facilities, for a minimum of three years. B. Confidential and personal information shall be redacted from data before being made available to the public.

CSYC Annual Facility Report, including PREA
2021-<https://douglascountydistrictcourtspreaagency.com/annual-reports/>

CSYC SSV report and individual reports 2018-2021
<https://chinaspringyouthcamp.com/prea/>

WNRYS 2021 annual report <https://wnryc.org/prea/>

DCJDC: 2020 and 2021 annual report:
<https://douglascountydistrictcourtspreaagency.com/annual-reports/>

Interviews: Agency PC, facility PCMs.

115.389	Data storage, publication, and destruction
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>115.389 Data Storage, Publication, and Destruction</p> <p>Acronyms used in this report:</p> <ul style="list-style-type: none"> • CSYC: Facility: China Spring Youth Camp • CDC: Agency: Douglas County Ninth District Court • PCM: PREA Compliance Manager (DCJDC) • PCC: PREA Compliance Coordinator (CSYC) • DCJDC: Douglas County Juvenile Detention Center • PC: Agency PREA Coordinator • PAQ: Pre-Audit Questionnaire • WNRVC: Western Nevada Regional Youth Center <p>PREA Standard Requirements:</p> <ul style="list-style-type: none"> • <i>a: The agency shall ensure that data collected pursuant to 115.387 are securely retained.</i> • <i>b: The agency shall make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means.</i> • <i>c: Before making aggregated sexual abuse data publicly available, the agency shall remove all personal identifiers.</i> • <i>d: The agency shall maintain sexual abuse data collected pursuant to 115.387 for at least 10 years after the date of its initial collection unless Federal, State, or local law requires otherwise.</i> <p>Compliance Assessment 115.389</p> <p>Documentation: Policy, Paperwork, Reports, Forms Reviewed:</p> <p>Policies:</p> <p>New DCDC Policy 115.387 Agency Transparency, Data, and Auditing: Section VII: Agency Website: A. The Agency shall maintain a website, B. The Agency shall ensure the following are posted on the Agency website: 1. Agency PREA Policies, 2. Annual Aggregate Agency PREA report for a minimum of three (3) years, 3. Federal PREA audits are conducted within the agency and youth facilities, for a minimum of three years.; Section VIII Facility Website: A. The Agency shall ensure the following are posted on the Operated/Contracted Facility website(s) or made available: 1. PREA Policies, 2. Annual PREA report, for a minimum of three (3) years, 3. Federal PREA audits are conducted within the agency and youth facilities, for a minimum of</p>

three years.

Reports:

- CSYC Annual PREA Reports 2016-2021: <https://chinaspringyouthcamp.com/annual-reports/>
- CSYC Annual Facility Reports, including PREA 2018-2020: Highlights: training highlights, operating highlights; looking ahead; financial summary; provided services; camp statistics; and the PREA, Budget report. <https://chinaspringyouthcamp.com/annual-reports/>
- CSYC SSV report and individual reports for 2018-2021
- WNYRC 2020 and 2021 annual PREA report - <https://wnryc.org/prea/>
- DCJD annual PREA report, 2019
021<https://douglascountydistrictcourtspreaagency.com/annual-reports/>

Practice:

Facilities:

China Spring Youth Camp:

- Retains all information for the sole purpose of tracking sexual abuse allegations, investigations, and reports and this information is only accessible to the Director or designee. All information is stored in their database and is restricted to administrative restrictions.
- Retains this information for 10 years.
- Removes personal identifiers and redacts information that would jeopardize the confidentiality of the facility's residents, before posting required aggregated data annually to its website: <https://chinaspringyouthcamp.com/prea>.
- CSYC's PCC ensures the required data is shared with the agency PC.
- China Spring was used as a model facility throughout the state assisting other facilities to gain PREA compliance, such as Spring Mountain Youth Center, Clark County Detention, Carson City Detention (2019), Western Nevada Youth Regional Center, and Douglas County Detention Center.

Douglas County Juvenile Detention Center:

- Retains sexual abuse data securely in the facility PCM's office and in secure files.
- Removes personal identifiers and redacts information that would jeopardize the confidentiality of the facility's residents, before posting required aggregated data annually.
- Maintains its records for 10 years and the facility.
- The facility PCM ensures the required data is shared with the agency PC.

Western Nevada Regional Youth Center:

- Stores sexual abuse data in secure files maintained and monitored by the facility PCM.
- Removes personal identifiers and redacts information that would jeopardize the confidentiality of the facility's residents, before posting required aggregated data annually.
- Retains its records for 10 years and ensures this information is shared with the contracting agency DCDC.

Agency:

Agency policy/procedures, Agency Transparency, Data, and Auditing, require the agency (DCDC) and their facilities, DCJDC, CSYC, and WNRYS, to retain sexual abuse/harassment data for 10 years. In addition, requires the secure and confidential retention of such information. It also requires the agency, DCDC, to make aggregate sexual abuse data, after redacting personal identifiers, available on its website. This includes data from both operated facilities and their contracted facility (DCJDC, CSYC, and WNRYS).

Practice:

The Agency PREA Coordinator (PC) stores data securely in the office of the Director of Juvenile Camp Services/CSYC and retains this data for 10 years. The PC aggregated the sexual abuse data, from all three facilities, removed any personal identifiers, and created an annual 2021 PREA report. This report is posted on the DCDC website.

The PC also meets monthly with the facility PCMs to ensure the collection of data, use of it to ensure the safety of residents and staff in their facilities, and document collected data in annual facility and agency PREA reports. .

Culture:

The PC position is new to the agency, Douglas County Ninth District Court (DCDC); however, the compliance with PREA standards is not new to the facilities under the operational control of DCDC and contracted.

New agency policies were created during corrective action, and the facilities policies were reviewed to ensure both agency and facility policies complied. No new training was required due to the policies already in place for the facilities.

The agency PC instituted monthly meetings with the facility PCMs to ensure the agency and facilities are working together and provide data sharing, identification of corrective action, and tracking action implemented.

Policy requirements, training, and actions were already ingrained in the culture of the facilities, and the new PC is well-known to the PCMs. This created a fairly seamless transition in the culture of the agency and facilities.

The requirement for assimilation of the policy/procedure and practice into the

agency and facility cultures is compliant with PREA standard 115.389.

Compliance Determination:

PREA Standard Requirements A, and D:

The agency-operated facilities, CSYC and DCJDC, the contracted, confinement facility, WNRYS, and the agency PREA Coordinator store sexual abuse and sexual harassment data securely and confidentially. Documentation included and interviews confirm that CSYC, DCJDC, WNRYS, and the Agency PC, store this data securely and confidentially, for 10 years.

PREA Standard requirements B, and C:

The agency, Douglas County Ninth District Court (DCDC), requires each facility to post aggregated sexual abuse data, in the form of a facility's annual PREA report, on each of its websites.

DCJDC, CSYC, and WNRYS reports are included in the documentation of this audit and are posted on their websites. The agency, DCDC, removes all personal identifiers and posts the agency's annual PREA report on its website with links to all facility reports. <https://douglascountydistrictcourtspreaagency.com/annual-reports/>

Interviews with the agency PC, facility PCMs, and the Agency Director confirm gathering and securely storing facility sexual abuse data, aggregating it, and creating facility PREA annual reports. Also, verified the agency PC collects their aggregated data. In addition, verified they retain the secure data for at least 10 years. All facilities and the agency confirmed posting the reports to their websites. The agency Director approves agency reports before they are posted.

DCDC is compliant with standard 115.389.

115.401	Frequency and scope of audits
	<p data-bbox="280 188 1007 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 579 297">Auditor Discussion</p> <hr/> <p data-bbox="280 340 504 374">15.401 Audits</p> <p data-bbox="280 416 624 450">Standard Requirements:</p> <p data-bbox="280 490 1465 602">(a): During the three years starting on August 20, 2013, and during every three years thereafter, the agency shall ensure that each facility operated by the agency, or by a private organization on behalf of the agency, is audited at least once.</p> <p data-bbox="280 642 676 676">Compliance Assessment:</p> <p data-bbox="280 714 699 748">Documentation Reviewed:</p> <p data-bbox="280 788 1465 866">China Spring Youth Camp (CSYC) has completed two audits, and all compliant PREA audits are posted on their website: https://chinaspringyouthcamp.com/prea/.</p> <p data-bbox="280 904 1465 1106">Western Nevada Regional Youth Center (WNRYS) posted their 2021 and 2020 PREA reports to their website: https://wnryc.org/prea/. These reports list WNRYS's progress towards PREA compliance, including working with the PREA Resource Center on policy, the Nevada state PREA Coordinator, and China Spring Youth Camp PREA Coordinator.</p> <p data-bbox="280 1144 459 1178">Interviews:</p> <p data-bbox="280 1218 1465 1330">WNRYS: Their contract gives them two years to become PREA compliant and pass a PREA audit. They are working towards compliance, have conducted a mock audit, and have budgeted for a PREA audit for 2023/24;</p> <p data-bbox="280 1368 1369 1402">DCJDC: has an open audit, and their site visit is scheduled for February 2023.</p> <p data-bbox="280 1440 1433 1518">CSYC: Currently completing corrective action due to agency non-compliance. Has completed two previous audits and is compliant with audit requirements.</p> <p data-bbox="280 1556 1230 1632">Reports and audits are posted on the agency website: https://douglascountydistrictcourtspreaagency.com/annual-reports/</p> <p data-bbox="280 1671 424 1704">Practice:</p> <p data-bbox="280 1744 1465 1901">The Agency, Douglas County Ninth District Court (DCDC), has two juvenile facilities under its operational control. China Spring Youth Camp (CSYC) and Douglas County Juvenile Detention Center (DCJDC), In addition, it contracts with one facility, Western Nevada Regional Youth Center (WNRYS).</p> <p data-bbox="280 1939 1465 2051">This is the third year of the PREA audit cycle, and one facility has completed an audit during every three-year audit period. CSYC is currently in corrective action for its third audit and has excelled in most standards in previous audits.</p>

DCJDC has not had a completed audit; however, has is currently in audit status and has an audit site visit scheduled for February 2023, the first year of audit cycle four.

DCDC contracted facility, WNRYS, has not completed a PREA audit in the first three audit cycles; however, the facility is budgeted for an audit in 2023/24. The new contract with WNRYS gives them two years to demonstrate PREA compliance.

Douglas County Ninth District Court (DCDC) is on track to have all three facilities complete a PREA audit in the fourth cycle of PREA audits.

The agency (DCDC) has completed an agency audit and is in compliance with it.

Compliance Determination:

The agency (DCDC) is compliant with ensuring two-thirds of its facilities were audited in this three-year cycle. One of their two facilities has completed PREA audits in the last three-year audit cycle, as WNRYS is in the two-year window for compliance as it was just added to the contract this year. All facilities have audits planned in the fourth audit cycle, including the contracted facility (WNRYS).

115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>15.403: Auditing and Corrective Action:</p> <p>PREA Requirement</p> <p>(f): The agency shall ensure that the auditor’s final report is published on the agency’s website if it has one or is otherwise made readily available to the public.</p> <p>Compliance Determination:</p> <p>Agency, Douglas County Ninth District Court (DCDC), has two juvenile facilities under its operational control. China Spring Youth Camp (CSYC) and Douglas County Juvenile Detention Center (DCJDC), in addition, it contracts with one facility, Western Nevada Regional Youth Center (WNRYS).</p> <p>The only facility that has completed PREA audits is China Spring Youth Camp. China Spring Youth Camp’s two previous PREA audits are posted on the facility and agency website: https://chinaspringyouthcamp.com/prea/ https://douglascountydistrictcourtspreaagency.com/annual-reports/</p> <p>The current third PREA audit, for CSYC, is in corrective action. The China Spring's last two final audit reports are linked to the agency’s website and compliant with this standard.</p> <p>DCDC is compliant with this standard 115.403</p>

Appendix: Provision Findings		
115.311 (b)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
115.312 (a)	Contracting with other entities for the confinement of residents	
	If this agency is public and it contracts for the confinement of its residents with private agencies or other entities including other government agencies, has the agency included the entity's obligation to adopt and comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents.)	yes
115.312 (b)	Contracting with other entities for the confinement of residents	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents OR the response to 115.312(a)-1 is "NO".)	yes

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

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

115.317 (f)	Hiring and promotion decisions	
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.317 (g)	Hiring and promotion decisions	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.317 (h)	Hiring and promotion decisions	
	Unless prohibited by law, does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.366 (a)	Preservation of ability to protect residents from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes

115.387 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.387 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.387 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
115.387 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.387 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents? (N/A if agency does not contract for the confinement of its residents.)	yes
115.387 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes

115.388 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
115.388 (b)	Data review for corrective action	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
115.388 (c)	Data review for corrective action	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.388 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
115.389 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.387 are securely retained?	yes

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

115.403 (f)	Audit contents and findings	
	<p>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.)</p>	yes