

Responding to Sexual Abuse of Inmates in Custody: Addressing the Needs of Men, Women, and Gender Nonconforming Populations
Notification of Curriculum Use
April 2014

The enclosed Responding to Sexual Abuse of Inmates in Custody: Addressing the Needs of Men, Women, and Gender Nonconforming Populations curriculum was developed by the Project on Addressing Prison Rape at American University, Washington College of Law as part of contract deliverables for the National PREA Resource Center (PRC), a cooperative agreement between the National Council on Crime and Delinquency (NCCD) and the Bureau of Justice Assistance (BJA). The Prison Rape Elimination Act (PREA) standards served as the basis for the curriculum's content and development with the goal of the Responding to Sexual Abuse of Inmates in Custody: Addressing the Needs of Men, Women, and Gender Nonconforming Populations curriculum being to satisfy specific PREA standards requirements.

It is recommended that the Responding to Sexual Abuse of Inmates in Custody: Addressing the Needs of Men, Women, and Gender Nonconforming Populations curriculum be reviewed in its entirety before choosing which modules to use. Any alterations to the original materials require either acknowledgement during their presentation or removal of the PRC and Project on Addressing Prison Rape logos.

BJA is currently undergoing a comprehensive review of the enclosed curriculum for official approval, at which point the BJA logo may be added.

Note: Use of the enclosed curriculum, either in part or whole, does not guarantee that an auditor will find that a facility "meets standards." Rather, an auditor will take into consideration the curriculum used as part of their overall determination of compliance.

Notice of Federal Funding and Federal Disclaimer – This project was supported by Grant No. 2010-RP-BX-K001 awarded by the Bureau of Justice Assistance. The Bureau of Justice Assistance is a component of the Office of Justice Programs, which also includes the Bureau of Justice Statistics, the National Institute of Justice, the Office of Juvenile Justice and Delinquency Prevention, the Office for Victims of Crime, and the Office of Sex Offender Sentencing, Monitoring, Apprehending, Registering, and Tracking. Points of view or opinions in this document are those of the author and do not necessarily represent the official position or policies of the U.S. Department of Justice nor those of the National Council on Crime and Delinquency (NCCD), which administers the National PREA Resource Center through a cooperative agreement with the Bureau of Justice Assistance.



PRE-TRAINING CHECKLIST

RESPONDING TO SEXUAL ABUSE OF ADULTS IN CUSTODY: ADDRESSING THE NEEDS OF MEN, WOMEN, AND GENDER NON- CONFORMING ADULTS¹

The following pre-training checklist should be used by trainers in conjunction with the 'Responding to Sexual Abuse of Adults in Custody: Addressing the Needs of Men, Women, and Gender Non-Conforming Adults' curriculum. The purpose of this pre-training checklist is to summarize the information from the training modules and provide the trainer a checklist of items to consider prior to training. This information is not intended for participants, but to help trainer(s) assess their own readiness and the readiness of their agency or facility for training.

I. Goals and Objectives (Module 1)

This training curriculum educates participants on the Prison Rape Elimination Act of 2003 (PREA) and the final national standards applicable to jails and prisons. The goals of this training are to have participants:

1. Learn why gender responsive strategies are important in responding to sexual abuse of inmates;
2. Acquire vocabulary to discuss gender and its impacts on sexual abuse in custody;
3. Understand how gender affects legal remedies for sexual abuse of inmates – state criminal laws, human resource law and civil litigation;
4. Learn the impact of gender on culture, policy development and operational practice and its relationship to the implementation of the PREA standards; and
5. Become familiar with the vectors of sexual abuse of inmates– gender, sexuality, sexual behavior and victimization.

¹ Gender non-conforming as defined by the National PREA Standards means “ a person whose appearance or manner does not conform to traditional societal gender expectations” This training uses the term to describe all lesbian, gay, bisexual, transgender, intersex (LGBTI) persons in custody.

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II. The Prison Rape Elimination Act of 2003 (Module 2)

Important Training Points:

- The Prison Rape Elimination act was passed unanimously by both houses of congress in 2003.
- The aim of PREA is to create zero tolerance for prison rape.
- PREA applies to any confinement facility whether run by the government or a private organization on behalf of the government.
- Under PREA, the first audit cycle begins in August 2013. The first Governor certification is due on May 15, 2014.
- PREA represents the minimum requirements for agencies to prevent sexual assault in custody; states are encouraged to do more.
- 9.6% of former state prisoners reported one or more incidents of sexual victimization during the most recent period of incarceration in jail, prison, or a post-release community-treatment facility; supporting the contention that prisoners are not immediately reporting sexual assault to custodial facilities.
- In 2008, more than 209,400 persons were victims in prisons, jails, and juvenile facilities.
- Certain groups such as youthful inmates held in adult facilities and gender non-conforming inmates are more vulnerable to sexual abuse in custody than others.
- Agencies stand to lose 5% of DOJ grant funding for a failure to meet the standards.

Why this is important: Sexual abuse in custody is preventable. All agency staff, contractors and volunteers who have contact with inmates need to know their responsibilities and obligations under the law to protect, detect and respond to sexual abuse in custodial settings. It is equally important for them to know and understand the Bureau of Justice Statistics' findings regarding sexual abuse of inmates.

Pre-Training checklist

	Yes	No
Does the agency have a zero tolerance policy towards all forms of sexual abuse and sexual harassment?		
Does the agency have a PREA Coordinator and/or PREA Compliance Manager?		
Does the PREA Coordinator/Manager have the appropriate authority to implement change in the agency?		
Has the agency consulted with general counsel to determine the applicability of other laws related to sexual abuse in custody and their impact on implementing the PREA standards?		
Has the agency implemented and tracked training for all staff members, contractors, and volunteers on PREA related material (e.g. agency policies, reporting requirements, first responder duties etc.)?		

III. Vectors of Sexual Abuse (Module 3)

Applicable PREA Standards:

- ✓ Standards on Screening for Risk of Sexual Victimization and Abusiveness 115.41-115.42

Important Training Points:

- Institutionalized punishment has always been gendered.
- After male staff had been perpetrators of the sexual abuse of female inmates, female staff were introduced into corrections to provide greater safety for female inmates.
- Female staff is involved in sexual abuse of inmates at a higher rate relative to their participation in the work force than their male counterparts.
- According to the last correctional census (2005), male employees outnumbered female employees by a ratio of 2 to 1, while men in direct contact positions [with inmates] outnumbered female employees by a ratio of 3 to 1.
- There is a lack of data regarding the number of gender non-conforming staff working in corrections.
- Women in corrections are not necessarily seen as equals and many report derogatory language and behavior from coworkers and inmates.

- Title VII makes it unlawful for an employer to discriminate based on race, color, religion, sex or national origin.
- Bona Fide Occupational Qualifications (BFOQs) permit employers to discriminate in hiring or firing decisions when it is “reasonably necessary to the normal operation of that particular business or enterprise.”

Why this is important: Effective policies addressing sexual abuse in custody must be multi-dimensional and recognize that male and female inmates and staff could be both perpetrators and victims of sexual abuse. PREA standards require staff have specific gender informed training depending on the gender of the inmates they work with.

Again, agencies should be mindful that male inmates are more likely to be victims of sexual abuse by female staff than male staff. That coupled with the feelings of female staff that they are not seen as equal to male counterparts, could signal a need for more interventions for female staff working with male inmates. This may mean additional training on professional boundaries and codes of silence or mentors within the facilities.

Pre-Training Checklist

	Yes	No
Does the agency screen and appropriately use information about each inmate's history and behavior to reduce the risk of victimization or predation?		
Does the agency use the information obtained through screening and risk assessments to make housing, bed, program, education, and work assignments for all inmates?		
Does the agency train staff about vulnerable populations, how their vulnerability may make them targets for abuse, and what special needs they may have?		
Does the agency train staff on respectful communications with gender non-conforming inmates?		
Does the agency employ both male and female line staff?		
Does PREA training discuss all areas of staff sexual misconduct, including female staff interactions with men and boys?		

IV. Sexuality and Sexual Behaviors (Module 4)

Applicable PREA Standards:

- ✓ Standards on Prevention Planning 115.11-155.18
- ✓ Standards on Responsive Planning 115.21-115.22
- ✓ Standards on Training and Education 115.31-115.35
- ✓ Standards on Screening for Risk of Sexual Victimization and Abusiveness 115.41-115.42
- ✓ Standards on Investigations 115.71-115.73

Important Training Points:

- Sexuality is determined by several factors including biological sex, gender, gender expression and sexual acts.
- A sexual minority is someone whose actual or perceived gender expression, sexual conduct and/or sexuality are inconsistent with traditional expectations established by biological sex.
- An individual's sexual orientation can be fluid.

- Inmates may engage in sexual activity with each other for a number of reasons. There is a continuum of sexual activity in custody that can help staff understand the fluidity of consent.
- Studies suggest that women generally engage in sex while in custody because of boundary issues, defining relationships as love, fear of relation and untreated trauma.
- Studies suggest that men generally engage in sex while in custody because of higher level of aggression, deprivation, favors or benefits and protection.
- Studies suggest that gender non-conforming inmates generally engage in sex while because of a history of confinement, for protection, or out of fear.

Why this is important: This section explains stereotypes about gender, sexuality and victimization in order for participants to better understand the fluidity of inmate sexual behaviors. Additionally, the module helps participants to learn why inmates may engage in sexual abuse with each other and how to know the difference between non-coercive sexual interactions as opposed to coercive sexually abusive situations.

Pre-Training Checklist

	Yes	No
Does the agency have a discipline policy in place sanctioning inmates for consensual sex?		
Does the agency prohibit isolation to protect inmates who are potential victims?		
Does your agency have a policy to investigate all allegations of sexual abuse?		
Have investigators received specialized training for interviewing male, female and gender non-conforming adults?		
Have staff, volunteers and contractors who could potentially be first responders received training on interacting with and the different communication needs of victims who are male, female and gender non-conforming?		
Does the agency provide comprehensive education to all inmates regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents?		
Does the agency provide comprehensive education to all inmates in multiple formats accounting for inmates who may not speak English, have cognitive disabilities, be hearing impaired, blind etc.?		
Does the agency have a policy prohibiting searches or physical examinations for the sole purpose of determining an inmate's gender?		
Does the agency have a policy in place prohibiting verbal and physical harassment of inmates based on sexual orientation or gender identity by staff and other inmates?		
Does the agency provide inmates with multiple reporting mechanisms—both internal and external as well as anonymously?		

V. Impact of Culture (Module 5 & Module 6)

Applicable PREA Standards:

- ✓ Standards on Prevention Planning 115.11-155.18
- ✓ Standards on Responsive Planning 115.21-115.22

- ✓ Standards on Training and Education 115.31-115.35
- ✓ Standards on Reporting 115.51-115-54
- ✓ Standards on Official Response 115.61-115.68
- ✓ Standards on Investigations 115.71-115.73
- ✓ Standards on Discipline 115.76-115.78
- ✓ Standards on Data Collection and Review 115.86-115.89

Important Training Points:

- An institution’s culture is the sum total of the attitudes, beliefs, traditions, symbols, ceremonies and prejudices. .
- How an institution thinks about sexuality and sexual violence is reflected in their policies.
- In order to change the culture, leadership must first recognize, understand, and appreciate the existing culture.
- Staff can be either sympathetic or contribute to a culture of sexual violence.
- Culture can either support or obstruct efforts to address sexual violence.
- Inmate culture can negatively impact reporting sexual abuse of oneself or others.

Why this is important: This section educates participants on the impact of agency and inmate culture on addressing sexual abuse. An agency’s culture is critical in preventing sexual abuse of inmates and impacts reporting, discipline, and overall safety within the facility. This provides a starting point for agencies to discuss the code of silence with staff and perceptions of sexual abuse in custodial settings. This section also trains participants to understand inmate culture and their perceptions of sex in prison and why men, women and gender non-conforming inmates may engage in sex while in custody. .

Pre-training Checklist

	Yes	No
Does the agency have a Code of Silence among staff?		
Does the agency have an ‘inmate code’ regarding sex and sexual abuse?		
Does the agency discipline staff who do not report misconduct by other staff?		
Does the agency discipline staff if they do not report abuse allegations in a timely manner?		
Does the agency have a policy prohibiting retaliation for reporting staff misconduct?		
Does the agency conduct criminal background checks during the hiring and/or promotions process?		

	Yes	No
Does the agency have clearly defined training and policies regarding professional boundaries?		
Does the agency provide employees with self-assessment tools to help them learn when they might be crossing boundaries?		
Does the agency provide employees with access to advice and assistance, such as Employee Assistance Programs (EAP) when they have concerns and questions about boundaries?		
Is there adequate supervision of multi-person housing units, chapels, showers, kitchens, work areas, cells, day-rooms?		
Does the agency require upper level management staff to supervise line staff on all shifts (e.g. wardens making rounds and supervising staff on overnight shifts)?		
Does the agency advertise all reporting mechanisms to inmates e.g. third party reports, external reports etc.?		
Does the agency advertise reporting mechanisms for non-English, illiterate, deaf, and blind populations?		

VI. Policy and Operational Practices (Module 9 & Module 11)

Applicable PREA Standards:

- ✓ Standards on Prevention Planning 115.11-155.18
- ✓ Standards on Responsive Planning 115.21-115.22
- ✓ Standards on Training and Education 115.31-115.35
- ✓ Standards on Screening for Risk of Sexual Victimization and Abusiveness 115.41-115.42
- ✓ Standards on Reporting 115.51-115.54
- ✓ Standards on Official Response 115. 61-115.68
- ✓ Standards on Investigations 115.71-115.73
- ✓ Standards on Discipline 115.76-115.78
- ✓ Standards on Medical and Mental Health Care 115.81-115.83
- ✓ Standards on Data Collection and Review 115.86-115.89
- ✓ Standard on Audit and Compliance 115.401-115.405, 115.501

Important Training Points:

- Good policies are consistently and routinely reviewed, revised, monitored, and enforced.
- Policies should be reviewed to address the needs of men, women, and gender non-conforming inmates.
- Good policies use clear language regarding intent, definitions, responsibility, applicability, prohibited activities and sanctions.
- Operational practices should be consistent with policies.
- Gender matters for operational practices in a multitude of ways—for example, grooming, showering, shaving materials, and medical care.
- Agencies must be respectful when creating policies that impact the treatment of gender non-conforming inmates.

Why this is important: This section describes elements of effective policies needed to address sexual abuse in custody and how to operationalize them. This section will guide participants through the process of developing policies and practices reflecting PREA standards using an interdisciplinary group of leaders, stakeholders and legal professionals. .

Pre-training Checklist

	Yes	No
Do the agency’s policies reflect the PREA standards?		
Do the agency’s policies provide a clear statement of the agency’s mission, goals and values?		
Do the agency’s current practices differ from written policies and directives?		
Do the agency’s policies promote safety and security for all inmates and staff?		
Do the agency’s policies address the challenges gender non-conforming inmate’s face while in custody (e.g. safety, access to medical and mental health care)?		
Do the agency’s policies address the specific needs of victims specific to their gender-- men, women and gender non-conforming?		
Do the policies follow Federal, state and local laws and regulations?		
Does the agency’s leadership model policies and procedures?		
Has the agency begun operationalizing PREA standards and formulating standards into policies?		
Does the agency use data collection and BJS victimization reports to inform policies and procedures?		

	Yes	No
Does agency leadership understand and address gaps between policy and practice?		

VII. Gender and Victimization: Medical and Mental Health of Victims (Module 7 & Module 10)

Applicable PREA Standards:

- ✓ Standards on Prevention Planning 115.11-155.18
- ✓ Standards on Responsive Planning 115.21-115.22
- ✓ Standards on Screening for Risk of Sexual Victimization and Abusiveness 115.41-115.42
- ✓ Standards on Medical and Mental Health Care 115.81-115.83

Important Training Points:

- Men generally tend to guard inner feelings, protect autonomy and suppress weaker emotions.
- Women generally tend to be emotionally expressive, more verbal, defines self in relation to others.
- Previously victimized inmates often have early histories of victimization.
- Past victimization causes PTSD, anxiety, depression, constant feelings of danger, mistrust of authority, which impacts how they may interact with staff.
- Gender plays important part in assessing risk and responding to victimization in custodial settings.
- Many procedures in custodial settings (i.e. search procedures) could be traumatizing for past victims of abuse.
- Vulnerable populations are previously victimized, limited language ability, developmentally disabled, mentally ill, hearing impaired, untreated addicts, gender non-conforming and youthful inmates.
- A multidisciplinary team should respond to sexual abuse allegations to comprehensively address the report and subsequent investigation.
- Both immediate and ongoing medical and mental health care are required by the PREA standards and imperative for victims in custodial settings.

Why this is important: There are clear gender-influenced socialization, communication styles and behaviors for men, women and gender non-conforming inmates. It is critical for correctional staff to understand these distinctions to address sexual abuse. This section will also define who vulnerable inmates are, and define medical health interventions for men, women and gender non-conforming inmates; agencies must understand the medical and mental health impacts on an inmate to fully address sexual abuse in custody. Additionally, this section of training will help staff understand the need to be gender specific in responses to victims and vulnerable populations within facilities.

Pre-training Checklist

	Yes	No
Does the agency have a formal screening tool that is used for inmates to assess the risk of victimization and predation?		
Does the agency formally screen all inmates to assess the risk of victimization and predation within 72 hours of arrival and again within 30 days?		
Does the agency have a policy restricting cross gender viewing of inmates when they shower, preform bodily functions, and/or change clothes?		
Does the agency have a policy prohibiting cross gender strip or cavity searches of inmates?		
Does the agency provide ongoing training on conducting cross gender pat searches in the least restrictive manner possible?		
Does the agency have a policy and provide training on conducting searches of gender non-conforming inmates?		
Does the agency use a victim-centered approach when responding to allegations of sexual abuse?		
Does the agency provide timely, unimpeded access to emergency medical treatment and crisis intervention services to victims of sexual abuse?		
Does the agency offer victims of sexual abuse information about and timely access to emergency contraception and sexually transmitted infections prophylaxis?		
Does the agency offer medical and mental health evaluation and treatment to all inmates who have been victimized?		
Does the agency offer treatment to all inmates who have been predators?		
Does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions?		
Does the agency offer all victims of sexual abuse access to forensic medical examinations?		
Do Sexual Assault Nurse Examiners (SANE) conduct sexual assault examinations and follow applicable chain of custody guidelines for evidence		

	Yes	No
kits?		
Does the agency offer ongoing medical and mental health care to all inmates who have been victimized?		

VIII. Gender Implications for Investigations (Module 12)

Applicable PREA Standards:

- ✓ Standards on Prevention Planning 115.11-155.18
- ✓ Standards on Responsive Planning 115.21-115.22
- ✓ Standards on Training and Education 115.31-115.35
- ✓ Standards on Screening for Risk of Sexual Victimization and Abusiveness 115.41-115.42
- ✓ Standards on Reporting 115.51-115.54
- ✓ Standards on Official Response 115.61-115.68
- ✓ Standards on Investigations 115.71-115.73.

Important Training Points:

- Sexual abuse victims should be medically examined by a trained SANE.
- Investigative techniques should consider gender norms and question appropriately—i.e. using ‘thinking’ questions for men and ‘feeling’ questions for women. .
- *Garrity* does not prohibit law enforcement from turning over information to your agency.
- Unless there is overwhelming evidence to classify an allegation as unfounded, the victim and accuser should be separated, at least until the investigation concludes.
- If other agencies are involved in the investigation, coordinate with them so that the victim does not have to do multiple interviews.
- In addition to investigating abuse, investigators should pursue claims of staff failure to supervise or report abuse.
- If you house or supervise sexual offenders, staff should receive specialized training in working with this population.
- The alleged aggressor should be advised of his/her constitutional rights.
- Agencies should investigate “non-coercive” sex acts between youth to determine if they are truly non-coercive. If they are non-coercive, agencies can choose to sanction the youth or not. According to the PREA standards non-coercive sex between youth is not sexual abuse. If the agency determines that the sex was coercive then it should proceed with either or both, criminal and administrative investigations of youth and staff. All sex acts with staff are considered crimes.

Why it is important: This section teaches participants the foundations of successful administrative investigations. Successful investigations are essential to addressing sexual abuse in custody. Correctional staff should know the elements of successful investigation, their role in the investigation, and the implications gender can have on investigations. As covered in previous modules, boys, girls, and non-conforming youth have different communications styles so interview questions must take that into consideration. This training shows participants the reasons why investigations fail and it also trains them on the key elements of an effective investigation. Participants will leave this training knowing the importance of the *Garrity* rule. Participants will also have a concrete understanding of the foundation of a successful investigation and useful investigative techniques.

Pre-Training Checklist

	Yes	No
Does the agency have a policy to investigating all allegations of sexual abuse?		
Does the agency provide multiple reporting avenues—internal and external--for inmates making allegations of sexual abuse, sexual harassment, retaliation, and staff violations?		
Does the agency provide at least one way that inmates can anonymously report sexual abuse incidents to a public or private entity that is not a part of the agency?		
Does the agency’s policy on collection of physical evidence include timeframes that are in line with the <i>National Protocol for Sexual Assault Medical Forensic Examinations, Second Edition</i> ?		
Does the agency have specialized training for investigators as outlined by PREA Standards?		
Does your agency offer investigators training on gender specific communication strategies for men, women, and gender non-conforming inmates?		
Does agency staff know the mandatory reporting laws for your state?		
Does the agency train investigators on handling both inconsistencies between interviews and recanting?		
Do investigators know all the sources of potential evidence and witnesses to interview?		

	Yes	No
Are investigative records kept in a confidential and manner?		

IX. Gender and the Law: Human Resources, State Criminal Laws and Legal Liability (Module 8, Module 13 & Module 14)

Applicable PREA Standards:

- ✓ Standards on Cross-gender Searches 115.15
- ✓ Standards on Hiring and Promotion Decisions 115.17
- ✓ Standards on Criminal and Administrative Agency Investigations 115.71
- ✓ Standards on Discipline Sanctions on Staff 115.76
- ✓ Standard on Exhaustion of Administrative Remedies 115. 52

Important Training Points:

- Staff who sexually abuse inmates could be convicted under state criminal laws of sexual assault, sodomy, staff sexual misconduct, child exploitation and other theories depending on the circumstance.
- Agencies that house youthful inmates should be mindful of laws that dictate increased protection for children including child exploitation, statutory rape and mandatory reporting obligations of child abuse.
- Corrections officials can be held liable in their official, individual, and personal capacities for sexual violence against inmates committed by either staff or other inmates.
- In human resources, different legal considerations may apply depending on the gender of the staff member.
- Courts recognize that female inmates have a greater degree of privacy than male inmates.
- Pre-trial adults have greater privacy rights than adults who are incarcerated.
- Agencies can be held liable for both sexual harassment and sexual discrimination.
- Agencies can institute anti-fraternization policies. Agencies should be mindful these policies may have a greater impact on female staff than male staff and such policies cannot be overly broad and must have articulable exceptions.
- PREA standards can assist inmates in establishing an 8th or 14th Amendment claims.
- DOJ can monitor facilities with Civil Rights of Institutionalized Persons Act (CRIPA) violations for a period of months, or even years.
- The respective genders of the staff member and the inmate can have a dramatic effect on the outcome of civil litigation.

Why this is important: This section educates participants on relevant state criminal laws, , civil liability and human resources law and highlights the role gender plays in each of these legal elements.

This section helps staff identify the various forms of legal liability, understand that sexual abuse with inmates in custody carries criminal, civil and reputational consequences, and understand their duties and obligations. Staff will also fully understand the implications of gender as it relates to these legal frameworks.

These modules are state specific and therefore part of your preparation to train should be to obtain the statutes and cases that are relevant to your state. These modules should be trained or presented by someone with legal experience and knowledge e.g. your general counsel.

Pre-T Checklist

	Yes	No
Does the agency have policies prohibiting cross gender strip and body cavity searches?		
Does the agency prohibit cross-gender pat-down searches of female inmates except in exigent circumstances?		
Does the agency train staff on how to conduct a cross-gender search of an inmate in the least intrusive manner possible?		
Does the agency document and justify all cross gender searches conducted in exigent circumstances?		
Does the agency have policies and procedures that enable inmates to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender present?		
Does the agency prohibit staff from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status?		
Does the agency have policy allowing inmates to submit a grievance to someone other than the staff member who may be the subject of the allegation?		
Does the agency have a policy in place that allows staff a way to privately report sexual abuse, harassment and/or retaliation?		
Does the agency have policies to protect inmates from retaliation after reporting?		
Have you researched and included state specific laws from your jurisdiction?		
Have you researched and included state specific court cases from your		

	Yes	No
jurisdiction to use as examples?		

X. Conclusion

The purpose of this pre-training checklist is to summarize the information from the training modules and provide the trainer a checklist of items to consider prior to training for each module.

If trainers answered ‘no’ for questions such as “have you researched and included state specific laws from your jurisdiction?” it may indicate that the trainer needs to do more preparation or that the lead trainer or training director needs to find a subject matter specialist to present the material. For example, a medical professional might present material on adolescent development while a lawyer from the general counsel’s office might present the module on legal liability.

If trainers answered ‘no’ for questions about policies and procedures, such as “does the agency have a zero tolerance policy towards all forms of sexual abuse and sexual harassment?” it could be an indicator that your agency is not ready to conduct staff training. Policies and procedures form the backbone of agency practice to address sexual abuse and provides a foundation for staff understanding agency expectations and their responsibilities. Absent PREA related policies in force, it will be difficult for trainers to explain to staff what they need to do to address sexual abuse of youth in custody.