

## PREA Auditor Handbook

## Version 2.1 November 2022 Update Summary

As described in the PREA Auditor Handbook (Handbook) Version 1.0 released in August 2017, the Handbook is a living document that will be updated and adapted over time to meet the evolving needs of the Department of Justice (DOJ), PREA auditors, and the field. The Handbook Version 2.1 was updated in November 2022 to reflect revised or updated guidance on audit methodology regarding documentation sampling and review and systematic review of evidence, as well as changes in use of language, contracting requirements, audit instrumentation, auditor continuing education requirements, and auditor support. As a condition of their DOJ certification, auditors are required to read, understand, and abide by the requirements in the Handbook. A summary of updates included in Handbook Version 2.1 is provided below.

- Chapter 1. Purpose of the PREA Auditor Handbook (see pages 1-2). This chapter has been updated to include a note on person-first language revisions. Pursuant to the May 2022 BJA Style Guide, Handbook Version 2.1 uses person-first language (e.g., "person confined in...," "person who is confined," "individual who is confined"), unless directly quoting, or referring to the language in, the PREA Standards (which use the terms inmate, resident, and detainee). In very limited circumstances, specifically in tables referencing interviewees or documentation/lists for auditors to review, the Handbook uses the term "confined person" for brevity and ease of formatting.
- Section II. PREA Audit Assignment System (see pages 4-7). This section describes the new PREA Audit Assignment System required by the PREA Amendment to the U.S. Parole Commission Extension Act of 2018 that was launched on June 30, 2022. The section is new to Handbook Version 2.1, but it includes language that has already been posted on the PREA Resource Center website. This topic has been the subject of several webinars and discussed in auditor refresher sessions as well.
- Chapter 4. Audit Contracts and Compensation (see pages 9-14). This chapter is
  updated to reflect the contract requirements and recommendations for auditors that
  align with the PREA Audit Assignment System. This chapter is new to Handbook Version
  2.1, but includes language that has been posted on the PREA Resource Center website.
  This topic has been the subject of several webinars and discussed in auditor refresher
  sessions as well.
- Chapter 10. Probationary Certification Status (see pages 26-28). This chapter has been updated to reflect the new probationary certification process, which includes self-paced

training modules and individualized coaching sessions instead of reviews of audit reports. The language referencing the previous probationary process has been removed.

- Chapter 11. Auditor Reporting Requirements (see pages 28-32). This chapter has been revised to reflect the June 30, 2022 requirement for auditors to conduct and report all PREA audits via the Online Audit System. It also describes the audit initiation form approval process (consistent with the audit assignment description included in Section II), the audit initiation and confirmation process, user and account creation in the Online Audit System, and post-audit reporting requirements. References to the paper audit instrument and the Paper Audit Reporting Portal have also been removed.
- Chapter 12. Continuing Education Requirements (see page 32). This chapter has been revised to change "up to 10 hours" of continuing education coursework for auditors to maintain their certification to "at least 10 hours," and added a maximum of "no more than 12 hours in a given year... or 35 hours in any given three-year period." The purpose of this revision is to ensure that auditors receive reasonable, consistent, and adequate continuing education to maintain, support, and enhance their auditing knowledge and skills.
- Chapter 14. PREA Audit Instrument (see pages 34-40). This chapter has been revised to remove references to the paper audit instrument and the Paper Audit Reporting Portal (per the requirement to use the Online Audit System, as outlined in Chapter 11), includes additional details regarding the core evidence components of the PREA Audit Instrument, as detailed on the PREA Resource Center's website, and provides additional guidance regarding agency-level audits.
- Chapter 15. Phase One: Pre-Onsite Audit (see pages 40-54). This chapter has been revised to move explanations regarding documentation sampling and review from the post-onsite phase to the pre-onsite phase of the audit, to align with the Justice Department's strong encouragement that auditors strive to conduct the majority of their documentation sampling and review in the pre-onsite phase. This recommended practice will enable auditors to focus during the onsite phase on supplementing and corroborating, if needed, the documentation review they have already conducted, and examining if and how existing practices align with policies and practice. Additionally, further discussion has been added to the "Coordinating Audit Logistics" subchapter regarding planning for, and the logistics around, the completion of the Pre-Audit Questionnaire. Guidance has also been added to the "Confidential Correspondence" subchapter regarding interviews with volunteers, contractors, and other interested parties who submit confidential correspondence that is relevant to a PREA audit. Finally, the "Lists for Document Sampling" have been revised. These changes focus on sexual abuse and sexual harassment allegations, incidents, and grievances. The "Lists for Document Sampling" includes "all grievances indicating a fear of sexual abuse or inappropriate handling of a sexual abuse allegation or incident for the 12 months

preceding the audit." This guidance incorporates an FAQ response from the DOJ that was issued in July 2022.

- Chapter 16. Phase Two: Onsite Audit (see pages 54-79). This chapter has been revised to remove most of the original "Documentation Selection and Review" chapter (which has been moved to Chapter 15, as outlined above), and create a new "Onsite Documentation Selection" subchapter to reflect the emphasis of documentation selection and review in the pre-onsite phase. As noted above, this recommended practice will enable auditors to focus during the onsite phase on supplementing and corroborating, if needed, the documentation review they have already conducted, and examining if and how existing practices align with policies and practice. Additionally, the "Site Review" subchapter has been revised to reflect the new Site Review Instructions that were made available via the PREA Resource Center website in March 2022, and were highlighted in multiple PRC webinars, newsletters, and the auditor refresher. Finally, the "Conducting Interviews" subchapter has been updated to:
  - o Emphasize representative sampling of interviewees;
  - Include criteria for auditors to consider/use to ensure a representative sample of interviewees; and
  - Provide additional information/guidance on the post-audit reporting information questions that auditors must complete regarding their interview methodology.
- Chapter 17. Phase Three: Evidence Review and Interim Report (see pages 79-84). This chapter includes an expanded "Systematic Review of the Evidence" subchapter to provide more detailed guidance to auditors related to aggregating, reviewing, and analyzing evidence to make compliance determinations.
- Chapter 18. Phase Four: Corrective Action and Final Report (see page 84-89). This
  chapter includes the "Post Audit Reporting Information" subsection which has been
  moved from the "Reporting Requirements" subsection, and revised to be more
  consistent with the post-audit reporting information section of the Auditor Compliance
  Tool. Additionally, a new subsection titled "Final Report Important Reminders" has
  been added that includes guidance that was formerly in other subchapters/sections
  throughout the Handbook.
- Chapter 21. Peer Review and Peer Mentoring. This new chapter replaces the former Chapter 21, "Quality Improvement Program" to reflect the recent, successful implementation of the Peer Review and Peer Mentoring programs.