NATIONAL PREA RESOURCE CENTER

# National Prison Rape Elimination Act (PREA) Resource Center 2014–2015 Annual Report

October 2015



NCCD

National Council on Crime & Delinquency

# NATIONAL PREA RESOURCE CENTER





# PREA Resource Center 2014–2015 at a Glance

Reach 588,400 PRC website views

17,000 individuals receiving event notifications

## Training and TA

- 1,898 inquiries
- 69 webinars
- 18,128 webinar participants
- 18,730 archived webinar views
- 11 curricula released

#### **Grant Management**

43 PRC-funded grantees86 BJA Grantees



## Auditor Training and Audit Instruments

11 auditor trainings600 auditors certified



## Table of Contents

Introduction and Report Summary
Activity Overview
Communications
Audit
Audit Quality Improvement
Conclusion
Appendix A: Current PRC Partners
Appendix B: PRC Grant Award List

#### Acknowledgments

This report was written by Tara Graham, Senior Program Specialist with the National Council on Crime and Delinquency (NCCD). The PREA Resource Center, a project run through a cooperative agreement between the Bureau of Justice Assistance and NCCD, is working to address sexual safety in confinement and to assist state and local jurisdictions with implementation of the Department of Justice national PREA standards.

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. The unanimous passage of the Prison Rape Elimination Act (PREA) by Congress in 2003 was a significant event, ushering in an era of national dialogue and focus on improving sexual safety in confinement. Since the release of the final PREA standards in May 2012, the National PREA Resource Center (PRC) has worked, via a competitively awarded cooperative agreement between the National Council on Crime and Delinguency (NCCD) and the Bureau of Justice Assistance (BJA) in the Office of Justice Programs (OJP), to guide and support efforts to create zero-tolerance cultures related to sexual abuse and sexual harassment in confinement; to address this serious problem in adult prisons and jails, juvenile facilities, community corrections facilities, and lockups; and to achieve compliance with the national PREA standards. Corrections professionals across the country are examining all aspects of their operations, including training, personnel practices, and incident responses, and making necessary changes to come into compliance with the PREA standards. While these goals cannot be accomplished overnight, there is commitment and dedication to improving the sexual safety of these facilities.

This report summarizes PRC's work, carried out in collaboration with BJA's PREA Management Office (PMO), from June 2014 through September 2015. It provides a review of training and technical assistance (TTA) efforts, including webinars, regional trainings, and curricula; a summary of the use of field-initiated assistance by state, local, and tribal jurisdictions; and an overview of work completed or in progress by PRC and BJA grantees. This report also highlights PRC's and PMO's audit-related activities, including certified auditor training, the Field Training Program (FTP), and quality improvement (QI). The efforts of PRC, PMO, and their partners to support PREA standards implementation are broad in scope and comprehensive, and also, when necessary, tailored to meet a jurisdiction's specifically defined needs. Since the release of the final PREA standards, PRC has hosted 69 webinars and 26 regional training events with participants from all 50 states, the District of Columbia, and Canada. The corrections field and affiliated organizations have actively reached out to PRC for assistance, as demonstrated by the more than 588,000 website visitors since the website's launch. In the 16 months covered in this report, TTA efforts have included more than 1,900 field-initiated requests and "Contact Us" inquiries.

In addition to delivering TTA to the field, PRC works with PMO to serve as a hub for resources and communications related to the PREA standards. The PRC library is a compilation of



Poster presentation, International Association of Chiefs of Police Annual Conference, Orlando, Florida

all the PREA-related materials developed and collected by PRC. In the summer of 2015, the library underwent a major review to ensure that available resources are current and relevant to PREA-standard implementation efforts. PRC and PMO communicate regularly with the field about available resources, and continue to engage professional associations and other stakeholder organizations to ascertain the emerging needs and how best to respond to them. PRC also works with PMO to advise the US Department of Justice (DOJ) PREA Working Group (PWG) about the most pressing standards-related issues and questions from the field; interpretive guidance provided by the PWG is added to the Frequently Asked Questions page on the PRC website on an ongoing basis.

PRC provides ongoing grant management to its remaining locally operated *Zero Tolerance* 

grantees, who were awarded these grants in April 2013. In collaboration with PMO, PRC also provides coaching to 65 jurisdictions in receipt of awards under BJA's *Demonstration Projects to Establish* "*Zero Tolerance" Cultures for Sexual Assault in Correctional Facilities* grant program.

The third and final year of the PREA audit cycle commenced August 20, 2015. PRC and PMO have spent significant time, effort, and resources supporting development of the audit function of the PREA standards. Major accomplishments related to the audit function include finalizing four audit instruments, hosting 11 auditor trainings for 865 potential auditors, processing 1,381 auditor applications, coordinating the certification and posting process for 600 certified auditors, providing ongoing auditor support, instituting the FTP for certified auditors, and developing a quality improvement process.



Field Training Audit Pilot at the Santa Rita Jail, Alameda Sheriff's Office, Dublin, California

### **Targeted TTA Providers<sup>1</sup>**

PRC's and PMO's efforts would not be possible without the hard work and support of their TTA partners, who are among the foremost experts in PREA implementation and represent varied expertise. PRC works with PMO to coordinate the resource development of these varied providers and partners to ensure that developed resources address the needs of the field, are innovative, and are not duplicative of resources already available.

## Curricula

Since December 2013, PRC has worked with PMO to release the following curricula. These curricula were developed to target specific PREA standards and are used by the field to deliver comprehensive training in a classroom setting. Correctional agencies can document the use of these curricula in part to demonstrate compliance with particular PREA standards.

- Specialized training: Investigating Sexual Abuse in Confinement Settings
- Specialized training: PREA Medical and Mental Health Standards
- Preventing and Addressing Sexual Abuse in Tribal Detention Facilities: The Impact of the Prison Rape Elimination Act
- Inmate Education (video and facilitator's guide)
- Human Resources and Administrative
  Investigations Employee Training
- Gender-Responsive Strategies: Adults
- Gender-Responsive Strategies: Juveniles
- Victim Services

#### **Forthcoming Resources**

- Investigating Sexual Assault and Sex-Related Crimes in Confinement Settings: Guidance for Criminal Investigators
- Video Series: Using a Trauma-Informed Approach for PREA Implementation
- Developing and Implementing a PREA-Compliant Staffing Plan
- Inmate Education Resource Guide
- Prosecutor's Resource Guide and article on witness intimidation
- Making PREA and Victim Services Accessible for People With Disabilities: An Implementation Guide for Practitioners on the Adult and Juvenile Standards
- PREA Fact Sheets (Topics: cross-gender video monitoring, victim advocates and forensic medical exams, volunteers, inmate reporting hotlines, sexual harassment, and inmate education)
- The PREA Cross-Gender Supervision and Viewing Standard: Promising Practices for Staff Announcement Policies and Camera Viewing
- Promising Practices in Meeting the National Prison Rape Elimination Act Standard on Youthful Inmates

<sup>1</sup> A list of PRC TTA providers can be found in Appendix A of this report.

- Employee Training
- Guidance on Cross-Gender and Transgender Pat Searches

#### **Webinars**

To date, PRC and PMO have hosted 69 webinars, all of which are archived on the PRC website. Of these webinars, 14 were broadcast during the 16 months covered in this report. In total across all PRC webinars, more than 18,000 people participated in the live broadcasts, with over 18,000 views of the archived webinars. Webinars will continue to be offered throughout the coming year and archived on the PRC website. These webinars are targeted to corrections professionals and community stakeholders to assist in PREA implementation and with identified needs of the field.

### **Field-Initiated TTA**

PRC and PMO continue to encourage jurisdictions to request assistance via the PRC website request form. Each request is reviewed and triaged in one of four levels, ranging from a simple question and remote assistance to onsite assistance and conference presentations. As a result of this triage process, PRC staff personally respond to and engage jurisdictions in more than 90% of





#### Requests by Agency Type (Field-Initiated Requests Only)

- State Adult Corrections Agency: 39
- Jail (city/sheriff/county corrections): 110
- Police: 11
- Juvenile detention: 23
- Community corrections: 13
- Private for-profit and nonprofit: 30
- Associations/academies/coalitions/ national networks: 17
- Other [Includes other public entities (federal/state/local), entities from outside U.S., and media inquiries, among others]: 37

all inquiries. PRC TTA partners are relied upon to develop appropriate assistance to respond to the remaining, more complex requests.

The request for assistance is a very successful method of addressing the field's need for targeted support related to PREA. Nearly 1,900 inquiries were submitted to PRC during the past 16 months. The types of field-initiated requests include training, policy reviews, general information, and presentations. "Contact Us" inquiries are most commonly focused on requests for materials, questions about PREA and the standards, and auditor training. To ensure efficient use of PRC resources, PRC staff members often encourage requestors to review and use the previously mentioned PRC curricula and other targeted training materials and resources available in the PRC library.

\*Unknown 83 and other (Canada, Virgin Islands, and Puerto Rico) 3.

#### PREA Training in Indian Country

PRC has a strong commitment to providing training and technical assistance to tribal nations. In August 2015, PRC and Just Detention International, in collaboration with the Bureau of Indian Affairs, presented "PREA 101" to representatives from jails operated by nine tribal nations in the northern part of the United States. Held in Rapid City, South Dakota, the training included information on sexual dynamics, sexual abuse in confinement settings, and the DOJ PREA standards. Responses to the training were overwhelmingly positive, and it provided a tremendous learning opportunity for PRC trainers regarding the unique challenges related to promoting sexual safety in these confinement facilities. A second training will be offered to tribal nations in the southern United States in Albuquerque, New Mexico, in November 2015.

#### **Frequently Asked Questions** and Interpretive Guidance

PRC has received thousands of questions since the release of the PREA standards. These have been received as direct communication from the field with PRC; through PRC TTA providerfacilitated listservs for designated adult and juvenile PREA coordinators; and from participants at regional trainings, webinars, and PRC presentations.

PRC continues to work diligently to provide timely responses to questions and routes questions of first impression that require interpretive guidance to the DOJ PWG. These questions and official DOJ PWG responses are added to the PRC website's Frequently Asked Questions (FAQ) page. The FAQ page has expanded tremendously since its inception. As a result, the FAQ page was revamped in 2015 to improve its search capabilities, thus enabling visitors to the page to more easily identify and locate the interpretive guidance they seek.

#### **PRC Grant Program**

On April 1, 2013, PRC announced 43 awards totaling nearly \$5 million to support efforts in local jurisdictions across the nation to establish zero-tolerance cultures for sexual abuse and sexual harassment in confinement facilities. All PRC grantees completed their grant-funded activities on or before September 30, 2015, and spent more than 98% of their allocated funds.

A sampling of activities funded through these grants include the following.

- PREA social worker offering group services to female inmates
- Training for all external partner and stakeholder agencies
- Converting classroom-based staff training to online, self-managed training, including a final exam
- Training for facility-based sexual assault nurse examiners (SANE)
- Establishment of a youthful inmate housing unit
- Revision to an inmate handbook to include policy on transgender inmates
- Creation of investigation packets for allegations of sexual abuse and sexual harassment, as well as training for staff on how to use these packets
- Development and delivery of a training for public defenders and state's attorneys

- Training staff on motivational interviewing techniques
- Staff training for trainers on trauma-informed care
- Facilitation of presentations by local rape crisis center for inmates, residents, and staff at multiple facilities
- Production of an inmate education video
- Creation of a sexual assault response team (SART) and protocols
- Creation of a lesbian, gay, bisexual, transgender, and intersex (LGBTI) inmate policy
- Creation of a PREA data collection system

### Coaching the BJA PREA Program Grantees

PRC continues to provide coaching support to the BJA Demonstration Projects to Establish "Zero-Tolerance" Cultures for Sexual Assault in Correctional Facilities from fiscal years (FY) 2011, 2012, 2013, and 2014. Beginning with FY 2014 BJA grantees, all sites participated in an introductory call involving agency leadership, grant points of contact, and PRC representatives. Each call followed PRC's review of the jurisdiction's successful grant proposal, and these calls allowed PRC staff to learn directly from the site about the intended outcomes of the grant activities. These activities allowed PRC to conduct a needs assessment regarding the type of coaching support needed. A fourlevel system was developed whereby sites are assigned a level based on intensity of support. This support ranges from at least quarterly check-in calls to intensive start-up assistance or tailored assistance based on particular topics and challenges faced. FY 2014 topics include traumainformed care, screening, and resources for working effectively with LGBTI inmates.

In scaled fashion based on the level of support required, coaches provide guidance on the most effective strategies for carrying out the activities proposed in the grant applications.

#### **BJA Grantee Promising Practices**

- Georgia Department of Juvenile Justice: Gender-responsive staff training
- South Carolina Department of Corrections: PREA training for correctional leaders, facility managers, and agency partners; inmate peer education
- Harris County, Texas: LGBTI training for staff, developed and delivered in collaboration with community-based partners
- Washington State Department of Corrections: DOC provided education to county-level SARTs on the PREA standards and their impact on correctional policies and procedures
- Dallas County, Texas, Juvenile Department: Conducted specialized training for staff on the role of key community partners in implementing the PREA standards
- Pennsylvania Department of Corrections: Multi-faceted strategy to address complex issues of crossgender supervision and unique challenges facing women working in corrections.

## Communications

#### **Conference Presentations**

PRC presented multiple PREA workshops at major national conferences from June 2014 to September 2015, including the following.

#### June 2014

 National Sheriffs' Association Annual Conference—Fort Worth, Texas

#### August 2014

- American Correctional Association (ACA)—Salt Lake City, Utah
- Association of State Correctional Administrators (ASCA)—Salt Lake City, Utah
- Council of Juvenile Correctional Administrators (CJCA)—Salt Lake City, Utah

#### October 2014

- International Association of Chiefs of Police (IACP) Annual Conference—Orlando, Florida
- West Central Wardens and Superintendents Association Conference—Iowa City, Iowa
- International Association of Correctional Training Personnel—Scottsdale, Arizona

#### November 2014

 National Partnership for Juvenile Services National Symposium— Greensboro, North Carolina

#### February 2015

- ACA-Long Beach, California
- ASCA-Long Beach, California
- CJCA—Long Beach, California
- Corrections USA-Las Vegas, Nevada
- IACP Division of State Associations of Chiefs of Police—San Antonio, Texas

#### April 2015

- American Jail Association (AJA)— Charlotte, North Carolina
- Office on Violence Against Women STOP Administrator Conference— Jacksonville, Florida

#### June 2015

• Correctional Accreditation Managers Association—Columbus, Ohio

#### July 2015

- AJA Summit in the Mountains— Edwards, Colorado
- Middle Atlantic States Correctional Association—Atlantic City, New Jersey

#### August 2015

- ACA—Indianapolis, Indiana
- ASCA—Indianapolis, Indiana
- CJCA—Indianapolis, Indiana

#### September 2015

 American Federation of State, County, and Municipal Employees—Albuquerque, New Mexico (September 2015)



Poster presentation International Association of Chiefs of Police Annual Conference, Orlando, Florida



Auditor Training Small Groups - San Diego, California

#### Notifications

PRC continues its commitment to providing the field with accurate, timely information about the PREA standards, including event announcements, available resources, and interpretive guidance. This is accomplished through monthly e-blasts and periodic special notifications. Since June 2014, PRC has sent 19 event blasts, each reaching more than 17,000 recipients.

#### **Website Highlights**

The PRC website is the key entry point to access information and resources to assist with understanding and implementation of the PREA standards. Since its launch in May 2012, the PRC website has had 588,400 total visitors, more than 290,000 of them unique. In the last 16 months, the website has had nearly 300,000 total visitors, more than 157,000 of them unique. PRC updates the five rotating home page banners as a way to alert visitors to recently added resources and funding or training opportunities. The PRC library contains all of the documents collected by PRC, and its organization was revamped in the summer of 2015 so visitors to the PRC website will be able to locate resources more effectively. In the spring of 2015, a systematic review of the entire library collection was begun to ensure that available resources are relevant and reflect the intent of the final PREA standards.

#### **Most Frequented Webpages**

The PRC website's most frequently visited pages (total number of visits) since the launch of the website in May 2012 are as follows (home page not included).

Page	Page Views
Frequently Asked Questions	198,059
PREA Essentials: Prisons and Jail Standards	197,877
Curricula	160,796
Training and Technical Assistance	108,615
Audit homepage	83,210
List of Certified Auditors	72,784
PREA Essentials: Juvenile Standards	72,069
Library	67,959

## Audit

The final PREA standards set forth guidance for the development of an audit that functions to evaluate an individual facility's compliance with the PREA standards. Beginning in July 2012, PRC, in collaboration with BJA and Abt Associates, embarked on the creation of audit instruments and the development of an auditor training and certification process. Since that time, four audit instruments have been developed, 11 auditor trainings have been conducted, and 600 auditors have been certified. August 2015 marks the beginning of the third and final year of the first three-year audit cycle. The following is a summary of PRC's and PMO's audit-specific achievements, current challenges related to the audit function, and efforts that are planned in the months to come.

### **Auditor Training**

The PREA audit process varies from that of many other correctional audits. This ensures a comprehensive evaluation of a facility's policies and procedures; incorporation of interviews with specialized and random staff, volunteers, and inmates/residents/detainees; and onsite practice observation. Auditors are trained to triangulate the information collected during the course of the audit to inform their decision-making regarding a facility's compliance, including recommendations for corrective action as necessary.

Since June 2013, PRC has conducted 11 auditor trainings. The classroom-based 40-hour training aims to prepare individuals to audit facilities by focusing on the PREA standards themselves and the information that must be reviewed, collected, and analyzed in order to determine whether a facility meets a standard. Comprehensive auditor training is achieved through pre-training document review, lecture-style presentation, and small-group scenarios analysis and interview practice. The training is dynamic, with adjustments made, as needed, based on evaluations and observations by faculty on how to best prepare individuals for a successful auditing experience. While minor adjustments are made regularly, auditor candidates consistently report that the training is among the most comprehensive and thorough of their professional careers.

Auditor Training Location	Date		
Potomac, Maryland	June 2013		
Columbia, South Carolina	November 2013		
Columbia, South Carolina	January 2014		
Columbia, South Carolina	March 2014		
Kansas City, Missouri	June 2014		
Kansas City, Missouri	July 2014		
Columbia, South Carolina	September 2014		
Columbia, South Carolina	November 2014		
San Diego, California	March 2015		
San Diego, California	May 2015		
San Diego, California	September 2015		

### **Certified Auditors**

PRC uses an online application portal to host its auditor applications. Overall, PRC has received nearly 1,381 completed applications, with many more initiated but not completed. The trainees are diverse in terms of geography, auditing experience, and type of auditing certifications sought. In August 2014, an adjustment was made from four certification types to two: adult facilities and juvenile facilities. Adult facility certification includes adult prisons and jails, lockups, and community confinement facilities. This adjustment was made based on evaluation of the auditor gualifications and determination that auditors need experience interacting with inmate and resident populations, but auditing success is less reliant on facility-specific experience. Trainees are eligible for certification based on their experience with the inmate or juvenile resident population; many trainees have sought dual certifications. Individuals certified prior to August 2014 were grandfathered in and granted the more inclusive certification.

Candidates who are selected and complete the auditor training mentioned above are required to complete and pass a written exam with a score of 80% or greater, as well as pass a background check conducted by the FBI. Individuals who pass both of these requirements are then certified by DOJ as PREA auditors.

To date, PRC has trained 865 individuals; 600 have become DOJ-certified PREA auditors. In addition, PRC has hosted 58 federal observers individuals interested in the auditor training process as a way to inform the PREA-related work of their own agencies. The PRC website maintains a dedicated page listing all certified auditors, which includes a brief bio, date of certification, certification type(s), and state and city of residence. This list is searchable by multiple variables, including keyword.

### **Auditor Assistance**

Auditors may encounter interpretive challenges or other issues during their audits. To support auditors in the field, PRC has established methods for auditors to obtain ongoing assistance. For questions related to the audit documents or the development of an audit report, auditors may submit an email query, to which PRC will respond within three business days. Recognizing that some auditors may need assistance while at a facility during an audit, PRC operates a help line and works to respond within 24 hours during the work week.

Finally, PRC has two main communication mechanisms to disseminate information to auditors. The first is notification of requests for proposals or other solicitations for audit contracts received by PRC from external entities. Second, in order to keep auditors abreast of recent auditrelated updates, PRC issues auditor newsletters to advise them of recent interpretive guidance and auditor resources.

#### Auditor Continuing Education and Field Training Program

Auditor continuing education is provided by PRC primarily through webinars. Since March 2014, PRC has offered seven webinars to auditors to explain interpretive guidance; offer assistance on the conduct of an audit, including report writing; and present refresher trainings on specific standards. Auditors also receive the auditorspecific newsletters mentioned above and general PRC monthly updates.

The auditor training provides a solid foundation of knowledge related to conducting PREA audits. In response to the expressed and observed needs of DOJ-certified PREA auditors, PRC and PMO launched the Field Training Program (FTP) in the fall of 2014. The goals are to strengthen auditors' PREA auditing skills; enhance their understanding of the standards; and provide a "real life" experience conducting a PREA audit, including use of the audit instrument. These goals are achieved through carrying out a PREA audit of a facility that has volunteered to participate in a mock PREA audit.

In early 2015, eight of the 130 facilities that applied were selected to participate in the FTP, and seven facilities ultimately participated.<sup>2</sup> Certified auditors applied to participate in the FTP, and 48 certified auditor trainees (CATs) were selected from 82 applications. Under the guidance of an experienced auditor, as well as DOJ and PRC staff members, CATs are grouped in teams of six, and guided through the entire audit process (pre-audit, onsite audit, and post-audit), which includes document review, interviews of staff and inmates/residents, and report writing.

#### **Audit Instruments**

The development of audit instruments for all four sets of standards has been a significant and time-intensive undertaking for PRC and PMO. The audit instrument for adult prisons and jails was released in May 2013, with final revisions incorporated by April 2014. The juvenile facilities instrument was also released in April 2014, the community confinement facilities instrument was released in May 2014, and the lockups instrument was released in July 2014.

The online audit instrument is still under development. The delays in the release of this resource are a result of the Federal Information Security Management Act's security requirements. PRC and PMO recognize the importance of ensuring that sensitive information reviewed or collected as part of PREA audits is appropriately safeguarded.

#### Field Training Program Sites

- Monroe Correctional Complex, Washington State Department of Corrections (Monroe, WA)
- Mount Olive Correctional Complex, West Virginia Division of Corrections (Mount Olive, WV)
- Eldora State Training School for Boys, Iowa Department of Human Services (Eldora, IA)
- Racine Correctional Institution, Wisconsin Department of Corrections (Sturtevant, WI)
- Rhode Island Department of Corrections (Cranston, RI)
- Lafayette Parish Correctional Center, Lafayette Parish Sheriff's Office (Lafayette, LA)
- Sacramento County Sheriff's Department (Sacramento, CA)

Beta versions of the online audit instrument, which have been used in auditor trainings since November 2013, provide auditor trainees with access to the instrument and enable them to become familiar with its functionality and use it to access and review audit scenarios that have been developed to enhance knowledge of the PREA standards, as well as skills related to evaluating compliance with those standards. Furthermore, the FTP mentioned above allows both facilities and auditors to access the Pre-Audit Questionnaire (PAQ) portion of the online

<sup>&</sup>lt;sup>2</sup> The FTP was conducted in seven of the eight selected facilities; one facility opted out after the facility selection process was complete.



Field Training Audit, Mount Olive Correctional Complex, West Virginia Division of Corrections

instrument. Facilities complete the PAQ—including uploading documentation—which is then reviewed by the FTP audit teams in preparation for the onsite portion of the FTP. The online audit instrument allows audit documents to be completed electronically and reference materials to be uploaded and stored securely online, in lieu of the auditor keeping hard copies of all audit materials. Once live, the online instrument will also assist PRC and PMO in audit tracking, as discussed below.

#### Audit Outreach and Governor Certification

The audit has become a focal point for inquiries received by PRC. PRC has worked diligently with PMO since the initial audit instrument release in May 2013 to further understanding of the audit process by the field, as well as by certified auditors. This has been accomplished through additions to the PRC FAQ page, webinars, individual communication, and presentations and outreach to major professional organizations.

Beginning in 2014, and in each subsequent year, each state's and territory's governor is required to submit a letter to DOJ indicating that the correctional facilities under their operational control either are in full compliance with the PREA standards or will use at least 5% of certain DOJ grant programs for prison purposes to come into compliance. PRC posts the certification notice on the PRC website as a reference when inquiries are received. Furthermore, PRC directs specific inquiries about the governor certificationincluding those specific to the outcomes of what has been submitted-to PMO for followup. In May 2015, PMO received certifications of compliance from 11 states and assurances of future compliance from 40 states or territories and the District of Columbia. This is an increase of nine certifications from the 2014 submissions.

After creating and implementing the core elements of the PREA audit function, including the audit instruments and auditor certification process, PRC and PMO turned attention over the past year to developing an audit quality improvement (QI) program. The primary objectives of the QI program are to collect information about audit activity and to use that information to inform ongoing training for facilities and auditors, support auditors' efforts to meet DOJ's expectations for PREA audit reporting, and improve the PREA audit's overall quality and thoroughness. PRC and PMO have been working to develop a myriad of quality improvement efforts, as described below.

## **Audit Tracking**

As the audit cycle proceeded, it became clear to PMO that tracking audit activity and cataloging audit reports would provide critical information about the status and operation of the audit function. While the standards require final audit reports to be made publicly available, the standards do not establish a systematic method for identifying and collecting these reports, or for monitoring audit activity. As such, in October 2014, PMO implemented an audit reporting requirement and issued data collection forms to be completed by auditors. One such form requested information on auditors' audit activity to date. Subsequent forms are required to be completed when an auditor initiates an audit, when the interim report is completed, and when the audit final report has been issued. Compliance by auditors with this requirement has been less than complete, so PRC and PMO are refining the reporting requirements and working to educate auditors about the requirements, in the hopes of ensuring greater compliance. Once the online audit instrument is available, auditors using that tool will automatically have their audits tracked. To date, PRC has received notice of more than 1180 audits at some stage of completion; more than 700 of those are complete.

## **Auditor Handbook**

As audit activity has increased, a need for clarity and further written description of an auditor's role and responsibilities has arisen. To respond to this need, PRC and PMO have been working to develop an auditor handbook to detail these roles and responsibilities, including a code of conduct, ethical guidelines, clarification regarding conflicts of interest, and information about peer review, recertification, and decertification.

## **Auditor Remediation**

As the number of auditors and audits has increased, some concerns regarding audit quality have been raised. A series of issues have been identified and a process for remediation is in development. This process is tailored to specific types of issues and focuses on providing support and assistance to auditors to ensure they meet the expectations for conducting and reporting audits. The overall goals of this process are to improve audit quality and consistency among auditors, so that audits credibly reflect the audit requirements included in the standards.

## **Probationary Certification**

Beginning with the March 2015 auditor training, all auditor candidates who are certified enter into probationary certification status. In order to improve the quality and consistency of audit reports, certified auditors are now required to submit draft reports to PRC before the reports are submitted to an audited facility. In collaboration with PMO, PRC staff review these draft reports and provide constructive feedback to the auditor on how to improve the presentation of crucial



Auditor Training - San Diego, California

elements of the report, including evidence, reasoning, and the basis for all compliance determinations. Auditors then integrate PRC's feedback into the report they submit to the audited facility. Typically, auditors will achieve full certification status after submitting two draft reports and successfully demonstrating improvement in their reporting practices. It should be noted that the probationary status in no way impedes an auditor's ability to conduct audits and does not indicate lesser competence.

#### Auditor Recertification/ Decertification

Auditors receive a three-year certification, after which time they must be recertified. PRC and PMO are working to develop the process for recertification, which will impact auditors beginning in the summer of 2016. Instead of being recertified on the date the auditor was initially certified, auditors will be recertified on one of two dates per year, with auditors assigned to the date immediately following their initial three-year certification date to ensure more, not less, time associated with their certification. Auditors will be notified well in advance of their recertification date of the requirements, including deadlines for submitting necessary documentation. Details on this process will be issued once it is finalized.

#### **Peer Review**

Another quality improvement mechanism under development is an audit peer review. Highly skilled and experienced auditors are best positioned to provide a critical review of audit findings and underlying documentation to ascertain whether the finding(s) of compliance adhere to what is required by the PREA standards. Currently, the peer review process is being developed to enlist DOJ-certified PREA auditors for a specified term of service to conduct a systemic review of audit reports. Peer review outcomes will be relayed to BJA and will be used to guide the quality improvement efforts of individual auditors, including, but not limited to, decertification. The peer review outcomes will also be used to enhance the continuing education that is made available to all auditors.

## Conclusion

Funding for PRC, operated by NCCD, runs through September 2016. In the coming year, PRC will continue its commitment to respond to needs related to standards implementation and other efforts to eliminate sexual abuse and sexual harassment in confinement. This will include:

- Release of additional resources related to implementation of the PREA standards;
- Finalization of the online audit instrument, accompanied by training for the field and auditors on its use;
- Further development and implementation of the above-mentioned quality improvement and audit peer reviews;
- Revision of the auditor training application;
- Conducting one auditor training in Harrisburg, Pennsylvania, in May 2016;
- Establishment of an auditor online learning system and portal to access critical documents and resources;

- Four deliveries of the Auditor FTP training audit;
- Revised protocols for auditor reporting;
- Delivery of coaching to existing and new BJA PREA demonstration site grantees;
- Auditor recertification guidelines;
- An auditor handbook; and
- Establishment of an auditor peer review process.

Funding to continue the work of PRC has been awarded to Impact Justice for two additional years, extending PRC until June 2018. A period of transition will commence in June 2016 from NCCD to Impact Justice. All involved parties are committed to making this as seamless a transition as possible, so as not to disrupt the provision of needed assistance and support to the field.



PREA Resource Center Staff - Auditor Training, San Diego, California

## Appendix A: Current PRC Partners

#### **PRC Partners**

AEquitas: The Prosecutors' Resource on Violence Against Women www.aequitasresource.org

American Jail Association (AJA) www.americanjail.org

American University Washington College of Law, Project on Addressing Prison Rape www.wcl.american.edu/endsilence

International Association of Chiefs of Police (IACP) www.theiacp.org

Just Detention International (JDI) www.justdetention.org

National Association of State Mental Health Program Directors (NASMHPD) www.nasmhpd.org

The Moss Group (TMG) www.mossgroup.us

Vera Institute of Justice (Vera) www.vera.org

## **PRC Audit Work Group**

Abt Associates (ABT) www.abtassociates.com

American Correctional Association (ACA) www.aca.org

National Commission on Correctional Health Care (NCCHC) www.ncchc.org

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# Appendix B: PRC Grant Award List

#### Table B1: BJA PREA Site-Based Project Awards, Fiscal Year 2011

Organization	State	Award Amount
Alabama Department of Corrections	AL	\$270,000
Colorado Department of Corrections	СО	\$453,662
Cook County Sheriff's Office	IL	\$300,000
Georgia Department of Corrections	GA	\$600,000
Georgia Department of Juvenile Justice	GA	\$558,956
Indiana Department of Correction	IN	\$599,380
Kansas Department of Corrections	KS	\$599,862
Kentucky Department of Corrections	KY	\$600,000
Louisiana Youth Services, Office of Juvenile Justice	LA	\$600,000
Maine Department of Corrections	ME	\$545,475
Michigan Department of Corrections	MI	\$490,740
Montana Department of Corrections	MT	\$236,275
New York State Department of Corrections and Community Supervision	NY	\$424,970
North Carolina Department of Juvenile Justice and Delinquency Prevention	NC	\$599,917
Ohio Department of Rehabilitation and Correction	ОН	\$599,998
Oregon Department of Corrections	OR	\$600,000
Texas Youth Commission	ТХ	\$599,963
Vermont Department of Corrections	VT	\$600,000
	TOTAL	\$9,279,198

Table B2: BJA F	PREA Site-Based	<b>Project Awards,</b>	Fiscal Year 2	012
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Organization	State	Award Amount
California Emergency Management Agency	CA	\$267,300
Colorado Division of Criminal Justice	СО	\$171,657
District of Columbia Office of Victim Services	DC	\$600,000
Indiana Department of Correction	IN	\$416,610
Kentucky Department of Corrections	KY	\$149,148
Kentucky Department of Juvenile Justice	KY	\$153,200
Middlesex Sheriff's Office	MA	\$227,822
New Mexico Department of Public Safety	NM	\$282,268
New York State Department of Corrections and Community Supervision (City of New York Department of Correction)	NY	\$600,000
New York State Office of Children and Family Services	NY	\$492,309
Washington Department of Commerce	WA	\$206,126
Wisconsin Department of Corrections	WI	\$396,777
	TOTAL	\$3,963,217

Organization	State	Award Amount
California Department of Corrections and Rehabilitation	CA	\$250,000
Colorado Department of Corrections	СО	\$250,000
County of Los Angeles	CA	\$245,380
County of Los Angeles Probation Department	CA	\$250,000
Florida Department of Corrections	FL	\$250,000
Georgia Department of Juvenile Justice	GA	\$249,000
Harris County	TX	\$237,693
Indiana Department of Correction	IN	\$250,000
Louisiana Youth Services, Office of Juvenile Justice	LA	\$246,023
Minnesota Department of Corrections	MN	\$250,000
Ohio Department of Youth Services	ОН	\$250,000
Pacific County	WA	\$242,581
Riverside County Sheriff's Department	CA	\$228,087
San Francisco Juvenile Probation Department	CA	\$95,978
South Carolina Department of Corrections	SC	\$250,000
Suffolk County Sheriff's Department	MA	\$179,072
Tennessee Department of Children's Services	TN	\$250,000
Washington State Department of Corrections	WA	\$250,000
Webb County	TX	\$250,000
	TOTAL	\$4,473,814

#### Table B3: BJA PREA Site-Based Project Awards, Fiscal Year 2013

#### Table B4: BJA PREA Site-Based Project Awards, Fiscal Year 2014

Organization	State	Award Amount
Alabama Department of Corrections	AL	\$489,206
Broward County Sheriff's Office	FL	\$250,000
Dallas County Juvenile Department	ТХ	\$56,066
Florida Department of Corrections	FL	\$497,835
Georgia Department of Juvenile Justice	GA	\$400,680
Iowa Department of Corrections	IA	\$166,416
Kansas Department of Corrections	KS	\$499,100
Kentucky Justice and Public Safety Cabinet	KY	\$500,000
Louisiana Youth Services, Office of Juvenile Justice	LA	\$245,257
Maricopa County Sheriff's Office	CA	\$419,170
Maryland Department of Juvenile Services	MD	\$310,186
Massachusetts Department of Correction	MA	\$377,966
Montana Department of Corrections	MT	\$483,797
Norfolk County Correctional Center	MA	\$250,000
Oregon Department of Corrections	OR	\$500,000
Pennsylvania Department of Corrections	PA	\$272,034
Sullivan County Department of Corrections	NH	\$143,803
Travis County Juvenile Probation Department	ТХ	\$17,338
Virginia Department of Corrections	VA	\$460,913
West Virginia Regional Jail and Correctional Facility Authority	WV	\$410,522
Wisconsin Department of Corrections	WI	\$495,998
Wor-Wic Community College, Eastern Shore Criminal Justice Academy	MD	\$295,626
	TOTAL	\$7,541,913

#### Table B5: BJA PREA Site-Based Project Awards, Fiscal Year 2015

Organization	State	Award Amount
Texas Department of Criminal Justice	ТХ	\$437,663
Indiana Department of Correction	IN	\$180,025
New York State Department of Corrections and Community Supervision	NY	\$500,000
Nevada Department of Health and Human Services	NV	\$177,174
Georgia Department of Corrections	GA	\$500,000
Alabama Department of Corrections	AL	\$468,754
New York City Department of Correction	NY	\$493,280
DeKalb County	GA	\$150,000
County of Sacramento	СА	\$500,000
Bexar County Commissioners Court	ТХ	\$250,000
South Carolina Department of Corrections	SC	\$498,545
New Mexico Department of Public Safety	NM	\$500,000
Rosebud Sioux Tribe	SD	\$249,963
Cuyahoga County	ОН	\$500,000
	TOTAL	\$5,405,404