

# PREA Facility Audit Report: Final

**Name of Facility:** State Training School for Boys

**Facility Type:** Juvenile

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 05/08/2026

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input 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 type="checkbox"/>
<b>Auditor Full Name as Signed:</b> Karen d. Murray	<b>Date of Signature:</b> 05/08/2026

AUDITOR INFORMATION	
<b>Auditor name:</b>	Murray, Karen
<b>Email:</b>	kdmconsults1@gmail.com
<b>Start Date of On-Site Audit:</b>	04/14/2026
<b>End Date of On-Site Audit:</b>	04/15/2026

FACILITY INFORMATION	
<b>Facility name:</b>	State Training School for Boys
<b>Facility physical address:</b>	3211 Edgington Ave, Eldora, Iowa - 50627
<b>Facility mailing address:</b>	3211 Edgington Ave, Eldora, - 50627

Primary Contact
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<b>Name:</b>	Troy Kroeger
<b>Email Address:</b>	Troy.Kroeger@hhs.iowa.gov
<b>Telephone Number:</b>	402-305-8944

<b>Superintendent/Director/Administrator</b>	
<b>Name:</b>	Chris Olson
<b>Email Address:</b>	Christopher.Olson@hhs.iowa.gov
<b>Telephone Number:</b>	641-858-5402

<b>Facility PREA Compliance Manager</b>	
<b>Name:</b>	Jason Halsey
<b>Email Address:</b>	jason.halsey@hhs.iowa.gov
<b>Telephone Number:</b>	641.858.6103

<b>Facility Health Service Administrator On-Site</b>	
<b>Name:</b>	Amanda Sizemore Melton
<b>Email Address:</b>	Amanda.Sizemore@hhs.iowa.gov
<b>Telephone Number:</b>	641-858-5402

<b>Facility Characteristics</b>	
<b>Designed facility capacity:</b>	64
<b>Current population of facility:</b>	52
<b>Average daily population for the past 12 months:</b>	44
<b>Has the facility been over capacity at any point in the past 12 months?</b>	No
<b>What is the facility's population designation?</b>	Men/boys

<b>Age range of population:</b>	12-18
<b>Facility security levels/resident custody levels:</b>	30
<b>Number of staff currently employed at the facility who may have contact with residents:</b>	150
<b>Number of individual contractors who have contact with residents, currently authorized to enter the facility:</b>	9
<b>Number of volunteers who have contact with residents, currently authorized to enter the facility:</b>	37

#### AGENCY INFORMATION

<b>Name of agency:</b>	Iowa Department of Health and Human Services
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	321 East 12th Street, Des Moines, Iowa - 50319
<b>Mailing Address:</b>	
<b>Telephone number:</b>	

#### Agency Chief Executive Officer Information:

<b>Name:</b>	Larry Johnson, HHS Director
<b>Email Address:</b>	Larry.Johnson@hhs.iowa.gov
<b>Telephone Number:</b>	

#### Agency-Wide PREA Coordinator Information

<b>Name:</b>	Troy Kroeger	<b>Email Address:</b>	Troy.Kroeger@hhs.iowa.gov
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# Facility AUDIT FINDINGS

## Summary of Audit Findings

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

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

### Number of standards exceeded:

7

- 115.311 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
- 115.331 - Employee training
- 115.332 - Volunteer and contractor training
- 115.361 - Staff and agency reporting duties
- 115.368 - Post-allegation protective custody
- 115.381 - Medical and mental health screenings; history of sexual abuse
- 115.383 - Ongoing medical and mental health care for sexual abuse victims and abusers

### Number of standards met:

36

### Number of standards not met:

0

## POST-AUDIT REPORTING INFORMATION

Please note: Question numbers may not appear sequentially as some questions are omitted from the report and used solely for internal reporting purposes.

### GENERAL AUDIT INFORMATION

#### On-site Audit Dates

1. Start date of the onsite portion of the audit:	2026-04-14
2. End date of the onsite portion of the audit:	2026-04-15

#### Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	Crisis Intervention Services - Advocacy Agency prea.report@dhs.state.ia.us. - Third Party Reporting

### AUDITED FACILITY INFORMATION

14. Designated facility capacity:	64
15. Average daily population for the past 12 months:	50
16. Number of inmate/resident/detainee housing units:	4
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

<b>23. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:</b>	49
<b>25. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>26. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:</b>	1
<b>27. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>28. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>29. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>30. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:</b>	1

<p><b>31. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>0</p>
<p><b>32. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>1</p>
<p><b>33. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>2</p>
<p><b>34. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>0</p>
<p><b>35. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</b></p>	<p>No text provided.</p>
<p><b>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</b></p>	
<p><b>36. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</b></p>	<p>150</p>
<p><b>37. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b></p>	<p>31</p>

<b>38. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b>	<p>9</p>
<b>39. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</b>	<p>No text provided.</p>
<b>INTERVIEWS</b>	
<b>Inmate/Resident/Detainee Interviews</b>	
<b>Random Inmate/Resident/Detainee Interviews</b>	
<b>40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</b>	<p>5</p>
<b>41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</b>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Age</li> <li><input type="checkbox"/> Race</li> <li><input type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic)</li> <li><input type="checkbox"/> Length of time in the facility</li> <li><input checked="" type="checkbox"/> Housing assignment</li> <li><input type="checkbox"/> Gender</li> <li><input type="checkbox"/> Other</li> <li><input type="checkbox"/> None</li> </ul>
<b>42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</b>	<p>The facility provided a roster of students by targeted categories and housing units. After the Auditor selected five targeted students, random were selected by selected by housing unit to ensure a representative sample across as many housing units as possible.</p>

<b>43. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>44. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b>	No text provided.
<b>Targeted Inmate/Resident/Detainee Interviews</b>	
<b>45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</b>	5
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
<b>47. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</b>	0
<b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b>	<input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.  <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.

<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>After review of rosters and specialized interviews with staff, this category of student did not appear to be present at the facility during the onsite review.</p>
<p><b>48. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>3</p>
<p><b>49. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>After review of rosters and specialized interviews with staff, this category of student did not appear to be present at the facility during the onsite review.</p>
<p><b>50. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>

<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>After review of rosters and specialized interviews with staff, this category of student did not appear to be present at the facility during the onsite review.</p>
<p><b>51. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>After review of rosters and specialized interviews with staff, this category of student did not appear to be present at the facility during the onsite review.</p>
<p><b>52. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>1</p>

<p><b>53. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>After review of rosters and specialized interviews with staff, this category of student did not appear to be present at the facility during the onsite review.</p>
<p><b>54. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</b></p>	<p>1</p>
<p><b>55. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</b></p>	<p>1</p>
<p><b>56. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</b></p>	<p>0</p>

<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The facility does not utilize segregated housing for their vulnerable populations.</p>
<p><b>57. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</b></p>	<p>No text provided.</p>
<p><b>Staff, Volunteer, and Contractor Interviews</b></p>	
<p><b>Random Staff Interviews</b></p>	
<p><b>58. Enter the total number of RANDOM STAFF who were interviewed:</b></p>	<p>12</p>
<p><b>59. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</b></p>	<p><input type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input checked="" type="checkbox"/> Rank (or equivalent)</p> <p><input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p><b>60. Were you able to conduct the minimum number of RANDOM STAFF interviews?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

<p><b>61. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b></p>	<p>No text provided.</p>
<p><b>Specialized Staff, Volunteers, and Contractor Interviews</b></p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p><b>62. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</b></p>	<p>13</p>
<p><b>63. Were you able to interview the Agency Head?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>64. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>65. Were you able to interview the PREA Coordinator?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>66. Were you able to interview the PREA Compliance Manager?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)</p>

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

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

	<input type="checkbox"/> Other
<b>68. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>a. Enter the total number of VOLUNTEERS who were interviewed:</b>	2
<b>b. Select which specialized VOLUNTEER role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Mental health/counseling <input checked="" type="checkbox"/> Religious <input type="checkbox"/> Other
<b>69. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>a. Enter the total number of CONTRACTORS who were interviewed:</b>	2
<b>b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input type="checkbox"/> Security/detention <input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input checked="" type="checkbox"/> Other
<b>70. Provide any additional comments regarding selecting or interviewing specialized staff.</b>	No text provided.

## SITE REVIEW AND DOCUMENTATION SAMPLING

### Site Review

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

<b>71. Did you have access to all areas of the facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>Was the site review an active, inquiring process that included the following:</b>	
<b>72. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>73. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>74. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>75. Informal conversations with staff during the site review (encouraged, not required)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No

<p><b>76. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</b></p>	<p>No text provided.</p>
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**Documentation Sampling**

Where there is a collection of records to review-such as staff, contractor, and volunteer training records; background check records; supervisory rounds logs; risk screening and intake processing records; inmate education records; medical files; and investigative files-auditors must self-select for review a representative sample of each type of record.

<p><b>77. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</b></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
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<p><b>78. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</b></p>	<p>No text provided.</p>
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**SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY**

**Sexual Abuse and Sexual Harassment Allegations and Investigations Overview**

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

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

	# of sexual abuse allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
<b>Inmate-on-inmate sexual abuse</b>	0	0	0	0
<b>Staff-on-inmate sexual abuse</b>	1	0	1	0
<b>Total</b>	1	0	1	0

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

	# of sexual harassment allegations	# of criminal investigations	# of administrative investigations	# of allegations that had both criminal and administrative investigations
<b>Inmate-on-inmate sexual harassment</b>	1	0	1	0
<b>Staff-on-inmate sexual harassment</b>	1	0	1	0
<b>Total</b>	2	0	2	0

## Sexual Abuse and Sexual Harassment Investigation Outcomes

### Sexual Abuse Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual abuse</b>	0	0	0	0
<b>Staff-on-inmate sexual abuse</b>	0	0	1	0
<b>Total</b>	0	0	1	0

### Sexual Harassment Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
<b>Inmate-on-inmate sexual harassment</b>	0	0	0	1
<b>Staff-on-inmate sexual harassment</b>	0	0	1	0
<b>Total</b>	0	0	1	0

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

**Sexual Abuse Investigation Files Selected for Review**

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

1

<p><b>86. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p><b>Inmate-on-inmate sexual abuse investigation files</b></p>	
<p><b>87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>0</p>
<p><b>88. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p><b>89. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p><b>Staff-on-inmate sexual abuse investigation files</b></p>	
<p><b>90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>1</p>
<p><b>91. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p><b>92. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p><b>Sexual Harassment Investigation Files Selected for Review</b></p>	
<p><b>93. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>2</p>
<p><b>94. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p><b>Inmate-on-inmate sexual harassment investigation files</b></p>	
<p><b>95. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>1</p>
<p><b>96. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p><b>97. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

<b>Staff-on-inmate sexual harassment investigation files</b>	
<b>98. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b>	1
<b>99. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
<b>100. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)
<b>101. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</b>	No text provided.
<b>SUPPORT STAFF INFORMATION</b>	
<b>DOJ-certified PREA Auditors Support Staff</b>	
<b>102. Did you receive assistance from any DOJ-CERTIFIED PREA AUDITORS at any point during this audit? REMEMBER: the audit includes all activities from the pre-onsite through the post-onsite phases to the submission of the final report. Make sure you respond accordingly.</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No

## Non-certified Support Staff

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

Yes

No

## AUDITING ARRANGEMENTS AND COMPENSATION

**108. Who paid you to conduct this audit?**

The audited facility or its parent agency

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

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

Other

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

<b>115.311</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> <li>3. Iowa Health and Human Services Division of Table of Organization - Division of State-Operated Care, dated 11.2025</li> <li>4. State Training School Organizational Chart, not dated</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Random Students</li> </ol>

2. Targeted Students
3. Youth Service Workers
4. Deputy Superintendent / PREA Compliance Manager
5. Superintendent
6. Executive Officer / PREA Coordinator

Interviews with students demonstrated a strong sense of safety and respect within the facility. Students consistently reported, "of course I feel safe here," with 100% of students stating they feel sexually safe in the program and that searches are conducted respectfully by staff. Students expressed appreciation for the use of a body scanner in place of strip searches, with one student stating, "they use the scanner instead of strip searching us. I like this a lot better."

Students further demonstrated staff take intentional steps to ensure privacy, explaining that when they notify staff they are changing or using the bathroom through staff calling cards, "only male staff come down the hall to check on us so we have privacy." Students also reported staff respond appropriately to concerns, with one stating, "I reported and staff told him not to say those things anymore."

Additionally, 100% of students stated they are offered mental health services regardless of past sexual abuse or harmful behaviors. Students expressed trust in leadership. Overall, student responses demonstrated a culture of safety, respect, responsiveness, and trust within the program.

Interviews with staff demonstrated a strong commitment to maintaining professional boundaries, safety, and a trauma-informed approach to supervision. Staff consistently stated, "we don't get too friendly with them, we do our job," while also emphasizing the importance of rapport, noting there is "a fine line with rapport building and relationship building." Staff further demonstrated strong awareness of youth behaviors, with one stating, "we get to know our youth and can detect when something is bothering them or they are acting out... I know my students," and considering that behaviors may be related to past trauma.

Staff demonstrated a consistent focus on safety, stating, "we make sure students are safe and made to feel safe and protect them right away," and emphasizing practices such as never being one-on-one with students and maintaining awareness of staff safety, including "keeping an eye out for our female staff at all times." Staff also described structured privacy practices, noting the use of "staff caller cards" to ensure appropriate gender supervision when students can be in a state of undress.

Staff expressed confidence in leadership and teamwork, stating, “we have a great team here,” and describing a “very supportive and collaborative Administration.” Staff further described strong administrative practices, including maintaining relationships with local law enforcement and court officials, completing monthly safety surveys and two extensive annual audits, and ensuring advocacy services are available, with ongoing in-person emotional support provided when requested. Overall, staff responses demonstrated a culture of professionalism, teamwork, accountability, and commitment to safety.

The interview with the PREA Compliance Manager demonstrated he is well versed in PREA system implementation, has sufficient time to complete his PREA responsibilities, and articulated specific systems in place to support ongoing compliance. These systems include strong team collaboration, particularly with the PREA Coordinator, who conducts monthly audits in various areas and reviews PREA-related systems. The PREA Compliance Manager further demonstrated he works closely with managers of each department, identifies areas requiring additional training, and collaborates with staff to develop action plans to ensure ongoing compliance and sustainability.

Site Observation:

During the tour of the facility, multiple student-designed PREA posters and “No Means No” postings were observed displayed throughout the campus, including instructions for accessing reporting services by dialing 211. “No Means No” flyers were observed in cottages and other high-traffic areas, providing multiple internal and external reporting options. Audit notices were laminated and prominently posted at the facility entrance, canteen where visitation occurs, day rooms, school, and administrative areas throughout the campus.

(a) State Training School for Boys PAQ states the agency policy mandates zero-tolerance toward all forms of sexual abuse and sexual harassment in the facility it operates and those directly under contract. The facility has a policy outlining how it will implement the agency’s approach to preventing, detecting, and responding to sexual abuse and sexual harassment.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 1, section policy, states, “The State Training School (STS) has zero tolerance for sexual abuse or sexual harassment of students both by staff or other students, and for any form of retaliation for reporting. This policy establishes this zero-tolerance standard for the incidence of sexual abuse/assault in accordance with the Prison Rape

Elimination Act of 2003 (PREA) and the National Standards to Prevent, Detect and Respond to Prison Rape.

STS has established this policy to help prevent, detect, respond and report any incident of sexual abuse, sexual harassment or retaliation for reporting within the facility. This policy establishes guidelines for action including but not limited to staff training and education; reporting and investigative standards; student victim services and support; and data collection measures related to sexual abuse at the State Training School.

All reported incidents of sexual abuse by staff or others or sexual harassment by staff or others will be documented and investigated. Employees, contractors, or volunteers who perpetrate, or fail to report, any sexual abuse or sexual harassment as outlined in this policy, will be subject to disciplinary action up to and including termination of employment or services. All substantiated criminal cases will be referred to local law enforcement as well as the appropriate County Attorney's Office for review for prosecution."

(b) State Training School for Boys PAQ states the agency employs or designates an upper-level, agency-wide PREA Coordinator. The PREA Coordinator has sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities. The position of the PREA Coordinator in the agency's organizational structure. The Executive Officer 2 functions as the PREA Coordinator and reports directly to the Deputy Director.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 5-6, section 1. A.1., states, "The Division Administrator shall designate an upper-level central office, facility PREA Coordinator with sufficient time and authority to develop, implement, and ensure consistent compliance with PREA standards. In addition, at the facility level a PREA manager shall be designated and assigned to the State Training School to ensure on-sight oversight of PREA compliance."

The facility provided an Iowa Health and Human Services Division of Table of Organization - Division of State-Operated Care. The organization chart demonstrates the PREA Coordinator reports directly to the Deputy Director.

(c) State Training School for Boys PAQ states the PREA Compliance Manager has sufficient time and authority to coordinate the facility's efforts to comply with the

	<p>PREA standards. The Deputy Superintendent functions as the PREA Compliance Manager and reports directly to the Institutional Superintendent.</p> <p>Based on interviews, documentation, and observations, the facility exceeds compliance with this standard. Interviews with students and staff demonstrated a well-established culture of safety, respect, and accountability, supported by strong leadership and consistent PREA practices. Students reported feeling safe within the facility, demonstrated understanding of reporting options, and described respectful search practices and privacy protections, including use of body scanners and structured staff notification procedures. Staff interviews demonstrated a clear understanding of professional boundaries, trauma-informed supervision, and proactive monitoring of youth behaviors, with consistent communication and team-based decision-making regarding placement and safety. Leadership further demonstrated active oversight and engagement, including collaboration between the PREA Compliance Manager and PREA Coordinator, ongoing internal audits, and continuous identification of training needs to support compliance sustainability. Observations during the onsite review further demonstrated a high level of PREA visibility, including student-designed PREA materials and clearly posted reporting information throughout the facility. Collectively, these practices demonstrate a comprehensive and sustained approach to PREA implementation that exceeds the requirements of this standard.</p>
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<b>115.312</b>	<b>Contracting with other entities for the confinement of residents</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Executive Officer / PREA Coordinator</li> </ol> <p>The interview with the Executive Officer demonstrated the agency does not utilize privatized contracts for the confinement of students. The Executive Officer reported that all residents are housed and managed within the facility, and no agreements exist with private entities for confinement services.</p> <p>(a) State Training School for Boys PAQ states the agency has not entered into or</p>

	<p>renewed a contract for the confinement of residents on or after August 20, 2012, or since the last PREA audit, whichever is later.</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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115.313	Supervision and monitoring
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> <li>3. State Training School (STS) Staffing Plan, dated 1.27.2026</li> <li>4. Iowa Department of Health and Human Services State-Operated Specialty Care Division, State Training School Annual PREA Staffing Plan Review, dated 1.27.2026</li> <li>5. Unannounced Rounds Form, not dated</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Treatment Services Supervisor / Duty Superintendent</li> <li>2. Deputy Superintendent / PREA Compliance Manager</li> </ol> <p>The interview with the Duty Superintendent demonstrated that unannounced rounds are conducted at varying times based on daily operations and facility needs. The Duty Superintendent reported initiating rounds early in the shift to allow for full campus coverage, with the exception of the kitchen and maintenance buildings, as students are not permitted on that side of the campus. During rounds, the Duty Superintendent checks for any issues, ensures adequate supervision in each area, communicates pertinent information with staff and students, assesses the overall environment, and provides support and direction as needed.</p> <p>The interview with the PREA Compliance Manager demonstrated ongoing collaboration with the PREA Coordinator, who reviews systems and works with</p>

management and various departments to ensure continued compliance with all components of the staffing plan.

Site Observations:

Documentation of unannounced rounds was reviewed within a cottage and demonstrated that rounds are conducted weekly, with at least one round per shift each week. Documentation reviewed covered the timeframe of January 2026 through April 14, 2026. Additional documentation reviewed for the Canteen, Gym, MSDR, and Recreation Hall demonstrated rounds were conducted at least weekly from January 2026 through April 2, 2026. While documentation was organized by binder and/or tab, several unannounced round sheets did not include the specific building name. The Auditor recommended that future documentation include the building name for clarity and consistency.

(a) State Training School for Boys PAQ states the agency requires each facility it operates to develop, document, and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect residents against abuse. Since August 20, 2012, or last PREA audit, whichever is later, the average daily number of residents is 50. Since August 20, 2012, or last PREA audit, whichever is later, the average daily number of residents on which the staffing plan was predicated is 64.

The facility provided a State Training School Staffing Plan and Review. The staffing plan and review includes the following components.

- Staffing Details
- Cottages
- Supervisory Staff
- Medical Staff
- Security Staff
- Video Monitoring
- Staffing Plan Review will consider:

Generally accepted juvenile detention and correctional/secure policies.

- o Any judicial findings of inadequacy.
- o Any findings of inadequacy from Federal investigative agencies.

- o Any findings of inadequacy from internal or external oversight bodies.
- o All components of the facility's physical plant (including "blind spots" or areas where staff or students may be isolated)
- o The composition of the student population
- o The number and placement of supervisory staff
- o Facility programs occurring on a particular shift
- o Any applicable State or local laws, regulations, or standards
- o The prevalence of substantiated "

(b) State Training School for Boys PAQ states each time the staffing plan is not complied with, the facility documents and justifies all deviations from the staffing plan.

(c) State Training School for Boys PAQ states the facility is not obligated by law, regulation, or judicial consent decree to maintain staffing ratios of a minimum of 1:8 during resident waking hours and 1:16 during resident sleeping hours. In the past 12 months, the number of times the facility deviated from the staffing ratios of 1:8 security staff during resident waking hours was one.

(d) State Training School for Boys PAQ states at least once every year the agency or facility, in collaboration with the agency's PREA Coordinator, reviews the staffing plan to see whether adjustments are needed to: (a) the staffing plan; (b) prevailing staffing patterns; (c) the deployment of monitoring technology; or (d) the allocation of agency or facility resources to commit to the staffing plan to ensure compliance with the staffing plan.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 6, section B. 4., states, "Whenever necessary, but no less frequently than once each year the State Training School, in consultation with the assigned/appointed PREA Coordinator, shall assess, determine, and document whether adjustments are needed to:

- a. The staffing plan established pursuant to paragraph (1) of this section;
- b. Prevailing staffing patterns;
- c. The State Training School deployment of video monitoring systems and other monitoring technologies; and

d. The resources the facility has available to commit to ensure adherence to the staffing plan.”

The facility provided a State Training School Annual PREA Staffing Plan Review. The document demonstrates the following was reviewed with commentary.

- Describe how generally accepted juvenile justice residential treatment facility practices are being utilized.
- Describe how any findings of inadequacy, by judicial, federal investigative agencies or internal or external oversight bodies, in program policies and procedures are addressed.
- Describe how the following have impacted staffing decisions
- Location or other factors
- Programs offered
- Number and placement of supervising staff
- Staffing ratios
- Determinations
- Facilities use of video monitoring systems are: adequate
- Resources available to ensure adherence to the staffing plan are adequate
- Summary Comments

(e) State Training School for Boys PAQ states the facility requires that intermediate-level or higher-level staff conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 7, section B. 5., states, “The State Training School shall implement a practice of having intermediate-level or higher lever supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment. This practice shall be implemented for night shifts as well as day shifts. The State Training School prohibits staff from alerting other staff members that these supervisory rounds are occurring, unless such an announcement is related to the legitimate operational functions of the facility.”

	<p>The facility provided an Unannounced Rounds form demonstrating that unannounced rounds are conducted in each cottage and in non-cottage buildings at varying times, at least weekly. Documentation reviewed reflects that supervisory staff complete and record these rounds to support active supervision and PREA compliance.</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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115.315	Limits to cross-gender viewing and searches
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> <li>3. STS Staff Training PREA Prevention &amp; Response PowerPoint, not dated</li> <li>4. Post Audit: STS Orientation Training Documentation, dated 4.29.2026</li> <li>5. Post Audit: State Training School Memorandum, dated 4.30.2026</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Random Students</li> <li>2. Targeted Students</li> <li>3. Youth Service Workers</li> </ol> <p>Interviews with students demonstrated strip searches are conducted using a body scanner. Students expressed appreciation that they are no longer required to remove all of their clothing during these searches. One hundred percent of students formally interviewed stated searches are conducted respectfully by staff and that when they use their “staff callers” to notify staff they are in a state of undress in their rooms, only male staff respond during those times. Students further stated female staff do not consistently make cross-gender announcements by ringing the doorbell upon entry into the cottages or making verbal announcements when near restroom or shower areas.</p>

Interviews with Youth Service Workers demonstrated most staff are aware of and attempt to ring the cottage doorbell when entering the cottages; however, staff acknowledged they could improve consistency in making verbal announcements when entering areas where students may be in a state of undress.

Staff interviewed attested strip searches are conducted in Corbett Miller Hall in designated rooms, out of the line of sight of others. Staff described one staff member is positioned in the doorway facing the student, while a second staff member remains immediately outside the open door in the hallway during the search process. Staff demonstrated students are informed of each step of the search process, with clear communication provided throughout each transition as students hand staff articles of clothing.

Corrective Action Plan:

- Provide documented refresher training demonstrating female personnel are consistently ringing the cottage bell when entering youth cottages.
- Appropriate facility personnel to provide a memorandum with a sustainable action plan stating which facility position will ensure all requirements of §115.315 (d) is met and sustained. Memorandum to be addressed to the DOJ PREA Auditor, date and author of the memorandum and standard in question.
- Upload supporting documentation to corresponding standard provision in the online audit system.

Post audit, the facility provided documented training demonstrating that applicable personnel have completed training to ensure cross-gender announcements are consistently conducted by all female staff.

Post audit, the facility provided a memorandum from the agency PREA Coordinator and the facility PREA Compliance Manager, addressed to the PREA Auditor with the following sustainable action plan. "The State Training School would like to thank you again for coming to our campus on 4/13/26 and 4/14/26 to complete a PREA inspection of the campus. In response to the area identified as needing improvement, we have completed training with all staff across campus regarding staff of the opposite sex entering our student's homes. Please see the attached documentation regarding training with all staff since your visit.

Additionally, we are having our Designated Superintendents (DS) monitor for this as they are doing unannounced rounds, and we are adding a question to the monthly

Student Safety Survey for students to track effectiveness of our training and monitoring. Additional steps will be taken if students fail to report at a very high percentage that staff of the opposite gender are notifying them before entering the cottage.”

(a) State Training School for Boys PAQ states the facility does not conduct cross-gender strip or cross-gender visual body cavity searches of their Residents. In the past 12 months the facility has not conducted cross-gender strip or cross-gender visual body cavity searches.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 7, section C. 1., states, “STS shall not conduct cross-gender strip searches or cross-gender visual body except when performed for health-related reasons by medical personnel such as; Medical Doctor (MD), Physician Assistant (PA), Advanced Registered Nurse Practitioner (ARNP), Registered Nurse (RN) and Licensed Practical Nurse (LPN) levels of licensure.”

(b) State Training School for Boys PAQ states the facility does not permit cross-gender pat-down searches of female residents, absent exigent circumstances. The number of pat-down searches of female residents that were conducted by male staff has been zero. The number of pat-down searches of female residents conducted by male staff that did not involve exigent circumstance(s) has been zero.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 7, section C. 2., states, “STS shall not conduct cross-gender pat-down searches except in exigent circumstances. Any cross-gender pat-down searches shall be documented and justified.”

(c) State Training School for Boys PAQ states the facility policy requires that all cross-gender strip searches, cross-gender visual body cavity searches, and cross-gender pat-down searches be documented and justified. Policy compliance can be found in provision (b) of this standard.

(d) State Training School for Boys PAQ states the facility has implemented policies and procedures that enable Residents to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks (this includes viewing via video camera).

	<p>Policies and procedures require staff of the opposite gender to announce their presence when entering a resident housing unit/areas where residents are likely to be showering, performing bodily functions, or changing clothing.</p> <p>State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 7, section C. 3-4., states,</p> <p>3. “Students shall be permitted to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cottage checks.</p> <p>4. Staff of the opposite gender of the student(s) shall announce their presence when entering a student cottage/housing unit or any area where students are likely to be showering, performing bodily functions, or changing clothing.”</p> <p>The facility provided an STS Staff Training PREA Prevention &amp; Response PowerPoint demonstrating Prevention-Search Policy is in the facility training.</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<b>115.316</b>	<b>Residents with disabilities and residents who are limited English proficient</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> <li>3. Lionbridge Global Solutions II Inc., Interpretation and Translation Services, dated 01.01.2026</li> <li>4. Iowa Department of Human Services Boys State Training School PREA Refresher: Helping Students with a Learning Disability, not dated</li> </ol>

Interviews:

1. Targeted Students
2. Youth Service Worker

Interviews with three cognitive students demonstrated each was knowledgeable of the agency's zero tolerance policy, their right to be free from sexual abuse and sexual harassment, and multiple reporting options. Students reported they could report directly to staff, call the PREA hotline by dialing 211 from a student pay phone, submit a grievance form available on the wall, or report to a trusted adult.

The interview with the Youth Service Worker demonstrated that students are provided PREA education through a questionnaire that explains the agency's zero tolerance policy, reporting options, and resident rights, including both internal and external reporting methods. The Youth Service Worker reported that students are required to achieve a 100% score on the associated quiz, and if not achieved, additional instruction is provided to ensure comprehension. Students who are limited English proficient are provided access to interpretation services through staff or a language line services.

Site Observations:

During the onsite review, student-designed materials and "No Means No" posters were observed posted throughout the facility, including in each cottage, the school, canteen, recreation center, and administrative areas.

During the onsite review, three cognitive student files were reviewed utilizing the PREA Audit - Juvenile Facilities Documentation Review - Resident Files/Records template. Documentation demonstrated each student received PREA education at intake and again within 10 days of arrival, consistent with PREA requirements.

(a) State Training School for Boys PAQ states the agency has established procedures to provide disabled Residents equal opportunities to be provided with and learn about the agency's efforts to prevent, detect and respond to sexual abuse and sexual harassment.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 7, section D.1., states, "STS shall take appropriate steps to ensure students with disabilities and students with limited English language skills are aware of its zero tolerance for any form of sexual abuse by staff or other students or sexual harassment by staff or other students. Reasonable steps will also be taken to ensure

meaningful access to all aspects of efforts to prevent, detect, and respond, including steps to provide professional interpreters who can interpret effectively, accurately, and impartially [refer to State of Iowa Master Agreement with Language Link].”

The facility provided a one-page document titled: Boys State Training School PREA Refresher: Helping Students with a Learning Disability. This guide instructs staff on the following:

- Can a Staff Provide Reading Assistance?
- Strategies for Assisting a Student with a Learning or Reading Disability

The facility provided a Lionbridge Global Solutions II Inc., Interpretation and Translation Services contract demonstrating the contract is for interpretation and translation services and related solutions for all state agencies and political subdivisions use.

(b) State Training School for Boys PAQ states the agency has established procedures to provide residents with limited English equal opportunity to participate in or benefit from all aspects of the agency’s efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Policy compliance can be found in provision (a) of this standard.

(c) State Training School for Boys PAQ states the agency policy prohibits use of resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident’s safety, the performance of first-response duties under §115.364, or the investigation of the resident’s allegations. If YES, the agency or facility documents the limited circumstances in individual cases where resident interpreters, readers, or other types of resident assistants are used. In the past 12 months, the number of instances where resident interpreters, readers, or other types of resident assistants have been used and it was not the case that an extended delay in obtaining another interpreter could compromise the resident’s safety, the performance of first-response duties under §115.364, or the investigation of the resident’s allegations was zero

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 8, section D.2., states, “STS shall not rely on student interpreters, student readers, or other types of student assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the student’s

	<p>safety, the performance of first-response duties or the investigation of the student's allegation.”</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<b>115.317</b>	<b>Hiring and promotion decisions</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Human Resource Technical Assistant</li> </ol> <p>Interviews with the Human Resource Technical Assistant demonstrated the initial criminal history check was completed before hire, and upon promotion. The Human Resource Technical Assistant was aware criminal history checks were subsequently completed every five years after the employee hire date. The Human Resource Technical Assistant was aware and could demonstrate Administrative Adjudication questions were asked during the hiring and promotion processes and institutional reference questions were asked and documented for applicable employees.</p> <p>Site Review Observation:</p> <p>20 personnel files were reviewed by utilizing the PREA Audit Documentation Review – Employee Files / Records review template. Record review demonstrated each employee had been asked administrative adjudication questions during the completion of the interview and or at promotion and an institutional reference request had been completed on the one applicable employee.</p> <p>(a) State Training School for Boys PAQ states the Agency policy prohibits hiring or promoting anyone who may have contact with residents, and prohibits enlisting the</p>

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); • 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 • Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 8, section E. 3., states, “STS shall ask all applicants and employees who may have contact with students directly about previous misconduct related to sexual abuse or sexual harassment in written applications or interviews for hiring or promotion and in any interviews or written self-evaluations conducted as part of reviews of current employees. STS shall also impose upon employees a continuing affirmative duty to disclose any such misconduct. Material omissions regarding such misconduct or the provision of materially false information shall be grounds for termination.”

(b) State Training School for Boys PAQ states agency policy requires the consideration of any incidents of sexual harassment when determining to hire and or promote anyone, or to enlist services of any contractor, who may have contact with youth.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 8, section E. 1., states, “A person, who STS is aware, has been convicted or charged with sexual abuse or sexual harassment, as defined by this policy, shall not be hired. Employees, who have engaged in sexual abuse or sexual harassment, as defined by this policy will be subject to progressive discipline and potential termination.”

(c) State Training School for Boys PAQ states agency policy requires that before it hires any new employees who may have contact with residents, it (a) conducts criminal background record checks; (b) consults any child abuse registry maintained by the State or locality in which the employee would work; and (c) consistent with Federal, State, and local law, makes 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. In the past 12 months, the number of persons hired who may have contact with residents who have had criminal background record checks was 53.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 8, section E. 2., states, "Before hiring new employees, who may have contact with students, the State Training School shall perform a criminal background check, consult any child abuse registry maintained by the State of Iowa Department of Criminal Investigations (DCI), and make its best effort to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of sexual abuse."

(d) State Training School for Boys PAQ states the agency policy requires that a criminal background records check be completed and applicable child abuse registries consulted before enlisting the services of any contractor who may have contact with residents. In the past 12 months, the number of contracts for services where criminal background record checks were conducted on all staff covered in the contract who might have contact with residents is four.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 8, section E. 4., states, "The State Training School shall perform a criminal background check before enlisting the services of any contractor who may have contact with students. The State Training School shall consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with students."

(e) State Training School for Boys PAQ states the agency policy requires that either criminal background records checks be conducted at least every five years of current employees and contractors who may have contact with residents or that a system is in place for otherwise capturing such information for current employees.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 8, section E. 5., states, "STS shall perform a criminal background check before enlisting the services of any contractor who may have contact with students. STS shall consider any incidents of sexual harassment in determining whether to enlist the services of any contractor who may have contact with students."

(g) State Training School for Boys PAQ states that agency policy states that material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination. Policy compliance can be found in provision (a) of this standard.

	<p>(h) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 8, section E. 6., states, “In accordance with current state and federal laws, the State Training School 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.”</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<b>115.318</b>	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Deputy Superintendent / PREA Compliance Manager</li> </ol> <p>The interview with the Deputy Superintendent demonstrated the facility currently operates approximately 270 cameras, including the addition of approximately 60 new cameras since the last PREA audit in 2023. The Deputy Superintendent reported that cameras are rarely out of service and, when issues arise, they are typically resolved quickly through system reboot or replacement. The facility maintains additional cameras on hand to ensure timely replacement when needed. The Deputy Superintendent further reported that since the last PREA audit, all dorms have been upgraded and replaced with single wet cells within each cottage.</p> <p>Site Observations:</p> <p>Camera footage was reviewed in the Deputy Superintendent’s office and included coverage of cottages, hallways, school and classrooms, gymnasium, de-escalation room, observation rooms, vocational building, reception area, library, MSDR rooms, and kitchen. In observation rooms, toilets were observed to be covered with gray boxes to ensure privacy. All cameras reviewed appeared clear and functional.</p>

	<p>(a) State Training School for Boys PAQ states the facility has made substantial expansions or modifications to existing facilities since the last PREA audit.</p> <p>(b) State Training School for Boys PAQ states the agency, or facility has installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<b>115.321</b>	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> <li>3. Memorandum of Understanding Crisis Intervention Service, dated 5.8.2025</li> <li>4. Memorandum of Understanding, Johnson County Sexual Assault Response Team, dated 4.26.2025</li> <li>5. Intergovernmental Agreement, dated 7.1.2025</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Youth Counselor Supervisor / Investigator</li> <li>2. Treatment Service Director / Investigator</li> <li>3. Nurse Supervisor</li> </ol> <p>The interviews with Investigators demonstrated the agency conducts administrative investigations, while local law enforcement and the Department of Inspections &amp; Appeals are responsible for investigations involving allegations of a criminal nature.</p>

The interview with the Nurse Supervisor demonstrated that students are transported to a University of Iowa hospital for forensic medical examinations, as the facility is under contract with the Johnson County Sexual Assault Response Team. The Nurse Supervisor explained that staff contact the team in advance, and the team directs transporting staff to the appropriate location where a SANE nurse is available to conduct the examination.

Site Observations:

There were no sexual abuse allegations reported within the past 12 months that required a forensic medical examination.

(a) State Training School for Boys PAQ states the agency/facility is responsible for conducting administrative sexual abuse investigations (including resident-on-resident sexual abuse or staff sexual misconduct). The agency/facility is not responsible for conducting criminal sexual abuse investigations (including resident-on-resident sexual abuse or staff sexual misconduct). Criminal Investigations are conducted by Department of Inspections & Appeals. When conducting a sexual abuse investigation, the agency investigators follow a uniform evidence protocol.

(b) State Training School for Boys PAQ states the protocol being developmentally is appropriate for youth. The protocol was adapted from or otherwise based on the most recent edition of the DOJ's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011.

(c) State Training School for Boys PAQ states the facility offers all residents who experience sexual abuse access to forensic medical examinations. Forensic examinations are offered at no cost to the victim. Where possible, all examinations are conducted by SAFE or SANE examiners. There has been zero medical exam, SAFE/SANE exam performed in the last 12 months.

The facility provided a Memorandum of Understanding (MOU) between the Johnson County Sexual Assault Response Team and State Training School. The purpose of the MOU is to establish written agreement that is in compliance with the Prison Rape Elimination Act (PREA) standards, concerning the coordination and efforts and assets between the State Training School (STS) and the Johnson County Sexual Assault Response Team (JCSART) with conducting Sexual Assault Nurse Examiner

(SANE) exams at University of Iowa Hospital and Clinics (UIHC) for alleged victims of sexual assault incidents involving STS students. The MOU is signed by the JCSART/SANE Coordinator on 4.26.2025

(d) State Training School for Boys PAQ states the facility attempts to make a victim advocate from a rape crisis center available to the victim, in person or by other means. All efforts are documented. If a rape crisis center is not available to provide victim advocate services. The facility does employ qualified staff member to accompany victims.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page, 9., section, II. A. 3., states, "STS shall offer advocacy services from a sexual assault service provider to the student victim. If requested by the student victim, the victim advocate shall be asked to accompany and support the student victim through the forensic medical exam and investigatory interview to provide emotional support; crisis intervention, information, and referrals (Refer to Memorandum of Understanding with Crisis Intervention Services)."

The facility provided a Memorandum of Understanding (MOU) Crisis Intervention Service. Page 1, section Purpose, states, "To establish written procedures that are in compliance with the Prison Rape Elimination Act (PREA) standards, concerning the exchange of information and the coordination of efforts and assets between the State Training School (STS) and Crisis Intervention Services with sexual assault or abuse concerns/incidents involving STS students." This MOU appears to expire and must be renewed annually. The MOU is signed and dated by the Crisis Intervention Services Executive Officer.

(e) State Training School for Boys PAQ states if requested by the victim, a victim advocate, or qualified agency staff member, or qualified community-based organization staff member accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provides emotional support, crisis intervention, information, and referrals. Policy compliance can be found in provision (d) of this standard.

(f, g) State Training School for Boys PAQ states if the agency is responsible for investigating administrative or criminal allegations of sexual abuse and relies on another agency to conduct these investigations, the agency has requested that the responsible agency follow the requirements of paragraphs §115.321 (a) through (e) of the standards. The investigative policy is posted on the facility website at <https://hhs.iowa.gov/mhds/mental-health/in-patient/juvenile-facility/eldora/prea>

	<p>The facility provided an Intergovernmental Agreement between the Iowa Department of Health and Human Services and the Iowa Department of Inspections, Appeals, &amp; Licensing (DIAL). The contract is current and appears to expire on 6.30.2026. The agreement may be renewed for up to five (5) one (1) year terms, not to exceed a contract limit of six (6) years, or through July 31, 2030. The contract is electronically signed by the Deputy Director, Iowa's Department of Inspections, Appeals and Licensing and the Deputy Director, Iowa Department of Health and Human Services.</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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115.322	Policies to ensure referrals of allegations for investigations
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Youth Counselor Supervisor / Investigator</li> <li>2. Treatment Service Director / Investigator</li> </ol> <p>The interviews with Investigators demonstrated that all allegations of sexual harassment and sexual abuse are investigated, regardless of the source of the allegation. Investigators reported that each allegation is taken seriously and processed in accordance with established investigative procedures.</p> <p>Site Observations:</p> <p>In the past 12 months, there were three allegations of sexual harassment referred for investigation. A review of these investigations demonstrated that each allegation was responded to on the same day it was received. Documentation further demonstrated that investigations were conducted in a thorough and objective</p>

manner by facility personnel throughout the investigative process.

(a) State Training School for Boys PAQ states the agency ensures that an administrative or criminal investigations are completed for all allegations of sexual abuse and sexual harassment. In the past 12 months the facility has had three allegations of sexual harassment that were received. In the past 12 months, the number of allegations resulting in an administrative investigation was three.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 9, section II. B. 1., states, "STS shall ensure that an administrative, Department of Inspections, Appeals, & Licensing (DIAL) or criminal investigation is completed for all allegations of sexual abuse and sexual harassment as appropriate based on the particulars of the allegation."

(b-d) State Training School for Boys PAQ states the agency has a policy that requires allegations of sexual abuse or sexual harassment be referred for investigation to an agency with the legal authority to conduct criminal investigations, including the agency if it conducts its own investigations, unless the allegation does not involve potentially criminal behavior. The agency's policy regarding the referral of allegations of sexual abuse or sexual harassment for a criminal investigation is published on the agency website or made publicly available via other means. The facility has published their investigation policy on their website at <https://hhs.iowa.gov/mhds/mental-health/in-patient/juvenile-facility/e-Idora/prea>

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 9-10, section II. B. 2-3., state,

2. "STS shall ensure allegations of sexual abuse and/or sexual harassment are referred to the appropriate agency with the legal authority to conduct criminal and/or abuse investigations. If the allegation does not involve potentially criminal behavior the State Training School will conduct its own investigation per facility guidelines/protocols. These guidelines/protocols will be published on the State Training School website for the public's information. All such referrals shall be documented.

3. Local law enforcement and DIAL are responsible for conducting criminal and/or abuse investigations, such publication shall describe the responsibilities of the State Training School, local law enforcement and DIAL."

Based on the review of documentation, observations, and interviews, the facility

	meets the standard requirements.
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<b>115.331</b>	<b>Employee training</b>
	<p><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> <li>3. STS Staff Training PREA Prevention &amp; Response PowerPoint, not dated</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Youth Service Workers</li> </ol> <p>Interviews with facility staff demonstrated staff are aware of and receive initial and annual PREA training. Both newly hired personnel and tenured staff demonstrated receipt of documented, in-person PREA education on an annual basis, as well as training through email notifications and the facility's Workday training system.</p> <p>Site Observation:</p> <p>During the onsite review, 24 staff files were reviewed utilizing the PREA Audit - Juvenile Facilities Documentation Review - Employee Files / Records Review template. Documentation demonstrated all staff completed initial and annual PREA training in 2025 and 2026. Newly hired staff had upcoming annual training due dates documented.</p> <p>(a) State Training School for Boys PAQ states the agency trains all employees who may have contact with Residents in all required provisions of this standard.</p> <p>State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 10, section III. A. 1., states, "The State Training School shall train all new and existing employees who may have contact with students on:</p> <ol style="list-style-type: none"> <li>a. State Training School zero-tolerance policy for sexual abuse and sexual</li> </ol>

harassment.

- b. How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures;
- c. Students' right to be free from sexual abuse and sexual harassment;
- d. The right of students and employees to be free from retaliation for reporting sexual abuse or harassment;
- e. The dynamics of sexual abuse and harassment in juvenile facilities;
- f. The common reactions of juvenile victims of sexual abuse and sexual harassment;
- g. How to detect and respond to signs of threatened and actual sexual abuse and how to distinguish between agreed upon sexual contact and sexual abuse between students;
- h. How to avoid inappropriate relationships with students;
- i. How to communicate effectively and professionally with all students, including lesbian, gay, bisexual, transgender, intersex, and gender non-conforming students;
- j. How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities."

The facility provided an STS Staff Training PREA Prevention & Response PowerPoint Presentation. Slides of the presentation provide direction on the following topics.

- Prison Rape Elimination Act
- PREA Misconduct
- Zero Tolerance Policy
- Staff Sexual Misconduct
- Common Reactions
- Healthy Sexual Development
- Iowa Code - Age of Consent
- Dynamics of Sexual Abuse / Harassment in Facilities
- Student Reporting
- Staff Response-Intervention & Reporting
- Mandatory Reporting

- Staff and Facility Reporting Duties
- Investigations
- Consensual or Abuse
- Preventative Measures at Intake
- Prevention-Skill Building & Cultural Competency
- Avoiding Inappropriate Relationships with Students
- Preventative Staff Behavior
- Preventative-Practicing Cultural Competency
- LGBTQIA Students
- Communicating with LGBTQIA
- Search Policy 2A-15 Strip Searches
- Other Preventative Measures
- Protection from Retaliation

(b) State Training School for Boys PAQ states training is tailored to the unique needs and attributes and gender of residents at the facility.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 10, section III. A. 2., states, "Such training shall be tailored to suit the needs, attributes, and gender of the students of the State Training School."

(c) State Training School for Boys PAQ states between trainings the agency provides employees who may have contact with residents with refresher information about current policies regarding sexual abuse and sexual harassment. The frequency with which employees who may have contact with residents receive refresher training on PREA requirements is through annual refreshers. The facility utilizes the PowerPoint training found in provision (a) of this standard for refresher training.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 10, section III. A. 3., states, "All current employees will receive PREA training as detailed in section 1 above within six months of the effective date of this policy and will be provided with refresher training every two years to ensure that all employees know

the State Training School current sexual abuse and sexual harassment policies and procedures. In the years in which an employee does not receive refresher training, the agency shall provide information on current sexual abuse and sexual harassment policies.”

(d) State Training School for Boys PAQ states, “Yes, we have a system online that they must pass the test to complete. Attached above is the completed list of staff for 2025. In addition to passing the competency assessment staff affirm they understand the training they received through electronic verification.”

Based on interviews, documentation, and observations, the facility exceeds compliance with this standard. Documentation demonstrated staff receive PREA training on an annual basis, exceeding the standard requirement for policy review every two years. Interviews with staff further demonstrated awareness of PREA policies and procedures, as well as the ability to articulate key concepts related to prevention, detection, reporting, and response. The consistent delivery of annual training, combined with staff comprehension and documentation, reflects a proactive and sustained approach to PREA education that exceeds the requirements of this standard.

115.332	Volunteer and contractor training
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> <li>3. Training Manual Contract Staff &amp; Volunteers, State Training School, dated 2025-2026</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Volunteer - Religious Services</li> <li>2. Contractor - Aftercare Services (Life Skills)</li> <li>3. Contractor - Program Coordinator for Substance Abuse</li> </ol>

Interviews with volunteers and contractors demonstrated each completes annual PREA education, including in-person training on the facility's zero tolerance policy alongside facility staff. Volunteers and contractors were able to articulate preventative measures, including maintaining appropriate boundaries with students, avoiding physical contact, and reporting any knowledge, suspicion, or information related to sexual harassment or sexual abuse.

Site Observation:

During the onsite review, contractor and volunteer training records were reviewed utilizing the PREA Audit - Juvenile Facilities Documentation Review - Employee Files / Records Review template. Documentation demonstrated all contractors completed initial and annual PREA training in 2024, 2025 and 2026. File review further demonstrated newly onboarded volunteers completed PREA training in late 2025.

(a) State Training School for Boys PAQ states all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and harassment prevention, detection, and response. The number of volunteers and contractors, who have contact with residents, who have been trained in agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response is 37.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 10, section B.1., states, "

1. "STS shall ensure that all volunteers and contractors who have contact with students have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures.
2. The level and type of training provided to volunteers and contractors shall be based on the services they provide and the level of contact they have with students, but all volunteers and contractors who have contact with students shall be notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents."

The facility provided a Training Manual Contract Staff & Volunteers, State Training School with the PREA learning objectives. The final page of the manual has the following volunteer/contractor attestation. "I confirm, by signing below, that I have carefully reviewed the content of the Contract Staff and Volunteer Training Manual. I will adhere to the rules and guidelines stated therein as long as I am serving at the State Training School.

(b) State Training School for Boys PAQ states the level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with residents. All volunteers and contractors who have contact with residents have been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

(a) State Training School for Boys PAQ states the agency maintains documentation confirming that the volunteers and contractors understand the training they have received.

Based on interviews, documentation, and observations, the facility exceeds compliance with this standard. Interviews with volunteers and contractors demonstrated annual PREA training is provided in person alongside facility staff, reinforcing consistent expectations and understanding of PREA requirements. Volunteers and contractors were able to clearly articulate preventative measures, professional boundaries, and reporting responsibilities, demonstrating retention and comprehension of training material. Documentation further demonstrated consistent completion of initial and annual training for contractors, as well as timely training for newly onboarded volunteers. The integration of volunteers and contractors into the facility's ongoing PREA training program, combined with demonstrated understanding and consistent documentation, reflects a comprehensive and sustained approach to PREA education that exceeds the requirements of this standard.

115.333	Resident education
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> <li>3. Post-Intake PREA Follow Up, dated 3.2023</li> <li>4. Speak Up Speak Out Flyer, not dated</li> </ol>

5. State Training School Student Handbook, dated 8.21.2025

Interviews:

1. Random Students
2. Targeted Students
3. Youth Service Worker

Interviews with 10 students demonstrated knowledge of the agency's zero tolerance policy, their right to be free from sexual abuse and sexual harassment, and their responsibility not to sexually abuse or sexually harass others. Students were able to identify multiple internal and external reporting options, including calling 211 from a student phone, reporting to a trusted adult or staff member, submitting a grievance form available in their cottages, and reporting anonymously.

The interview with the Youth Service Worker demonstrated that PREA education is provided to students upon arrival at the facility. The Youth Service Worker reported reading a questionnaire that outlines the agency's zero tolerance policy, student rights, reporting mechanisms, including both internal and external reporting options. Students are then administered a quiz and are required to achieve a score of 100%. If a student does not achieve a passing score, the information is reviewed again to ensure comprehension.

Site Observations:

During the onsite review, 10 student files were reviewed utilizing the PREA Audit - Juvenile Facilities Documentation Review - Resident Files/Records template. File review demonstrated each student received initial and comprehensive PREA education within 72 hours of intake, typically on the same day of admission, and again within 10 days of intake.

(a) State Training School for Boys PAQ states residents receive information at time of intake about the zero-tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment. In the past 12 months 65 residents were given information at intake.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 11, section C. 1., states, "During the intake process, students shall receive information explaining, in an age-appropriate fashion, the agency's zero tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or

suspicious of sexual abuse or sexual harassment.”

The facility provided a Post-Intake PREA Follow Up providing youth with the following information PREA information.

- PREA governs sexual behavior between and among students and between staff and students.
- State Training School has a zero-tolerance policy toward ALL forms of sexual abuse and sexual harassment.
- ALL students have the right to be free from sexual abuse and sexual harassment while enrolled at the State Training School.
- To protect students, sexual behaviors between and/or among students are NOT allowed.
- Students SHOULD notify staff if experiencing or witnessing sexual abuse and/or harassment at STS.
- Cross-gender strip searches are NOT allowed at STS, unless urgent circumstances exist in which same-gender staff are not available.
- Visual and/or physical body cavity searches are NOT allowed at STS.
- ALL STS Staff are mandatory reporters of child abuse while on duty.
- STS investigates ALL complaints and allegations of sexual abuse and harassment.
- Students may report sexual abuse or sexual harassment by:
  - o Verbally communicating to staff
  - o Calling Crisis Intervention Services (#211)
  - o Writing a grievance
  - o Reporting to outside parties
- Outside parties (Family, JCOs, Attorneys, other advocates) may report sexual abuse or sexual harassment by:
  - o Communicating to STS directly
  - o Contacting outside agencies (Department of Inspections & Appeals (DIA)/Crisis Intervention Services)
  - o Emailing [prea.report@dhs.state.ia.us](mailto:prea.report@dhs.state.ia.us)
- ALL students have the right to be free from retaliation from reporting sexual

abuse or harassment.

- To ensure safety from retaliation, STS staff conduct regular retaliation checks on students reporting sexual abuse and sexual harassment.

(b) State Training School for Boys PAQ states the number of those residents admitted in the past 12 months who received comprehensive age-appropriate education on their rights to be free from sexual abuse and sexual harassment, from retaliation for reporting such incidents, and on agency policies and procedures for responding to such incidents within 10 days of intake was 62.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 11, section C. 2., states, "Within 10 days of intake, the State Training School shall provide comprehensive age-appropriate education to students either in person or through video 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."

(c) State Training School for Boys PAQ states of those who were not educated during 10 days of intake, all residents have been educated subsequently. All juveniles have been trained. Agency policy requires that residents who are transferred from one facility to another be educated 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 to the extent that the policies and procedures of the new facility differ from those of the previous facility.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 11, section C. 3., states, "Current students who have not received such education shall be educated within two weeks of the effective date of this policy and shall receive education upon transfer to a different facility to the extent that the policies and procedures of the student's new facility differ from those of the previous facility."

(d) State Training School for Boys PAQ states Resident PREA education is available in accessible formats for all residents including those who are limited English proficient, deaf, visually impaired, otherwise disabled or have limited reading skills.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 11, section C. 4., states, "STS shall provide student education in formats accessible to

all students, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to students who have limited reading skills.”

(e) State Training School for Boys PAQ states the facility maintains documentation of resident participation in PREA education sessions.

The facility provided a Post-Intake PREA Follow Up having student attest to the following. “I have completed supplemental training on the Prison Rape Elimination Act (PREA) within my first ten days of admission and understand the following standards and expectations that the State Training School must meet to remain in PREA compliance.”

(f) State Training School for Boys PAQ states the agency ensures that key information about the agency’s PREA policies is continuously and readily available or visible through posters, resident handbooks, or other written formats.

The facility provided a State Training School Student Handbook. Page 7-8 provides students information on the following.

- Facility zero-tolerance policy
- Student Rights
- Sexual Abuse / Sexual Harassment definitions
- Internal reporting to include the grievance procedures
- External hotline reporting information
- Protecting yourself against sexual intimidation

The facility provided a Speak Up Speak Out Flyer providing youth with hotline, and reporting information.

Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Document Review:

1. State Training School for Boys PAQ
2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025
3. Investigating Sexual Harassment and Abuse Training 2021 PowerPoint
4. PREA Investigator Training, dated 2020
5. State of Iowa Department of Health and Human Services PREA: Investigations - Specialized Training certificates of completion

Interviews and on site file review:

1. Youth Counselor Supervisor / Investigator
2. Treatment Services Director / Investigator

The interviews with Investigators demonstrated each has completed specialized training for conducting sexual harassment investigations through the National Institute of Corrections and the State of Iowa Department of Health and Human Services.

Site Observations:

Documentation review demonstrated both Investigators have completed the required specialized training, as evidenced by certificates of completion. Training records reflected instruction specific to conducting sexual abuse and sexual harassment investigations in confinement settings, consistent with PREA requirements.

(a-b) State Training School for Boys PAQ states the agency policy requires that investigators are trained in conducting sexual abuse investigations in confinement settings.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 11-12, section D. 1-2., state, “

1. "In addition to the general training provided to all employees, the State Training School shall ensure that, to the extent the agency itself conducts sexual abuse investigations as appropriate its upper-level management have received training in conducting such investigations.
2. Specialized training shall include techniques for interviewing juvenile sexual abuse victims, sexual abuse evidence collection in similar settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral."

The facility provided Investigating Sexual Harassment and Abuse Training 2020 PowerPoint. The training includes the following objectives.

- Goals of Investigations
- Types of Investigations
- What is reportable?
- Who can report?
- Investigations - General Information
- Continuum of Student-on-Student Sexual Abuse
- Dynamics of Sexual Harassment
- Staff Sexual Misconduct
- Responding to Reports
- First Responder's Role: Interacting with the Victim
- Reporting
- Documenting
- What Every Investigation Needs
- What is Evidence
- Sources of Evidence
- Sexual Assault Crime Scene
- Physical Evidence
- Chain of Custody
- Forensic Medical Examination

	<ul style="list-style-type: none"> <li>· Notifications</li> <li>· For Supervisors and Counselors</li> <li>· References</li> </ul> <p>(c) State Training School for Boys PAQ states the agency maintains documentation showing that investigators have completed the required training. The number of investigators currently employed who have completed the required training is 13.</p> <p>The facility provided 13 State of Iowa Department of Health and Human Services PREA: Investigations - Specialized Training certificates of completion demonstrating all investigators have completed the required specialized training.</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<b>115.335</b>	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> <li>3. PREA: Specialized Training Mental Health and Medical Providers, dated 2019</li> <li>4. State of Iowa Department of Health and Human Services Training Completion PREA: Medical and Mental Health Specialized PREA Training Certificates</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Nurse Supervisor</li> <li>2. Behavioral Health Professional</li> </ol> <p>The interviews with medical and mental health practitioners demonstrated each has</p>

completed specialized training through a PowerPoint curriculum provided to them through the State of Iowa. Practitioners were able to articulate key components of the training, including detection of sexual abuse, evidence collection, responding to victims, and reporting requirements. Each practitioner reported they would immediately notify the Youth Service Technician or Duty Superintendent on shift and document the allegation through an incident report.

Site Observations:

Documentation review demonstrated both practitioners have completed the required specialized training, as evidenced by certificates of completion. Training records reflected instruction specific to evidence collection, communication with victims of sexual abuse, and the detection and assessment of sexual abuse, consistent with PREA requirements.

(a) State Training School for Boys PAQ states the agency has a policy related to the training of medical and mental health practitioners who work regularly in its facilities. The number of all medical and mental health care practitioners who work regularly at this facility who received the training required by agency policy is 12.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 12, section E. 1., states, "The State Training School shall ensure that all medical and mental health care personnel who work regularly in its facilities have been trained:

- a. How to detect and assess signs of sexual abuse and sexual harassment;
- b. How to preserve physical evidence of sexual abuse;
- c. How to respond effectively and professionally to juvenile victims of sexual abuse and sexual harassment; and
- d. How and to whom to report allegations or suspicions of sexual abuse and sexual harassment."

The facility provided a PREA: Specialized Training Mental Health and Medical Providers. The training has the following learning objectives.

- Identify the dynamics and profile of sexual abuse in facilities and how it is defined in the Prison Rape Elimination Act (PREA)
- Detect signs and symptoms of both acute and prior sexual abuse
- Summarize the short- and long-term effects of trauma on the brain

	<ul style="list-style-type: none"> <li>· Describe considerations for the development of intake screening tool requirement in PREA</li> <li>· Recognize the health care provider’s role in the screening process</li> </ul> <p>(b) State Training School for Boys PAQ states their medical staff do not conduct forensic medical exams.</p> <p>(c) State Training School for Boys PAQ states the agency maintains documentation showing that medical and mental health practitioners have completed the required training.</p> <p>The facility provided 12 State of Iowa Department of Health and Human Services Training Completion PREA: Medical and Mental Health Specialized PREA Training certificates demonstrating all practitioners have completed the required specialized training.</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<b>115.341</b>	<b>Obtaining information from residents</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> <li>3. State Training School Risk of Sexual Victimization / Perpetration Screener, dated 2.28.2025</li> <li>4. Iowa State Training School – Eldora Psychosocial Evaluation</li> </ol> <p>Interviews:</p>

1. Random Students
2. Targeted Students
3. Youth Counselor Supervisor

Interviews with students demonstrated each had been asked risk screening questions, including prior sexual abuse history, whether medical and mental health services were offered regardless of past victimization or harmful behaviors, how they identify, any safety concerns upon arrival, and the presence of any physical or mental disabilities.

The interview with the Youth Counselor Supervisor demonstrated that risk assessments are completed at intake, within one year of arrival, and additionally when warranted based on new information or incidents. The Youth Counselor Supervisor reported that assessments are conducted privately in a one-on-one setting and include consideration of factors such as age, physical build, intellectual capacity, prior victimization, history of sexually harmful behavior, ability to interact with peers, vulnerability to bullying, and gang affiliation.

Site Observations:

During the onsite review, 10 student files were reviewed utilizing the PREA Audit – Juvenile Facilities Documentation Review – Resident Files/Records template. Documentation demonstrated each student had a completed risk assessment on the day of intake. Additional assessments were completed when warranted, with two students having reassessments completed near their annual intake date and three others scheduled for upcoming annual reassessments, consistent with PREA requirements.

(a) State Training School for Boys PAQ states the facility has a policy that requires screening, upon admission or transfer, for risk of sexual abuse victimization or sexual abusiveness toward other residents. The policy requires that residents be screened for risk of sexual victimization or risk of sexually abusing other residents within 72 hours of their intake. The number of residents entering the facility (either through intake or transfer) within the past 12 months whose length of stay in the facility was for 72 hours or more and who were screened for risk of sexual victimization or risk of sexually abusing other residents within 72 hours of their entry into the facility was 65.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 12, section IV. A. 1., states, “Within 72 hours of the student’s arrival at the facility and periodically throughout a student’s confinement, the State Training School shall

obtain and use information about each student's personal history and behavior to reduce the risk of sexual abuse by or upon a student."

(b-c) State Training School for Boys PAQ states the Risk assessment is conducted using an objective screening instrument.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page12-13, section IV. A. 3. states, "At a minimum, the State Training School shall attempt to ascertain information about:

- a. Prior sexual victimization or abusiveness;
- b. Any gender nonconforming appearance or manner or identification as lesbian, gay, bisexual, transgender, or intersex, and whether the student may, therefore, be vulnerable to sexual abuse;
- c. Current charges and offense history;
- d. Age;
- e. Level of emotional and cognitive development;
- f. Physical size and stature;
- g. Mental illness or mental disabilities;
- h. Intellectual or developmental disabilities;
- i. Physical disabilities;
- j. The student's own perception of vulnerability; and
- k. Any other specific information about individual students that may indicate heightened needs for supervision, additional safety precautions, or separation from certain other students."

The facility provided a State Training School Risk of Sexual Victimization / Perpetration Screener. The screener includes the following information.

1. Age of student
2. Have you been in a locked juvenile facility?
3. Do you think you get along with other people well?
4. Do you find it easy to make friends?

5. How do you feel about being in groups of people you don't know well?
6. Do you feel at risk from attack from other people?
7. Have you ever been attacked, bullied, or abused by your peers?
8. Have you ever been the victim of sexual abuse?
9. Vulnerabilities in a confinement setting, check: build, looks younger than stated age, non-English speaking, pronounced disfigurement, physical disability, deaf, appears frail, weak
10. Is there evidence this student is or has been reported as having an intellectual impairment?
11. Have you ever been arrested on a sexual offense?
12. Have you ever engaged in behavior that you would consider sexually aggressive/violent?
13. File Review: Does file indicate student has been charged with a sex offense?
14. File Review: Does the information suggest sexual aggression/violence or victimization of others?

The following questions are not scored:

1. What is your gender expression.
2. What is your sexual orientation
3. Which if the following best fits your current situation?

The screening has an overall score for vulnerability to sexual victimization or propensity towards sexual perpetration.

In addition, the facility provided the Iowa State Training School – Eldora Psychosocial Evaluation, demonstrating that each youth admitted into the program is assessed to determine whether the youth have a mental illness or mental disability.

(d) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page14, section IV. A. 4., states, "This information shall be ascertained through conversations with the student during the intake process and medical and mental health screenings, during classification assessments, and by reviewing court

	<p>records, case files, facility behavioral records, and other relevant documentation from the student's files.”</p> <p>(e) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page13 section IV. A. 5, states, “ STS shall implement appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard to ensure that sensitive information is not exploited to the student's detriment by staff or other students.</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<b>115.342</b>	<b>Placement of residents</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Targeted Students</li> <li>2. Youth Service Workers</li> <li>3. Deputy Superintendent / PREA Compliance Manager</li> <li>4. Executive Officer / PREA Coordinator</li> </ol> <p>Interviews with two vulnerable students, two cognitively delayed students, one gay student, and two students who reported sexual harassment or sexual abuse while residing in the facility demonstrated they feel comfortable within their cottages, staff are respectful, and staff respond appropriately to reports, with each student reporting concerns directly to staff members. One targeted student who identified as part of the LGB population reported being bullied by another student. Upon follow-up with the Deputy Superintendent and Executive Officer, this Auditor was informed the student had been identified as having behavioral concerns and is</p>

currently on a safety plan.

Interviews with Youth Service Workers, the PREA Compliance Manager, and the PREA Coordinator demonstrated cottage staff are made aware of student safety crisis plans, including when a student is identified as vulnerable or aggressive, allowing staff to maintain increased supervision and ensure appropriate separation during meals, in classrooms, and within educational settings, including the use of separate rooms when necessary. Administration communicates student risk levels through email communications to cottage staff and conducts daily meetings to discuss student behaviors, placement decisions, and schedule assignments. Staff are advised to maintain heightened awareness of students exhibiting harmful behaviors. Placement within cottages and school schedules is determined collaboratively, with input from multiple directors, reflecting a team-based approach to supervision and safety.

(a) State Training School for Boys PAQ states the facility uses information from the risk screening required by §115.341 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 13, section B. 1., states, "STS shall use all information obtained through the intake screening to make housing, bed, program, education, and work assignments for students with the goal of keeping all students safe and free from sexual abuse and sexual harassment.

(b) State Training School for Boys PAQ states the facility has a policy that residents at risk of sexual victimization may only be placed in isolation as a last resort if less restrictive measures are inadequate to keep them and other residents safe, and only until an alternative means of keeping all residents safe can be arranged. The number of residents at risk of sexual victimization who were placed in isolation in the past 12 months was zero.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 13, section B. 2., states, "Students may be isolated from others only as a last resort when less restrictive measures are inadequate to keep them and other students safe, and then only until an alternative means of keeping all students safe can be arranged. During any period of seclusion, the State Training School shall not deny students daily large-muscle exercise and any legally required educational programming or special education services. Students in seclusion shall receive daily

	<p>visits from medical or mental health care personnel. Students shall also have access to other programs and work opportunities to the extent possible.”</p> <p>(h) State Training School for Boys PAQ states from a review of case files of residents at risk of sexual victimization who were held in isolation in the past 12 months was zero.</p> <p>(i) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 14, section B. 9., states, “Every 30 days, the State Training School shall afford each isolated student a review to determine whether there is a continuing need for separation from the general population.”</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<b>115.351</b>	<b>Resident reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> <li>3. State Training School Policy 4D-02 PREA Reporting Abuse, Neglect and Sexual Abuse, dated 1.31.2025</li> <li>4. Student Handbook &amp; Rights Manual, State Training School, dated 2025</li> <li>5. Post-Intake PREA Follow Up, dated 3.2023</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Random Students</li> <li>2. Targeted Students</li> <li>3. Youth Service Workers</li> </ol>

Interviews with students demonstrated their knowledge of PREA through facility postings, including student-designed materials, and a clear awareness of multiple reporting options. Students reported access to contact phone numbers and addresses through their handbooks, as well as “No Means No” postings located in their cottages.

Interviews with staff demonstrated they would accept allegations regardless of how they are received, including reports made in person, through written notes with or without a name, third-party reports, or through the grievance process.

Site Observations:

The facility has an established practice of students designing PREA posters displayed throughout the facility, which promotes awareness among both students and staff. Additionally, “No Means No” postings containing multiple internal and external reporting options, including contact information, were observed in the cottages, canteen, school, and administrative building.

(a) State Training School for Boys PAQ states the agency has established procedures allowing for multiple internal ways for residents to report privately to agency officials about sexual harassment, abuse, retaliation and or any type of neglect.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 15, section V. A. 1., states, “The State Training School shall provide multiple internal ways for students to privately report sexual abuse and sexual harassment, retaliation by other students or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.”

The facility provided a State Training School Student Handbook. Page 7-8, provides students information on the following.

- Facility zero-tolerance policy
- Student Rights
- Sexual Abuse / Sexual Harassment definitions
- Internal reporting to include the grievance procedures
- External hotline reporting information

- Protecting yourself against sexual intimidation

The facility provided a Crisis Intervention Service Poster providing #211 as an option to dial for services.

(b) State Training School for Boys PAQ states facility provides at least one way for residents to report abuse or harassment to a public or private entity or office that is not part of the agency. The agency does not have a policy requiring residents detained solely for civil immigration purposes be provided detention facility locator information.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 15, section V. A. 2., states, "The State Training School shall provide a toll free phone line dedicated for students to use for reporting abuse or harassment to an outside agency. The outside agency is not part of the State Training School or the Department of Human Services and will be able to receive and immediately forward student reports of sexual abuse and sexual harassment to State Training School officials, as well as other investigatory bodies while allowing the student to remain anonymous upon request. The following agency contact number will be posted: Crisis Intervention Services Sexual Assault Hotline (800-479-9071) #211"

The facility provided a Post-Intake PREA Follow Up where students attest to the following, "have completed supplemental training on the Prison Rape Elimination Act (PREA) within my first ten days of admission and understand the following standards and expectations that the State Training School must meet to remain in PREA compliance"

(c) State Training School for Boys PAQ states the agency has a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously and from third parties. The agency has a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously and from third parties.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 15, section V. A. 3., states, "Staff shall accept reports made verbally, in writing, anonymously, and from third parties and shall promptly document any verbal reports."

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 5, section XVIII., states, “Any employee, contractor, or volunteer shall report within 24 hours or on the next scheduled working day any allegation or founding of abuse or being arrested for, charged with, or convicted of any felony or misdemeanor against the person arising from the person’s actions outside the work place.”

(d) State Training School for Boys PAQ states the facility provides residents with access to tools to make written reports of sexual abuse or sexual harassment, retaliation by other residents or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 15, section V. A. 4., states, “The State Training School shall provide students with access to tools necessary to make a written report.”

(e) State Training School for Boys PAQ states the agency has established procedures for staff to privately report sexual abuse and sexual harassment of residents.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 15, section V. A. 5., states, “The State Training School shall provide a method for staff to privately report sexual abuse and sexual harassment of students. Staff can report in the following ways:

- a. To any supervisor by phone
- b. To any supervisor in person
- c. To any supervisor in writing (through email, interdepartmental mail, mailbox)”

Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

<b>115.352</b>	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

Document Review:

1. State Training School for Boys PAQ
2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025

Interviews:

1. Random Students
2. Targeted Students
3. Deputy Superintendent / PREA Compliance Manager

Interviews with students demonstrated their knowledge of grievance procedures. Students reported grievance forms are consistently available on the wall alongside other student forms and, if forms are not available at a given time, staff promptly provide them upon request. Students stated they could submit a grievance to a trusted staff member or place it in the grievance box located in the dayroom adding that staff check the box every day.

The interview with the PREA Compliance Manager demonstrated that he, along with another administrative staff members, checks grievance boxes six days per week.

Site Observations:

During the tour, the Auditor observed grievance boxes located in the cottages and grievance forms available in the locations described by students, including racks near the entrances of student bathrooms and sleeping areas. Grievance boxes were observed to be placed in the dayrooms of each cottage.

(a) State Training School for Boys PAQ states the agency has an administrative procedure for dealing with resident grievances regarding sexual abuse.

(b) State Training School for Boys PAQ states the agency policy or procedure allows a resident to submit a grievance regarding an allegation of sexual abuse at any time regardless of when the incident is alleged to have occurred.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 15, section B. 1., states, "The State Training School shall not impose a time limit on

when a student may submit a grievance regarding an allegation of sexual abuse; however, may apply otherwise-applicable time limits on any portion of the grievance that does not allege an incident of sexual abuse.”

(c) State Training School for Boys PAQ states the agency’s policy and procedure allows a resident to submit a grievance alleging sexual abuse without submitting it to the staff member who is the subject of the complaint. The agency’s policy and procedure requires that a resident grievance alleging sexual abuse not be referred to the staff member who is the subject of the complaint.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 16, section B. 4., states, “The State Training School shall ensure that:

a. A student who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and

b. Such grievance is not referred to the staff member who is the subject of the complaint”

(d) State Training School for Boys PAQ states the agency’s policy and procedures that require a decision on the merits of any grievance or portion of a grievance alleging sexual abuse be made within 90 days of the filing of the grievance. In the past 12 months there have been zero grievances filed alleging sexual abuse;

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 16, section B. 5., states, “The State Training School shall issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance whenever possible.

a. The 90-day time period shall not include time used by students in preparing an administrative appeal.

b. STS may claim an extension of the time to respond of up to 70 days if needed. The student shall be notified in writing of the extension.

c. The student may consider an absence of response within the time periods as a denial at that level.”

(e) State Training School for Boys PAQ states agency policy and procedure permits third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, to assist residents in filing requests for administrative

remedies relating to allegations of sexual abuse and to file such requests on behalf of residents. Agency policy and procedure requires that the resident declines to have third-party assistance in filing a grievance alleging sexual abuse, the agency documents the resident's decision to decline.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 16, section B. 6., states, "Third parties shall be permitted to assist students in filing requests for administrative remedies relating to allegations of sexual abuse and shall also be permitted to file such requests on behalf of students.

a. Third parties include other students, staff, family members, attorneys and outside advocates.

b. When requests are filed by third parties, STS may require that the alleged victim agrees with and will personally pursue any subsequent steps in the administrative remedy process. STS shall document a student's decision to decline to process a request.

c. A student's parent or legal guardian shall be allowed to file a grievance or an appeal regarding allegations of sexual abuse on behalf of the student. The grievance or appeal shall not be conditioned upon the student agreeing to have the request filed on his behalf."

(f) State Training School for Boys PAQ states the facility has a policy and established procedures for filing an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse. The facilities policy and procedures for emergency grievances alleging substantial risk of imminent sexual abuse require an initial response within 48 hours. The facilities policy and procedure for emergency grievances alleging substantial risk of imminent sexual abuse require that a final agency decision be issued within 5 days. The number of emergency grievances alleging substantial risk of imminent sexual abuse that were filed in the past 12 months was zero.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 16, section B. 7., states, "STS administrative staff shall be notified immediately when there is an allegation that a student is at substantial risk of imminent sexual abuse.

a. Immediate corrective action shall be taken with an initial response within 48 hours and final decision in five (5) calendar days, documenting whether the student is in substantial risk of imminent sexual abuse and the action taken in response."

(g) State Training School for Boys PAQ states the facility has a written policy that

	<p>limits its ability to discipline a resident for filing a grievance alleging sexual abuse to occasions where the agency demonstrates that the resident filed the grievance in bad faith. In the past 12 months, there have been zero grievances alleging sexual abuse to occasions where the agency demonstrated that the resident filed the grievance in bad faith.</p> <p>State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 16, section B. 8., states, "A student may be disciplined for filing a grievance alleging sexual abuse only when STS demonstrates that the grievance was filed in bad faith."</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<b>115.353</b>	<b>Resident access to outside confidential support services and legal representation</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> <li>3. Memorandum of Understanding Crisis Intervention Service, dated 5.8.2025</li> <li>4. Student Handbook &amp; Rights Manual, State Training School, dated 3.5.2026</li> </ol> <p>Interviews</p> <ol style="list-style-type: none"> <li>1. Random Students</li> <li>2. Targeted Students</li> <li>3. Youth Service Workers</li> </ol> <p>Interviews with students demonstrated they had been made aware of the sexual abuse victim advocacy agency and reported they could contact the advocate by dialing 211 on a student phone. Of the 10 students formally interviewed, five were</p>

not clearly aware of the specific services offered by the advocacy agency. This information was reviewed with those students during the interview process to ensure awareness of available services. Although this does not rise to the level of noncompliance, it is recommended the facility enhance student awareness of advocacy services to ensure a clear understanding of how such services may benefit them.

Interviews with Youth Service Workers demonstrated that students are permitted to use the phone to make hotline calls and contact the advocacy agency at any time.

The interview with the PREA Coordinator demonstrated that Crisis Intervention Services serves as the sexual abuse victim advocacy provider and the facility hotline, and students are permitted to report abuse through these services.

**Site Observations:**

During the tour, Crisis Intervention Services information was observed on “No Means No” postings; however, the address and direct telephone number were located in student handbooks. Student handbooks were observed to be available in racks alongside other student forms.

During the tour, Crisis Intervention Services was contacted using a student payphone. The call was answered after one ring by an operator. After introducing the purpose of the call, the Auditor confirmed it was a test call from the Iowa State Training School for Boys to verify student access to advocacy services. The operator stated that if a student reported sexual abuse, the agency would notify the PREA Director. The operator further stated the agency would accompany the student during a forensic examination and provide ongoing emotional support services as needed.

(a) State Training School for Boys PAQ states the facility provides residents with access to outside victim advocates for emotional support services related to sexual abuse. The facility provides residents with access to such services by giving residents (by providing, posting, or otherwise making accessible) mailing addresses and telephone numbers (including toll-free hotline numbers where available) for local, State, or national victim advocacy or rape crisis organizations.

· The facility provides residents (by providing, posting, or otherwise making accessible) with access to such services by giving residents mailing addresses and telephone numbers (including toll-free hotline numbers where available) for immigrant services agencies for persons detained solely for civil immigration

purposes.

- The facility provides residents with access to such services by enabling reasonable communication between residents and these organizations in as confidential a manner as possible.
- The facility does not detain solely for civil immigration purposes.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 16-17, section C. 1., states, "STS shall provide students with access to outside victim advocates for emotional support services related to sexual abuse, by providing, posting, or otherwise making accessible mailing addresses and telephone numbers, including toll-free hotlines where available, of enable reasonable communication between students and these organizations and agencies, in as confidential a manner as possible."

The facility provided a Student Handbook & Rights Manual, State Training School demonstrating youth are provided with the Crisis Intervention Services speed dial phone number when using a student phone and a post office box address.

(b) State Training School for Boys PAQ states the facility informs residents, prior to giving them access to outside support services, the extent to which such communications will be monitored. The facility informs residents, prior to giving them access to outside support services, of the mandatory reporting rules governing privacy, confidentiality, and/or privilege that apply for disclosures of sexual abuse made to outside victim advocates, including any limits to confidentiality under relevant Federal, State, or local law.

(c) State Training School for Boys PAQ states the facility maintains memoranda of understanding with community service providers that are able to provide residents with emotional support services related to sexual abuse.

The facility provided a Memorandum of Understanding (MOU) Crisis Intervention Service. Page 1, section Purpose, states, "To establish written procedures that are in compliance with the Prison Rape Elimination Act (PREA) standards, concerning the exchange of information and the coordination of efforts and assets between the State Training School (STS) and Crisis Intervention Services with sexual assault or abuse concerns/incidents involving STS students." This MOU appears to expire and must be renewed annually. The MOU is signed by the Crisis Intervention Services Executive Officer.

	<p>(d) The facility provides residents with reasonable and confidential access to their attorneys or other legal representation. The facility provides residents with reasonable access to parents or legal guardians.</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<b>115.354 Third-party reporting</b>	
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> </ol> <p>Interviews</p> <ol style="list-style-type: none"> <li>1. Random Students</li> <li>2. Targeted Students</li> <li>3. Youth Service Workers</li> <li>4. Deputy Superintendent / PREA Compliance Manager</li> </ol> <p>Interviews with students and staff demonstrated their knowledge of third-party reporting options. Students and staff reported that family members or other trusted adults could report allegations of sexual harassment or sexual abuse on behalf of a student, if needed. Staff further demonstrated an understanding that reports may be received from external sources and must be accepted and acted upon accordingly.</p> <p>Site Observations:</p> <p>During the tour of the canteen, where visitation occurs, a “No Means No” posting was observed that included external reporting information, including contact phone numbers and email addresses.</p>

(a) State Training School for Boys PAQ states the facility provides a method to receive third-party reports of resident sexual abuse or sexual harassment. The agency publicly distributes information on how to report resident sexual abuse or sexual harassment on behalf of residents. The agency website for third-party reporting is as follows: [prea.report@dhs.state.ia.us](mailto:prea.report@dhs.state.ia.us)

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 17, section D.1., states, "STS shall establish an email and toll-free line dedicated to receiving third-party reports of sexual abuse and sexual harassment and shall distribute publicly the information on how to report sexual abuse and sexual harassment on behalf of a student.

The following email and toll-free lines are established for such reporting

[prea.report@dhs.state.ia.us](mailto:prea.report@dhs.state.ia.us)

Department of Inspections, Appeals, & Licensing (DIAL) complaint line

Crisis Intervention Services Sexual Assault Hotline

On 1.28.2026 at 9:10 a.m., the following message was sent to [prea.report@dhs.state.ia.us](mailto:prea.report@dhs.state.ia.us). My name is Karen Murray and I am conducting PREA audits for The Division of Youth Services. In addition, I am conducting a review of third-party reporting procedures and am seeking clarification regarding the Division's response process when a third-party report is received via email notification. Specifically, please describe the steps taken upon receipt of a third-party report, including how the information is reviewed, documented, and routed for action; who is responsible for initiating follow-up; and how the reporting party and/or facility are notified, if applicable. This information will assist in verifying compliance with PREA reporting and response requirements.

On 1.28.2026 at 12:12 pm the following response was received. I am the PREA Compliance Manager. Troy and I receive these emails, and regularly check this mailbox.

If were to receive a 3rd party allegation, I/we would:

1. First, ensure that the alleged victim and alleged perpetrator are separated and that the alleged victim is safe. (If one or both are currently at STS). If there is a crime scene, it will be preserved pending law enforcement's investigation. I will also respond to the email indicating that it has been received and will be looked

into.

2. I would immediately document the email using our Potential PREA Evaluation Form to ensure that the process is initiated and followed. At this stage we don't determine the legitimacy of the allegation, as we address every allegation at face value and conduct fact-finding/investigation.
3. If applicable, Law enforcement will be contacted to pursue criminal charges.
4. I would assign an investigator, providing them with the details of the report, and instruct them to immediately begin the investigation.
5. If the allegation indicates sexual abuse, I/we would notify the alleged victim's parent/guardian, attorney, Juvenile Court Officer, the Institutional Superintendent, the PREA Coordinator, Cottage Counselor, and the Cottage Director.
6. If the alleged perpetrator is a staff member or it is believed that a lack of supervision resulted in sexual contact between two students, I would file a report with the Iowa Department of Inspections, Appeals, and Licensing (DIAL) to conduct an impartial independent investigation for child abuse. This call would occur within 24-hours. Depending on the allegation and circumstances, the staff may also be placed on paid administrative leaving pending the outcome of the investigation.
7. The investigator will conduct the investigation, within 5 business days (often times much sooner), and send me the completed investigative summary for review. During the investigation, the alleged victim will be asked if they request an advocate.
8. If substantiated, there will be appropriate sanctions imposed on the perpetrator [staff-discipline/termination/criminally charged/founded child abuse], [students-learning intervention/criminally charged/change to housing unit]
9. For all substantiated and unsubstantiated allegations, weekly retaliation checks will be conducted by the cottage counselor.
10. For all substantiated allegations the student's therapist will be made aware.
11. The student and their attorney, parent/guardian, juvenile court officer, superintendent, division director, PREA coordinator, cottage counselor, and cottage director will be informed of the outcome, following the investigation.
12. If a Substantiated or Unsubstantiated allegation of sexual abuse a Sexual Abuse Incident Review (SAIR) will be held.

However, depending on the report and circumstances. Safety and notifications to Law Enforcement, medical, advocate, or SAFE medical care may take priority over the reports being written, so the order may change based on those circumstances.

	<p>I stay apprised of the investigation that is being conducted and ensure that I stay up to date. The student’s safety is of paramount importance.</p> <p>Depending on who the person was that reported it, we will let them know that the investigation has been completed. However, because of confidentiality, we may not be able to notify the reporter in all cases.</p> <p>Please let me know if you have any more questions or need any more clarification.”</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<b>115.361</b>	<b>Staff and agency reporting duties</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Youth Service Workers</li> <li>2. Deputy Superintendent / PREA Compliance Manager</li> </ol> <p>Interviews with staff demonstrated each understands and actively practices the requirement to immediately report all allegations of sexual abuse and sexual harassment, regardless of the source of the allegation, including verbal reports from students, third-party reports, grievances, or anonymous reports.</p> <p>The interview with the PREA Compliance Manager demonstrated parents, juvenile court officers, and social workers are notified on the same day a sexual abuse allegation is received.</p>

Site Observation:

Investigation review demonstrated the parents, legal guardians, case workers, and/or court officers of victims were notified on the same day two allegations of sexual harassment were received.

(a) State Training School for Boys PAQ states the agency requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency. The agency requires all staff to report immediately and according to agency policy any retaliation against Residents or staff who reported such an incident. The agency requires all staff to report immediately and according to agency policy any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 17, section VI. A. 1., states, "State Training School staff, contractors, and volunteers shall report, to their supervisor, immediately any knowledge, suspicion, or information regarding:

- a. An incident of sexual abuse or sexual harassment that occurred in the State Training School or another facility;
- b. Retaliation against students or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

Staff shall comply with applicable mandatory child abuse reporting laws, included in Iowa Code.

- STS defines Child abuse. (See Iowa Code Section 232.68(2) and "Definitions" above."

(b) State Training School for Boys PAQ states the agency requires all staff to comply with any applicable mandatory child abuse reporting laws.

(c) State Training School for Boys PAQ states apart from reporting to the designated supervisors or officials and designated State or local service agencies, agency policy prohibits staff from revealing any information related to a sexual

abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 18, section VI. A. 2., states, "Apart from reporting to their supervisor, State Training School staff shall not reveal any information related to a sexual abuse or sexual harassment report to anyone other than to the extent necessary to make treatment or investigation decisions."

(d) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 18, section VI. A. 3., states, "Medical and mental health personnel shall be required to verbally inform students at the initiation of services of their duty to report and the limitations of confidentiality."

(e) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 18, section VI. A. 4-5., state,

4. Upon receiving any allegation of sexual abuse, the State Training School Institutional Superintendent or Duty Superintendent (D.S.) shall promptly report the allegation to local law enforcement, DIAL, the Division Director, and to the alleged victim's parents or legal guardians, as appropriate; unless there is official documentation showing the parents or legal guardians should not be notified. This notification shall occur within 24 hours of facility staff receiving the sexual abuse allegation.

5. The STS PREA Compliance Manager shall report any sexual abuse investigation updates and/or outcomes to the alleged victim's parents or legal guardians no more than 2 business days following the conclusion of the sexual abuse investigation."

Based on interviews, documentation, and observations, the facility exceeds compliance with this standard. Interviews and documentation demonstrated the facility notifies parents, legal guardians, juvenile court officers, and other applicable parties on the same day an allegation is received, exceeding the standard requirement for notification within 14 days. Additionally, the facility applies this practice to both sexual abuse and sexual harassment allegations, demonstrating a proactive and comprehensive approach to communication and victim support. This consistent, timely notification process reflects a system that exceeds the requirements of this standard.

<b>115.362</b>	<b>Agency protection duties</b>
	<p data-bbox="280 188 983 221"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="280 266 564 300"><b>Auditor Discussion</b></p> <p data-bbox="280 344 544 378">Document Review:</p> <ol data-bbox="280 412 1418 560" style="list-style-type: none"> <li data-bbox="280 412 839 445">1. State Training School for Boys PAQ</li> <li data-bbox="280 479 1418 560">2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> </ol> <p data-bbox="280 669 437 703">Interviews:</p> <ol data-bbox="280 736 1091 918" style="list-style-type: none"> <li data-bbox="280 736 900 770">1. Youth Service Supervisor / Investigator</li> <li data-bbox="280 804 943 837">2. Treatment Services Director / Investigator</li> <li data-bbox="280 871 1091 918">3. Deputy Superintendent / PREA Compliance Manager</li> </ol> <p data-bbox="280 952 1481 1323">The interviews with the PREA Compliance Manager and the Investigators demonstrated that facility staff act promptly and respond appropriately upon discovery of any incident involving sexual harassment or sexual abuse. Each reported that staff are trained to immediately ensure student safety, separate involved parties, preserve the scene when applicable, and notify appropriate supervisory and investigative personnel. The PREA Compliance Manager and Investigator further demonstrated that required notifications and documentation are completed in accordance with agency policy, and that timely response is prioritized to support both student safety and the integrity of the investigative process.</p> <p data-bbox="280 1435 1418 1637">(a) State Training School for Boys PAQ states when the agency or facility learns that a resident is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the resident. In the past 12 months, the number of times the agency or facility has determined that a resident was subject to a substantial risk of imminent sexual abuse was zero.</p> <p data-bbox="280 1749 1481 1816">State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 19, section VI. B. 1-3., states,</p> <ol data-bbox="280 1861 1458 2085" style="list-style-type: none"> <li data-bbox="280 1861 1458 1928">1. "The State Training School shall take immediate action to protect a student who is subject to substantial risk of imminent sexual abuse within its facility.</li> <li data-bbox="280 1973 1458 2085">2. This will include separating the victim from the alleged perpetrator immediately and assuring there is no-contact between the two until the conclusion of a comprehensive investigation.</li> </ol>

	<p>3. The victim will be supervised and monitored for safety and protection against potential retaliation.”</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<b>115.363</b>	<b>Reporting to other confinement facilities</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Superintendent</li> </ol> <p>The interview with the Superintendent demonstrated that he is aware that, upon receiving an allegation that a student was sexually abused while confined at another facility, he is responsible for notifying the head of the facility where the alleged abuse occurred. He further reported that he would initiate an internal response in an incident report, maintain communication with the receiving facility, and cooperate fully throughout the investigative process.</p> <p>Site Observations:</p> <p>The facility reported no allegations of sexual abuse involving students confined at another facility within the past 12 months.</p> <p>(a) State Training School for Boys PAQ states the agency has a policy requiring that, upon receiving an allegation that a resident was sexually abused while confined at another facility, the head of the facility must notify the head of the facility or appropriate office of the agency or facility where sexual abuse is alleged to have occurred. The agency’s policy also requires that the head of the facility notify the appropriate investigative agency. In the past 12 months, the facility has received zero allegations that a resident was abused while in confinement at</p>

another facility. hours; assist with investigation, as needed.”

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 19, section VI. C. 1., states, “Upon receiving an allegation that a student was sexually abused while a student at another facility, the State Training School Institutional Superintendent shall notify, as soon as possible but no later than 72 hours after receiving the allegation, the head of the facility or appropriate office of the agency where the alleged abuse occurred and shall also notify the appropriate investigative agency. STS shall document that this notification was made.”

(b) State Training School for Boys PAQ states agency policy requires that the facility head provides such notification as soon as possible, but no later than 72 hours after receiving the allegation. Policy compliance can be found in provision (a) of this standard.

(c) State Training School for Boys PAQ states the facility documents that it has provided such notification within 72 hours of receiving the allegation.

(d) State Training School for Boys PAQ states facility policy requires that allegations received from other agencies or facilities investigated in accordance with the PREA standards. In the last 12 months, there have been zero allegations of sexual abuse the facility received from other facilities.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 19, section VI. C. 2., states, “Upon receiving an allegation from another facility that a student was sexually abused while a resident at the State Training School, the allegation shall be investigated.”

Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

<b>115.364</b>	<b>Staff first responder duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

Document Review:

1. State Training School for Boys PAQ
2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025

Interviews:

1. Youth Service Workers
2. Youth Service Technician

Interviews with staff demonstrated each was aware of their first responder responsibilities. Staff reported that PREA information is posted throughout the facility and described taking immediate action to ensure student safety. Staff stated they would separate the victim from the alleged perpetrator into one of three designated areas, remain with the victim, and ensure all students are safe. Staff further demonstrated knowledge of evidence preservation, stating they would not allow students to wash, drink, or change clothing and would secure the area where the incident allegedly occurred until appropriate personnel respond. Staff reported they would notify their immediate supervisor, a Youth Service Technician, or the Duty Superintendent, who would then contact Crisis Intervention Services and law enforcement.

Site Observations:

There was no sexual abuse allegations reported within the past 12 months.

(a) State Training School for Boys PAQ states the agency has a first responder policy for allegations of sexual abuse. The policy requires that, upon learning of an allegation that a resident was sexually abused, the first security staff member to respond to the report shall be required to separate, preserve, protect, collect physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. In the past 12 months, one allegation occurred where a resident was sexually abused. Of these allegations, the number of times the first security staff member to respond to the report separated the alleged victim and abuser was one.

	<p>State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 19, section D. 1-2., states,</p> <ol style="list-style-type: none"> <li>1. “Upon learning of an allegation that a student was sexually abused, the first staff member to respond shall immediately separate the student victim and alleged abuser while protecting and preserving the crime scene until appropriate steps can be taken to collect any evidence.</li> <li>2. If the abuse occurred within a period that still allows for the collection of physical evidence, request that the student victim and the alleged abuser not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.”</li> </ol> <p>(b) State Training School for Boys PAQ states the facility’s’ policy requires that if the first staff responder is not a security staff member, that responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and notify security staff. Of the allegations that a resident was sexually abused made in the past 12 months, the number of times a non-security staff member was the first responder was zero.</p> <p>State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 19, section D. 3., states, “If the first staff responder is not a direct care or supervision staff member, the responder shall be required to request that the student victim not take any actions that could destroy physical evidence, and then notify the appropriate STS staff.”</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<b>115.365</b>	<b>Coordinated response</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> </ol>

Interviews:

1. Youth Service Workers
2. Youth Service Technician

Interviews with staff demonstrated each was aware of their first responder responsibilities. Staff reported that PREA information is posted throughout the facility and described taking immediate action to ensure student safety. Staff stated they would separate the victim from the alleged perpetrator into one of three designated areas, remain with the victim, and ensure all students are safe. Staff further demonstrated knowledge of evidence preservation, stating they would not allow students to wash, drink, or change clothing and would secure the area where the incident allegedly occurred until appropriate personnel respond. Staff reported they would notify their immediate supervisor, a Youth Service Technician, or the Duty Superintendent, who would then contact Crisis Intervention Services and law enforcement.

Site Observations:

There were no sexual abuse allegations reported within the past 12 months.

(a) State Training School for Boys PAQ states the agency has a first responder policy for allegations of sexual abuse. The policy requires that, upon learning of an allegation that a resident was sexually abused, the first security staff member to respond to the report shall be required to separate, preserve, protect, collect physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. In the past 12 months, one allegations occurred where a resident was sexually abused. Of these allegations, the number of times the first security staff member to respond to the report separated the alleged victim and abuser was one.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 19, section D. 1-2., states,

1. "Upon learning of an allegation that a student was sexually abused, the first staff member to respond shall immediately separate the student victim and alleged abuser while protecting and preserving the crime scene until appropriate steps can

	<p>be taken to collect any evidence.</p> <p>2. If the abuse occurred within a period that still allows for the collection of physical evidence, request that the student victim and the alleged abuser not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.”</p> <p>(b) State Training School for Boys PAQ states the facility’s’ policy requires that if the first staff responder is not a security staff member, that responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and notify security staff. Of the allegations that a resident was sexually abused made in the past 12 months, the number of times a non-security staff member was the first responder was zero.</p> <p>State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 19, section D. 3., states, “If the first staff responder is not a direct care or supervision staff member, the responder shall be required to request that the student victim not take any actions that could destroy physical evidence, and then notify the appropriate STS staff.”</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<b>115.366</b>	<b>Preservation of ability to protect residents from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. Collective Bargaining Agreement between the State of Iowa and The American Federation of State, County, and Municipal Employees, Council 61 AFL-CIO, dated 2025-2027</li> </ol> <p>Interviews:</p>

	<p>1. Superintendent</p> <p>The interview with the Superintendent demonstrated that current collective bargaining agreements are limited to salary-related matters and do not include provisions that would impact the agency’s ability to comply with PREA standards. The Superintendent reported that no elements within the agreement restrict or conflict with PREA requirements.</p> <p>(a) State Training School for Boys PAQ states the agency, facility, or any other governmental entity is responsible for collective bargaining on the agency’s behalf or has entered into or renewed any collective bargaining agreement or other agreement since August 20, 2012, or since the last PREA audit, whichever is later.</p> <p>The facility provided a collective bargaining agreement, which demonstrates the agreement is in place to protect only employee pay schedules. Employees are mandated to follow all other State Training School personnel and facility policy through the hiring process.</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<b>115.367</b>	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Youth Counselor / ITP Counselor</li> </ol> <p>The interview with the Youth Counselor demonstrated that retaliation monitoring begins immediately following an allegation of sexual abuse and includes ongoing communication with both the victim and the individual who reported the allegation.</p>

The Youth Counselor reported that, while informal check-ins may occur daily, formal documentation of monitoring is completed on a weekly basis. Monitoring includes review of behavior changes, housing reassignment, the student's perception of treatment by others, incident reports, and academic performance. The Youth Counselor further demonstrated a comprehensive approach to retaliation monitoring, stating that monitoring is conducted for both victims and reporters, whether staff or students, and may be extended beyond 90 days when necessary to ensure continued safety and stability.

Site Observations:

The facility reported no allegations of sexual abuse within the past 12 months. However, review of a sexual harassment investigation demonstrated that retaliation monitoring was documented on a weekly basis for nine weeks.

(a/e) State Training School for Boys PAQ states the agency has a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff. The agency designates the Cottage Directors and / or Cottage Counselors with the responsibility of retaliation monitoring.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 20, section F. 1., states, "STS has zero-tolerance for retaliation of any kind against student victims or staff members who report sexual abuse and sexual harassment or cooperate with sexual abuse or sexual harassment investigations. Immediately following the report of such an incident, a staff member or outside department will be charged with monitoring retaliation. Monitoring will include but not be limited to a counselor, direct care staff or appropriate supervisor checking in with a staff or student who reported or suffered abuse or was a victim of harassment to get verbal confirmation of the individual's current mental status and perceptions related to retaliation at least weekly."

(b) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 20, section F. 2., states, "STS shall employ multiple protection measures, such as housing changes or transfers for student victims or abusers, removal of alleged staff or student abusers from contact with victims, and emotional support services for students or staff that fear retaliation for reporting sexual abuse or sexual harassment for cooperating with investigations."

(c/d) State Training School for Boys PAQ states the agency/facility monitors the conduct or treatment of residents or staff who reported sexual abuse and of residents who were reported to have suffered sexual abuse to see if there are any changes that may suggest possible retaliation by residents or staff. The number of times an incident of retaliation occurred in the past 12 months was zero.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 20, section F. 3., states, "For at least 90 days following a report of sexual abuse or sexual harassment, the State Training School shall monitor the conduct and treatment of students or staff who have reported sexual abuse and sexual harassment, as well as of student victims who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by students or staff, and shall promptly act to remedy any such retaliation. Items the agency should monitor include any student disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. STS shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need.

In the case of students and staff involved in incidents or allegations, such monitoring shall include no less than weekly status checks."

Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

<b>115.368</b>	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Superintendent</li> </ol>

The interview with the Superintendent demonstrated the facility does not utilize room seclusion for vulnerable students. The Superintendent further demonstrated placement decisions for vulnerable populations are discussed among the Administrative Team, including members of the student’s multidisciplinary team, to ensure appropriate separation from the alleged perpetrator, access to medical and mental health services, and ongoing retaliation monitoring. The Superintendent also demonstrated students exhibiting harmful behaviors may be relocated closer to staff areas to allow for increased supervision.

(a) State Training School for Boys PAQ states the facility has a policy that residents who allege to have suffered sexual abuse may only be placed in isolation as a last resort if less restrictive measures are inadequate to keep them and other residents safe, and only until an alternative means of keeping all residents safe can be arranged. The number of residents who allege to have suffered sexual abuse who were placed in isolation in the past 12 months was zero.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 20, section G. 1., states, “Refer to Standard 115.342 for the use of segregation and housing option for student protection.”

Based on interviews, documentation, and observations, the facility exceeds compliance with this standard. The facility does not utilize room seclusion for vulnerable students and instead employs a multidisciplinary, team-based approach to placement and supervision. The Administrative Team, in collaboration with members of the student’s multidisciplinary team, ensures separation from alleged perpetrators, access to medical and mental health services, and ongoing retaliation monitoring. The facility also utilizes alternative supervision strategies, including increased staff proximity, to maintain safety without the use of restrictive housing. These coordinated and proactive practices demonstrate a comprehensive approach to protecting vulnerable students that exceeds the requirements of this standard.

<b>115.371</b>	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Document Review: <ul style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment,</li> </ul>

dated 2.27.2025

3. State Training School Sexual Harassment Investigations (3) Reviewed

Interviews:

1. Youth Counselor Supervisor / Investigator
2. Treatment Services Director / Investigator

The interviews with Investigators demonstrated a clear understanding of the processes required during a sexual abuse investigation. Investigators articulated the importance of immediate and ongoing separation of the victim and alleged perpetrator, as well as making required notifications once the situation is safe to do so. Investigators further demonstrated knowledge of investigative procedures, including conducting interviews with victims, witnesses, and alleged perpetrators; reviewing available video footage; assessing staff assignments; evaluating compliance with policy requirements; and discussing observations with facility administration when determining investigative outcomes.

Site Observations:

The facility reported no allegations of sexual abuse within the past 12 months. Of the three administrative investigations reviewed, each was completed in a thorough and timely manner and in compliance with the provisions of this standard.

(a) State Training School for Boys PAQ states the agency/facility has a policy related to criminal and administrative agency investigations.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 20, section VII. A. 1., states, "STS will facilitate prompt, thorough, and objective investigations into all allegations of sexual abuse or sexual harassment. Where sexual abuse has been alleged, the allegation will be immediately forwarded to law enforcement or the Department of Inspections, Appeals, & Licensing as appropriate for a complete investigation."

(d) State Training School for Boys PAQ states the agency does not terminate an investigation solely because the source of the allegation recants the allegation.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 21,

section VII. A. 3., states, "STS shall not terminate an investigation solely because the source of the allegation recants the allegation."

(i) State Training School for Boys PAQ states substantiated allegations of conduct that appear to be criminal are referred for prosecution. The number of substantiated allegations of conduct that appear to be criminal that were referred for prosecution since August 20, 2012, or since the last PREA audit, whichever is later was three.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 21, section VII. A. 8, states, "In all cases where criminal charges have been substantiated through investigation, the State Training School will inform the local County Attorney of such charges, for their consideration for further legal action."

The facility provided three sexual harassment investigations conducted by the State Training School. Each investigation reviewed was comprehensive and completed in a timely manner. The investigative files included detailed summaries of the allegations, credibility assessments, documentation of staff and student movements, required notifications, and evidence of retaliation monitoring.

The investigation documents the following information.

- Allegation Summary
- Investigators and Dates of Investigation
- Alleged Perpetrator(s) Information
- Alleged Victim Information
- Interview Summaries
- List of Individuals Interviewed
- List of Documents or Evidence Reviewed
- PREA Summary
- PREA Investigative Conclusion
- Outcome
- Recommendation / Follow Up
- List of Individuals Receiving Report

	<p>(j) State Training School for Boys PAQ states the agency retains all written reports pertaining to administrative or criminal investigation of alleged sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.</p> <p>State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 21, section VII. A. 11., states, “State Training School shall retain all written reports related to criminal and administrative investigations of any incidents of sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the State Training School, plus five years.”</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<b>115.372</b>	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Youth Counselor Supervisor / Investigator</li> <li>2. Treatment Services Director / Investigator</li> </ol> <p>The interview with Investigators demonstrated that the facility applies a preponderance of the evidence standard when determining whether allegations of sexual abuse or sexual harassment are substantiated or unsubstantiated, and does not impose a higher standard of proof.</p> <p>(a) State Training School for Boys PAQ states the agency imposes a standard of a</p>

	<p>preponderance of the evidence or a lower standard of proof for determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 21-22, section B. 1., states, “STS shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.”</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<b>115.373</b>	<b>Reporting to residents</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> <li>3. Notice of Child Abuse Assessment</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Random Students</li> <li>2. Targeted Students</li> <li>3. Youth Counselor Supervisor / Investigator</li> <li>4. Treatment Services Director / Investigator</li> </ol> <p>Interviews with one random and two targeted students demonstrated they had reported sexual harassment or a situation in which one student reported being touched on the buttocks during a restraint. Each student stated staff responded immediately following their verbal report, spoke with the alleged perpetrator, and the behavior ceased. The student who reported staff contact stated he was informed that camera footage demonstrated the staff member’s hand was on his back.</p>

The interview with Investigators demonstrated that the Deputy Superintendent provides verbal notification to the student/victim regarding the outcome of the investigation and documents the notification within the investigative report.

Site Observations:

Although the facility reported no allegations of sexual abuse within the past 12 months, review of one administrative investigation demonstrated that notification to the victim was documented in the investigative report.

(a) State Training School for Boys PAQ states the agency has a policy requiring that any resident who makes an allegation that he or she suffered sexual abuse in an agency facility is informed, verbally or in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation by the agency. The number of administrative investigations of alleged resident sexual abuse that were completed by the agency/facility in the past 12 months was one. Of the alleged sexual abuse investigations that were completed in the past 12 months, the number of residents who were notified, verbally or in writing, of the results of the investigation was one.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 22, section C. 1., "Following an investigation into a student's allegations of sexual abuse suffered in its facility, the State Training School shall inform the student as to whether the allegation has been determined to be substantiated, unsubstantiated or unfounded."

(b) State Training School for Boys PAQ states if an outside entity conducts such investigations, the agency requests the relevant information from the investigative entity in order to inform the resident as to the outcome of the investigation. In the past 12 months, there has been zero investigations of alleged resident sexual abuse.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 22, section C. 2., states, "If the State Training School did not conduct the investigation, it shall request the relevant information from the investigative agency to inform the student."

The facility provided a Notice of Child Abuse Assessment. This assessment demonstrates the Iowa Department of Education investigated a sexual harassment allegation and provided an outcome to the facility.

(c) State Training School for Boys PAQ states following a resident's allegation that a staff member has committed sexual abuse against the resident, the agency/facility subsequently does inform the Resident (unless the agency has determined that the allegation is unfounded) whenever:

- The staff member is no longer posted within the Resident's unit.
- The staff member is no longer employed at the facility.
- The agency learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or
- The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility."

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 22, section C. 3., states, "Following a student's allegation that a staff member has committed sexual abuse against the student, the State Training School shall subsequently inform the student (unless the allegation was determined to be unfounded) whenever:

- a. The staff member is no longer posted within the student's cottage/housing unit:
- b. The staff member is no longer employed at the State Training School.
- c. STS learns that the staff member has been charged with a crime related to sexual abuse within the facility; or
- d. STS learns that the staff member has been convicted on a charge related to sexual abuse within the facility."

(d) State Training School for Boys PAQ states following a resident's allegation that he or she has been sexually abused by another resident in an agency facility, the agency subsequently informs the alleged victim whenever: the agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or the agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.

	<p>State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 22, section C. 4., states, “Following a student’s allegation that he or she was sexually abused by another student, the State Training School shall subsequently inform the alleged victim whenever:</p> <p>a. The State Training School learns that the alleged abuser has been charged with a crime related to sexual abuse within the facility; or</p> <p>b. The State Training School learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.”</p> <p>(e) State Training School for Boys PAQ states the agency has a policy that all notifications to residents described under this standard are documented. In the past 12 months, there has been one notifications to a resident, pursuant to this standard.</p> <p>State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 22, section C. 5., states, “All such notification or attempts shall be documented.”</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<b>115.376</b>	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Superintendent</li> </ol> <p>The interview with the Superintendent demonstrated that staff involved in a substantiated allegation of sexual harassment would receive retraining. The</p>

Superintendent further reported that staff involved in a substantiated allegation of sexual abuse would no longer have access to the facility, would be reported to law enforcement, and that the department head would notify any applicable licensing agencies.

Site Observations:

In the past 12 months, the facility reported no staff were disciplined for violations of agency policy related to sexual abuse or sexual harassment.

(a) State Training School for Boys PAQ states staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 22-23, section VIII. A. 1., states, "Employees will be subject to disciplinary action up to and including termination of employment for substantiated allegations of abuse and/or assault. Disciplinary action that results in termination for criminal charges/conviction, or an employee's resignation preceding termination or the completion of an ongoing investigation, shall be reported to law enforcement agencies and any relevant licensing bodies."

(b) State Training School for Boys PAQ states in the last 12 months, there has been zero staff from the facility that had violated agency sexual abuse or sexual harassment policies. In the past 12 months, the number of staff from the facility who have been terminated (or resigned prior to termination) for violating agency sexual abuse or sexual harassment policies is zero.

(c) State Training School for Boys PAQ states disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories. In the past 12 months there has been zero staff requiring discipline for sexual abuse or sexual harassment.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 23, section VIII. A. 2., states, "Disciplinary sanctions for violations of policies relating to sexual abuse or sexual harassment (other than engaging in sexual abuse) shall be

	<p>commensurate with the nature and circumstances of the acts committed, the staff member’s disciplinary history, and the sanction imposed for comparable offenses by other staff with similar histories.”</p> <p>(d) State Training School for Boys PAQ states all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies. In the past 12 months, zero staff have been terminated for sexual abuse or harassment. Policy compliance can be found in provision (a) of this standard.</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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115.377	<b>Corrective action for contractors and volunteers</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>State Training School for Boys PAQ</li> <li>State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>Superintendent</li> </ol> <p>The interview with the Superintendent demonstrated that a contractor or volunteer involved in a substantiated allegation of sexual harassment or sexual abuse would no longer have access to the facility, would be reported to law enforcement, and that their associated agency would be notified. The Superintendent further reported that the department head would notify any applicable licensing agencies, as appropriate.</p> <p>Site Observations:</p> <p>In the past 12 months, the facility reported no contractors or volunteers were</p>

subject to disciplinary action for violations of agency policy related to sexual abuse or sexual harassment.

(a) State Training School for Boys PAQ states agency policy requires that any contractor or volunteer who engages in sexual abuse be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. Agency policy requires that any contractor or volunteer who engages in sexual abuse be prohibited from contact with residents. In the past 12 months, there have been zero contractors or volunteers reported to law enforcement or relevant licensing bodies for engaging in sexual abuse of residents.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 23, section VIII. B. 1., states, "Any contractor or volunteer who engages in sexual abuse or sexual harassment shall be prohibited from contact with students and shall be reported to law enforcement, unless the activity was clearly not criminal, and to relevant licensing bodies."

(b) State Training School for Boys PAQ states the facility takes appropriate remedial measures and considers whether to prohibit further contact with residents in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 23, section VIII. B. 2., states, "STS shall take appropriate remedial measures and shall consider whether to prohibit further contact with students, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer."

Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.378	Interventions and disciplinary sanctions for residents
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Document Review:

1. State Training School for Boys PAQ
2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025

Interviews:

1. Superintendent

The interview with the Superintendent demonstrated that a student involved in a sexual abuse incident would be placed on no contact with the victim. The Superintendent reported that notifications would be made to appropriate facility staff, law enforcement for potential criminal charges, parents or guardians, and any other applicable court authorities.

(a) State Training School for Boys PAQ states residents are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for resident-on-resident sexual abuse. Residents are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for resident-on-resident sexual abuse. In the past 12 months there have been five administrative findings of resident-on-resident sexual abuse have occurred at the facility. In the past 12 months there has been zero criminal findings of guilt for resident-on-resident sexual abuse, occurring at the facility.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 23, section VIII. C. 1., states, "A student may be subject to disciplinary sanctions only pursuant to a formal disciplinary process following an administrative finding that the student engaged in student-on-student sexual abuse or following a criminal finding of guilt for student-on-student sexual abuse."

(b) State Training School for Boys PAQ states in the event a disciplinary sanction for resident-on resident sexual abuse results in the isolation of a resident, the facility policy requires that residents in isolation have daily access to large muscle exercise, legally required educational programming, and special education services. In the event a disciplinary sanction for resident-on-resident sexual abuse results in the isolation of a resident, residents in isolation receive daily visits from a medical or mental health care clinician. In the past 12 months, the number of residents placed in isolation as a disciplinary sanction for resident-on-resident sexual abuse is zero.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 23, section VIII. C. 2., states, "Any disciplinary sanctions shall be commensurate with

the nature and circumstances of the abuse committed, the student's disciplinary history, and the sanctions imposed for comparable offenses by other students with similar histories. In the event a disciplinary sanction results in the seclusion of a student, the State Training School shall not deny the student daily large-muscle exercise or access to any legally required educational programming or special education services. Students in seclusion shall receive daily visits from medical or mental health care personnel. Students shall also have access to other programs and work opportunities to the extent possible."

(c) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 23, section VIII. C. 3., states, "The disciplinary process shall consider whether a student's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed."

(d) State Training School for Boys PAQ states the facility does offer therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse. However, the facility does not require participation as a condition of access to programming or other benefits.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 23-24, section VIII. C. 4., states, "STS shall consider whether to offer the offending student participation in such interventions as therapy, counseling, or other interventions to address and correct underlying reasons or motivations for the abuse, STS may require participation in such interventions as a condition of access to any rewards-based behavior management system or other behavior-based incentives, but not as a condition to access to general programming or education."

(e) State Training School for Boys PAQ states the agency disciplines residents for sexual contact with staff only upon finding that the staff member did not consent to such contact.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 24, section VIII. C. 5., states, "STS may discipline a student for sexual contact with staff only upon a finding that the staff member did not consent to such contact."

(f) State Training School for Boys PAQ states the agency prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish

evidence sufficient to substantiate the allegation.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 24, section VIII. C. 6., states, "For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation."

(g) State Training School for Boys PAQ states the agency prohibits all sexual activity between residents. If the agency prohibits all sexual activity between residents and disciplines residents for such activity, the agency deems such activity to constitute sexual abuse only if it determines that the activity is coerced.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 24, section VIII. C. 7., states, "STS prohibits all sexual activity between students and may discipline students for such activity. However, the State Training School does not deem such activity to constitute sexual abuse if it determines that the activity is not coerced between students who are of legal consenting age."

Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.

115.381	Medical and mental health screenings; history of sexual abuse
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>  Document Review:  1. State Training School for Boys PAQ  2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025  3. Iowa Department of Human Services, State Training School Authority for Release of Abuse Information Consent Form (E), not dated  4. State Training School Psychosocial Evaluation

Interviews:

1. Random Students
2. Targeted Students
3. Nurse Supervisor
4. Behavioral Health Professional

Interviews with students demonstrated each was offered mental health services during the intake process, regardless of whether they reported prior sexual victimization or a history of sexually abusive behavior. Students consistently reported access to services and awareness that support is available.

The interview with the Nurse Supervisor demonstrated that limitations to confidentiality are disclosed verbally at the initiation of services, with documentation of the disclosure maintained in student SOAP notes. The interview with the Behavioral Health Practitioner demonstrated that limitations to confidentiality are also disclosed in writing upon initiation of services. The Behavioral Health Practitioner further reported that mental health referrals are submitted electronically and followed up with verbal communication to ensure timely access to services. Students identified through risk screening as having prior sexual victimization or a history of sexually abusive behavior are placed on safety plans within the first few hours of admission, demonstrating a proactive and immediate response to identified needs.

Site Observations:

Utilization of the PREA Audit - Juvenile Facilities Documentation Review - Resident Files/Records template demonstrated that two targeted students who disclosed prior sexual victimization and/or abusiveness were offered mental health services upon receipt of the disclosure.

(a) State Training School for Boys PAQ states all residents at this facility who have disclosed any prior sexual victimization during a screening pursuant to §115.3341 are offered a follow-up meeting with a medical or mental health practitioner. Follow up meetings are offered within 14 days of the intake screening. In the past 12 months seven residents who disclosed prior victimization during the intake screening were offered a follow-up meeting with a medical or mental health provider. Medical and mental health staff maintain secondary materials, documenting compliance with the above required services. In the past 12 months, the percent of residents who disclosed prior victimization during screening who were offered a follow-up meeting with a medical or mental health practitioner was 100 on the day of the disclosure.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 24, section IX. A. 1., states, "If the intake screening indicates that a student has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff shall ensure that the student is offered a follow-up meeting with medical or mental health personnel within 14 days of the intake screening."

The facility provided a State Training School Psychosocial Evaluation demonstrating presenting problems, history of present complaint and symptomatology is documented after disclosure and or evidence found in collateral information.

(b) State Training School for Boys PAQ states all residents who have ever previously perpetrated sexual abuse are offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening. In the past 12 months 100% residents who disclosed previously perpetrated sexual abuse, as indicated during the screening process.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 24, section IX. A. 2., states, "If the intake screening indicates that a student has previously perpetrated sexual abuse; whether it occurred in an institutional setting or in the community, staff shall ensure that the student is offered a follow-up meeting with mental health personnel within 14 days of the intake screening."

(c) State Training School for Boys PAQ states information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health practitioners.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 24, section IX. A. 3., states, "Any information related to a sexual victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health personnel and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law."

(d) State Training School for Boys PAQ states medical and mental health practitioners obtain informed consent from residents before reporting information

	<p>about prior sexual victimization that did not occur in an institutional setting, unless the resident is under the age of 18.</p> <p>State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 24, section IX. A. 4., states, “Medical and mental health personnel shall obtain informed consent from students before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the student is under the age of 18.</p> <p>The facility provided an Iowa Department of Human Services, State Training School Authority for Release of Abuse Information Consent Form (E). The form documents the following information.</p> <ul style="list-style-type: none"> <li>· Consenting party (Student at Majority Age):</li> <li>· Consent IS GRANTED for student</li> <li>· Consent is NOT GRANTED for student</li> </ul> <p>Based on interviews, documentation, and observations, the facility exceeds compliance with this standard. The facility demonstrates a proactive approach to mental health care by offering services at intake regardless of disclosure, ensuring immediate safety planning for identified students, and reinforcing confidentiality expectations through both verbal and written communication. The consistency and timeliness of these practices reflect a strong commitment to student care and support.</p>
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<b>115.382</b>	<b>Access to emergency medical and mental health services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> </ol>

Interviews:

1. Nurse Supervisor
2. Behavioral Health Professional

Interviews with medical and mental health practitioners demonstrated each would provide students with immediate access to emergency medical and mental health services upon receipt of an allegation of sexual abuse. Both practitioners stated that medical and mental health staff are available on site and prepared to meet with any student upon return from a forensic examination.

(a) State Training School for Boys PAQ states resident victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. The nature and scope of such services are determined by medical and mental health practitioners according to their professional judgment. Medical and mental health staff maintain secondary materials (e.g., form, log) documenting the timeliness of emergency medical treatment and crisis intervention services that were provided; the appropriate response by non-health staff in the event health staff are not present at the time the incident is reported; and the provision of appropriate and timely information and services concerning contraception and sexually transmitted infection prophylaxis.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 25, section IX. B. 2., states, "Student victims of sexual abuse shall be offered timely information about and timely access to emergency contraception and sexual transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate."

(b) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 25, section IX. B. 1., states, "Student victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health personnel according to their professional judgment. If no qualified medical or mental health personnel are on duty at the time a report of recent sexual abuse is made, staff first responders shall take preliminary steps to appropriate medical and mental health personnel."

(c) State Training School for Boys PAQ states resident victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. Policy

	<p>compliance can be found in provision (b) of this standard.</p> <p>(d) State Training School for Boys PAQ states treatment services are provided to every victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 25, section IX. B. 3., states, "Treatment services shall be provided to the student victim without financial cost and regardless of whether the student victim names the abuser or cooperates with any investigation of the incident."</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<p><b>115.383</b></p>	<p><b>Ongoing medical and mental health care for sexual abuse victims and abusers</b></p>
	<p><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Nurse Supervisor</li> <li>2. Behavioral Health Professional</li> </ol> <p>Interviews with medical and mental health practitioners demonstrated ongoing treatment recommendations provided by hospital personnel are followed as prescribed, including testing for sexually transmitted diseases. Both practitioners demonstrated evaluations are conducted promptly to ensure a continuum of care. The Nurse Supervisor further demonstrated the facility ensures immediate initiation of services.</p>

(a) State Training School for Boys PAQ states the facility offers medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 25, section IX. C. 1., states, “STS shall offer medical and mental health evaluation and, as appropriate, treatment to all students who have been victimized by sexual abuse in any prison, jail, lock up, or juvenile facility.”

(b) State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 25, section IX. C. 2., states, “The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody.”

(d-e) This standard is not applicable as the facility does not house female offenders.

(f) State Training School for Boys PAQ states resident victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate.

(g) State Training School for Boys PAQ states treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 25, section IX. C. 5., states, “Treatment services shall be provided to the student victim without financial cost and regardless of whether the student victim names the abuser or cooperates with any investigation arising out of the incident.”

(h) State Training School for Boys PAQ states if the facility attempts to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offers treatment when deemed appropriate by mental health practitioners.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 25, section IX. C. 5., states, “STS shall attempt to conduct a mental health evaluation of all known student-on-student abusers within 60 days of learning of such abuse history and offer treatment and/or counseling when deemed appropriate.”

Based on interviews, documentation, and observations, the facility exceeds compliance with this standard. Interviews with medical and mental health practitioners demonstrated evaluations and treatment are initiated promptly following an allegation, rather than within the 60-day timeframe required by the standard. Practitioners further demonstrated ongoing treatment recommendations provided by hospital personnel are followed as prescribed, ensuring continuity of care. The Nurse Supervisor demonstrated the facility prioritizes immediate initiation of services to support both victims and students exhibiting harmful behaviors. This timely and proactive approach to evaluation and care demonstrates practices that exceed the requirements of this standard.

<b>115.386</b>	<b>Sexual abuse incident reviews</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> <li>3. Health and Human Services Sexual Abuse Incident Review (SAIR Form), not dated</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Deputy Superintendent / PREA Compliance Manager</li> </ol> <p>The interview with the Deputy Superintendent demonstrated that the Sexual Abuse Incident Review team is comprised of the Deputy Superintendent, Superintendent, PREA Coordinator, Nurse Supervisor, Mental Health Practitioner, Cottage Counselor, and the student’s multidisciplinary team. The Deputy Superintendent reported that the team reviews each incident in its entirety, including ensuring all required notifications are completed, referrals to medical and mental health services are</p>

made, and relevant factors such as student and group demographics, video footage, staffing levels, and policy compliance are evaluated. He further stated that oversight of recommendations and their implementation is the responsibility of both himself and the PREA Coordinator.

Site Observations:

The facility reported no allegations of sexual abuse and no requirement to conduct a sexual abuse incident review within the past 12 months.

(a) State Training School for Boys PAQ states the facility conducts a sexual abuse incident review at the conclusion of every criminal or administrative sexual abuse investigation, unless the allegation has been determined to be unfounded. In the past 12 months, there have been two administrative investigations of sexual harassment and one administrative investigation of sexual abuse.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 25, section X. 1., states, "All incidents of sexual abuse will be reviewed within 30 days of the conclusion of the investigation by a review team consisting of management, supervisors, investigating staff, and medical or mental health personnel."

(b) State Training School for Boys PAQ states sexual abuse incident reviews are ordinarily conducted within 30 days of concluding the criminal or administrative investigation. In the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility that were followed by a sexual abuse incident review within 30 days, excluding only "unfounded" incidents was one. Policy compliance can be found in provision (a) of this standard.

The facility provided a Health and Human Services Sexual Abuse Incident Review (SAIR) Form demonstrating the following is documented.

- Date of Incident / Investigation Outcome / Review Team
- Start and End Dates of Investigation / Date of SAIR
- Date of DIA Notified / Date Parent/Guardian Notified / Date Law Enforcement Notified
- Victim Name / Student Number / Date Rescreened for Risk / Risk
- Separation

- Suspect Name / Student Number / Employee ID
- Risk / Date Rescreened for Risk
- If Substantiated, Date Referred To ITP / Date Rescreened for Risk
- If Substantiated, Date Refereed to ITP / If Substantiated, Date Licensing Body Notified
- Staff Suspect / Date Facility Provided the Victim With Written Notification of the Suspect Move, Charge or Conviction

1. Describe the area of facility where incident allegedly occurred:
2. Are there physical barriers in the area that may enable abuse
3. Is there monitoring technology in this area?
4. Were there adequate levels of staffing in the area during the time of the alleged incident?
5. Was the incident or allegation motivated by any of the following?

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1. Were departmental and facility policies and procedures followed in response to this allegation?
2. Does this allegation or result of this investigation indicate a need to change a policy or procedure to better prevent, detect or respond to sexual abuse?
2. Describe recommendations for improvement.
3. What changes, if any, were made as a response to this allegation?

(c) State Training School for Boys PAQ states the sexual abuse incident review team includes upper-level management officials and allows for input from line supervisors, investigators, and medical or mental health practitioners.

State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 26, section X. 2., states, "The review team shall consist of upper-level management staff, with input from line supervisors and investigating staff. The review team shall:

- a. Consider whether the allegation or investigation indicates a need to change

	<p>policy or practice to better prevent detect, or respond to sexual abuse;</p> <p>b. Consider whether the incident or allegation was motivated by race, ethnicity, gender identity-lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics;</p> <p>c. Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse;</p> <p>d. Assess the adequacy of staff levels in that area during different shifts;</p> <p>e. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and</p> <p>f. Using the STS Sexual Abuse Incident Review form, the PREA Compliance Manager will prepare a report of its findings, including but not necessarily limited to determinations made pursuant to paragraphs (2)(a)-(2)(e) of this section, and any recommendations for improvement and submit such report to the Institutional Superintendent and agency PREA coordinator.”</p> <p>(d) State Training School for Boys PAQ states the facility prepares a report of its findings from sexual abuse incident reviews, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1) -(d)(5) of this section, and any recommendations for improvement and submits such report to the facility head and Operations Lead / PREA Compliance Manager. Policy compliance can be found in provision (c) of this standard.</p> <p>(e) State Training School for Boys PAQ states, the facility implements the recommendations for improvement or documents its reasons for not doing so.</p> <p>State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 26, section X. 3., states, “STS shall implement recommendations for improvement or shall document its reasons for not doing so.”</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<b>115.387</b>	<b>Data collection</b>
	<b>Auditor Overall Determination:</b> Meets Standard

**Auditor Discussion**

Document Review:

1. State Training School for Boys PAQ
2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025
3. Iowa Health and Human Services 2025 Annual Prison Rape Elimination Act (PREA) Report, dated 1.2026

Interviews:

1. Deputy Superintendent / PREA Compliance Manager
2. Superintendent
3. Executive Officer / PREA Coordinator

Interviews with administrative staff demonstrated the team meets monthly to review ongoing investigations, discuss investigative outcomes, analyze data derived from those investigations, and implement recommendations. Staff further reported that the team maintains close oversight of the status of implementation to ensure recommendations are effectively carried out.

(a)/(c)-1,2

State Training School for Boys PAQ states the agency collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions.

(b) State Training School for Boys PAQ states the agency aggregates the incident-based sexual abuse data at least annually. Practice compliance can be found in §115.388 through the agency PREA Annual Report

The facility provided an Iowa Health and Human Services 2025 Annual Prison Rape Elimination Act (PREA) Report demonstrating the following is documented.

- Staffing
- Training
- Policies

- Support Services
  - Audits
  - 2025 Sexual Incident Investigations & Reviews
  - Data Review for Corrective Action and Publication
  - General Definitions as defined by the PREA Standard 115.5
  - Student on Student sexual abuse is defined by PREA Standard 115.6 and includes the following:
    - o Nonconsensual Sexual Acts
    - o Abusive Sexual Contact
    - o Student on Student Sexual Harassment:
      - o State Training School (STS)-Eldora Reported Incidents of Student-on-Student Allegations
  - Data Assessment
  - Staff on Student Sexual Abuse is defined by PREA Standard 115.6 and includes the following:
    - o Staff Sexual Misconduct
    - o Staff Sexual Harassment
      - o State Training School (STS) - Eldora Reported Incidents Staff-on-Student Allegations
    - o Data Assessment
  - Graphs demonstrating comparison data for years of 2021-2025 exists for Student-on-Student and Staff-on-Student allegations of nonconsensual sexual acts, abusive sexual contact, sexual harassment and allegations in total.
- (d) State Training School for Boys PAQ states the agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.
- (e) State Training School for Boys PAQ states this provision is not applicable as the agency does not have private facilities with which it contacts for the confinement of its residents.

	<p>(f) State Training School for Boys PAQ states the agency provided the Department of Justice (DOJ) with data from the previous calendar year upon request. The agency provided the Department of Justice with data in year 2025.</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<b>115.388</b>	<b>Data review for corrective action</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> </ol> <p>(a) State Training School for Boys PAQ states the agency reviews 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, and training, including:</p> <ul style="list-style-type: none"> <li>· Identifying problem areas;</li> <li>· Taking corrective action on an ongoing basis; and</li> <li>· Preparing an annual report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole.</li> </ul> <p>(b) State Training School for Boys PAQ states the annual report includes a comparison of the current year’s data and corrective actions to those from prior years. The annual report provides an assessment of the agency’s progress in addressing sexual abuse. Practice compliance is demonstrated through the agency annual reports.</p> <p>(c) State Training School for Boys PAQ states the agency makes its annual report readily available to the public, at least annually, through its website. Annual reports are approved by the agency head. The following is the agency website where the</p>

	<p>annual reports will be located is 2023-PREA-Annual-Report-1-6-23-FINAL.pdf (iowa.gov)</p> <p>(d) State Training School for Boys PAQ states when the agency redacts material from an annual report for publication, the redactions are limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility.</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<b>115.389</b>	<b>Data storage, publication, and destruction</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. State Training School for Boys PAQ</li> <li>2. State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, dated 2.27.2025</li> </ol> <p>(a) State Training School for Boys PAQ states the agency ensures that incident-based and aggregate data are securely retained.</p> <p>State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 27, section D. 1., states, “The State Training School shall ensure that data collected pursuant to this policy is securely retained.”</p> <p>(b) State Training School for Boys PAQ states agency policy requires that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public at least annually through its website.</p> <p>(c/d) State Training School for Boys PAQ states before making aggregated sexual</p>

	<p>abuse data publicly available, the agency removes all personal identifiers.</p> <p>State Training School Policy 4D-01 PREA Sexual Assault/Abuse/Harassment, page 27, section D. 3., states, “The State Training School shall maintain sexual abuse data collected pursuant to this policy for at least 10 years after the date of the initial collection.”</p> <p>Based on the review of documentation, observations, and interviews, the facility meets the standard requirements.</p>
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<b>115.401</b>	<b>Frequency and scope of audits</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>(a) During the prior three-year audit period, the agency ensured that each facility operated was audited, once.</p> <p>(b) This is the fifth audit cycle for the State Training School and the first year of the audit cycle.</p> <p>(h) The Auditor was granted complete access to, and the ability to observe, all areas of the facility.</p> <p>(e) The Auditor was permitted to request and receive copies of any relevant documents (including electronically stored information).</p> <p>a The Auditor was permitted to conduct private interviews with residents.</p> <p>b Offenders were permitted to send confidential information or correspondence to the Auditor in the same manner as if they were communicating with legal counsel.</p> <p>Through such reviews, the facility meets the standards requirements.</p>

115.403	Audit contents and findings
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	115.403  (b) The agency has posted the current 2023 PREA audit report, on their website.  Through such reviews, the facility meets the standards requirements.

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

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

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

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

	functions of the facility? (N/A for non-secure facilities )	
<b>115.315 (a)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
<b>115.315 (b)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from conducting cross-gender pat-down searches in non-exigent circumstances?	yes
<b>115.315 (c)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility document and justify all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches?	yes
<b>115.315 (d)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility implement policies and procedures that enable residents to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering a resident housing unit?	yes
	In facilities (such as group homes) that do not contain discrete housing units, does the facility require staff of the opposite gender to announce their presence when entering an area where residents are likely to be showering, performing bodily functions, or changing clothing? (N/A for facilities with discrete housing units)	yes
<b>115.315 (e)</b>	<b>Limits to cross-gender viewing and searches</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na

<b>115.315 (f)</b>	<b>Limits to cross-gender viewing and searches</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<b>115.316 (a)</b>	<b>Residents with disabilities and residents who are limited English proficient</b>	
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who are blind or have low vision?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other? (if "other," please explain in overall determination notes.)	yes
	Do such steps include, when necessary, ensuring effective	yes

	communication with residents who are deaf or hard of hearing?	
	Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Have intellectual disabilities?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Who are blind or have low vision?	yes
<b>115.316 (b)</b>	<b>Residents with disabilities and residents who are limited English proficient</b>	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to residents who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
<b>115.316 (c)</b>	<b>Residents with disabilities and residents who are limited English proficient</b>	
	Does the agency always refrain from relying on resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-response duties under §115.364, or the investigation of the resident's allegations?	yes
<b>115.317 (a)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has engaged in sexual	yes

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

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

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

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

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

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

	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the agency train all employees who may have contact with residents on: How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
	Does the agency train all employees who may have contact with residents on: Relevant laws regarding the applicable age of consent?	yes
<b>115.331 (b)</b>	<b>Employee training</b>	
	Is such training tailored to the unique needs and attributes of residents of juvenile facilities?	yes
	Is such training tailored to the gender of the residents at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male residents to a facility that houses only female residents, or vice versa?	yes
<b>115.331 (c)</b>	<b>Employee training</b>	
	Have all current employees who may have contact with residents received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
<b>115.331 (d)</b>	<b>Employee training</b>	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
<b>115.332 (a)</b>	<b>Volunteer and contractor training</b>	
	Has the agency ensured that all volunteers and contractors who	yes

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

	video regarding: Agency policies and procedures for responding to such incidents?	
<b>115.333 (c)</b>	<b>Resident education</b>	
	Have all residents received such education?	yes
	Do residents receive education upon transfer to a different facility to the extent that the policies and procedures of the resident's new facility differ from those of the previous facility?	yes
<b>115.333 (d)</b>	<b>Resident education</b>	
	Does the agency provide resident education in formats accessible to all residents including those who: Are limited English proficient?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are deaf?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are visually impaired?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are otherwise disabled?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Have limited reading skills?	yes
<b>115.333 (e)</b>	<b>Resident education</b>	
	Does the agency maintain documentation of resident participation in these education sessions?	yes
<b>115.333 (f)</b>	<b>Resident education</b>	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to residents through posters, resident handbooks, or other written formats?	yes
<b>115.334 (a)</b>	<b>Specialized training: Investigations</b>	
	In addition to the general training provided to all employees pursuant to §115.331, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its	yes

	investigators have received training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	
<b>115.334 (b)</b>	<b>Specialized training: Investigations</b>	
	Does this specialized training include: Techniques for interviewing juvenile sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
	Does this specialized training include: Proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
	Does this specialized training include: Sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
	Does this specialized training include: The criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
<b>115.334 (c)</b>	<b>Specialized training: Investigations</b>	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
<b>115.335 (a)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and	yes

	mental health care practitioners who work regularly in its facilities have been trained in: How to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to respond effectively and professionally to juvenile victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
<b>115.335 (b)</b>	<b>Specialized training: Medical and mental health care</b>	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na
<b>115.335 (c)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
<b>115.335 (d)</b>	<b>Specialized training: Medical and mental health care</b>	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.331? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Do medical and mental health care practitioners contracted by	yes

	and volunteering for the agency also receive training mandated for contractors and volunteers by §115.332? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	
<b>115.341 (a)</b>	<b>Obtaining information from residents</b>	
	Within 72 hours of the resident's arrival at the facility, does the agency obtain and use information about each resident's personal history and behavior to reduce risk of sexual abuse by or upon a resident?	yes
	Does the agency also obtain this information periodically throughout a resident's confinement?	yes
<b>115.341 (b)</b>	<b>Obtaining information from residents</b>	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes
<b>115.341 (c)</b>	<b>Obtaining information from residents</b>	
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Prior sexual victimization or abusiveness?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Current charges and offense history?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Age?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Level of emotional and cognitive development?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Physical size and stature?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Mental illness or mental disabilities?	yes

	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Intellectual or developmental disabilities?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Physical disabilities?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: The resident's own perception of vulnerability?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Any other specific information about individual residents that may indicate heightened needs for supervision, additional safety precautions, or separation from certain other residents?	yes
<b>115.341 (d)</b>	<b>Obtaining information from residents</b>	
	Is this information ascertained: Through conversations with the resident during the intake process and medical mental health screenings?	yes
	Is this information ascertained: During classification assessments?	yes
	Is this information ascertained: By reviewing court records, case files, facility behavioral records, and other relevant documentation from the resident's files?	yes
<b>115.341 (e)</b>	<b>Obtaining information from residents</b>	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the resident's detriment by staff or other residents?	yes
<b>115.342 (a)</b>	<b>Placement of residents</b>	
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Housing Assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Bed assignments?	yes

	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Work Assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Education Assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Program Assignments?	yes
<b>115.342 (b)</b>	<b>Placement of residents</b>	
	Are residents isolated from others only as a last resort when less restrictive measures are inadequate to keep them and other residents safe, and then only until an alternative means of keeping all residents safe can be arranged?	yes
	During any period of isolation, does the agency always refrain from denying residents daily large-muscle exercise?	yes
	During any period of isolation, does the agency always refrain from denying residents any legally required educational programming or special education services?	yes
	Do residents in isolation receive daily visits from a medical or mental health care clinician?	yes
	Do residents also have access to other programs and work opportunities to the extent possible?	yes
<b>115.342 (c)</b>	<b>Placement of residents</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na

<b>115.342 (d)</b>	<b>Placement of residents</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<b>115.342 (e)</b>	<b>Placement of residents</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<b>115.342 (f)</b>	<b>Placement of residents</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<b>115.342 (g)</b>	<b>Placement of residents</b>	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
<b>115.342 (h)</b>	<b>Placement of residents</b>	
	If a resident is isolated pursuant to paragraph (b) of this section, does the facility clearly document: The basis for the facility's concern for the resident's safety? (N/A for h and i if facility doesn't use isolation?)	yes
	If a resident is isolated pursuant to paragraph (b) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged? (N/A for h and i if facility doesn't use isolation?)	yes
<b>115.342 (i)</b>	<b>Placement of residents</b>	
	In the case of each resident who is isolated as a last resort when less restrictive measures are inadequate to keep them and other residents safe, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
<b>115.351</b>	<b>Resident reporting</b>	

<b>(a)</b>		
	Does the agency provide multiple internal ways for residents to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: 2. Retaliation by other residents or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
<b>115.351 (b)</b>	<b>Resident reporting</b>	
	Does the agency also provide at least one way for residents to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the resident to remain anonymous upon request?	yes
	Are residents detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security to report sexual abuse or harassment?	yes
<b>115.351 (c)</b>	<b>Resident reporting</b>	
	Do staff members accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Do staff members promptly document any verbal reports of sexual abuse and sexual harassment?	yes
<b>115.351 (d)</b>	<b>Resident reporting</b>	
	Does the facility provide residents with access to tools necessary to make a written report?	yes
<b>115.351 (e)</b>	<b>Resident reporting</b>	

	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of residents?	yes
<b>115.352 (a)</b>	<b>Exhaustion of administrative remedies</b>	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address resident grievances regarding sexual abuse. This does not mean the agency is exempt simply because a resident does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
<b>115.352 (b)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency permit residents to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an resident to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
<b>115.352 (c)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency ensure that: A resident who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
<b>115.352 (d)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by residents in preparing any administrative appeal.) (N/A if agency is exempt from this	yes

	standard.)	
	If the agency determines that the 90 day timeframe is insufficient to make an appropriate decision and claims an extension of time (the maximum allowable extension of time to respond is 70 days per 115.352(d)(3)) , does the agency notify the resident in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the resident does not receive a response within the time allotted for reply, including any properly noticed extension, may a resident consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
<b>115.352 (e)</b>	<b>Exhaustion of administrative remedies</b>	
	Are third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, permitted to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of residents? (If a third party, other than a parent or legal guardian, files such a request on behalf of a resident, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the resident declines to have the request processed on his or her behalf, does the agency document the resident’s decision? (N/A if agency is exempt from this standard.)	yes
	Is a parent or legal guardian of a juvenile allowed to file a grievance regarding allegations of sexual abuse, including appeals, on behalf of such juvenile? (N/A if agency is exempt from this standard.)	yes
	If a parent or legal guardian of a juvenile files a grievance (or an appeal) on behalf of a juvenile regarding allegations of sexual abuse, is it the case that those grievances are not conditioned upon the juvenile agreeing to have the request filed on his or her behalf? (N/A if agency is exempt from this standard.)	yes
<b>115.352</b>	<b>Exhaustion of administrative remedies</b>	

<b>(f)</b>		
	Has the agency established procedures for the filing of an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging a resident is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the resident is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
<b>115.352 (g)</b>	<b>Exhaustion of administrative remedies</b>	
	If the agency disciplines a resident for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the resident filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
<b>115.353 (a)</b>	<b>Resident access to outside confidential support services and legal representation</b>	
	Does the facility provide residents with access to outside victim advocates for emotional support services related to sexual abuse by providing, posting, or otherwise making accessible mailing addresses and telephone numbers, including toll-free hotline	yes

	numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies?	no
	Does the facility enable reasonable communication between residents and these organizations and agencies, in as confidential a manner as possible?	yes
<b>115.353 (b)</b>	<b>Resident access to outside confidential support services and legal representation</b>	
	Does the facility inform residents, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
<b>115.353 (c)</b>	<b>Resident access to outside confidential support services and legal representation</b>	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide residents with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
<b>115.353 (d)</b>	<b>Resident access to outside confidential support services and legal representation</b>	
	Does the facility provide residents with reasonable and confidential access to their attorneys or other legal representation?	yes
	Does the facility provide residents with reasonable access to parents or legal guardians?	yes
<b>115.354 (a)</b>	<b>Third-party reporting</b>	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of a resident?	yes

<b>115.361 (a)</b>	<b>Staff and agency reporting duties</b>	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding retaliation against residents or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
<b>115.361 (b)</b>	<b>Staff and agency reporting duties</b>	
	Does the agency require all staff to comply with any applicable mandatory child abuse reporting laws?	yes
<b>115.361 (c)</b>	<b>Staff and agency reporting duties</b>	
	Apart from reporting to designated supervisors or officials and designated State or local services agencies, are staff prohibited from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
<b>115.361 (d)</b>	<b>Staff and agency reporting duties</b>	
	Are medical and mental health practitioners required to report sexual abuse to designated supervisors and officials pursuant to paragraph (a) of this section as well as to the designated State or local services agency where required by mandatory reporting laws?	yes
	Are medical and mental health practitioners required to inform residents of their duty to report, and the limitations of confidentiality, at the initiation of services?	yes

<b>115.361 (e)</b>	<b>Staff and agency reporting duties</b>	
	Upon receiving any allegation of sexual abuse, does the facility head or his or her designee promptly report the allegation to the appropriate office?	yes
	Upon receiving any allegation of sexual abuse, does the facility head or his or her designee promptly report the allegation to the alleged victim's parents or legal guardians unless the facility has official documentation showing the parents or legal guardians should not be notified?	yes
	If the alleged victim is under the guardianship of the child welfare system, does the facility head or his or her designee promptly report the allegation to the alleged victim's caseworker instead of the parents or legal guardians? (N/A if the alleged victim is not under the guardianship of the child welfare system.)	na
	If a juvenile court retains jurisdiction over the alleged victim, does the facility head or designee also report the allegation to the juvenile's attorney or other legal representative of record within 14 days of receiving the allegation?	yes
<b>115.361 (f)</b>	<b>Staff and agency reporting duties</b>	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
<b>115.362 (a)</b>	<b>Agency protection duties</b>	
	When the agency learns that a resident is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the resident?	yes
<b>115.363 (a)</b>	<b>Reporting to other confinement facilities</b>	
	Upon receiving an allegation that a resident was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
	Does the head of the facility that received the allegation also notify the appropriate investigative agency?	yes

<b>115.363 (b)</b>	<b>Reporting to other confinement facilities</b>	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
<b>115.363 (c)</b>	<b>Reporting to other confinement facilities</b>	
	Does the agency document that it has provided such notification?	yes
<b>115.363 (d)</b>	<b>Reporting to other confinement facilities</b>	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
<b>115.364 (a)</b>	<b>Staff first responder duties</b>	
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
<b>115.364 (b)</b>	<b>Staff first responder duties</b>	

	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
<b>115.365 (a)</b>	<b>Coordinated response</b>	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes
<b>115.366 (a)</b>	<b>Preservation of ability to protect residents from contact with abusers</b>	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
<b>115.367 (a)</b>	<b>Agency protection against retaliation</b>	
	Has the agency established a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
<b>115.367 (b)</b>	<b>Agency protection against retaliation</b>	
	Does the agency employ multiple protection measures for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations, such as housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services?	yes
<b>115.367 (c)</b>	<b>Agency protection against retaliation</b>	

	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Any resident disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Resident housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Resident program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
<b>115.367 (d)</b>	<b>Agency protection against retaliation</b>	

	In the case of residents, does such monitoring also include periodic status checks?	yes
<b>115.367 (e)</b>	<b>Agency protection against retaliation</b>	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
<b>115.368 (a)</b>	<b>Post-allegation protective custody</b>	
	Is any and all use of segregated housing to protect a resident who is alleged to have suffered sexual abuse subject to the requirements of § 115.342?	yes
<b>115.371 (a)</b>	<b>Criminal and administrative agency investigations</b>	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency does not conduct any form of administrative or criminal investigations of sexual abuse or harassment. See 115.321(a).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency does not conduct any form of administrative or criminal investigations of sexual abuse or harassment. See 115.321(a).)	yes
<b>115.371 (b)</b>	<b>Criminal and administrative agency investigations</b>	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations involving juvenile victims as required by 115.334?	yes
<b>115.371 (c)</b>	<b>Criminal and administrative agency investigations</b>	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes

<b>115.371 (d)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency always refrain from terminating an investigation solely because the source of the allegation recants the allegation?	yes
<b>115.371 (e)</b>	<b>Criminal and administrative agency investigations</b>	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
<b>115.371 (f)</b>	<b>Criminal and administrative agency investigations</b>	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as resident or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring a resident who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
<b>115.371 (g)</b>	<b>Criminal and administrative agency investigations</b>	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
<b>115.371 (h)</b>	<b>Criminal and administrative agency investigations</b>	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
<b>115.371 (i)</b>	<b>Criminal and administrative agency investigations</b>	
	Are all substantiated allegations of conduct that appears to be	yes

	criminal referred for prosecution?	
<b>115.371 (j)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency retain all written reports referenced in 115.371(g) and (h) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years unless the abuse was committed by a juvenile resident and applicable law requires a shorter period of retention?	yes
<b>115.371 (k)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the facility or agency does not provide a basis for terminating an investigation?	yes
<b>115.371 (m)</b>	<b>Criminal and administrative agency investigations</b>	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
<b>115.372 (a)</b>	<b>Evidentiary standard for administrative investigations</b>	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
<b>115.373 (a)</b>	<b>Reporting to residents</b>	
	Following an investigation into a resident's allegation of sexual abuse suffered in the facility, does the agency inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
<b>115.373 (b)</b>	<b>Reporting to residents</b>	
	If the agency did not conduct the investigation into a resident's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the resident? (N/A if the agency/facility is	yes

	responsible for conducting administrative and criminal investigations.)	
<b>115.373 (c)</b>	<b>Reporting to residents</b>	
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the resident's unit?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
<b>115.373 (d)</b>	<b>Reporting to residents</b>	
	Following a resident's allegation that he or she has been sexually abused by another resident, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following a resident's allegation that he or she has been sexually abused by another resident, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse	yes

	within the facility?	
<b>115.373 (e)</b>	<b>Reporting to residents</b>	
	Does the agency document all such notifications or attempted notifications?	yes
<b>115.376 (a)</b>	<b>Disciplinary sanctions for staff</b>	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
<b>115.376 (b)</b>	<b>Disciplinary sanctions for staff</b>	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
<b>115.376 (c)</b>	<b>Disciplinary sanctions for staff</b>	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
<b>115.376 (d)</b>	<b>Disciplinary sanctions for staff</b>	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies, unless the activity was clearly not criminal?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
<b>115.377 (a)</b>	<b>Corrective action for contractors and volunteers</b>	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with residents?	yes

	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
<b>115.377 (b)</b>	<b>Corrective action for contractors and volunteers</b>	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with residents?	yes
<b>115.378 (a)</b>	<b>Interventions and disciplinary sanctions for residents</b>	
	Following an administrative finding that a resident engaged in resident-on-resident sexual abuse, or following a criminal finding of guilt for resident-on-resident sexual abuse, may residents be subject to disciplinary sanctions only pursuant to a formal disciplinary process?	yes
<b>115.378 (b)</b>	<b>Interventions and disciplinary sanctions for residents</b>	
	Are disciplinary sanctions commensurate with the nature and circumstances of the abuse committed, the resident's disciplinary history, and the sanctions imposed for comparable offenses by other residents with similar histories?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident is not denied daily large-muscle exercise?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident is not denied access to any legally required educational programming or special education services?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident receives daily visits from a medical or mental health care clinician?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the resident also have access to other programs and work opportunities to the extent possible?	yes
<b>115.378</b>	<b>Interventions and disciplinary sanctions for residents</b>	

<b>(c)</b>		
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether a resident's mental disabilities or mental illness contributed to his or her behavior?	yes
<b>115.378 (d)</b>	<b>Interventions and disciplinary sanctions for residents</b>	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to offer the offending resident participation in such interventions?	yes
	If the agency requires participation in such interventions as a condition of access to any rewards-based behavior management system or other behavior-based incentives, does it always refrain from requiring such participation as a condition to accessing general programming or education?	yes
<b>115.378 (e)</b>	<b>Interventions and disciplinary sanctions for residents</b>	
	Does the agency discipline a resident for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
<b>115.378 (f)</b>	<b>Interventions and disciplinary sanctions for residents</b>	
	For the purpose of disciplinary action, does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
<b>115.378 (g)</b>	<b>Interventions and disciplinary sanctions for residents</b>	
	Does the agency always refrain from considering non-coercive sexual activity between residents to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between residents.)	yes
<b>115.381 (a)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.341 indicates that a resident has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that	yes

	the resident is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening?	
<b>115.381 (b)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	If the screening pursuant to § 115.341 indicates that a resident has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the resident is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening?	yes
<b>115.381 (c)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
<b>115.381 (d)</b>	<b>Medical and mental health screenings; history of sexual abuse</b>	
	Do medical and mental health practitioners obtain informed consent from residents before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the resident is under the age of 18?	yes
<b>115.382 (a)</b>	<b>Access to emergency medical and mental health services</b>	
	Do resident victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
<b>115.382 (b)</b>	<b>Access to emergency medical and mental health services</b>	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do staff first responders take preliminary steps to protect the victim pursuant to § 115.362?	yes
	Do staff first responders immediately notify the appropriate	yes

	medical and mental health practitioners?	
<b>115.382 (c)</b>	<b>Access to emergency medical and mental health services</b>	
	Are resident victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
<b>115.382 (d)</b>	<b>Access to emergency medical and mental health services</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.383 (a)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
<b>115.383 (b)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
<b>115.383 (c)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
<b>115.383 (d)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are resident victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if all-male facility.)	na
<b>115.383 (e)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If pregnancy results from the conduct described in paragraph §	na

	115.383(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if all-male facility.)	
<b>115.383 (f)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are resident victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
<b>115.383 (g)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.383 (h)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility attempt to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners?	yes
<b>115.386 (a)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
<b>115.386 (b)</b>	<b>Sexual abuse incident reviews</b>	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
<b>115.386 (c)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
<b>115.386 (d)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team: Consider whether the allegation or	yes

	investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.386(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
<b>115.386 (e)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
<b>115.387 (a)</b>	<b>Data collection</b>	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
<b>115.387 (b)</b>	<b>Data collection</b>	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
<b>115.387 (c)</b>	<b>Data collection</b>	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes

<b>115.387 (d)</b>	<b>Data collection</b>	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
<b>115.387 (e)</b>	<b>Data collection</b>	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents? (N/A if agency does not contract for the confinement of its residents.)	na
<b>115.387 (f)</b>	<b>Data collection</b>	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
<b>115.388 (a)</b>	<b>Data review for corrective action</b>	
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
<b>115.388 (b)</b>	<b>Data review for corrective action</b>	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in	yes

	addressing sexual abuse?	
<b>115.388 (c)</b>	<b>Data review for corrective action</b>	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
<b>115.388 (d)</b>	<b>Data review for corrective action</b>	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
<b>115.389 (a)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency ensure that data collected pursuant to § 115.387 are securely retained?	yes
<b>115.389 (b)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
<b>115.389 (c)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
<b>115.389 (d)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency maintain sexual abuse data collected pursuant to § 115.387 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
<b>115.401 (a)</b>	<b>Frequency and scope of audits</b>	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once?	yes

	(Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	
<b>115.401 (b)</b>	<b>Frequency and scope of audits</b>	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	yes
	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.)	na
<b>115.401 (h)</b>	<b>Frequency and scope of audits</b>	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
<b>115.401 (i)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
<b>115.401 (m)</b>	<b>Frequency and scope of audits</b>	
	Was the auditor permitted to conduct private interviews with inmates, residents, and detainees?	yes
<b>115.401 (n)</b>	<b>Frequency and scope of audits</b>	
	Were inmates, residents, and detainees permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel?	yes
<b>115.403 (f)</b>	<b>Audit contents and findings</b>	
	The agency has published on its agency website, if it has one, or	yes

	<p>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>	
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