

# PREA Facility Audit Report: Final

**Name of Facility:** Boys Town Louisiana

**Facility Type:** Juvenile

**Date Interim Report Submitted:** 03/12/2024

**Date Final Report Submitted:** 06/07/2024

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> Derek Craig Henderson	<b>Date of Signature:</b> 06/07/2024

AUDITOR INFORMATION	
<b>Auditor name:</b>	Henderson, Derek
<b>Email:</b>	derekc.henderson@outlook.com
<b>Start Date of On-Site Audit:</b>	02/25/2024
<b>End Date of On-Site Audit:</b>	02/26/2024

FACILITY INFORMATION	
<b>Facility name:</b>	Boys Town Louisiana
<b>Facility physical address:</b>	300 North Broad Street, New Orleans, Louisiana - 70119
<b>Facility mailing address:</b>	300 N Broad St, Ste 106, New Orleans, Louisiana - 70119

Primary Contact
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<b>Name:</b>	Colleen Hurst
<b>Email Address:</b>	colleen.hurst@boystown.org
<b>Telephone Number:</b>	15042937900

<b>Superintendent/Director/Administrator</b>	
<b>Name:</b>	RASHAIN CARRIERE
<b>Email Address:</b>	rashain.carriere@boystown.org
<b>Telephone Number:</b>	5042320410

<b>Facility PREA Compliance Manager</b>	
<b>Name:</b>	
<b>Email Address:</b>	
<b>Telephone Number:</b>	

<b>Facility Characteristics</b>	
<b>Designed facility capacity:</b>	6
<b>Current population of facility:</b>	4
<b>Average daily population for the past 12 months:</b>	5
<b>Has the facility been over capacity at any point in the past 12 months?</b>	No
<b>Which population(s) does the facility hold?</b>	Males
<b>Age range of population:</b>	12-21
<b>Facility security levels/resident custody levels:</b>	non-secure
<b>Number of staff currently employed at the facility who may have contact with</b>	10

<b>residents:</b>	
<b>Number of individual contractors who have contact with residents, currently authorized to enter the facility:</b>	0
<b>Number of volunteers who have contact with residents, currently authorized to enter the facility:</b>	0

<b>AGENCY INFORMATION</b>	
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<b>Name of agency:</b>	Boys Town
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	14100 Crawford Street, Boys Town, Nebraska - 68010
<b>Mailing Address:</b>	
<b>Telephone number:</b>	

<b>Agency Chief Executive Officer Information:</b>	
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<b>Name:</b>	
<b>Email Address:</b>	
<b>Telephone Number:</b>	

<b>Agency-Wide PREA Coordinator Information</b>			
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<b>Name:</b>	Colleen Hurst	<b>Email Address:</b>	colleen.hurst@boystown.org
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<b>Facility AUDIT FINDINGS</b>	
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<b>Summary of Audit Findings</b>	
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The OAS automatically populates the number and list of Standards exceeded, the number of Standards met, and the number and list of Standards not met.

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

**Number of standards exceeded:**

1

- 115.313 - Supervision and monitoring

**Number of standards met:**

42

**Number of standards not met:**

0

## POST-AUDIT REPORTING INFORMATION

### GENERAL AUDIT INFORMATION

#### On-site Audit Dates

<b>1. Start date of the onsite portion of the audit:</b>	2024-02-25
<b>2. End date of the onsite portion of the audit:</b>	2024-02-26

#### Outreach

<b>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?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
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<p><b>a. Identify the community-based organization(s) or victim advocates with whom you communicated:</b></p>	<p>The PC noted in the PAQ that BTLA has a fully executed Memorandum of Understanding (MOU) with the Children’s Hospital Audrey Hepburn CARE Center (“CARE Center”), which was signed into effect on 12/6/2023. This MOU outlines the responsibilities of the CARE Center to provide the applicable medical and mental health services required by the PREA juvenile standards, including, but not limited to: medical evaluations and services provided by specially trained medical professionals, forensic medical examinations, specialized medical treatment, victim assistance, confidential emotional support services related to sexual abuse, consultation, and prevention training and education. During the onsite visit, the auditor contacted the Director of the CARE Center in New Orleans, who detailed the victim services offered by the organization to juvenile victims of sexual abuse and their cooperation in criminal investigations. The Director confirmed that the CARE Center has the capacity to provide specialized medical practitioners for examinations and evaluations, tailored to the specific situation. They also ensure the proper conduct of forensic interviews, working closely with specialized detectives. Additionally, the organization provides advocacy services to the survivor and their family, as well as access to therapeutic mental health services and treatment. Lastly, the Director further confirmed that the CARE Center operates as a non-profit organization, meaning that the services offered are provided free of charge to both the victim and the victim's family.</p>
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**AUDITED FACILITY INFORMATION**

<p><b>14. Designated facility capacity:</b></p>	<p>5</p>
<p><b>15. Average daily population for the past 12 months:</b></p>	<p>5</p>
<p><b>16. Number of inmate/resident/detainee housing units:</b></p>	<p>1</p>

<p><b>17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?</b></p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)</p>
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**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**

<p><b>36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:</b></p>	<p>3</p>
<p><b>38. 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></p>	<p>0</p>
<p><b>39. 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></p>	<p>0</p>
<p><b>40. 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></p>	<p>0</p>
<p><b>41. 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></p>	<p>0</p>

<p><b>42. 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></p>	<p>0</p>
<p><b>43. 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></p>	<p>0</p>
<p><b>44. 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>45. 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>0</p>
<p><b>46. 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>0</p>
<p><b>47. 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>48. 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>During the onsite audit, all three youth residing at the home were interviewed. Through these interviews and interactions and interviews with the onsite staff, the auditor did not observe or receive any indications of youth who would fall under the PREA targeted resident categories.</p>



<b>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</b>	
<b>49. 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>	10
<b>50. 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>	0
<b>51. 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>	0
<b>52. 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>	No text provided.
<b>INTERVIEWS</b>	
<b>Inmate/Resident/Detainee Interviews</b>	
<b>Random Inmate/Resident/Detainee Interviews</b>	
<b>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</b>	3

<p><b>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</b></p>	<p><input checked="" type="checkbox"/> Age</p> <p><input checked="" type="checkbox"/> Race</p> <p><input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic)</p> <p><input checked="" type="checkbox"/> Length of time in the facility</p> <p><input checked="" type="checkbox"/> Housing assignment</p> <p><input type="checkbox"/> Gender</p> <p><input checked="" type="checkbox"/> Other</p> <p><input type="checkbox"/> None</p>
<p><b>If "Other," describe:</b></p>	<p>All the youth residing at the home during the onsite were interviewed- total of 3.</p>
<p><b>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</b></p>	<p>All the youth residing at the home during the onsite were interviewed- total of 3.</p>
<p><b>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<p><b>a. Explain why it was not possible to conduct the minimum number of random inmate/resident/detainee interviews:</b></p>	<p>All the youth residing at the home during the onsite were interviewed- total of 3.</p>
<p><b>57. 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></p>	<p>No text provided.</p>
<p><b>Targeted Inmate/Resident/Detainee Interviews</b></p>	
<p><b>58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</b></p>	<p>0</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>60. 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></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>During the onsite audit, all three youth residing at the home were interviewed. Through these interviews and interactions and interviews with the onsite staff, the auditor did not observe or receive any indications of youth who would fall under the PREA targeted resident categories.</p>
<p><b>61. 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>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>During the onsite audit, all three youth residing at the home were interviewed. Through these interviews and interactions and interviews with the onsite staff, the auditor did not observe or receive any indications of youth who would fall under the PREA targeted resident categories.</p>
<p><b>62. 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>During the onsite audit, all three youth residing at the home were interviewed. Through these interviews and interactions and interviews with the onsite staff, the auditor did not observe or receive any indications of youth who would fall under the PREA targeted resident categories.</p>
<p><b>63. 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>During the onsite audit, all three youth residing at the home were interviewed. Through these interviews and interactions and interviews with the onsite staff, the auditor did not observe or receive any indications of youth who would fall under the PREA targeted resident categories.</p>
<p><b>64. 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>During the onsite audit, all three youth residing at the home were interviewed. Through these interviews and interactions and interviews with the onsite staff, the auditor did not observe or receive any indications of youth who would fall under the PREA targeted resident categories.</p>
<p><b>65. 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>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>During the onsite audit, all three youth residing at the home were interviewed. Through these interviews and interactions and interviews with the onsite staff, the auditor did not observe or receive any indications of youth who would fall under the PREA targeted resident categories.</p>
<p><b>66. 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>During the onsite audit, all three youth residing at the home were interviewed. Through these interviews and interactions and interviews with the onsite staff, the auditor did not observe or receive any indications of youth who would fall under the PREA targeted resident categories.</p>
<p><b>67. 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>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>During the onsite audit, all three youth residing at the home were interviewed. Through these interviews and interactions and interviews with the onsite staff, the auditor did not observe or receive any indications of youth who would fall under the PREA targeted resident categories.</p>
<p><b>68. 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>69. 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>During the onsite audit, all three youth residing at the home were interviewed. Through these interviews and interactions and interviews with the onsite staff, the auditor did not observe or receive any indications of youth who would fall under the PREA targeted resident categories. Furthermore, the BTLA program operates in a home and, therefore, segregated housing/ isolation practices are not practiced or allowed.</p>
<p><b>70. 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>71. Enter the total number of RANDOM STAFF who were interviewed:</b></p>	<p>10</p>
<p><b>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</b></p>	<p><input checked="" 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>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>



<p><b>a. Select the reason(s) why you were unable to conduct the minimum number of RANDOM STAFF interviews: (select all that apply)</b></p>	<p><input type="checkbox"/> Too many staff declined to participate in interviews.</p> <p><input checked="" type="checkbox"/> Not enough staff employed by the facility to meet the minimum number of random staff interviews (Note: select this option if there were not enough staff employed by the facility or not enough staff employed by the facility to interview for both random and specialized staff roles).</p> <p><input type="checkbox"/> Not enough staff available in the facility during the onsite portion of the audit to meet the minimum number of random staff interviews.</p> <p><input type="checkbox"/> Other</p>
<p><b>74. 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>All the staff working with the youth at the BTLA group home were interviewed onsite, including two staff members who do not work at the facility but have interaction with the youth outside the home.</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>75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</b></p>	<p>4</p>
<p><b>76. 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>77. 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>

<b>78. Were you able to interview the PREA Coordinator?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>79. Were you able to interview the PREA Compliance Manager?</b>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" 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)

**80. 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>81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No
<b>82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No
<b>83. Provide any additional comments regarding selecting or interviewing specialized staff.</b>	<p>Despite being a small group home with a limited number of administrative staff, the administrative team at the BTLA program shoulders various responsibilities related to PREA. During the audit, the four administrators interviewed demonstrated their adeptness by effectively answering the pertinent PREA protocol questions without any notable concerns or discrepancies.</p>

## **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>84. Did you have access to all areas of the facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
--	--

**Was the site review an active, inquiring process that included the following:**

<b>85. 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>86. 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>87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>88. Informal conversations with staff during the site review (encouraged, not required)?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>89. 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>	No text provided.
<b>Documentation Sampling</b>	
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.	
<b>90. 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>	<input checked="" type="radio"/> Yes <input type="radio"/> No

**91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).**

No barriers experienced and all phases of the audit process were completed with no issues.

## **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.

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

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

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

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

**94. 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

**95. 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	0	0
<b>Total</b>	0	0	0	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.



**96. 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

**97. 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	0
<b>Staff-on-inmate sexual harassment</b>	0	0	0	0
<b>Total</b>	0	0	0	0

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

**Sexual Abuse Investigation Files Selected for Review**

<b>98. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:</b>	0
--	---

<p><b>a. Explain why you were unable to review any sexual abuse investigation files:</b></p>	<p>As per the PC's response in the PAQ, no instances of alleged sexual abuse or sexual harassment involving youth at the BTLA home were reported during the previous 12-month audit review period. Consequently, there was no evidence available to demonstrate compliance with the elements of this specific PREA standard in practice during this audit review period.</p>
<p><b>99. 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  <input type="radio"/> No  <input checked="" 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>100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>0</p>
<p><b>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p> <input type="radio"/> Yes  <input type="radio"/> No  <input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files) </p>
<p><b>102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p> <input type="radio"/> Yes  <input type="radio"/> No  <input checked="" 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>103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</b></p>	<p>0</p>

<p><b>104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p><b>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" 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>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>0</p>
<p><b>a. Explain why you were unable to review any sexual harassment investigation files:</b></p>	<p>As per the PC's response in the PAQ, no instances of alleged sexual abuse or sexual harassment involving youth at the BTLA home were reported during the previous 12-month audit review period. Consequently, there was no evidence available to demonstrate compliance with the elements of this specific PREA standard in practice during this audit review period.</p>
<p><b>107. 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 type="radio"/> No</p> <p><input checked="" 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>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>0</p>

<p><b>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p><b>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p><b>Staff-on-inmate sexual harassment investigation files</b></p>	
<p><b>111. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>0</p>
<p><b>112. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p><b>113. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p><b>114. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</b></p>	<p>No text provided.</p>

## SUPPORT STAFF INFORMATION

### DOJ-certified PREA Auditors Support Staff

**115. 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.**

- Yes
- No

### Non-certified Support Staff

**116. 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

**121. 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>
<p><b>Auditor Overall Determination Definitions</b></p> <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>
<p><b>Auditor Discussion Instructions</b></p> <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>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Boys Town Louisiana (BTLA) PREA Policy Handbook (*throughout this report, will be referred to as: "Agency's PREA Policy")</li> <li>- Pre-Audit Questionnaire (PAQ)</li> <li>- Agency's Harassment, Discrimination, &amp; Retaliation Policy (#4225)</li> <li>- Mandatory Requirements for Employees Policy</li> <li>- Boys Town Louisiana (BTLA) SART Protocol</li> <li>- BTLA Code of Conduct</li> <li>- BTLA PREA Local Operation Procedures</li> <li>- Reporting Abuse &amp; Neglect Policy (#9150)</li> </ul>

- Youth Rights Form
- Youth Boundaries Education Form
- Annual Training Requirements
- Organizational Chart
- Fully Executed Contract Between the Louisiana Office of Juvenile Justice (OJJ) and BTLA

**Interviews:**

- PREA Coordinator (PC)

**Site Review Observations:**

The auditor confirmed during the onsite visit that the agency prominently displays multiple posters in the program's house, containing PREA related information including the agency's zero tolerance policy against all forms of sexual abuse and sexual harassment. Additionally, the posters provide clear instructions for youth and staff on the multiple ways to make a PREA report, outline program rules, include important contact information (including Dorm Leader, Caseworker, Probation Officer, and Facility Directors), and outline the youth grievance process and youth rights and responsibilities. The posters also feature important resources such as the youth safety line for Boys Town, Department of Children & Family Services (DCFS) reporting instructions, details on prohibited punishment, contact information for the Louisiana Office of Juvenile Justice reporting hotline, suicide prevention helplines, and information on the Behavioral Health Center Children's Hospital. Upon examination by the auditor, it was verified that the posters were prominently displayed, in good condition, and easily accessible to the youth residing in the home.

**Explanation of Determination:**

**115.311**

**(a):** The auditor reviewed the agency's PREA Policy and confirmed that the policy includes a policy statement mandating zero tolerance toward all forms of sexual abuse and sexual harassment, as well as thoroughly outlines the agency's approach to preventing, detecting, and responding to such conduct. Moreover, according to the agency's PREA Policy on pages 7 and 10:

- "BTLA has written policies mandating zero tolerance toward all forms of sexual abuse and sexual harassment, which outlines the agency's approach to preventing, detecting, and responding to such conduct.
- Boys Town Louisiana, Inc. complies with the Prison Rape Elimination Act of

2003 which establishes a zero tolerance standard for the incidence of resident sexual assault and rape; makes prevention of resident sexual assault and sexual harassment a top priority in each facility; implements policies for the detection, prevention, and punishment of prison rape; increases available data and information of the incidence of resident sexual assault and sexual harassment; standardizes the definitions used for data collection; increases accountability of personnel who fail to detect, prevent, reduce and punish prison rape; and protects the Eighth Amendment rights of Boys Town Louisiana, Inc. youths. Boys Town Louisiana, Inc. will respond immediately to allegations, fully investigate reported incidents, pursue disciplinary action, and refer for criminal investigation and prosecution of those who perpetrate such conduct."

In addition to the aforementioned PREA Policy, the auditor was provided with several agency-wide policies that further substantiate the agency's zero tolerance stance toward all forms of sexual abuse and sexual harassment. These policies, such as the Harassment, Discrimination, & Retaliation Policy, Mandatory Requirements for Employees Policy, and Reporting Abuse & Neglect Policy, were thoroughly reviewed and found to contain procedures that outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment within the Boys Town Louisiana (BTLA) residential treatment program.

Furthermore, the auditor confirmed that the agency's Code of Conduct, Youth Rights Form, and Youth Boundaries Education Form also incorporate pertinent language that illustrates how the agency's zero tolerance policy is enforced and highlights the importance placed on sexual safety within Boys Town programs. These additional policy documents provide comprehensive evidence of the agency's commitment to maintaining a safe and secure environment, protecting residents and staff from sexual abuse and sexual harassment.

The auditor received a fully executed contract for the placement of OJJ youth at the BTLA program. Upon examination of this document, it was confirmed that the following relevant information related to reporting and investigations is included:

- Youth Services {OJJ} staff shall have access to youth on or off the Contractor's premises at any time. YS officials or their designees may access and inspect the Contractor's premises at any time. Access and inspection includes, but is not limited to, youth, staff, the entire facility, and all books and records related to the operation of the facility.
- In the event that the Contractor has knowledge of or cause to suspect abuse or neglect of a youth under YS custody, the Contractor shall provide written notification to YS, the Department of Social Services, Office of Community Services, and the local law enforcement agency, in addition to complying with the Child Abuse Reporting and Investigation requirements of Children's Code Articles 609 et seq.
- Contractor will comply with the Prison Rape Elimination Act of 2003.), and



with all applicable PREA Standards, YS Policies related to PREA and Standards related to PREA for preventing, detecting, monitoring, investigating, and eradicating any form of sexual abuse within YS Facilities/ Programs/Offices owned, operated or contracted. Contractor acknowledges that, in addition to "self-monitoring requirements", YS will conduct announced or unannounced, compliant monitoring to include "on-site" monitoring. Contractor will also work with the Office of Juvenile Justice PREA Coordinator in scheduling audits in accordance with the agency audit cycle established by YS. Failure to comply with PREA, including PREA Standards and US Policies, or to pass the PREA audit after any corrective action period may result in termination of the contract.

**(b):** According to the agency's PREA Policy on page 10:

- "BTLA Program Support Services Coordinator serves as the PREA Coordinator (PC). This position allows the PC sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards. Program Support Services Coordinator is also the site's compliance coordinator. This position reports directly to the Executive Director and has regular communication with the Program Director and Sr. Program Operations Manager which oversees the Bienville Home, Boys Town full compliant PREA home."

To demonstrate the PC's authority and ability to comply with the requirements of the PREA standards in practice, the auditor interviewed the program's PC and was provided with the program's Organizational Chart. The chart confirmed that the PC, serving as the BTLA's Program Support Services Coordinator, holds a position that directly reports to the Executive Director of the program. This placement within the organizational hierarchy was confirmed by the PC and empowers the PC with the necessary authority to ensure that all policies and procedures related to PREA compliance are followed consistently. In the event of any identified deficiencies or non-compliance, the PC possesses the authority to effectively address the issue and implement appropriate corrective measures. This authority, as per the PC, allows her the ability to take prompt and decisive action to rectify any gaps in compliance with PREA standards, as well as organize meetings with the management team to ensure a comprehensive, collaborate, and effective response is implemented for each situation.

**(c):** Due to the small size and unique organizational structure of the Boys Town Louisiana program, as confirmed by the auditor, the requirements associated with this provision do not apply. However, it is important to note that the program has demonstrated full compliance with the provisions of this PREA standard associated with designating a PREA Coordinator who possesses sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards. Despite not utilizing a PREA compliance manager, BTLA remains fully compliant with the requirements set forth by this PREA standard.

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.**

**115.312 Contracting with other entities for the confinement of residents**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

**The following is a list of evidence used to determine compliance:**

- Agency's PREA Policy
- Pre-Audit Questionnaire (PAQ)
- Fully Executed Contract Between the Louisiana Office of Juvenile Justice (OJJ) and BTLA

**Explanation of Determination:**

**115.312**

**(a & b):** According to the agency's PREA Policy on page 10:

- "As an OJJ contracted facility, Boys Town Louisiana, Inc. shall comply with the PREA standards and agree to monitoring for PREA compliance and factors that will place the Agency into full compliance with the Act."

The auditor verified through discussions with the program's PREA Coordinator that the BTLA program has not engaged in any contracts for the confinement of its youth with private agencies or other entities, including other government agencies. As a result, the requirements of this specific PREA standard do not apply to the BTLA program's current situation. It should be noted, however, that the agency does incorporate the language of this PREA standard in the fully executed contract between BTLA and the Louisiana Office of Juvenile Justice (OJJ) for the confinement of OJJ youth at BTLA. Detailed contract provisions can be located on pages 12 and 13 of the contract document, as referenced below:

- "In the event that the Contractor has knowledge of or cause to suspect abuse or neglect of a youth under YS custody, the Contractor shall provide written notification to YS, the Department of Social Services, Office of Community Services, and the local law enforcement agency, in addition to complying with the Child Abuse Reporting and Investigation requirements of

Children's Code Articles 609 et seq.  
 Contractor will comply with the Prison Rape Elimination Act of 2003 (Federal Law 42. U.S.C. 15601 ET. Seq.), and with all applicable PREA Standards, YS Policies related to PREA and Standards related to PREA for preventing, detecting, monitoring, investigating, and eradicating any form of sexual abuse within YS Facilities/Programs/Offices owned, operated or contracted. Contractor acknowledges that, in addition to "self-monitoring requirements", YS will conduct announced or unannounced, compliant monitoring to include "on-site" monitoring. Contractor will also work with the Office of Juvenile Justice PREA Coordinator in scheduling audits in accordance with the agency audit cycle established by YS. Failure to comply with PREA, including PREA Standards and US Policies, or to pass the PREA audit after any corrective action period may result in termination of the contract. Contractor is required to comply with all applicable provisions of the Louisiana Children's Code."

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.**

<b>115.313</b>	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> <li>- 2023 Staffing Plan</li> <li>- Ratio-Monitoring Compliance for Residential Programs</li> <li>- Residential Home Standards Type IV (Department of Children &amp; Family Services-DCFS)</li> <li>- Annual Assessment of Agency's Staffing Plan (2023)</li> <li>- Overnight Safety Guidelines</li> <li>- Onboarding Checklist for Overnight Staff</li> </ul>

- Awake Overnight Guidelines
- Consultation Service
- BTLA Family Home Program Consultation Service Delivery
- Samples of Overnight Unannounced Observations

**Interviews:**

- Executive Director (ED)
- PREA Coordinator (PC)

**Site Review Observations:**

During the onsite phase of the audit, the auditor thoroughly evaluated the program's adherence to their Staffing Plan and did not identify any deficiencies or deviations. In fact, the program was found to surpass the minimum required PREA staff to resident supervision ratios of 1:8 and 1:16, with a ratio of at least 2 staff members present in the home with no more than three (3) youth, resulting in a supervision ratio of 2:3. The program's housing structure also ensures that the supervision ratio never exceeds 1:6, as the maximum bed space is limited to six youth.

Moreover, the presence of Family Teachers living in the home guarantees that there are consistently at least two staff members present in the home for the majority of the time, further enhancing supervision and support for the youth. In addition to staffing levels, the auditor reviewed the program's security measures, including electronic surveillance equipment such as a motion detector system, locks on bathroom doors, sensors on exit doors and windows, and a sign-in log for all individuals entering the house. These comprehensive security measures demonstrate the program's commitment to ensuring a safe and secure environment for the youth under their care.

**Explanation of Determination:**

**115.313**

**(a):** According to the agency's PREA Policy on page 11:

- A staffing plan will be developed to include all the required elements listed below:
  - Generally accepted juvenile detention and correctional/secure residential practices.
  - Any judicial findings of inadequacy.
  - Any findings of inadequacy from Federal investigative agencies.
  - Any findings of inadequacy from internal or external oversight

bodies.

- All components of the facility's physical plant (including " blind spots" or areas where staff or residents may be isolated);
- The composition of the resident population.
- The number and placement of supervisory staff.
- Institution programs occurring on a particular shift.
- Any applicable State or local laws, regulations, or standards.
- The prevalence of substantiated and unsubstantiated incidents of sexual abuse.
- Any other relevant factors

In addition to the agency's PREA Policy, the auditor was provided with the program's 2023 Staffing Plan, a 13-page comprehensive plan that encompasses all the requirements of the PREA standard. This plan was recently reviewed and signed by key personnel, including the PREA Coordinator (PC), Executive Director, Sr. Program Operations Manager, FH Residential Director, and I&A Acting Director, on October 27th, 2023. The program's ED and PC shared in their individual interviews that the Staffing Plan reaffirms the program's commitment to fulfilling staffing requirements and supervision ratios that exceed the minimum 1:8 and 1:16 PREA provision. The administrators further explained how they incorporated the eleven elements of this PREA standard into their Staffing Plan, with the PC for the Louisiana Office of Juvenile Justice assisting with its development in early 2023 (when the program was required by OJJ to begin the process of complying with the PREA standards).

Furthermore, the auditor was provided the Louisiana Department of Children's Family Services (DCFS) 'Residential Home Standards Type IV' policy manual. It was explained that compliance with this manual is mandatory for the BTLA program as per the licensure requirements of the Louisiana DCFS. The manual contains a specific section, starting on page 30, which outlines the staffing and supervision requirements for youth.

Importantly, it should be noted that the staff-to-youth supervision ratios established by the Louisiana DCFS exceed the minimum corresponding requirements of the PREA standard. The BTLA program adheres to the state's mandatory supervision requirements of 1 staff member to 6 youth at all times due, in part, to the fact the program's maximum capacity is 6 youth. Further details on this compliance can be found in subsection (c) of the report.

**(b):** As expressed in the program's 2023 Staffing Plan, "Boys Town will comply with the staffing plan except during limited and discrete exigent circumstances and shall full document deviation from the plan during such circumstances." The PC noted in the PAQ that there has not been a situation in the past 12 month audit review period in which the BTLA program deviated from their Staffing Plan. Moreover, the PC and ED confirmed during their interviews onsite that the program has never deviated from the Staffing Plan in any way, and the program exceeds the minimum requirements of staffing to ensure they are never in jeopardy of deviating from the plan. The ED also explained further how if a deviation situation were to occur, the

issue would be immediately addressed by the management team, thoroughly documented, and rectified as soon as possible.

Additionally, as per the agency's Staffing Plan on page 11:

- "This staffing plan is currently in place at Boys Town La for the PREA compliant Family Homes. Any deviations in the staffing plan including any that result in out of ratio event will be reported up the chain of command as required by BT policies and will include the PREA coordinator."

**(c):** According to the agency's PREA Policy on page 10:

- "Boys Town provide guidelines to ensure the proper supervision of youth and families by employees. All state licensing, contractual requirements, or accreditations standards directing specific employee-to-service recipient ratios, supervision requirements, or licensed capacity requirements must be followed.
- The ratio of employees to youth is maintained at a minimum of one employee for every six youth (1:6) when youth are present and awake. In addition, there shall be one additional staff person for every six-youth present. as specified in licensing requirements.
- Types of Monitoring include:
  - Normal
  - Precautionary
  - One-on-one"

Furthermore, the auditor verified that the agency's 2023 Staffing Plan includes the required elements of this provision, as described on page 1:

- "This staffing plan was created by adapting best practices for securing the safety of youth in a non-secure residential setting with PREA guidelines. Boys Town La minimum standard of monitoring in the residential home is 1:6 during awake hours and the same for sleep time. These also are the standards of the DCFS State Licensing and the Office of Juvenile Justice. This ratio allows the facility to be in the best position to prevent, detect and respond to sexual abuse and sexual harassment.
- Due to the mix environment of DCFS (Child Welfare) and OJJ (Juvenile Justice) youth, per State Licensing standards, the Office of Juvenile Justice must present documentation during the referral process that youth is acceptable for nonsecure residential setting."

The agency's Staffing Plan further elaborates the program's staffing situation by outlining the following for the number and placement of supervisory staff:

- "At all times the staff ratio is at least 1:6. This is the minimum requirement to properly provide safety and security of youth and staff within the facility.

Youth are always supervised by at least one staff member so there are no deviations from the staffing plan that allows for an inadequacy in the safety, security and monitoring of the facility except during limited and discrete exigent circumstances. Those circumstances that caused the deviations will be fully documented. In addition to Assistant Family Teachers (direct care staff), the Program Director and Family Home Consultant are available for "call out for coverage" to the staff to fill the void or increase coverage when needed. This allows the staff to remain in compliance of the staffing plan to provide Family Teachers with additional support or coverage on their off days. When the married couple- Family Teachers are on shift the ratio is increased and on certain occasions along with the Family Teachers there may be an additional staff on duty for support or scheduling necessity. There are 3 shifts, and the shifts are 6am- 3pm; 3pm to 10:00pm; and the overnight shift is 10pm to 6am."

Note: The BTLA is NOT a secure juvenile facility, as confirmed by the auditor, and, therefore, is not required to comply with the requirements set forth by this specific provision. However, as confirmed by the auditor, the program not only complies with the minimum PREA staff-to-resident supervision ratios of 1:8 and 1:16 but significantly exceeds them by adhering to the 1:6 ratio at all times. Both the PC and ED affirmed in their individual interviews that the program strictly adheres to a maximum population limit of six male youth. This deliberate limitation ensures that the program consistently maintains compliance with the agency's mandated 1:6 supervision ratio, as outlined in agency policy. By operating within this defined capacity, the program mitigates any risk of straying from the prescribed supervision standards and reinforces their commitment to providing safe and effective care for the youth in their custody.

**(d):** The auditor confirmed that the requirements of this PREA standard are included in the agency's PREA Policy on page 11, as documented below, and in the agency's 2023 Staffing Plan.

- At least once a year, Boys Town will assess, determine, and document whether adjustments are necessary to the staffing plans and other monitoring for its non-secure facilities.
  - The staffing plan is established pursuant to §115.313(a) 1-11 of this section.
  - Prevailing staffing patterns.
  - The facility's deployment of video monitoring systems and other monitoring technologies; and
  - The resources the facility has available to commit to ensure adherence to the staffing plan.

Additionally, as per the agency's 2023 Staffing Plan (created and approved in March of 2023):

- "In pursuant to PREA Standard 115.313, the Boys Town Louisiana Staffing Plan will be reviewed every 12 months or whenever necessary in search of any inadequacies and to verify compliance of the staffing plan itself. The staffing plan is reviewed by the PREA Coordinator, Executive Director, Sr. Director of Program Operations, and the Family Home Program Director. Additional staff maybe added as needed.
- This staffing plan will be reviewed annually by a panel of the facility upper-level management (Executive Director, Sr. Director of Program Operations) administrators (Program Directors) and PREA Coordinator. Boys Town adheres to all applicable laws, regulations, and standards that must be met in a juvenile correctional facility (Boys Town Residential Family Homes), including staffing.
- Any findings of inadequacy from federal investigative agencies and /or internal or external oversight bodies must be addressed and corrected in a timely fashion through a Corrective Action Plan. As state or local laws, regulations, and standards change, so shall the staffing plan for Boys Town Louisiana Residential Homes under PREA mandates.
- The staffing plan review will assess whether adjustments are needed to:
  - The staffing plan.
  - Prevailing staffing patterns
  - Deployment of monitoring technology; or
  - The allocation of agency or facility resources to commit to the staffing plan to ensure compliance with the staffing plan.

In order to demonstrate how the agency's Staffing Plan was reviewed by administration in accordance to the requirements of this provision, the auditor was provided the signed Staffing Plan that confirmed the PC, Executive Director, Sr. Program Operations Manager, FH Residential Director, and I&A Acting Director all reviewed the plan on October 27th, 2023. Additionally, the PC and ED advised in their interviews how the management team is planning to meet to conduct the annual review of the Staffing Plan in March of this year. The administrators adequately described the elements of the Staffing Plan that are required to be reviewed and indicated that the review will be documented on a report that will be made available to the auditor. Furthermore, no deviations to the agency's Staffing Plan were experienced, as per the PC and ED, since the Staffing Plan was created last year.

**(e):** Even though the BTLA program is not a secure juvenile facility and, therefore, not required to adhere to the requirements of this PREA provision, the program was found by the auditor to have procedures in the agency's PREA Policy and in the 2023 Staffing Plan that describe the program's plan to conduct periodic unannounced supervisory rounds on the overnight shift. For example, the agency's PREA Policy states on page 11:

- "Boys Town complies with §115.113(e) by having unannounced visits conducted by intermediate-level or higher-level supervisors, to the facility to



identify and deter staff sexual abuse and harassment. Policy dictates that overnight staff will use swipe cards or alternate means to document bed checks. Awake Overnight Guidelines is attached."

Furthermore, as noted in the agency's 2023 Staffing Plan:

- "Drop in checks will be completed at least monthly, during sleep hours, by site Supervisor, Director, other member of site leadership, or the Quality department to check adherence to the Overnight process.
- Checks may be adjusted to occur more frequently to meet the needs of the program.
- Overnight checks should be noted in the NDB2 as an overnight observation of staff present. The overnight checklist should be attached to the entry and a copy provided to the Program Director."

Samples of completed Overnight Observation Check Lists documents spanning a four-month period in the calendar year 2023 were submitted for review. Upon examination, the auditor determined that these samples sufficiently illustrate how the BTLA program ensures the implementation of PREA unannounced supervisory rounds in accordance with the program's PREA Policy and Staffing Plan. It is essential to note that, as a non-secure facility, the requirements outlined in provision (e) are not applicable to the BTLA program. Nonetheless, the auditor recommends that BTLA continue these procedures as a measure of best practices.

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency substantially exceeds the required elements of this standard. No corrective action is required.**

115.315	Limits to cross-gender viewing and searches
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> <li>- Safety Search of Youth's Room/Belongings/Persons</li> <li>- BTLA Youth Searches Processes &amp; Policies Training Document</li> </ul>

- Employee List
- BTLA Training Documentation Form (PREA Training: Proper Searches)

**Interviews:**

- Random Staff
- All Youth in the Program

**Site Review Observations:**

- During the onsite, the auditor did not observe any youth being searched; confirmed that the youth living at the BTLA home have full privacy in their individual bathrooms to change, use the restroom, and shower; and took note of a sign posted upstairs in the home that clarifies that female staff work at the house on a regular basis.

**Explanation of Determination:**

**115.315**

**(a - f):** The auditor reviewed the agency's PREA Policy and confirmed that the BTLA program is not authorized to conduct any type of strip search or body cavity search of a resident, with the only resident search allowed, per agency Policy, being an approved same gender pat-down search. This was also confirmed by the PC in the PAQ notes section, in which the PC indicated that only same gender pat-down searches are allowed and no cross gender searches of any kind have occurred at the program. Furthermore, the auditor confirmed that the following procedures are included in the agency's PREA Policy on page 12:

- "Boys Town does not allow strip searches or surveillance equipment or listening devices for routine observation of youth in their rooms or living areas.
- Cross- gender pat-down searches are not allowed, except in exigent circumstances.
- Staff are trained annually in how to conduct searches, cross-gender pat-down searches and searches of transgender and intersex youth. All pat down searches will be documented per Boys Town: Safety Search of Youth's Room/Belongings/Person Procedure located in the Appendices. If it is necessary to conduct a cross gender pat down search, the staff will have a witness and document the justification of the pat down search and reason for the necessity of a cross gender staff to conduct the search. Boys Town Louisiana, Inc. programs do not conduct cross gender strip searches or body cavity searches of any type.
- Residents living in Boys Town Louisiana, Inc. residential programs shower, perform bodily functions, and change clothing in private. All staff members

will announce their presence when entering the areas designated for privacy generally areas related to showering, performing bodily functions, or changing clothes.

- Boys Town Louisiana, Inc. staff will not search or physically examine a transgender or intersex resident for the sole purpose of determining the resident's genital status. If the resident's genital status is unknown, it may be determined during conversations with the resident, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner."

Additionally, the auditor was provided an agency-wide policy titled, "Safety Search of Youth's Room/Belongings/Person," in which the following procedures are included therein:

- "Father Flanagan's Boys' Home (a/k/a Boys Town) and its affiliate corporations (hereinafter collectively referred to as "Boys Town") provide guidelines for employees to conduct searches of a youth's room, belongings, or person. A search can be conducted by employees when they have reasonable belief that dangerous, illegal, or stolen (i.e., contraband) items that pose a safety concern are in a youth's possession. Searches will be conducted in accordance with this procedure and local licensing, accreditation, contractual guidelines, or legal standards. Before conducting a search, employees should first encourage youth to voluntarily turn over or relinquish any contraband. Permission must be authorized by the Program Director, Senior Director of Operations, or Executive Director prior to a search being conducted, unless an emergency or unsafe condition requires immediate action.
- Person or pat-down searches are to be used only in those programs and locations where they are required by contract and allowed by licensing.
- Person or pat-down searches are to be used only if reasonable grounds exist that the search of the youth will reveal evidence that he or she has violated, or is violating, the law or the rules of the program.
- Employees must maintain the privacy of the youth by not having other youth present during the search.
- Two employees must be present when a person or pat-down search is conducted. The employee conducting the person or pat-down search should be of the same gender as the youth, whenever possible.
- All person or pat-down searches must be documented in the National Database Incident Report. The documentation must include the date and time of the search, the specific reason for the search, the type of search conducted, the names of the employees involved, the name of the supervisor who was notified, and a listing of any items found during the search.
- Types of Searches Not Permitted:
  - Strip searches
  - Surveillance equipment or listening devices for routine observation

of youth in their rooms or other living areas, unless required by contract or program (e.g., baby monitors in homes for younger youth, with Program Director approval)."

In order to demonstrate how the agency ensures all youth are continually reminded of the gender of staff working at the program, the PC provided the auditor with a sign that is posted throughout the facility. This sign states, "Male and female staff members routinely work and visit housing areas," and is a requirement included in the contract the BTLA program has with the Louisiana DFCS.

The auditor was furnished with the program's youth searches training curriculum, a comprehensive four-page document encompassing Boys Town policies on searches, relevant licensing standards, Louisiana Office of Juvenile Justice standard operating procedures and official guidelines on pat-down searches, and staff training talking points. Additionally, the PC supplied the auditor with the program's latest Training Documentation Form, confirming successful training of all staff on the described curriculum. This training verification document attests that all staff have been adequately trained in accordance with the requirements specified by this PREA standard and applicable agency policy and state standards.

In addition to the documentation evidence review explained above, the auditor conducted individual interviews with all three male youth and eight out of nine available staff members (one staff member was on scheduled leave). The interviews with the youth revealed that they have never been subjected to physical searches nor witnessed other youth undergoing any form of search at the home. Staff members confirmed that they are prohibited from conducting searches, but are trained in pat-search procedures, including protocols for conducting cross-gender pat-searches and pat-searches on transgender/intersex youth in exigent circumstances, which must be authorized by a supervisor. However, all the staff advised that such a search would never be authorized because it is the Boys Town policy to never place their hands on a youth. As expressed by the staff interviewed, such a search would, most likely, be conducted by law enforcement for situations involving illegal behavior at the home.

Staff members elaborated on their interpretation of exigent circumstances, demonstrating a clear understanding of when a pat-down search may be necessary. The auditor verified that the staff's training on pat-search procedures equips them to conduct searches in a professional, respectful, and least intrusive manner, while still meeting security requirements. Both youth and staff confirmed that all youth have private bathrooms for showering, restroom use, and changing, with the ability to secure the doors for privacy.

During individual discussions with the youth, they expressed feeling a high level of privacy and comfort within the program. They noted that they have never felt uncomfortable with the privacy level or experienced any instances of being observed in a state of undress while at the home. The youth were asked about their own level of safety while in the BTLA program. All three youth confirmed they felt

	<p>safe and stated there were no issues of concerns to share with the auditor. They also mentioned having staff they trusted and who they could talk to about any concerns or issues they may experience.</p> <p>Furthermore, when asked about encounters with transgender or intersex youth in the program within the past few years, staff members reported no recollection of such individuals being admitted to the facility. However, all staff explained that they have received training on how to handle such situations. Each staff member elaborated on the management team's process of staffing any transgender or intersex youth before admission into the program. This process ensures that the youth's situation is properly assessed, and staff are briefed on the specifics in advance to ensure a smooth transition for the youth to the home.</p> <p><b><u>Conclusion:</u></b></p> <p><b>Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.</b></p>
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<b>115.316</b>	<b>Residents with disabilities and residents who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> <li>- Service Recipient Accommodation Request (Youth Care Policy #3500)</li> <li>- Letter of Agreement Between BTLA &amp; Professional Interpreting Services</li> <li>- PREA Youth Brochure in Spanish (OJJ)</li> <li>- PREA Youth Orientation Presentation (21 slides)</li> <li>- "No Means No" Spanish PREA Poster</li> </ul> <p><b>Interviews:</b></p> <ul style="list-style-type: none"> <li>- All Youth in the Program (3)</li> <li>- All Available Staff</li> </ul>

- Executive Director (ED)

**Site Review Observations:**

During the onsite, the auditor assessed the program dynamics at the home and confirmed that BTLA has the capability to deliver individualized, one-on-one specialized services pertaining to the applicable PREA requirements set forth by this PREA standard on a case-by-case basis. The unique family-oriented structure of the home facilitates tailored support for each youth, such as weekly counseling sessions with a counselor, attendance at a local public school for mandated education, personalized assistance from dedicated and specially trained Family Teachers and staff who interact with the youth daily, and access to interpreting and translation services as needed on a case-by-case basis.

In addition, the auditor further inquired with the three youth in the program regarding any potential communication barriers, challenges in comprehending the PREA information shared, or disabilities that could hinder their understanding of the PREA-related content. Each youth confirmed that they had a full understanding of the PREA information provided during the intake process, were familiar with all the PREA signs displayed throughout the house, and none of them reported having a disability that would impede their comprehension of the PREA information presented.

The auditor also conducted several successful test calls while onsite, including calls to:

- the Louisiana Office of Juvenile Justice (OJJ) Reporting Hotline;
- Louisiana Foundation Against Sexual Assault Reporting Hotline;
- Aubrey Hepburn CARE Center; and
- Boys Town Student Hotline.

The calls detailed above were made through the same phone call process that a youth at the home would use to make a call out, and each entity contacted confirmed that they are equipped to accept reports of abuse, neglect, and exploitation from both juveniles and adults. They also stated that translators are available on an as needed basis, and the three hotline centers confirmed that they operate a 24/7 call center.

**Explanation of Determination:**

**115.316**

**(a - c):** The auditor confirmed that all the requirements of this PREA standard are included in the agency's PREA Policy on page 12, as outlined below:

- "Boys Town Louisiana, Inc. provide reasonable accommodations to potential, current, or past youth and families who have known protected disabilities, in

accordance with the requirements of applicable law, local contracts, licensing regulations, and/or accrediting agencies. Boys Town Louisiana Inc shall take appropriate steps to ensure that residents with disabilities (for example, residents who are deaf or hard of hearing; those who are blind or have low vision; or those who have intellectual, psychiatric, or speech disabilities) have an equal opportunity to participate in or benefit from all aspects of the facilities efforts to prevent, detect, and respond to sexual abuse and sexual harassment.

- Boys Town Louisiana, Inc. shall take reasonable steps to ensure meaningful access to all aspects of the facilities efforts to prevent, detect, and respond to sexual abuse and sexual harassment to residents who are limited English proficient, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary as well as access to written material in their own language. Boys Town Louisiana, Inc. shall not rely on peer interpreters, peer readers, or other types of peer assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety.
- Boys Town Louisiana, Inc. has access to Spanish speaking employees/ volunteers who have agreed to provide interpretation services for intakes, PREA orientation, and any other PREA affiliated instances that may occur."

In order to effectively demonstrate compliance with the requirements of this PREA standard, the BTLA program has implemented a range of initiatives tailored specifically for Spanish-speaking youth. To ensure equal opportunities for participation and access to vital resources, the program has provided the auditor with a comprehensive set of PREA resident orientation and educational materials in Spanish. Additionally, three PREA posters written in Spanish were uploaded in the OAS by the PC, and the PC indicated in the PAQ that these posters are placed throughout the facility. Furthermore, the BTLA program utilizes a dedicated Spanish PREA resident video and brochure, empowering residents to fully understand their rights and resources within a language barrier-free environment. These materials encompass crucial PREA related information, including reporting protocols, emotional support services, and guidance on personal safety. The ED of the BTLA program confirmed the information detailed above and advised the program will take any steps necessary to ensure all youth who are admitted 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. It was further explained that the program has a signed MOU with a local professional interpreter who can be used on a case-by-case basis to ensure a youth who may be limited English proficient is able to effectively communicate and be provided information in a language he can fully understand. The ED shared how the program's management team conducts thorough pre-screenings of all prospective youth before acceptance into the program, identifying any specialized needs that may require attention. In instances where a youth does not meet the minimum program requirements, placement will be declined to uphold the integrity and effectiveness

of the program.

In alignment with the requirements of this PREA standard, the agency demonstrates a commitment to addressing the needs of residents who may face language or disability barriers. The auditor's review revealed the agency's proactive measures, including the utilization of professional interpreting services, in order to effectively communicate with residents who are limited English proficient or have a disability. The evidence of this commitment was observed through the examination of a signed and fully executed Letter of Agreement Between Boys Town Louisiana and a Certified Interpreter and Translation Technician, which was signed in November of 2023. This Agreement outlines the responsibilities of the Technician to include, but not limited to, the following:

- Provide interpreting and translation services to Family Home (FH) program youth, with limited English proficiency to prevent, detect, and respond to sexual abuse and sexual harassment.
- Provide interpretations effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.
- Assist the agency with ensuring that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities and language barriers, including residents who have intellectual disabilities, limited reading skills, or who are blind or have low vision.
- Provide immediate communication (verbal and written) to FH Program Director when an emergency or serious issue arise when providing services to BT FH staff and/or youth.

Furthermore, the Agreement also described the responsibilities of BTLA, to include:

- Identify the central point of contact for a seamless transition into services including initial meetings to identify workflow and communication strategies.
- Ensure the meetings/services occur at scheduled times and dates. If meetings are cancelled/rescheduled, Boys Town administration will inform the "technician" of the change 24 hours prior to the previously appointed time. If not, "technician" will be compensated for her time.
- Provide "technician" with a contact person(s) and emergency number(s) for any immediate and serious issues or problems that will need to be communicated immediately.
- Verify professional certification status of the party with whom this Agreement is with through the State and periodical verification of license{s} status during the term of the Agreement.
- Conduct a Criminal/Child Protective Background Check and SCR screen.
- Provide Boys Town orientation related to BT model of care and any other approach required by our contractor.

In addition to the previously mentioned evidence reviewed, the auditor was provided with an agency-wide policy document titled "Service Recipient



Accommodation Request." This policy underscores the agency's commitment to addressing the specific needs of residents and ensuring that appropriate accommodations are made, as described below:

- "Father Flanagan's Boys' Home (a/k/a Boys Town) and its affiliate corporations (hereinafter collectively referred to as "Boys Town") provide reasonable accommodations to potential, current, or past youth and families (hereinafter referred to as "service recipients") who have known protected disabilities, in accordance with the requirements of applicable law, local contracts, licensing regulations, and/or accrediting agencies.
- An accommodation requested by a potential, current, or past service recipient will be provided if the accommodation is reasonable and not an undue burden. For instance, Boys Town provides qualified/certified interpreters, translators, equipment (e.g., readers, tapes, ramps, etc.), and materials to service recipients to ensure they are provided equal access to services. Boys Town will provide additional or different accommodations that are consistent with applicable contract requirements."

Finally, it is important to share that during the 12-month audit review period, the PC noted in the PAQ that there have been no instances where resident interpreters, readers, or other types of resident assistants have been utilized in a PREA situation related to an allegation or incident of sexual abuse or sexual harassment. Moreover, the staff interviewed all confirmed that they are prohibited from using one youth to translate for another in a PREA situation, such as reporting an allegation of sexual abuse or sexual harassment, and Boys Town has the ability to call in Spanish speaking staff or a professional interpreter to provide translation services on a case-by-case basis.

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.**

<b>115.317</b>	<b>Hiring and promotion decisions</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> </ul>

- Mandatory Requirements for Employees (FFBH Policy #3050)
- Background Checks Policy (FFBH Policy #3080)
- Employment Verifications (FFBH Policy #3230)
- PREA Questionnaire for New Staff & Contractors
- Reference Questionnaire
- Personnel File Review

**Interviews:**

- HR Administrative Staff Designee (PREA Coordinator- PC)

**Explanation of Determination:**

**115.317**

**(a):** According to the agency's PREA Policy on page 13:

- "Boys Town Louisiana, Inc. requires background checks on applicants, volunteers, contractors, who will be performing ongoing services directly targeted to any youth, family, patient, or client and interns who are accepting conditional offers of employment/service, and recurring background checks on current employees.
- Background checks may include, but are not limited to: credit checks, criminal history reviews, child abuse registry checks, education and employment verifications, driving history reviews, professional and personal references. Boys Town conduct criminal background records checks annually on current employees and contractors who may have contact with residents.
- As a condition of employment, a satisfactory background check must be completed for every employee; every volunteer who will be performing ongoing services directly targeted to service recipients and interns who will have contact with any service recipient; and every independent contractor who will have unsupervised contact with any service recipient. No applicant can report for work until his or her background check has been satisfactorily completed."

Furthermore, the auditor was provided the agency's Policy titled, "Mandatory Requirements for Employees." This policy outlines the following background check requirements:

- "Mandatory requirements include, but are not limited, to background checks and licenses and certifications.
- Mandatory requirements for each position are collaboratively determined by Youth Care/Health Care leadership, the Chief Compliance Officers of Youth

Care and Health Care, the Office of the General Counsel, and the Human Resources Department. The management of an affiliate corporation must determine additional requirements according to local contracts, licensing agencies, and/or accrediting agencies."

The agency's "Background Checks" Policy was also provided in the OAS and includes the following additional procedures required for conducting the PREA required background checks:

- "Father Flanagan's Boys' Home (a/k/a Boys Town) and its affiliate corporations (hereinafter collectively referred to as "Boys Town") require background checks on applicants, volunteers who will be performing ongoing services directly targeted to any youth, family, patient, or client (hereinafter referred to as "service recipient"), and interns who are accepting conditional offers of employment/service, and recurring background checks on current employees.
- Background checks may include, but are not limited to:
  - Credit checks
  - Criminal history reviews
  - Child abuse registry checks
  - Education verifications
  - Employment verifications
  - Driving history reviews
  - Professional and personal references
- Background checks will be conducted in accordance with state law and regulations; procedures for requesting and receiving results from such checks will adhere to local contracts, licensing regulations, and/or accrediting agencies' requirements.
- As a condition of employment, a satisfactory background check must be completed for every employee; every volunteer who will be performing ongoing services directly targeted to service recipients and interns who will have contact with any service recipient; and every independent contractor who will have unsupervised contact with any service recipient. No applicant can report for work until his or her background check has been satisfactorily completed.
- The Talent Acquisition Partner or a Human Resources representative reviews the results of background checks, notes all issues and variances between the results and the candidate's application, and follows the Review and Use of Background Check Results, Human Resources Practice. Background check reviewers must consult the Director of Human Resources Youth Care, or the Boys Town National Research Hospital® Human Resources Director, about significant variances or concerns. Completed background checks are maintained by the Human Resources Department.
- Applicants who withhold or falsify information on their application may be disqualified from further employment consideration. Additionally, certain offenses may disqualify an applicant from employment based on the Review

and Use of Background Check Results, Human Resources Practice. In these instances, the Human Resources Department will discuss appropriate information with the Hiring Manager."

The auditor also reviewed a form titled, "Fingerprint- Based Criminal Background Check (CBC) Requirements for Residential- Type IV Providers." This document outlines the requirements associated with the background checks conducted for any employee, contractor, or volunteer who is pending employment or enlistment of services at the BTLA program. The document indicates that a criminal history and clearance through the FBI criminal record checks is required to be obtained through the local DCFS Child Welfare offices.

The PC also provided the auditor with the agency's form titled, "PREA Questionnaire for New Staff and Contractors." This document is required to be completed by all new staff and contractors and includes the questions required to be asked by PREA provision (f) (a) (1-3).

**(b):** As per the agency's PREA Questionnaire for New Staff and Contractors form:

- Agency Policy requires the consideration of 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.
- The above statement is on the form, with the following question that requires a 'yes' or 'no' answer: "Have you been involved in any incident of sexual harassment? If the new staff or contractor answers 'yes,' then the individual must then explain the situation.

Additionally, the agency's Background Checks Policy also includes the following procedures for reviewing the results of the background checks:

- The Talent Acquisition Partner or a Human Resources representative reviews the results of background checks, notes all issues and variances between the results and the candidate's application, and follows the Review and Use of Background Check Results, Human Resources Practice.
- Background check reviewers must consult the Director of Human Resources Youth Care, or the Boys Town National Research Hospital® Human Resources Director, about significant variances or concerns. Completed background checks are maintained by the Human Resources Department.
- Applicants who withhold or falsify information on their application may be disqualified from further employment consideration. Additionally, certain offenses may disqualify an applicant from employment based on the Review and Use of Background Check Results, Human Resources Practice. In these instances, the Human Resources Department will discuss appropriate information with the Hiring Manager."

**(c & d):** As noted in subsection (a) above, the program includes the following

procedures in the agency's PREA Policy related to the background requirements of this provision:

- "Boys Town Louisiana, Inc. requires background checks on applicants, volunteers, contractors, who will be performing ongoing services directly targeted to any youth, family, patient, or client and interns who are accepting conditional offers of employment/service, and recurring background checks on current employees.
- Background checks may include, but are not limited to: credit checks, criminal history reviews, child abuse registry checks, education and employment verifications, driving history reviews, professional and personal references. Boys Town conduct criminal background records checks annually on current employees and contractors who may have contact with residents.
- As a condition of employment, a satisfactory background check must be completed for every employee; every volunteer who will be performing ongoing services directly targeted to service recipients and interns who will have contact with any service recipient; and every independent contractor who will have unsupervised contact with any service recipient. No applicant can report for work until his or her background check has been satisfactorily completed.
- Consistent with law, BT HR shall additionally use their best efforts to contact all prior institutional employers for information on substantiate allegation of sexual abuse or resignation during a pending investigation of allegation of sexual abuse. Employees have a continuing duty to disclose any such misconduct; material omissions or providing materially false information shall be grounds for termination."

Furthermore, as a means of demonstrating how the program 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 the auditor was provided an agency form titled, "Reference Questionnaire." This document illustrates how the institutional reference checks are documented as required by element (3) of this provision.

Additionally, the auditor examined the Boys Town Employee Handbook, which includes the following information related to the background requirements of this PREA standard on page 23, as outlined below:

- Boys Town requires background checks on applicants who are accepting conditional offers of employment/service, as well as interns, volunteers and other non-employees who will be performing ongoing services directly targeted to any youth, family, patient or client (hereinafter referred to as "service recipient.")
- In addition, Boys Town requires certain current employees to satisfactorily complete periodic and recurring background checks. Boys Town will consider the employee's job duties, among other factors, in determining which

employees will be subject to periodic and recurring background checks and what constitutes satisfactory completion of the background check.

- All information obtained as a result of a background check will be kept confidential and used solely for employment purposes. Failure to timely complete any background check authorization and/or falsification or omission of information may result in discipline, up to and including termination of employment.

**(e):** As per the agency's PREA Policy on page 13:

- "Background checks may include, but are not limited to: credit checks, criminal history reviews, child abuse registry checks, education and employment verifications, driving history reviews, professional and personal references. Boys Town conduct criminal background records checks *annually* on current employees and contractors who may have contact with residents."

**(f):** The auditor reviewed the agency's form titled, "PREA Questionnaire for New Staff and Contractors." This document is required to be completed by all new staff and contractors and includes the questions required to be asked by PREA provision (f) (a) (1-3).

**(g):** As confirmed to be in the agency's PREA Policy on page 13: "Employees have a continuing duty to disclose any such misconduct; material omissions or providing materially false information shall be grounds for termination." Additionally, it is important to point out that the agency's PREA Questionnaire for New Staff and Contractors Form includes the following question that is required to be answered with a 'yes' or 'no' (with an explanation if 'yes'):

- "Material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination. Have you omitted information regarding sexual misconduct other provision of materially false information?"

**(h):** The following relevant procedures to this provision were confirmed to be included in the agency's 'Employment Verifications' Policy:

- "Father Flanagan's Boys' Home (a/k/a Boys Town) and its affiliate corporations (hereinafter collectively referred to as "Boys Town") will respond to employment verification requests for former and current employees and volunteers.
- Employment verifications shall be provided only by a Human Resources Department representative and will include the verification of dates of employment, position held, and full-time or part-time status unless otherwise requested or authorized, in writing, by the employee.
- All employment verification and/or reference requests should be directed to

the Human Resources Department."

**Employee Personnel File Review & PC/HR Interview:**

During the onsite audit, the auditor randomly selected six staff personnel files to review for compliance with the applicable PREA requirements. The PC provided assistance to the auditor during the examination of each staff file, and the PC was also asked the PREA HR Administrator Interview Protocols during this file review process. The auditor utilized the PREA Documentation Review Worksheet to ensure that all elements mandated by the PREA standard were evaluated for compliance. Upon examination of each of the six staff personnel files, no instances of non-compliance were identified, and all essential documentation supporting PREA compliance was found in each file.

Additionally, the PC elaborated on the agency's background screening procedures, outlining how staff members are required to respond to PREA-related questions, the protocol for conducting initial criminal history and child abuse registry checks, the mandate for annual criminal history checks (both state and national database searches) for all employees, and the process for conducting institutional reference checks for staff members with prior institutional experience.

**Non-Compliance Summary:**

Upon conducting the interviews with the juveniles at the home, it was learned that a licensed therapist meets with each youth weekly at the home. The auditor followed up with the PC in regards to this therapist being screened as appropriate to the background requirements of this PREA standard, specific to the contractor elements. In response, the PC indicated that the agency does not have a formalized contract with this counselor; therefore, the agency has not conducted the background screenings or provided PREA training. The PC explained that even though the agency may not have a formal contract or MOU with this individual, as per the PREA FAQ dated 7/20/2018, BTLA is still required to conduct the background and applicable PREA training requirements pursuant to standards 115.317 (b), (d), and (e) and 115.335. The PC understood and advised she will provide verification documentation during the corrective action period to prove that the criminal background and child abuse registry check have been completed for this therapist, as well as the required PREA training.

**Correction Action Summary:**

In response to the non-compliance issues identified above, the PC promptly took the necessary corrective action by requesting the original criminal history check conducted by the Louisiana Department of Public Safety and Corrections (Louisiana State Police Criminal Records) for the therapist in 2016 from the therapist's employer. Furthermore, a recent criminal history background check and child abuse registry check were carried out on the therapist to ensure adherence to the relevant requirements of the PREA standard. Proof documentation of the required background checks that were completed for this therapist during the corrective

	<p>action period was reviewed by the auditor and found to be sufficient to demonstrate full compliance with this deficiency.</p> <p>The child abuse registry check was conducted by the Louisiana Department of Child and Family Services and verified that the therapist is not included on the Louisiana State Central Registry of Child Abuse and/or neglect. In addition, the criminal history check was conducted by the Louisiana Department of Public Safety and Corrections (Louisiana State Police Criminal Records) on 6/4/2024 and no disqualifying criminal history was identified.</p> <p>These evidentiary documents, as well as the interview with the therapist during the corrective action period, proved that BTLA successfully rectified the non-compliance issues identified and no further corrective action is required at this time.</p> <p><b><u>Conclusion:</u></b></p> <p><b>Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard and no corrective action is required at this time.</b></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><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> </ul> <p><b>Interviews:</b></p> <ul style="list-style-type: none"> <li>- The program's PREA Coordinator (PC) confirmed that the BTLA program has not recently acquired a new facility or made a substantial expansion or modification to the existing facility or installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology.</li> </ul> <p><b>Site Review Observations:</b></p> <ul style="list-style-type: none"> <li>- At no time during the onsite phase of the audit did the auditor observe any evidence to suggest the facility recently acquired a new facility or made a substantial expansion or modification to the existing facility or installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology.</li> </ul>



	<p><b>Explanation of Determination:</b></p> <p><b>115.318</b></p> <p><b>(a &amp; b):</b> According to the agency's PREA Policy on page 14:</p> <ul style="list-style-type: none"> <li>• "Boys Town Louisiana adheres to a procedure that ensure that all construction and remodeling projects meet all local and state regulations, construction codes, and building standards. When designing or acquiring any new facility or in planning any substantial expansion or modification of existing facilities, Boys Town Louisiana, Inc. will consider how the design, acquisition, expansion, or modification may impact the agency's ability to protect and monitor youth from sexual abuse, as well as other forms of abuse and/or neglect. Boys Town Louisiana, Inc. will consider how technology may enhance the agency's ability to protect residents from sexual abuse when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology. Boys Town Louisiana, Inc. prohibits the use of video monitoring or other monitoring technology within the Residential programs."</li> </ul> <p>Furthermore, as noted by the PC in the PAQ, the agency has not acquired a new facility or made a substantial expansion or modification to the existing facility or installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since the last PREA audit time frame. This was also verified by the auditor through the documentation review and facility inspection.</p> <p><b>Conclusion:</b></p> <p><b>Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.</b></p>
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<b>115.321</b>	<p><b>Evidence protocol and forensic medical examinations</b></p> <p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> <li>- Youth Safety Audit Reporting &amp; Participation Document</li> </ul>
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- BTLA Request Emails to New Orleans Police Department (NOPD)
- BTLA Official Letter to NOPD
- Signed MOU Between BTLA & Children's Hospital Audrey Hepburn CARE Center
- Coordinated Response to Sexual Abuse Incidents Document
- BTLA SART Protocols
- Children's Hospital New Orleans (Audrey Hepburn CARE Center) website
- Fully Executed Contract Between the Louisiana Office of Juvenile Justice (OJJ) and BTLA
- OJJ PREA Annual Reports (2021 - 2023)

**Interviews:**

- Random Staff
- PREA Coordinator (PC)
- CARE Center Director

**Explanation of Determination:**

**115.321**

**(a & b):** As per the agency's PREA Policy on page 14:

- "When Boys Town Louisiana, Inc. is made aware of a sexual abuse situation, members of Boys Town Louisiana, Inc. Sexual Abuse Response Team (SART) will meet to discuss the alleged incident identified in the SART Protocol detailed previously in this handbook. Boys Town will adhere to processes outlined in the SART Protocol to ensure proper procedures are followed to maximize the potential for obtaining usable physical evidence for the protection of the alleged victims rights. Boys Town Louisiana will work with the Office of Juvenile Justice and identified partners in securing alleged victim immediate medical and counseling services as applicable and identified in the SART Protocol."

Additionally, as required by the agency's Reporting Abuse & Neglect Policy:

- "If an employee, Foster Parent, or volunteer has reasonable cause to believe that an individual has been subjected to abuse or neglect or observes an individual being subjected to conditions or circumstances that reasonably would result in abuse or neglect, he or she must report the event to the required Child Protective Services, Department of Health and Human

Services, Department of Juvenile Justice, and/or law enforcement agencies as specified by contract and state law. The reporting person also must notify his or her immediate supervisor of the incident and provide a written report within one (1) business day to his or her Program Director. The supervisor must notify the Program Audit Department of the event. Other communication mandated by contractual and licensing reporting requirements also must be carried out."

The agency's Policy titled, "Youth Safety Audit Reporting and Participation," also includes reporting requirements applicable to this PREA standard, as noted below:

- "All employees, volunteers, Foster Parents, or independent contractors – regardless of their position – have the responsibility to report all allegations where the safety of service recipients may be jeopardized or if there is a violation of service recipient rights. The report should be made immediately to the individual's direct supervisor and, when applicable, to Child Protective Services (CPS) or local law enforcement, as required by state law. For additional information, refer to FFBH Policy, Reporting Abuse and Neglect."

The auditor was provided with the program's SART Protocol and PREA Coordinated Response to Sexual Abuse Incidents checklist to showcase BTLA's adherence to a standardized evidence protocol aimed at maximizing the potential for obtaining usable physical evidence for both administrative proceedings and criminal prosecutions. Upon review, the auditor confirmed that the evidence protocol is tailored for youth and, where applicable, is derived or based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication. It is important to note that while BTLA does not conduct criminal or administrative investigations into allegations of sexual abuse, the program's procedures dictate that the New Orleans Police Department (NOPD) handles criminal investigations, while administrative investigations are conducted by their contracting agency, the Louisiana Office of Juvenile Justice (OJJ). The PC indicated in the PAQ that BTLA has established policies mandating the immediate reporting of sexual abuse allegations to child protective services, OJJ, and local law enforcement (NOPD), in which the auditor confirmed that these requirements are included in the agency's PREA Policy, Report Abuse & Neglect Policy, and Youth Safety Audit Reporting and Participation Policy.

Additionally, the auditor received a fully executed contract for the placement of OJJ youth at the BTLA program. Upon examination of this document, it was confirmed that the following relevant information related to reporting and investigations is included:

- Youth Services {OJJ} staff shall have access to youth on or off the Contractor's premises at any time. YS officials or their designees may access and inspect the Contractor's premises at any time. Access and inspection includes, but is not limited to, youth, staff, the entire facility, and all books

and records related to the operation of the facility.

- In the event that the Contractor has knowledge of or cause to suspect abuse or neglect of a youth under YS custody, the Contractor shall provide written notification to YS, the Department of Social Services, Office of Community Services, and the local law enforcement agency, in addition to complying with the Child Abuse Reporting and Investigation requirements of Children's Code Articles 609 et seq.
- Contractor will comply with the Prison Rape Elimination Act of 2003.), and with all applicable PREA Standards, YS Policies related to PREA and Standards related to PREA for preventing, detecting, monitoring, investigating, and eradicating any form of sexual abuse within YS Facilities/ Programs/Offices owned, operated or contracted. Contractor acknowledges that, in addition to "self-monitoring requirements", YS will conduct announced or unannounced, compliant monitoring to include "on-site" monitoring. Contractor will also work with the Office of Juvenile Justice PREA Coordinator in scheduling audits in accordance with the agency audit cycle established by YS. Failure to comply with PREA, including PREA Standards and US Policies, or to pass the PREA audit after any corrective action period may result in termination of the contract.

The auditor conducted interviews with all available staff members working at the BTLA home (a total of 10; the only staff member not interviewed was on scheduled leave). Each staff member confirmed that in the event of any allegation of sexual abuse or sexual harassment involving a juvenile residing at the home, the state of Louisiana Office of Juvenile Justice (OJJ) is immediately notified. OJJ ensures that an administrative and/or criminal investigation is promptly initiated by the state agency. Additionally, child protective services for the state of Louisiana and local police must be immediately contacted for any allegations of sexual abuse or assault at the home. Staff members also stated that in cases of sexual abuse or harassment allegations, they are required to contact their immediate supervisor, the PC, and the Boys Town main office without delay. Furthermore, the interviewed staff members affirmed that they have completed comprehensive PREA training, which outlined their mandatory reporting requirements and provided guidance on effectively responding to sexual abuse situations. As part of their training, staff members were instructed to act as first responders to ensure the safety and separation of the victim from the perpetrator immediately. They were also directed to make necessary calls to report the incident to relevant authorities and management, secure the scene, preserve evidence, protect it from contamination, and advise the victim and perpetrator not to take any actions that could compromise physical evidence. Lastly, at no time throughout any of the interviews conducted onsite did the auditor discover any evidence to suggest the staff or administrators at the BTLA program conduct any form of administrative or criminal investigations into allegations or incidents of sexual abuse or sexual harassment.

**(c - e):** The PC noted in the PAQ that BTLA has a fully executed Memorandum of Understanding (MOU) with the Children's Hospital Audrey Hepburn CARE Center ("CARE Center"), which was signed into effect on 12/6/2023. This MOU outlines the

responsibilities of the CARE Center to provide the applicable medical and mental health services required by the PREA juvenile standards, including, but not limited to: medical evaluations and services provided by specially trained medical professionals, forensic medical examinations, specialized medical treatment, victim assistance, confidential emotional support services related to sexual abuse, consultation, and prevention training and education.

Furthermore, as documented in the BTLA SART Protocols:

- "Medical assistance will be obtained for victim through Children's Hospital when event is recent, and evidence needs to be documented and preserved. BT PREA Coordinator will monitor to ensure that mental health services are provided by the Children's Advocacy Center who works in conjunction with Children's Hospital. When victim is reporting a past event and physical evidence is not a factor, mental health services will be secured directly from the Children's Advocacy Center. BT Medical/Mental Health advocate will monitor compliance of follow-up and keep BT PREA coordinator updated."

The auditor also reviewed the CARE Center's website (Juvenile Standards | PREA ([prearesourcecenter.org](http://prearesourcecenter.org))), which includes relevant information to confirm that the CARE Center is able to provide the medical and mental health victim services and applicable treatment required by the PREA standards, as summarized below:

- The Audrey Hepburn Children at Risk Evaluation (CARE) Center is a comprehensive child abuse program providing state-of-the-art medical evaluations in a home-like cottage setting near Audubon Park. Beyond providing clinical excellence in child abuse forensic medicine, the CARE Center is active in treatment, consultation, prevention, training, and education.
- The specially trained physicians and nurse practitioners at the Audrey Hepburn CARE Center provide medical evaluations to more than 1,000 children a year from across Louisiana and southern Mississippi. These medical providers aid in the proper recognition of child abuse, including child physical abuse, child sexual abuse, and child neglect.
- The CARE Center is home to specialized staff to assist with the comprehensive management of possible child abuse. Trained nurses assist the medical providers in reassuring the child and family that the medical exam is not painful. A case manager with special training in victim assistance and coordination of care, provides resources and information for each family.
- A forensic medical examination involving a sexual assault is free and confidential.
- A forensic medical examination may include evidence collection up to 5 days after a sexual assault. If it is more than 5 days since the assault, a patient can still participate in the medication portion of the forensic medical examination. A multi-disciplinary team approach is involved in the

examination of physical trauma after a sexual assault.

- The Audrey Hepburn CARE Center provides counseling for sexually and physically abused children. In 1985, Children's Hospital of New Orleans began offering services specifically for the medical diagnosis and treatment of children suspected of being sexually abused. Since becoming affiliated with the Audrey Hepburn CARE Center in 2003, the hospital has expanded its services to handle cases of severe physical abuse, neglect, and false allegations. The Audrey Hepburn CARE Center also provides counseling and education on injury prevention and pediatric forensic medicine to aid in the proper recognition, intervention, protection, prevention, and care of maltreated children.

Additionally, as confirmed to be documented in the agency's PREA Policy on page 29:

- "Victims of sexual assault shall be referred under appropriate security provisions to Children's Hospital for treatment and gathering of evidence. Boys Town Louisiana, Inc. shall offer all residents who experience sexual abuse access to forensic medical examinations without financial cost.
- Such examinations shall be performed by Aubrey Hepburn Children at Risk Evaluation (CARE) Center at Children's Hospital Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. Boys Town Louisiana, Inc. shall document its efforts to access SAFEs or SANEs.
- Victims of sexual assault will be offered timely information about and access to emergency contraception and sexually transmitted infections prophylaxis, as prescribed by medical personnel and agreed upon by the guardian."

During the onsite visit, the auditor contacted the Director of the CARE Center in New Orleans, who detailed the victim services offered by the organization to juvenile victims of sexual abuse and their cooperation in criminal investigations. The Director confirmed that the CARE Center has the capacity to provide specialized medical practitioners for examinations and evaluations, tailored to the specific situation. They also ensure the proper conduct of forensic interviews, working closely with specialized detectives. Additionally, the organization provides advocacy services to the survivor and their family, as well as access to therapeutic mental health services and treatment. Lastly, the Director further confirmed that the CARE Center operates as a non-profit organization, meaning that the services offered are provided free of charge to both the victim and the victim's family.

**(f):** To substantiate compliance with this provision, the PC provided the auditor with email correspondences between the PC and NOPD administration, along with an official letter affirming the agency's request for NOPD to follow the requirements of this PREA standard. These communications serve as evidence of the program's efforts to request NOPD's adherence to the applicable requirements outlined in this

	<p>PREA standard.</p> <p><b>(g):</b> n/a</p> <p><b>(h):</b> Per the agency's policies, the agency does not provide the victim services required by this PREA standard. Such care would be provided at the CARE Center by specialized professionals.</p> <p><b>Note:</b> As per the PC's response in the PAQ, no instances of alleged sexual abuse or sexual harassment involving youth at the BTLA home were reported during the previous 12-month audit review period. Consequently, there was no evidence available related to a sexual abuse incident or allegation at the home to demonstrate compliance with the elements of this specific PREA standard in practice during this audit review period. Moreover, as verified by the auditor through the conclusion of the documentary evidence review process and interviews conducted onsite, the BTLA has not had a situation in the past three years involving sexual abuse or sexual harassment of a youth at the home.</p> <p><b>Conclusion:</b></p> <p><b>Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.</b></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><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> <li>- Youth Safety Audit Reporting &amp; Participation Document</li> <li>- BTLA Request Emails to New Orleans Police Department (NOPD)</li> <li>- BTLA Official Letter to NOPD</li> <li>- Signed MOU Between BTLA &amp; Children's Hospital Audrey Hepburn CARE Center</li> <li>- Coordinated Response to Sexual Abuse Incidents Document</li> <li>- BTLA SART Protocols</li> <li>- OJJ Contract with BTLA</li> </ul>

**Interviews:**

- Executive Director (ED)

**Explanation of Determination:**

**115.322**

**(a - c):** According to the agency's PREA Policy on page 15:

- "Boys Town Louisiana, Inc. will ensure that an administrative and/or criminal investigation is completed for all allegations of sexual abuse and sexual harassment."

Additionally, as per the agency's PREA Policy on page 14:

"When Boys Town Louisiana, Inc. is made aware of a sexual abuse situation, members of Boys Town Louisiana, Inc. Sexual Abuse Response Team (SART) will meet to discuss the alleged incident identified in the SART Protocol detailed previously in this handbook. Boys Town will adhere to processes outlined in the SART Protocol to ensure proper procedures are followed to maximize the potential for obtaining usable physical evidence for the protection of the alleged victims rights. Boys Town Louisiana will work with the Office of Juvenile Justice and identified partners in securing alleged victim immediate medical and counseling services as applicable and identified in the SART Protocol."

Additionally, as required by the agency's Reporting Abuse & Neglect Policy:

- "If an employee, Foster Parent, or volunteer has reasonable cause to believe that an individual has been subjected to abuse or neglect or observes an individual being subjected to conditions or circumstances that reasonably would result in abuse or neglect, he or she must report the event to the required Child Protective Services, Department of Health and Human Services, Department of Juvenile Justice, and/or law enforcement agencies as specified by contract and state law. The reporting person also must notify his or her immediate supervisor of the incident and provide a written report within one (1) business day to his or her Program Director. The supervisor must notify the Program Audit Department of the event. Other communication mandated by contractual and licensing reporting requirements also must be carried out."

The agency's Policy titled, "Youth Safety Audit Reporting and Participation," also includes reporting requirements applicable to this PREA standard, as noted below:

- "All employees, volunteers, Foster Parents, or independent contractors - regardless of their position - have the responsibility to report all allegations



where the safety of service recipients may be jeopardized or if there is a violation of service recipient rights. The report should be made immediately to the individual's direct supervisor and, when applicable, to Child Protective Services (CPS) or local law enforcement, as required by state law. For additional information, refer to FFBH Policy, Reporting Abuse and Neglect."

Additionally, the auditor received a fully executed contract for the placement of OJJ youth at the BTLA program. Upon examination of this document, it was confirmed that the following relevant information related to reporting and investigations is included:

- Youth Services {OJJ} staff shall have access to youth on or off the Contractor's premises at any time. YS officials or their designees may access and inspect the Contractor's premises at any time. Access and inspection includes, but is not limited to, youth, staff, the entire facility, and all books and records related to the operation of the facility.
- In the event that the Contractor has knowledge of or cause to suspect abuse or neglect of a youth under YS custody, the Contractor shall provide written notification to YS, the Department of Social Services, Office of Community Services, and the local law enforcement agency, in addition to complying with the Child Abuse Reporting and Investigation requirements of Children's Code Articles 609 et seq.
- Contractor will comply with the Prison Rape Elimination Act of 2003.), and with all applicable PREA Standards, YS Policies related to PREA and Standards related to PREA for preventing, detecting, monitoring, investigating, and eradicating any form of sexual abuse within YS Facilities/ Programs/Offices owned, operated or contracted. Contractor acknowledges that, in addition to "self-monitoring requirements", YS will conduct announced or unannounced, compliant monitoring to include "on-site" monitoring. Contractor will also work with the Office of Juvenile Justice PREA Coordinator in scheduling audits in accordance with the agency audit cycle established by YS. Failure to comply with PREA, including PREA Standards and US Policies, or to pass the PREA audit after any corrective action period may result in termination of the contract.

The Executive Director of BTLA was interviewed during the onsite and confirmed that the agency has a policy to ensure allegations of sexual abuse, sexual harassment, retaliation for reporting, and staff neglect are immediately referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. The investigative agencies include the Louisiana OJJ, child protective services for the state, and local law enforcement.

**Note:** Based on the interviews conducted onsite and the review of documents for this PREA audit, there were no reported instances of alleged sexual abuse or sexual harassment involving youth at the BTLA home in the past three years prior to this

audit. Consequently, there was no investigative evidence available to demonstrate compliance with the specific elements of the PREA standard in practice for an actual event within the audit review period.

**Non-compliance Summary:**

The auditor conducted a review of the BTLA website and noted a lack of information or published links detailing the responsibilities of both the agency and the investigating entity in addressing allegations of sexual abuse and harassment. Given that the BTLA program does not carry out administrative or criminal investigations independently, it is imperative that this information is accessible on their website, as mandated by provision (c) of the PREA standard. The PC was made aware of this deficiency and has committed to ensuring that the required information is added to the website, with final approval from Boys Town.

**Correction Action Summary:**

During the corrective action period, the auditor was provided proof that BTLA added the required information pursuant to provision (c) of this PREA standard on the facility's web page, at: <https://www.boystown.org/Louisiana>. Under the "About" section on this web page, it states:

- "Boys Town Louisiana ensures that allegations of sexual abuse or sexual harassment are referred for investigation to the local police in the appropriate jurisdiction to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. The Office of Juvenile Justice is responsible for conducting administrative investigations of sexual abuse or sexual harassment in our Family Homes Programs. A summary of their findings can be found at the link below."

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard and no corrective action is required at this time.**

<b>115.331</b>	<b>Employee training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> </ul>

- Staff PREA Training Material (Units 1-5)
- Mandatory Requirements for Employees
- BTLA PREA Refresher Training Material: Juvenile Detention PREA Basics
- PREA Staff Training Video
- Reporting Abuse & Neglect (Youth Care Policy #9150)
- Reporting Guidelines for Safety & Communication (Youth Care Policy #9525)
- Staff Training Calendar Example
- Safety Systems Course Description for Pre-Service
- BTLA Youth Rights Training Document
- Youth Boundaries Staff Training Document
- Mandatory Reporting Staff Training Document
- Training Required & Annual Disclosures for Employees
- Louisiana Age of Consent & Sexual Violations Laws 2024 Training Material
- Staff Confirmation of Receipt for PREA Training Document
- Random Staff PREA Training File Review

**Interviews:**

- Random Staff (includes all available staffing working at the home)
- PREA Coordinator (PC)

**Site Review Observations:**

- During the onsite, the auditor took notice of the numerous PREA information posted throughout the home- to include information on reporting protocols for sexual abuse and harassment, outside reporting hotline numbers for making a PREA report, and other pertinent information related to PREA. This information was visibly posted on bulletin boards throughout the facility to ensure staff were reminded on a daily basis of the mandatory reporting protocols.

**Explanation of Determination:**

**115.331**

**(a - d):** According to the agency's PREA Policy on page 15:

- Boys Town Louisiana, Inc. will provide PREA training to new employees and annual training every year after, in addition to Agency mandatory trainings. PREA related training will include the following:
  - The zero-tolerance policy for sexual abuse and sexual harassment.
  - The person's responsibilities under the Boys Town Louisiana, Inc. PREA policy.
  - The rights of residents to be free from sexual abuse and sexual harassment.
  - The rights of residents and employees to be free from retaliation for reporting PREA related incidents.
  - The dynamics of sexual abuse and sexual harassment in placements.
  - The common reactions to sexual abuse and sexual harassment victims.
  - How to detect and respond to signs of threatened and actual sexual abuse.
  - How to avoid inappropriate relationships with residents.
  - How to communicate effectively with residents including LGBTIN.
  - The (state) mandated child protected service laws and mandated abuse reporting.
  - Relevant laws regarding the applicable age of consent.
- Training will be tailored to the unique need and attributes of the youth living in Boys Town facilities.
- Staff will be required to attend or complete the Boys Town Louisiana, Inc. employee training of PREA presentation by the PREA Coordinator and document through signature that the training was completed.
- Signature sheets will be collected at the training to document the employee's attendance. Training records will be maintained for a minimum three (3) years.

Furthermore, to demonstrate the agency's commitment to training all staff on the necessary PREA topics outlined above, the auditor was provided with the PREA training curriculum and PREA video delivered during initial staff PREA training courses and refresher trainings. Upon review, it was confirmed that the curriculum covers, at a minimum, the eleven PREA training topics specified in provision (a) (1-11) and is customized to suit the unique needs and characteristics of the youth and program dynamics. In addition, it is important to note that the BTLA conducts a comprehensive annual PREA refresher training for all staff, surpassing the minimum requirements of this PREA standard. The auditor also verified that the 'Staff Confirmation of Receipt- PREA,' a training verification form used to ensure staff comprehension of the training, includes an acknowledgment statement as outlined below:

- "This is to acknowledge that I received and understand information on the Prison Rape Elimination Act of 2003 regarding the following:
  - The Prison Rape Elimination Act: Overview of the Law and Your Responsibilities

- The Right to be Free from Sexual Abuse, Sexual Harassment and Retaliation for Reporting
- Prevention and Detection of Sexual Abuse and Sexual Harassment
- Response and Reporting of Sexual Abuse and Sexual Harassment
- Professional Boundaries
- Effective and Professional Communication with Residents
- I further acknowledge that if I have any questions or need assistance with guidelines regarding the elimination, reduction, prevention reporting procedures for PREA, I will seek guidance from my supervisor."

The training verification document necessitates a staff signature, staff printed name, training ID/Personnel Number, location, and date. Additionally, during the onsite interviews, all ten staff members affirmed that they undergo this PREA training annually and sign acknowledgment forms to signify their comprehension of the material presented. When questioned by the auditor about the depth and scope of the PREA training sessions and the subjects covered, all staff members were able to effectively articulate a thorough understanding of the training provided by BTLA in their individual responses. Moreover, during the interviews, both staff members and the PC described their regular participation in training sessions, including specific training on PREA, conducted throughout the year. The staff mentioned their monthly meetings, during which they review various PREA topics to reinforce their understanding of youth and staff safety protocols, reporting obligations, and effective responses to PREA-related incidents.

**Employee PREA Training File Review & Non-Compliance Summary:**

During the onsite, the auditor randomly selected six staff to review their training verification documents related to the PREA training requirements of this PREA standard. Upon the auditor's analysis of the verification documents provided, it was determined that the program provides the required training to all their staff on an annual basis; however, there was an issue of compliance identified with the inconsistency practice of ensuring all staff complete an acknowledgement of understanding after completion of their PREA training, as required by provision (d). Due to this deficiency, the PC advised she will add an acknowledgement statement to the training sign in sheets going forth and ensure all staff who attend PREA trainings complete an acknowledgement of understanding form.

**Corrective Action Summary:**

As outlined by the PC in the program's corrective action plan:

- "On occasion when doing training topics related to PREA, a regular training sign-in sheet was used & did not have staff acknowledging their understanding of the training. The training sheet has been revised to include the acknowledgement statement. The form was revised for on-going trainings however, staff receiving the initial training will continue to use the acknowledgement training sheet that addresses all aspect of initial training.

	<p style="text-align: center;">Examples of both formats are attached."</p> <p>The auditor reviewed the updated Staff Confirmation of Receipt (PREA) form and confirmed the updated acknowledgement statement of understanding was added. This form will be used for any new staff hired; however, as of the date of this final report, there have been no new hires at the BTLA program.</p> <p><b>Conclusion:</b></p> <p><b>Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard and no corrective action is required at this time.</b></p>
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<b>115.332</b>	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> <li>- Reporting Abuse &amp; Neglect (Youth Care Policy #9150)</li> <li>- Reporting Guidelines for Safety and Communications (Youth Care Policy #9525)</li> <li>- Staff PREA Training Video</li> <li>- PREA Training Material (Handling Disclosures of Abuse, Professional Communication &amp; Boundaries, &amp; PREA Basics)</li> <li>- Staff Confirmation of Receipt- PREA</li> <li>- Confirmation of Receipt PREA Training Contractor/Volunteer/Service Provider</li> </ul> <p><b>Interviews:</b></p> <ul style="list-style-type: none"> <li>- PREA Coordinator (PC)</li> <li>- Random Staff Interviews</li> <li>- Licensed Therapist</li> </ul> <p><b>Site Review Observations:</b></p>

- During the onsite, the auditor did not observe any evidence to suggest a contractor or volunteer meet with youth at the BTLA home on a regular basis- except for the one therapist described below.

**Explanation of Determination:**

**115.332**

**(a - c):** According to the agency's PREA Policy on pages 15 and 16:

- Before entering the facility, Boys Town Louisiana, Inc. shall ensure that all volunteers and contractors who 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. Boys Town Louisiana, Inc. shall provide training to volunteers and contractors based on the services they provide and level of contact they have with the residents. All volunteers and contractors who have contact with residents shall be notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents. Boys Town Louisiana, Inc. shall maintain documentation confirming that volunteers and contractors understand the training they have received.

In addition, the auditor was provided with the PREA training curriculum and PREA video designed for volunteers and contractors in alignment with the provisions of this PREA standard. Upon inspection of the verification documents provided, it was confirmed that the training material covers, at a minimum, the agency's zero-tolerance policy concerning sexual abuse and harassment and the procedures for reporting such incidents. Furthermore, the same 'Staff Confirmation of Receipt- PREA' acknowledgment form used for staff is also utilized for volunteers and contractors, as validated by the auditor. This acknowledgment form includes the following statement and is signed and dated by both the individual attending the training and the trainer.

- "This is to acknowledge that I received and understand information on the Prison Rape Elimination Act of 2003 regarding the following:
  - The Prison Rape Elimination Act: Overview of the Law and Your Responsibilities
  - The Right to be Free from Sexual Abuse, Sexual Harassment and Retaliation for Reporting
  - Prevention and Detection of Sexual Abuse and Sexual Harassment
  - Response and Reporting of Sexual Abuse and Sexual Harassment
  - Professional Boundaries
  - Effective and Professional Communication with Residents
- I further acknowledge that if I have any questions or need assistance with guidelines regarding the elimination, reduction, prevention reporting

procedures for PREA, I will seek guidance from my supervisor."

**Non-Compliance Summary:**

As explained in section 115.317 of this report, upon the auditor conducting the interviews with the juveniles at the home, it was learned that a licensed therapist, who is neither contracted or employed by Boys Town, meets with each youth weekly at the home. The auditor followed up with the PC in regards to this therapist being screened as appropriate to the background requirements of PREA standard 115.317 and the training elements associated with standard 115.332. In response, the PC indicated that the agency does not have a formalized contract with this counselor; therefore, the agency has not conducted the background screenings or provided PREA training.

The auditor explained to the PC that even though the agency may not have a formal contract or MOU with this individual, as per the PREA FAQ dated 7/20/2018, BTLA is still required to conduct the background and applicable PREA training requirements pursuant to standards 115.317 (b), (d), and (e) and 115.332. The PC understood and advised she will provide verification documentation during the corrective action period to prove that the criminal background and child abuse registry check have been completed for this therapist, as well as the required PREA training.

**Corrective Action Summary:**

The auditor was provided documentary evidence confirming that the aforementioned therapist has successfully completed the required PREA training. The provided training verification document includes an acknowledgment signed by the therapist, demonstrating her comprehensive understanding of the PREA information presented. Additionally, the form is signed by the PREA Coordinator (PC) and dated April 15th, 2024.

The PREA training for this therapist encompassed the following topics:

- An overview of the law and responsibilities under PREA
- The right to be free from sexual abuse, sexual harassment, and retaliation for reporting
- Agency's zero-tolerance policy regarding sexual abuse and sexual harassment
- Prevention and detection of sexual abuse and sexual harassment
- Response and reporting of sexual abuse and sexual harassment
- Professional boundaries
- Effective and professional communication with residents
- Guidelines regarding the elimination, reduction, prevention reporting procedures for PREA
- Identifying who to contact with questions related to PREA

Furthermore, the auditor conducted a phone interview with the licensed therapist



mentioned above to confirm that she had received and comprehended her PREA-related responsibilities. The therapist provided a detailed summary of the various PREA training sessions she had undergone throughout her career and confirmed her understanding of the state and facility reporting protocols implemented at the group home. Additionally, she highlighted her recent completion of the PREA training offered by BTLA and signed an acknowledgment of participation. This communication ensured that the therapist was well-informed and ready to fulfill her duties in alignment with the PREA standards and protocols.

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard and no corrective action is required at this time.**

115.333	Resident education
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> <li>- BTLA PREA Implementation Document</li> <li>- PREA Brochure (English &amp; Spanish)</li> <li>- PREA Orientation PowerPoint Presentation (21 Slides)</li> <li>- PREA Poster ("Break the Silence / Make the Call")</li> <li>- Youth Confirmation of Receipt- PREA Form</li> <li>- Youth Methods of Reporting Information</li> <li>- PREA Comprehensive Education Video (15 minutes)</li> <li>- Youth Boundaries Education Sheet</li> <li>- "No Means No" PREA Poster (English &amp; Spanish)</li> </ul> <p><b>Interviews:</b></p> <ul style="list-style-type: none"> <li>- Three youth at the home during the onsite</li> </ul>

- Supervisor (conducts intake process)

**Site Review Observations:**

- The auditor confirmed during the onsite visit that the agency prominently displays multiple posters in the program's house, containing crucial PREA information including the agency's zero tolerance policy against all forms of sexual abuse and sexual harassment. Additionally, the posters provide clear instructions for youth and staff on how to make a PREA report; outline program rules; offer important contact information for the Dorm Leader, Caseworker, Probation Officer, and Facility Directors; and include information on the grievance process and youth rights and responsibilities related to PREA. The posters also feature important resources such as the youth safety line for Boys Town, Department of Children & Family Services (DCFS) reporting instructions, details on prohibited punishment, contact information for the Louisiana Office of Juvenile Justice reporting hotline, suicide prevention helplines, and information on the Behavioral Health Center Children's Hospital. Upon examination by the auditor, it was verified that the posters were prominently displayed, in good condition, and easily accessible to the youth residing in the home.

**Explanation of Determination:**

**115.333**

**(a):** According to the agency's PREA Policy on page 16:

- "During the intake process, the resident shall receive both verbal and written information explaining, in an age-appropriate fashion, Boys Town Louisiana, Inc. zero tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment."

Additionally, the auditor was provided a form titled, 'Boys Town PREA Implementation.' This document includes how youth are provided the PREA orientation during the intake process, as outlined below:

- Provide youth with initial and written information about Boy's Town zero tolerance policy regarding sexual abuse and sexual harassment, which is presented through the use of the OJJ PREA Brochure.

The OJJ PREA Brochure titled, 'Youth Safety Guide,' was provided for the auditor's review, and it was confirmed that this brochure includes the BTLA's zero tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment.

In order to verify that the PREA orientation is provided to each youth admitted into the program during the intake process, as described above, the auditor interviewed

all the youth in the BTLA program at the time of the onsite, which included three youth. Each youth confirmed that they remembered staff going over PREA information the first day they arrived at the house, either at the house or at the BTLA office down the street. They were able to answer open ended questions about the different method to making a report of sexual abuse, sexual harassment, retaliation, and staff neglect, as well as sufficiently explained the agency's zero tolerance policy toward sexual abuse and sexual harassment. All the youth were knowledgeable of PREA (what it stands for) and advised that staff go over PREA topics periodically with them to ensure they understand their rights and how to stay safe. The youth also remembered receiving PREA material during the intake process that they could keep with them, and they also confirmed that they signed an acknowledgement of understanding with the intake staff member. Lastly, the youth interviewed indicated that there were PREA related posters throughout the home, which provide details on the multiple ways to make a PREA report, their rights, and other information related to the Boys Town program.

The auditor also interviewed a supervisor who conducts intakes at the BTLA home. This Supervisor sufficiently described the entire intake process, how he goes over the PREA material with each youth, and how he ensures the youth fully understand the information provided. He also explained how he asks each youth questions to ensure he understands the material they are going over and to ensure the youth has the opportunity to ask any question he may have. The Supervisor clarified that the intake process is conducted as soon as a youth arrives at the home.

**(b):** As documented in the agency's PREA Policy on page 16:

- "Within 10 days of intake, Boys Town Louisiana, Inc. shall provide comprehensive age- appropriate education to OJJ residents either in person or through video regarding their rights to be free from sexual abuse and sexual harassment, to be free from retaliation for reporting such incidents, and Boys Town Louisiana, Inc. policies and procedures for responding to such incidents.
- Each PREA Compliance Manager {PC} shall conduct the PREA resident education and maintain documentation of resident participation in these education sessions. Boys Town Louisiana, Inc. requires that all residents receive information regarding PREA upon admission to the facility.
- The PREA education will include:
  - Boys Town Louisiana, Inc. zero tolerance of sexual abuse and sexual harassment
  - Definitions of sexually abusive behavior and sexual harassment
  - Prevention strategies the resident can take to minimize his/her risk of sexual victimization while in placement.
  - Methods of reporting an incident of sexual abuse against oneself and for reporting allegations of sexual abuse involving other residents
  - Methods of reporting an incident of sexual harassment against oneself and for reporting allegations of sexual harassment involving other residents

- Treatment options and programs available to resident victims of sexual abuse and sexual harassment
- Monitoring, discipline, and prosecution of sexual perpetrators
- Notice that male and female staff routinely work and visit housing areas."

As verified by the auditor, the comprehensive PREA education at BTLA is facilitated in person by a staff member within 10 days of a youth being admitted into the program, utilizing a comprehensive PREA PowerPoint presentation. The auditor was provided the 21-slide PowerPoint presentation and confirmed that it covers an extensive range of PREA topics, including basic rules, relationships, health and unhealthy relationships, PREA definitions, safety protocols, behavioral responsibilities, reporting procedures, client grievance process, steps to take if a victim of sexual abuse, encouraging reporting through 'breaking the silence,' addressing the consequences of false allegations, risks associated with STDs, information related to sexual harassment, assault, and abuse, as well as a section for intake staff to address any questions the youth may have.

The interviews with the Supervisor who conducts intakes at the BTLA program and with the three youth at the home confirmed the program's practice of providing a one-on-one fully comprehensive PREA education to all youth admitted into the program within the required 10 days. This process was explained by the Supervisor as a private meeting either at the home or the BTLA office to ensure he has the full attention of the juvenile, with minimum distractions. As per the Supervisor, he thoroughly explains the PREA PowerPoint presentation and PREA material (brochure, handouts, etc.), taking the necessary time with each slide and document to ensure the youth understands the material being presented. He further shared that he ensures the youth understand the material presented by asking them questions, and that the entire PREA education process takes at least one hour to complete.

**(c):** According to the agency's PREA Policy and the documentation review undertaken by the auditor for this specific PREA standard, it was verified that ALL youth admitted into the BTLA program receive the required education on PREA within the specified timeframes delineated in provisions (a) and (b). Moreover, the Supervisor interviewed confirmed that the intake process is the same for each youth admitted into the program, regardless if a transfer or a new student.

**(d):** The agency's PREA Policy includes the required elements of this provision on page 16, as outlined below:

- "Boys Town Louisiana, Inc. shall provide resident education in formats accessible to all residents, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to resident who have limited reading skills."

The Supervisor and PC outlined their approach to addressing the needs of youth who may require translation services or additional assistance to comprehend the

PREA materials provided. They assured that appropriate services would be offered to ensure the information is fully understood. Additionally, it was verified that BTLA conducts pre-screening for all prospective youth applicants, ensuring that only individuals meeting specific minimum qualifications are accepted into the program. The PC also disclosed that BTLA maintains a contract with a local professional interpreter, whom they can contact on an as-needed basis.

Note: Further explanation is outlined in section 115.316 of this report on the program's compliance with providing residents education in formats accessible to all residents, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to residents who have limited reading skills.

**(e):** According to the agency's PREA Policy on pages 16 and 17:

- "Each PREA Compliance Manager {PC} shall conduct the PREA resident education and maintain documentation of resident participation in these education sessions.
- Both the initial notification and the education will be documented in writing by signature of the resident. The facility shall maintain documentation of resident participation in these education sessions in the resident's institutional file."

To showcase how BTLA ensures that each youth admitted into the program receives and comprehends the PREA orientation and comprehensive education, the PC provided the auditor with a form titled 'Youth Confirmation of Receipt- PREA.' This document includes an acknowledgment statement signed and dated by both the youth and the staff member who delivered the information, as outlined below:

- "This is to acknowledge that I received information as well as viewed a PowerPoint presentation on the Prison Rape Elimination Act of 2003 regarding the following:
  - How to avoid risky situations related to sexual assault
  - How to safely report rape or sexual activity
  - How to obtain counseling services and/or medical assistance if victimized
  - What the risks and potential consequences are for engaging in any type of sexual activity while in the facility
- I further acknowledge that if I have any questions or need assistance I will seek guidance."

**(f):** As per the agency's PREA Policy:

- "In addition to providing such education, Boys Town Louisiana, Inc. shall ensure that key information is continuously and readily available or visible to residents through posters, resident handbooks, or other Boys Town Louisiana, Inc. formats.

- In each housing unit, the following will be posted:
  - A notice to residents stating, "Male and female staff members routinely work and visit housing areas."
  - A poster reflecting the Department's zero tolerance for sexual abuse and harassment and contact information for the reporting of sexual abuse allegations."

The three youth and ten staff interviewed all were aware of the PREA information posted in the home, which included reporting instructions, hotline numbers, youth rights', and other information related zero tolerance and reporting requirements.

**Resident PREA Orientation & Education Documentation Review:**

The auditor was presented with the PREA acknowledgement documents for the five OJJ youth admitted to the BTLA home within the past 12 months, and after review, it was verified that each OJJ youth received PREA orientation and comprehensive education upon admission. Furthermore, the acknowledgement documents, bearing the signatures of the youth and intake staff, indicated that the information provided was fully understood by each student.

**Non-Compliance Summary:**

Although the explanation of compliance outlined above indicates that BTLA generally follows the requirements of the PREA standards in practice, it was identified during the onsite phase that the program has not consistently delivered PREA orientation and education to all youth upon admission. It was clarified that since the implementation of the PREA standards last year to comply with contractual obligations with the state of Louisiana, youth from the Louisiana Office of Juvenile Justice (OJJ) undergo the full intake process, including the required PREA orientation and comprehensive education. However, youth referred from the Louisiana Department of Children & Family Services (DCFS) did not consistently receive the same level of PREA information. This discrepancy was highlighted through a review of PREA youth files and discussions with the PC during the onsite visit. To address this inconsistency, the PC expressed a commitment to ensuring that all future youth admitted into the program receive the same level of PREA information in accordance with the PREA standards.

Additionally, as a best practice recommendation, it was suggested that the student PREA acknowledgment of understanding documents be revised to provide clarity on how the initial PREA orientation (a) and comprehensive PREA education (b) are provided independently of each other. For instance, creating separate acknowledgment forms for the initial orientation and comprehensive PREA education could mitigate confusion and assist in demonstrating compliance with provisions (a) and (b) of this PREA standard. The PC was receptive to this best practice recommendation and advised she will take the necessary steps to implement the update as soon as possible.

**Corrective Action Summary:**

As outlined by the PC in the program's correction action plan:

- "Auditor recommended that it is best practice to deliver PREA orientation and education to all youth upon admission. Previously youth who were not in the custody of the Office of Juvenile Justice (department that requires PREA) did not receive PREA training. The residential programs now include PREA information in the intake packet for the DCFS youth. The DCFS youth receives same PREA information and are delivered the same initial and comprehensive PREA education as OJJ youth. In addition, the Youth Acknowledgement of Training form was revised to identify the dates of the initial and comprehensive training as recommended by the Auditor. Attached is the revised format."

To demonstrate practical compliance with the aforementioned corrective action plan, the auditor was provided with completed "Youth Confirmation of Receipt of PREA" forms for all youth admitted into the program during the corrective action period. Notably, it is important to mention that the program only admitted two youth during this period, with both juveniles referred from the Office of Juvenile Justice (OJJ). No youth were admitted into the program outside of these circumstances, including no youth admitted from the DCFS agency. Upon reviewing the documentary evidence provided, it was evident that the program has established a systematic process for delivering the required PREA orientation and comprehensive education to all admitted youth within the specified time frames as outlined in the PREA standard.

It is important to note that program's Youth Confirmation of Receipt of PREA acknowledgement form was updated to include two sections, with the top portion used to demonstrate compliance with providing all youth with the required PREA orientation information required by provision (a) and the bottom section for the comprehensive PREA education requirements of provision (b). The youth and staff completing this form both sign each section, as demonstrated in practice through the completed Youth Confirmation of Receipt of PREA provided for the youth admitted into the program during the correction action period.

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard and no corrective action is required.**

<b>115.334</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

**The following is a list of evidence used to determine compliance:**

- Agency's PREA Policy
- Pre-Audit Questionnaire (PAQ)

**Explanation of Determination:**

**115.334**

**(a-c):** Through the documentation review and onsite inspection processes, the auditor confirmed that the BTLA program does not conduct administrative or criminal sexual abuse investigations. Instead, as detailed in sections 115.321 and 115.322 of this report, BTLA promptly reports all allegations of sexual abuse and sexual harassment to the New Orleans Police Department and the Department of Children, Family Services for the State of Louisiana, and the Louisiana Office of Juvenile Justice. This practice ensures that a thorough administrative and/or criminal investigation is conducted in accordance with the appropriate authorities. Furthermore, it is important to add that as per the agency's PREA Policy on page 17:

- "Father Flanagan's Boys' Home (a/k/a Boys Town) and its affiliate corporations (hereinafter collectively referred to as "Boys Town") have established an independent Program Audit Department to examine, evaluate, and report on the adequacy and effectiveness of the systems designed to ensure youth, families and patients (hereinafter referred to as "service recipient") safety, adherence to Boys Town standards of care, and protection of service recipient rights. Specifically, the Program Audit Department will investigate all events, practices, or procedures that might be considered dangerous, illegal, unethical, immoral, or abusive in nature, and if necessary, will report the outcome to the appropriate public agency of authority. All individuals have the right, and may be required by state law, to report dangerous, illegal, unethical, immoral, or abusive activity to the appropriate CPS or law enforcement authorities. For additional information, refer to FFBH Policy #9150, Reporting Abuse and Neglect.
- It is the policy of Boys Town Louisiana, Inc. that all resident grievances of sexual harassment or sexual abuse be submitted to the PREA Compliance Manager (facility director), unless the allegation is against the PREA Compliance Manager, in which case the grievance will be submitted to the PREA Coordinator. When Boys Town Louisiana, Inc. is made aware of a sexual abuse situation, the Boys Town Louisiana, Inc. SART TEAM will meet to discuss the report of the situation before alerting law enforcement. Upon review of the report made, the SART Team will decide if the report has validity. If the team decides there is validity, they shall refer the investigation to the Jefferson Parish Sheriff's Department or the New Orleans Police Department based on the location of the event.
- These law enforcement agencies will be requested to utilize investigators that have received specialized training that include techniques for



interviewing juvenile sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. The request for trained investigators will be documented."

**Note:** As confirmed that BTLA lacks the authority to conduct administrative or criminal sexual abuse investigations, the requirements of this PREA standard are currently not applicable.

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.**

115.335	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> </ul> <p><b>Explanation of Determination:</b></p> <p><b><u>115.335</u></b></p> <p><b>(a-d):</b> Upon conducting a comprehensive documentation review and thorough onsite inspection, the auditor confirmed that the BTLA program does not employ medical and mental health practitioners who work regularly within its facility. Instead, all medical and mental health services are provided offsite. Moreover, the agency has appropriately included the corresponding information regarding this arrangement in the agency's PREA Policy, as outlined on page 18 and documented below:</p> <ul style="list-style-type: none"> <li>• Boys Town Louisiana, Inc. does not employ medical or mental health care practitioners that conduct forensic examinations or work in the facilities in a full or part-time basis. However, if the Agency were to employ these positions, they shall ensure that all full and part-time mental health care practitioners who work regularly in its facility have been trained in: <ul style="list-style-type: none"> <li>• How to</li> </ul> </li> </ul>

	<p>detect and assess signs of sexual abuse and sexual harassment.</p> <ul style="list-style-type: none"> <li>◦ How to preserve physical evidence of sexual abuse.</li> <li>◦ How to respond effectively and professionally to resident victims of sexual abuse and sexual harassment.</li> <li>◦ How and to whom to report allegations or suspicions of sexual abuse and sexual harassment.</li> </ul> <ul style="list-style-type: none"> <li>• Boys Town Louisiana, Inc. shall maintain documentation that mental health practitioners have received the required training. Boys Town does collaborate with external providers of medical and mental health care as described in the BT SART Protocol.</li> </ul> <p><b><u>Conclusion:</u></b></p> <p><b>Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.</b></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><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> <li>- Intake &amp; Quarterly Screening &amp; Housing Assessment Form</li> <li>- Youth Intake Documents</li> <li>- Pre-Admission Interview Forms</li> <li>- TCU Institute of Behavioral Research CTS-3 Assessment Form</li> </ul> <p><b>Interviews:</b></p> <ul style="list-style-type: none"> <li>- Intake Staff (Supervisor)</li> <li>- All youth at the home during onsite (3)</li> <li>- PREA Coordinator (PC)</li> </ul> <p><b>Site Review Observations:</b></p>

- During the onsite visit, the auditor was given a tour of the home and the office areas where intakes are conducted. It was confirmed that these areas provide privacy and minimize distractions and interruptions, thereby enhancing confidentiality. Additionally, the office housing the youth files was verified to be a secure environment that implements necessary controls to safeguard the confidentiality and restricted dissemination of juvenile information.

**Explanation of Determination:**

**115.341**

**(a - d):** According to the agency's PREA Policy on pages 18 and 19:

- All residents shall be screened prior to and upon arrival to identify potential vulnerabilities or tendencies of acting out with sexually aggressive behavior. Within 72 hours of the youth's arrival the facility, 30 days from youth's arrival at the facility, each full SAVRY reassessment, after a PREA incident, and if the youth is at substantial risk of imminent sexual abuse, Boys Town shall obtain and use information about each youth's personal history and behavior to reduce the risk of sexual abuse by or upon a youth. Housing assignments shall be made accordingly. Such reassessments should be documented on the "Intake & Quarterly Screening & Housing Assessment". At a minimum, Boys Town Louisiana, Inc. shall attempt to ascertain information about the following:
  - Prior sexual victimization or abusiveness
  - Whether the resident may be vulnerable to sexual abuse due to any gender nonconforming appearance or mannerisms or self-identification as lesbian, gay, bisexual, transgender, or intersex
  - Current charges and offense history
  - Age
  - Level of emotional and cognitive development
  - Physical size and stature
  - Mental illness or mental disabilities
  - Intellectual or developmental disabilities
  - Physical disabilities
  - The resident's own perception of vulnerability
  - Any other specific information about an individual resident that may indicate a heightened need for supervision, additional safety precautions, or separation from certain other residents.
- Residents shall be reassessed for risk if any of the following situations occur: a referral or request for reassessment is made by a resident, staff member, or parent/guardian; an incident of sexual abuse takes place; or Boys Town Louisiana, Inc. receives additional information on the resident.

The auditor was furnished the agency's Sexual Vulnerability/Aggressiveness Assessment form, which was confirmed by the auditor to be an objective screening instrument that ascertains, at a minimum, the eleven elements required by

provision (c) (1-11). Furthermore, the screening tool is completed conversationally with each youth during the intake process, and the intake officer conducting the assessment utilizes the following supplemental information, as outlined on the intake documents provided, to maximize the accuracy of the data being assessed:

- personal and legal information;
- medical history;
- family structure and dynamics;
- past placement history;
- strengths/activities;
- legal/significant behavioral information;
- diagnostic information;
- family problems identified;
- offenses committed;
- medical/mental health history;
- discharge planning;
- youth's behavior during the last 6 months; and
- school/academic information.

During the onsite, the auditor conducted interviews with one of the program Supervisors and all the youth at the home to evaluate the program's compliance with the requirements of this PREA standard in practice. The youth confirmed that they were asked the screening questions outlined on the BTLA Sexual Vulnerability/Aggressiveness Assessment form upon their arrival at the program. They also verified that they met with a therapist within two weeks of their arrival and had weekly counseling sessions with the counselor since the initial meeting. The Supervisor elaborated on how the intake assessment serves as a risk screening tool to ensure the safety of each admitted youth. He provided an overview of the questions included in the risk screening and highlighted that the screening is carried out in a private setting to facilitate the collection of accurate information. The Supervisor emphasized that the screening helps in assigning the safest and most suitable room accommodation and programming to each youth admitted. Additionally, it was explained how the intake packet and conversations with the youth are used to gather information for the screening.

**(e):** As per the agency's PREA Policy:

- "Boys Town Louisiana, Inc. will maintain confidentiality and only share information with other staff members that is relevant to maintain the resident's safety and security. Boys Town Louisiana, Inc. 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 resident's detriment by staff or other residents."

**Resident PREA File Review:**

The auditor was provided examples of completed Sexual Vulnerability/Aggressiveness Assessments for the OJJ youth admitted into the program in the last 12 month audit review period, as well as applicable periodic re-assessments. The sample reviewed were found to be compliant with the requirements set forth by this PREA standard and no issues of concern were identified for this particular sample.

**Non-Compliance Summary:**

Although the explanation of compliance outlined above indicates that BTLA generally follows the requirements of the PREA standards in practice, it was identified during the onsite phase that the program has not consistently completed the BTLA risk screening (Sexual Vulnerability/Aggressiveness Assessment) on all youth upon admission. It was clarified that since the implementation of the PREA standards last year to comply with contractual obligations with the state of Louisiana, youth from the Louisiana Office of Juvenile Justice (OJJ) undergo the full intake process, including the required PREA orientation and comprehensive education and risk screening pursuant to this PREA standard. However, it was confirmed that youth referred from the Louisiana Department of Children & Family Services (DCFS) were not consistently provided the risk screening tool during the intake process or periodically screened throughout their stay at the program. This discrepancy was highlighted through a review of PREA youth files and discussions with the PC during the onsite visit. To address this inconsistency, the PC expressed a commitment to ensuring that all future youth admitted into the program are screened in accordance with this PREA standards.

**Corrective Action Summary:**

The corrective action plan indicated that it was identified by the auditor that the risk screening (Sexual Vulnerability/Aggressiveness Assessment) was not completed on all youth upon admission upon Boys Town implementation of the PREA standards. It was not Boys Town practice to complete these assessments on youth in the custody of child welfare (DCFS). This however has now been added to the intake and reassessment process for DCFS youth, as recommended for best practice by the auditor.

To substantiate compliance with the revised procedure and practice, the auditor was furnished with completed risk screenings for the two youth admitted into the program during the corrective action period. Upon review, it was evident that the practice of conducting risk screenings for all admitted youth has been fully institutionalized and remains compliant with the established standards.

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard and no corrective action is required at this time.**

<b>115.342</b>	<b>Placement of residents</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> <li>- Intake &amp; Quarterly Screening &amp; Housing Assessment Form</li> <li>- Youth Intake Documents</li> <li>- Pre-Admission Interview Forms</li> <li>- TCU Institute of Behavioral Research CTS-3 Assessment Form</li> </ul> <p><b>Interviews:</b></p> <ul style="list-style-type: none"> <li>- Intake Staff (Supervisor)</li> <li>- PREA Coordinator (PC)</li> <li>- Executive Director (ED)</li> </ul> <p><b>Site Review Observations:</b></p> <ul style="list-style-type: none"> <li>- During the onsite, the auditor confirmed that BTLA is a group type home that provides for a non-secure setting for the youth to live; therefore, isolation is not used by any means for the confinement of youth.</li> </ul> <p><b>Explanation of Determination:</b></p> <p><b><u>115.342</u></b></p> <p><b>(a):</b> According to the agency's PREA Policy on page 19:</p> <ul style="list-style-type: none"> <li>• "Boys Town Louisiana, Inc. shall use all information obtained from placement documents, psychological and mental health assessments, social histories and intake screenings to make housing, bed, program, education, and work assignments for residents with the goal of keeping all residents safe and free from sexual abuse."</li> </ul>

The auditor was provided the agency's 'Sexual Vulnerability/Aggressive Assessment' screening tool, as noted in section 115.341 of this report, and confirmed that the information obtained from this form is used to make housing, bed, program, education, and work assignments for residents with the goal of keeping all residents safe and free from sexual abuse.

During the onsite, the auditor conducted interviews with one of the program Supervisors and all the youth at the home to evaluate the program's compliance with the requirements of this PREA standard in practice. The youth confirmed that they were asked the screening questions outlined on the BTLA Sexual Vulnerability/Aggressiveness Assessment form upon their arrival at the program. They also verified that they met with a therapist within two weeks of their arrival and had weekly counseling sessions with the counselor since the initial meeting. The Supervisor elaborated on how the intake assessment serves as a risk screening tool to ensure the safety of each admitted youth. He provided an overview of the questions included in the risk screening and highlighted that the screening is carried out in a private setting to facilitate the collection of accurate information. The Supervisor emphasized that the screening helps in assigning the safest and most suitable room accommodation and programming to each youth admitted. Additionally, it was explained how the intake packet and conversations with the youth are used to gather information for the screening.

The auditor was provided examples of completed Sexual Vulnerability/Aggressiveness Assessments for the OJJ youth admitted into the program in the last 12 month audit review period, as well as applicable periodic re-assessments. The sample reviewed were found to be compliant with the requirements set forth by this PREA standard and no issues of concern were identified for this particular sample. These assessments document how the information ascertained from the risk screening was used to make housing, bed, program, and education assignments for students with the goal of keeping all youth safe and free from sexual abuse and sexual harassment.

**(b, h, & i):** As per the agency's PREA Policy on page 19:

- "Residents in Boys Town Louisiana, Inc. residential programs are not separated from each other unless safety is an issue and only as a last resort when less restrictive measures are inadequate to keep them and other resident safe. If separation does occur, all required exercise, educational programming, and medical or mental health services still occur. Boys Town Louisiana, Inc. does not utilize isolation, holding, or time out interventions. Residents who are separated from the group are not placed in a confined setting and are integrated back into the group at the earliest opportunity. If a resident represents a safety risk to others in the facility, then alternative action will be utilized to ensure that there is no safety risk to others."

Note: As indicated above and confirmed by the auditor, BTLA does not utilize any form of isolation from others. The program operates as a family home living

structure for the youth and is classified as a non-secure facility. This was also confirmed through the onsite interviews with the three students at the home, the ten staff members, and multiple administrators.

**(c- g):** According to the agency's PREA Policy:

- "Lesbian, gay, bisexual, transgender, or intersex residents shall not be placed in particular housing, bed, or other assignments solely on the basis of such identification or status; assignments will be considered on a case-by-case basis as to whether a placement would ensure the resident's health and safety, and whether it would present management or security problems. Boys Town Louisiana, Inc. will not consider lesbian, gay, bisexual, transgender, or intersex identification or status as an indicator of likelihood of being sexually abusive.
- A transgender or intersex resident's own view with respect to his or her own safety shall be given serious consideration in determining safety issues.
- All residents, including transgender and intersex residents, shower separately from one another.
- Placement and programming assignments for all residents will be reassessed, at a minimum, at least twice a year to review any threats to safety experienced by the resident."

During the onsite interviews, both the ED and PC confirmed that to date, no youth identifying as transgender or intersex had been admitted to the BTLA program. However, they outlined a plan to address the situation if such a youth is admitted in the future. The management team, the youth's parent/guardian, and other professionals would collaborate on a case-by-case basis to ensure the youth's safety, rights, and required accommodations are met effectively. It was emphasized that the BTLA home operates as a standard group home setting, enabling each youth to have individual privacy in one of the home's bathrooms. This setup allows all youth to shower, change, and use the restroom in complete privacy with locked doors.

Moreover, the ED and PC highlighted that each youth is assigned a therapist who conducts weekly check-ins, exceeding the minimal requirement of biannual safety reassessments. This frequent engagement with mental health professionals ensures ongoing support and monitoring. Additionally, the PC and ED mentioned that staff and management regularly check in on youth to monitor progress towards specific programming goals and offer any necessary assistance.

**Non-Compliance Summary:**

As explained in sections 115.333 and 115.341 of this report, although the explanation of compliance outlined above indicates that BTLA generally follows the requirements of the PREA standards in practice, it was identified during the onsite phase that the program has not consistently completed the BTLA risk screening (Sexual Vulnerability/Aggressiveness Assessment) on all youth upon admission. It was clarified that since the implementation of the PREA standards last year to



comply with contractual obligations with the state of Louisiana, youth from the Louisiana Office of Juvenile Justice (OJJ) undergo the full intake process, including the required PREA orientation and comprehensive education and risk screening pursuant to this PREA standard. However, it was confirmed that youth referred from the Louisiana Department of Children & Family Services (DCFS) were not consistently provided the risk screening tool during the intake process or periodically screened throughout their stay at the program. This discrepancy was highlighted through a review of PREA youth files and discussions with the PC during the onsite visit. To address this inconsistency, the PC expressed a commitment to ensuring that all future youth admitted into the program are screened in accordance with this PREA standards.

**Corrective Action Summary:**

The corrective action plan indicated that it was identified by the auditor that the risk screening (Sexual Vulnerability/Aggressiveness Assessment) was not completed on all youth upon admission upon Boys Town implementation of the PREA standards- as it was not Boys Town practice to complete these assessments on youth in the custody of child welfare (DCFS). This however has now been added to the intake and reassessment process for DCFS youth, as recommended for best practice by the auditor.

To substantiate compliance with the revised procedure and practice, the auditor was furnished with completed risk screenings for the two youth admitted into the program during the corrective action period. Upon review, it was evident that the practice of conducting risk screenings for all admitted youth has been fully institutionalized and remains compliant with the established standards.

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard and no corrective action is required at this time.**

<b>115.351</b>	<b>Resident reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> <li>- BTLA PREA Implementation Document</li> </ul>

- PREA Brochure (English & Spanish)
- PREA Orientation PowerPoint Presentation (21 Slides)
- PREA Poster ("Break the Silence / Make the Call")
- Youth Confirmation of Receipt- PREA Form
- Youth Methods of Reporting Information
- PREA Comprehensive Education Video (15 minutes)
- Youth Boundaries Education Sheet
- "No Means No" PREA Poster (English & Spanish)
- Boys Town Employee Handbook
- Reporting Abuse & Neglect (Youth Care Policy #9150)
- Reporting Guidelines for Safety & Communication (Youth Care Policy #9525)

**Interviews:**

- All staff available (10)
- All youth at the home (3)

**Site Review Observations:**

- The auditor confirmed during the onsite visit that the agency prominently displays multiple posters in the program's house, containing important PREA information including the agency's steadfast zero tolerance policy against all forms of sexual abuse and sexual harassment. Additionally, the posters provide clear instructions for youth and staff on how to make a PREA report, outline program rules, offer staff contact information (including Dorm Leader, Caseworker, Probation Officer, and Facility Directors), explain the youth grievance process, and outline youth rights and responsibilities related to PREA. The posters also feature important resources such as the youth safety line for Boys Town, Department of Children & Family Services (DCFS) reporting instructions, details on prohibited punishment, contact information for the Louisiana Office of Juvenile Justice reporting hotline, suicide prevention helplines, and information on the Behavioral Health Center Children's Hospital. Upon examination by the auditor, it was verified that the posters were prominently displayed, in good condition, and easily accessible to the youth residing in the home.
- The auditor also conducted several successful test calls while onsite, including calls to:

- the Louisiana Office of Juvenile Justice (OJJ) Reporting Hotline;
- Louisiana Foundation Against Sexual Assault Reporting Hotline;
- Aubrey Hepburn CARE Center; and
- Boys Town Student Hotline.

The calls detailed above were made through the same phone call process that a youth at the home would use to make a call out, and each entity contacted confirmed that they are equipped to accept reports of abuse, neglect, and exploitation from both juveniles and adults. They also stated that translators are available on an as needed basis, and the three hotline centers confirmed that they operate a 24/7 call center.

In addition to making the test calls, the auditor also took note of the secure grievance box that is located in the foyer, as soon as you walk in the home. This box was explained by the PC and a staff member at the home as a secure box that students can use to communicate with the PC directly either through writing a grievance or just by writing down information on a piece of paper. The PC shared how she checks the box every day that she works, at least five days a week, and if a grievance is received that alleges any form of sexual abuse or sexual harassment, the mandatory reporting protocols are enacted to ensure the allegation is investigated by the proper authorities.

**Explanation of Determination:**

**115.351**

**(a):** The agency's PREA Policy includes the multiple internal ways for residents to privately report sexual abuse and 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. For example, it is documented in this Policy, as well as in the agency's Youth Methods of Reporting Policy:

- Residents who are victims of sexual abuse/assault/harassment have the option to report the incident to any staff member in addition to immediate point-of-contact line staff member.
- Residents may use Boys Town Louisiana, Inc. Grievance Form, available in each living unit, to report sexual abuse/harassment; they may submit a report in writing using plain paper; or they may make a verbal report.
- Residents may submit grievances by using the locked suggestion box located at each program site or through the postal service.
- Youth Safety Line which is available to all youth and families receiving services at Boys Town. The Youth Safety Line is also available to employees as a means of reporting.
- Online Reporting which is available to youth receiving services in Family Home Program and Intervention and Assessment Program.

- Youth Safety Questionnaire which is available to youth receiving services in Family Home Program, Intervention and Assessment Program, Foster Family Services and the Residential Treatment Center.
- Youth Comment Box which is available for all youth receiving services in Family Home Program and Intervention and Assessment Program and the Residential Treatment Center.

The auditor verified that upon arrival at the facility, youth are provided with information on various methods to report incidents under the PREA guidelines during the intake process and within the first 10 days of admission when comprehensive PREA education is delivered. This information is also posted in the home, as verified by the auditor. Furthermore, during the interview process onsite, all youth were asked to explain the multiple avenues available for making a PREA report. Each student proficiently detailed how to write and submit a report through the grievance process or by providing a letter to staff or their parent/guardian, disclose to a trusted staff member or adult, contact reporting hotlines, communicate through written correspondence to family/guardian/caseworker, and make an anonymous report by calling a hotline or writing it on a grievance form or paper without their name. It was confirmed that all youth and staff members at BTLA demonstrated a clear understanding of the diverse reporting options for PREA incidents. Moreover, during individual interviews, each person stated that they have not been aware of any student or staff at BTLA who has been involved in a sexual abuse or harassment incident, whether as an alleged victim or perpetrator.

**(b & e):** The agency's PREA Policy also outlines how a youth and staff member can privately report abuse or harassment to a public entity that is not part of the agency, with this outside agency able to receive and immediately forward reports of sexual abuse and sexual harassment to agency officials and law enforcement. This primary outside reporting entity is the Louisiana Office of Juvenile Justice (OJJ), and this state agency has a 24/7 reporting hotline number that is included in the agency's PREA Policy, as well as on the PREA Brochure that is provided to all youth during the intake process, as noted in section 115.333 of this report. It is important to note that a youth can remain anonymous upon request when contacting the OJJ. Additionally, the auditor was provided PREA signs that are posted throughout the living quarters of the BTLA program. These posters include the reporting hotline numbers for OJJ, Louisiana Foundation Against Sexual Assault, and Department of Child and Family Services. Additionally, Aubrey Hepburn CARE Center contact information is also included on one of the PREA posters, as confirmed by the auditor.

Additionally, the auditor confirmed that the following employee reporting methods are included in the Boys Town Employee Handbook on page 28:

- Youth Safety Issues can always be reported through the Youth Safety Line at: 531-355-3399 or 1-877-987-5100.
- If you aren't sure about a decision or question, or you are concerned about

something that has occurred, you should reach out to your manager. Managers at Boys Town have significant responsibility and should always lead by example. They work hard to create the kind of workplace where employees feel comfortable coming forward with questions or concerns. Managers support employees when they raise issues. At Boys Town, we work hard to train our managers to be strong and valuable mentors and we help them lead the way in collaborating across the enterprise. We encourage our managers and employees to build strong relationships with healthy communication and avenues for feedback.

- We encourage employees to always work first with their managers to resolve issues. In the event that an issue arises that cannot be resolved with your manager, you do have other available avenues for reporting.
  - Your Senior Management Team.
  - Human Resources is always available. You can contact them directly or through their general number at 531-355-1771.
  - If those avenues have been exhausted, you may reach out through EthicsPoint at 1-888-264-0754 or report via the Hub. Finally, you may always reach out to our Compliance or Legal teams directly.

During interviews with three youth and ten staff members, it was evident that they were well-informed about the reporting hotline options available, with the posted hotline numbers accessible 24/7. Both staff and students indicated their awareness that one of the 24/7 reporting hotlines enables direct contact with the Louisiana Office of Juvenile Justice (OJJ) to ensure that an external entity is capable of receiving such reports and investigate accordingly.

**(c):** As noted in the agency's PREA Policy:

- "If a resident makes a verbal report to staff, staff shall document these reports within their shift. Administration must be notified immediately, and documentation must be given to the PREA Compliance Manger (facility director) or the on-call administrator within 24 hours."
- Staff members who witness or receive a report of sexual assault, sexual harassment, or who learn of rumors or allegations of such conduct, must report information concerning incidents or possible incidents of sexual abuse or sexual harassment to the PREA Compliance Manager (facility director) or on-call administrator and write an Unusual Occurrence Report.
- All allegations of sexual assault of an OJJ resident will be reported to OJJ immediately upon receipt of the allegation.
- Boys Town Louisiana, Inc. shall report all allegations of sexual assault/harassment, including third-party and anonymous reports, to the PREA Coordinator and DCFS and/or the police department."

The ten staff interviewed confirmed that if they receive a verbal PREA report from a student at the program, they are required to immediately report to their direct supervisor and OJJ, as well as document the verbal report on a type of incident

reporting form.

**(d):** The auditor confirmed while onsite that all youth are provided access to tools necessary to make a written report, such as pens/pencils/papers/grievance forms. Additionally, youth are able to submit an email or call a reporting hotline at any time while in the BTLA program. All youth interviewed confirmed they have free access to writing utensils both at the home and at school. This was also confirmed by the auditor during the home inspection, in which writing utensils were observed available.

**(e):** The staff members interviewed onsite confirmed that they can report directly to OJJ, by use of the reporting hotline, or can report up the chain of command to ensure a report of sexual abuse or sexual harassment is handled appropriately.

**Note:** Based on the PC's responses in the PAQ and as validated by the auditor's documentation review and onsite audit activities, no instances of alleged sexual abuse or harassment involving youth at the BTLA program were reported in the preceding 12-month audit period. Consequently, there was no documented evidence available to demonstrate compliance with the elements of this PREA standard in actual practice during this timeframe. Additionally, as confirmed by the auditor, BTLA does not accept youth for the sole purpose of civil immigration purposes.

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.**

115.352	Exhaustion of administrative remedies
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"><li>- Agency's PREA Policy</li><li>- Pre-Audit Questionnaire (PAQ)</li><li>- Safety Enhancement Protocols</li><li>- Youth Safety Questionnaire</li><li>- Youth Methods of Reporting- Procedure</li></ul> <p><b>Explanation of Determination:</b></p>

**115.352**

**(a-g):** As per the agency's PREA Policy:

- "Boy Town Louisiana, Inc. has a policy (#9150 Reporting Abuse and Neglect Policy) to ensure that allegations of resident grievances of sexual harassment or sexual abuse are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation do not involve potentially criminal behavior. All reportable allegations will be reported to the local unit of Office of Juvenile Justice responsible for the coordinated efforts related to PREA allegations."

**Note:** As a matter of written agency policy and required practice, the auditor verified that grievances related to sexual abuse or allegations of sexual abuse (i.e., allegations of sexual abuse, a fear of sexual abuse, or allegations of mishandling of an incident of sexual abuse) are immediately converted to investigations that are outside of the agency's administrative remedies process, and are not considered by the agency to be grievances. Therefore, the requirements set forth by this PREA standard are not applicable to this audit.

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.**

<b>115.353</b>	<b>Resident access to outside confidential support services and legal representation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<b>The following is a list of evidence used to determine compliance:</b> <ul style="list-style-type: none"><li>- Agency's PREA Policy</li><li>- Pre-Audit Questionnaire (PAQ)</li><li>- MOU Between BTLA &amp; Children's Hospital Audrey Hepburn CARE Center</li><li>- "No Means No" PREA Poster</li><li>- "Break the Silence/Make the Call" PREA Poster</li><li>- PREA Brochure (English &amp; Spanish)</li></ul>

**Interviews:**

- Youth
- Executive Director (ED)
- Representative from Aubrey Hepburn CARE Center (Children's Advocacy Center)

**Site Review Observations:**

- During the onsite visit, the auditor verified that the agency had posted their "No Means No" PREA poster, which outlines various reporting methods and details on how students can access victim support services offered by the CARE Center. Furthermore, the auditor contacted the CARE Center from the facility using the information provided on the poster. An advocate who answered the call confirmed that the CARE Center is equipped to receive reports of sexual abuse and harassment and provide emotional support services for any juvenile in need of such assistance. Such services can be provided either at the home in person, by phone, or by staff transporting the youth to the advocacy center.

**Explanation of Determination:****115.353**

**(a - d):** According to the agency's PREA Policy on pages 21 and 22:

- "Boys Town Louisiana, Inc. shall 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 numbers where available, of local, state, or national victim advocacy or rape crisis organizations. Boys Town Louisiana, Inc. shall enable reasonable communication between residents and these organizations and agencies in as confidential a manner as possible.
- Boys Town Louisiana, Inc. shall 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.  
Boys Town Louisiana, Inc. shall utilize the Rape Crisis Outreach Center to provide residents with confidential emotional support services related to sexual abuse. Boys Town will pursue an agreement with Audrey Hepburn CARE Center for external counseling and support for the victim of sexual abuse or harassment.
- Boys Town Louisiana, Inc. shall also provide residents with reasonable and confidential access to their attorneys or other legal representation and reasonable access to parents or legal guardians.



In order to showcase how the program provides youth with access to the CARE Center for emotional support services related to sexual abuse, the PC provided the auditor with the fully executed MOU between the program and the CARE Center. Additionally, the auditor received a PREA poster featuring the CARE Center's mailing address and telephone number. All youth have the ability to contact the CARE Center for emotional support services at any time, as detailed in the MOU, which outlines the CARE Center's responsibility to provide this service at no charge to the youth.

Furthermore, all interviewed youth affirmed their awareness of the "No Means No" poster, positioned near the kitchen and home office, which provides information on contacting the CARE Center. The youth indicated that they have the capability to make calls if necessary and would call the CARE Center if they felt a need. In separate interviews with the Executive Director and PC, questions related to the requirements of this PREA standard were addressed. Both administrators acknowledged the established professional relationship with the CARE Center, which was formalized through the execution of a Memorandum of Understanding (MOU) between BTLA and CARE Center.

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.**

<b>115.354</b>	<b>Third-party reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> <li>- BTLA Parent or Legal Guardian Rights &amp; Responsibilities Form</li> </ul> <p><b>Site Review Observations:</b></p> <ul style="list-style-type: none"> <li>- The auditor confirmed during the onsite visit that the agency prominently displays multiple posters in the program's house, containing the agency's zero tolerance policy against all forms of sexual abuse and sexual harassment. Additionally, the posters provide clear instructions for youth and staff on how to make a PREA report, outline program rules, offer staff contact information (including Dorm Leader, Caseworker, Probation Officer, and Facility Directors), explain the youth grievance</li> </ul>

process, and detail the youth's rights and responsibilities. The posters also feature important resources such as the youth safety line for Boys Town, Department of Children & Family Services (DCFS) reporting instructions, details on prohibited punishment, contact information for the Louisiana Office of Juvenile Justice reporting hotline, suicide prevention helplines, and information on the Behavioral Health Center Children's Hospital. Upon examination by the auditor, it was verified that the posters were prominently displayed, in good condition, and easily accessible to the youth residing in the home.

- The auditor also conducted several successful test calls while onsite, including calls to:

- the Louisiana Office of Juvenile Justice (OJJ) Reporting Hotline;
- Louisiana Foundation Against Sexual Assault Reporting Hotline;
- Aubrey Hepburn CARE Center; and
- Boys Town Student Hotline.

The calls detailed above were made through the same phone call process that a youth at the home would use to make a call out, and each entity contacted confirmed that they are equipped to accept reports of abuse, neglect, and exploitation from both juveniles and adults. They also stated that translators are available on an as needed basis, and the three hotline centers confirmed that they operate a 24/7 call center.

**Explanation of Determination:**

**115.354**

**(a):** As documented in the agency's PREA Policy:

- "Boys Town Louisiana, Inc. encourages anyone including third parties to report incidents of suspected sexual abuse and sexual harassment that occurred in a Boys Town facility and/or a youth who previously or currently reside in the facility. Boys Town National Hotline is publicly advertised as a resource in addition to locally reporting the PREA Coordinator or a member of the administrative staff."

Additionally, the auditor was provided the agency's form titled, 'Parent or Legal Guardian Rights & Responsibilities.' This document outlines the following information that is provided to each youth's parent/guardian upon being admitted into the program:

- Your Right to Services:
  - Expect professional, quality services that are provided fairly in a non-discriminatory manner according to current law. You are encouraged to contact the Program Director for resolution of any concerns about

	<p>the quality of services.</p> <ul style="list-style-type: none"> <li>◦ Be included in the development of your child’s individualized Service Plan and receive regular communication and updates.</li> <li>◦ Decline Boys Town services at any time with adequate notice to Boys Town; you will be informed about options regarding your decision.</li> <li>◦ Have the right to file a grievance without interference or retaliation by contacting the 24-hour Boys Town National Hotline® at 1-800-448-3000, your referring agency, or the Council on Accreditation at coanet.org.</li> </ul> <ul style="list-style-type: none"> <li>• Your Responsibilities: <ul style="list-style-type: none"> <li>◦ Maintain communication and participate in your child’s Service Plan.</li> <li>◦ Notify a Boys Town employee of changes in your address, phone number, insurance, or other relevant information. Maintain the privacy and confidentiality of other participants in the program.</li> <li>◦ Communicate safety concerns to Boys Town employees.</li> <li>◦ Keep scheduled appointments and, when necessary, cancel them at least 24 hours in advance.</li> </ul> </li> </ul> <p><b>Note:</b> Based on the PC's responses in the PAQ and as validated by the auditor's documentation review and onsite audit activities, no instances of alleged sexual abuse or harassment involving youth at the BTLA program, including any type of third-party report, were reported in the preceding 12-month audit period. Consequently, there was no documented evidence available to demonstrate compliance with the elements of this PREA standard in actual practice during this timeframe.</p> <p><b>Conclusion:</b></p> <p><b>Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.</b></p>
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<b>115.361</b>	<b>Staff and agency reporting duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> <li>- Boys Town Code of Conduct</li> </ul>

- Boys Town Employee Handbook
- Boys Town Reporting Guidelines
- Reporting Guidelines for Safety & Communication (Youth Care Policy #9525)
- Reporting Abuse & Neglect (Youth Care Policy #9150)
- Staff PREA Training Course List and Corresponding Curriculum

**Interviews:**

- Staff
- PREA Coordinator (PC)
- Executive Director (ED)

**Explanation of Determination:**

**115.361**

**(a & b):** According to the agency's PREA Policy on pages 7 and 22:

- "Boys Town Louisiana, Inc. shall prohibit retaliation against a resident who reports sexual harassment or sexual contact, or a staff member who reports sexual harassment or sexual contact with a resident, or anyone who cooperates with sexual harassment or sexual abuse investigations.
- Staff members who witness or receive a report of sexual assault, sexual harassment, or who learn of rumors or allegations of such conduct, must report information concerning incidents or possible incidents of sexual abuse or sexual harassment to the PREA Compliance Manager (facility director) or on-call administrator and write an Unusual Occurrence Report.
- If the report is found valid, law enforcement will be contacted to conduct an investigation.
- All allegations of sexual assault of an OJJ resident will be reported to OJJ immediately upon receipt of the allegation.
- Boys Town Louisiana, Inc. shall report all allegations of sexual assault/harassment, including third-party and anonymous reports, to the PREA Coordinator and DCFS and/or the police department."

Additionally, it is further explained in the agency's Youth Care Policy #9150:

- "Father Flanagan's Boys' Home (a/k/a Boys Town) and its affiliate corporations (hereinafter collectively referred to as "Boys Town") focus on the safety of youth, families (hereinafter referred to as "service recipients"), employees, Foster Parents, and volunteers. As such, employees, Foster Parents, and volunteers are required to report incidents in which they have

reasonable cause to believe that a child or adult has been subjected to abuse or neglect, or that circumstances exist that reasonably would result in abuse or neglect.

- If an employee, Foster Parent, or volunteer has reasonable cause to believe that an individual has been subjected to abuse or neglect or observes an individual being subjected to conditions or circumstances that reasonably would result in abuse or neglect, he or she must report the event to the required Child Protective Services, Department of Health and Human Services, Department of Juvenile Justice, and/or law enforcement agencies as specified by contract and state law. The reporting person also must notify his or her immediate supervisor of the incident and provide a written report within one (1) business day to his or her Program Director. The supervisor must notify the Program Audit Department of the event. Other communication mandated by contractual and licensing reporting requirements also must be carried out."

During the onsite interviews, all ten staff members provided detailed explanations to the auditor regarding their mandated reporting duties as individuals and as representatives of the agency. Each staff member, when questioned about the reporting protocols for allegations of sexual abuse and harassment at BTLA, effectively outlined the requirements to promptly report any PREA-related allegation to their immediate supervisor, the PC, Louisiana OJJ, and local law enforcement (as applicable to the situation). The reporting obligations also encompass immediate reporting of situations involving retaliation for reporting, as well as staff neglect or violations of responsibilities that could contribute to instances of abuse, harassment, or retaliation. The auditor confirmed that the reporting guidelines established by BTLA's policies align with the mandatory child abuse reporting laws applicable in the state of Louisiana and as set forth by the PREA standards.

**(c):** As per the agency's PREA Policy on page 23:

- "Staff members shall not disclose any information concerning sexual abuse, sexual assault, sexual harassment, or sexual misconduct of a resident, including the names of alleged victims or perpetrators, except to report the information as required by this policy or the law, or to discuss such information as a necessary part of performing their job.
- Staff members who fail to comply with the reporting provisions of this policy will be subject to disciplinary action, up to and including termination, whichever is applicable."

Furthermore, the following confidentiality and privacy information was found to be included in the Boys Town Employee Handbook:

- "Boys Town is responsible for the confidential and private information of employees, volunteers, patients, interns (hereinafter referred to as "individuals"), its service recipients and the organization. Confidential or

private information is strictly controlled and shared within Boys Town only on a need-to-know basis and is generally not released to the public unless it is required by law, allowed by permission or done in order to protect and/or further the interests of Boys Town.

- Confidential and private information includes but is not limited to patient information, service recipient lists, service recipient information, clinical records, contracts and agreements, protected health information (PHI), scientific data, formulae and research. Each employee is expected to handle all confidential and private information with the utmost care. Employees with questions should seek clarification from their manager or the Boys Town Privacy or Information Security Officer."

The staff members interviewed recognized the significance of upholding confidentiality when interacting with students at the home. They conveyed their training in ensuring that information concerning sexual abuse is exclusively disclosed to professionals authorized to receive such information within the scope of their professional responsibilities in responding to a sexual abuse situation

**(d):** The BTLA program does not employ medical and mental health practitioners who work regularly within its facility. Instead, all medical and mental health services are provided offsite. Therefore, the elements set forth by this provision are not applicable for this audit.

**(e & f):** The agency's PREA Policy includes the reporting requirements of this provision on page 22, as outlined below:

- "If the report is found valid, law enforcement will be contacted to conduct an investigation.
- All allegations of sexual assault of an OJJ resident will be reported to OJJ immediately upon receipt of the allegation.
- Notification of allegations will be made to the resident's parents/guardians, attorney, or other legal representative, and the juvenile's court of jurisdiction. If an allegation of sexual abuse or assault is made by a resident in aftercare, staff receiving this information shall report it to the appropriate court.
- Boys Town Louisiana, Inc. shall report all allegations of sexual assault/harassment, including third-party and anonymous reports, to the PREA Coordinator and DCFS and/or the police department."

During individual onsite interviews, the PC and ED confirmed the procedures outlined above regarding confidentiality and reporting protocols. They both stated that no instances of sexual abuse or harassment had occurred at the BTLA program. However, in the event that such an incident were to occur in the future, the ED mentioned that she or the PC would ensure that the necessary notifications are promptly made and appropriate documentation is maintained according to the established protocols.

	<p><b>Note:</b> Based on the PC's responses in the PAQ and as validated by the auditor's documentation review and onsite audit activities, no instances of alleged sexual abuse or harassment involving youth at the BTLA program were reported in the preceding 12-month audit period. Consequently, there was no documented evidence available to demonstrate compliance with the elements of this PREA standard in actual practice during this timeframe.</p> <p><b>Conclusion:</b></p> <p><b>Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.</b></p>
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<b>115.362</b>	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> <li>- BTLA Sexual Abuse Response Team (SART) Protocol</li> </ul> <p><b>Interviews:</b></p> <ul style="list-style-type: none"> <li>- Executive Director (ED)</li> <li>- Staff</li> </ul> <p><b>Explanation of Determination:</b></p> <p><b><u>115.362</u></b></p> <p><b>(a):</b> According to the agency's Youth Care Policy #9150:</p> <ul style="list-style-type: none"> <li>• "Father Flanagan's Boys' Home (a/k/a Boys Town) and its affiliate corporations (hereinafter collectively referred to as "Boys Town") focus on the safety of youth, families (hereinafter referred to as "service recipients"), employees, Foster Parents, and volunteers. As such, employees, Foster Parents, and volunteers are required to report incidents in which they have reasonable cause to believe that a child or adult has been subjected to abuse or neglect, or that circumstances exist that reasonably would result in</li> </ul>

abuse or neglect.

- If an employee, Foster Parent, or volunteer has reasonable cause to believe that an individual has been subjected to abuse or neglect or observes an individual being subjected to conditions or circumstances that reasonably would result in abuse or neglect, he or she must report the event to the required Child Protective Services, Department of Health and Human Services, Department of Juvenile Justice, and/or law enforcement agencies as specified by contract and state law. The reporting person also must notify his or her immediate supervisor of the incident and provide a written report within one (1) business day to his or her Program Director. The supervisor must notify the Program Audit Department of the event. Other communication mandated by contractual and licensing reporting requirements also must be carried out."

Additionally, as per the agency's PREA Policy on pages 18, 21, & 22:

- "If the youth is at substantial risk of imminent sexual abuse, Boys Town shall obtain and use information about each youth's personal history and behavior to reduce the risk of sexual abuse by or upon a youth. Housing assignments shall be made accordingly.
- Residents may file an emergency grievance alleging that they are subject to a substantial risk of imminent sexual abuse by having a staff contact the facility director or on-call administrator. The chain of command related to reporting will include the PREA Coordinator and administrative investigative team. After receiving an emergency grievance alleging a resident is subject to a substantial risk of imminent sexual abuse, the director or on-call administration shall immediately take corrective action as well as forwarding the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to the facility PREA Coordinator.
- Boys Town Louisiana, Inc. shall report all allegations of sexual assault/harassment, including third-party and anonymous reports, to the PREA Coordinator and DCFS and/or the police department.
- All allegations of sexual assault of an OJJ resident will be reported to OJJ immediately upon receipt of the allegation.
- If the report is found valid, law enforcement will be contacted to conduct an investigation."

During the onsite interviews, the ten staff members were presented with a hypothetical scenario involving a youth being bullied by another youth who is making sexual comments and threats. The staff outlined their responses, indicating that they would prioritize the safety of the victim by removing the threat promptly, contacting a supervisor for assistance in managing the situation, and initiating the necessary reports as required by the circumstances. They also elaborated on the importance of documenting the situation thoroughly and informing other staff members working with the involved youth to ensure comprehensive awareness and support.



	<p>The auditor spoke with the ED about the measures in place to safeguard students from abuse and the steps to take if a youth is deemed at risk of imminent sexual abuse. The ED outlined the process, emphasizing the immediate priority of ensuring the victim's safety, extinguishing the threat promptly, and further actions such as follow-up procedures and making appropriate reports based on the severity and urgency of the situation. The ED advised that she did not recall any situation in which a student was at imminent risk of sexual abuse; however, the appropriate policies and procedures are fully institutionalized to ensure a quick and effective response to ensure student safety and to prevent such a situation from escalating to sexual abuse.</p> <p><b>Note:</b> The PC indicated in the PAQ that in the past 12 month audit review period, there have been no situations involving a BTLA youth who was subject to a substantial risk of imminent sexual abuse.</p> <p><b>Conclusion:</b></p> <p><b>Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.</b></p>
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<b>115.363</b>	<b>Reporting to other confinement facilities</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> <li>- Reporting Abuse &amp; Neglect</li> </ul> <p><b>Interviews:</b></p> <ul style="list-style-type: none"> <li>- Executive Director (ED)</li> </ul> <p><b>Explanation of Determination:</b></p> <p><b><u>115.363</u></b></p> <p><b>(a - d):</b> According to the agency's PREA Policy on page 23:</p> <ul style="list-style-type: none"> <li>• "Upon receiving an allegation that a resident was sexually abused while in</li> </ul>

placement at another facility, the employee that received the allegation shall notify the PREA Coordinator OR Manager. The PREA Coordinator will then notify the head of the facility or appropriate office of the facility where the alleged abuse occurred and shall also notify the appropriate investigative agency.

- Such notification shall be provided and documented as soon as possible but no later than 72 hours after receiving the allegation. Boys Town shall document that it has provided such notifications. The facility head or agency office that receives such notification shall ensure that the allegation is investigated in accordance with these standards if identified agency is designated as a PREA compliant agency."

Furthermore, the PC indicated in the PAQ that no instances of sexual abuse had occurred during the previous 12-month audit review period, a statement affirmed by the ED during their interview. The ED further explained that if a report is received alleging that a student was sexually abused while at another facility or program, immediate notifications would be made by either the ED or PC as soon as possible. Additionally, she affirmed that the agency would ensure that the report is managed in compliance with mandatory child abuse reporting laws, mandating reports to be made to local law enforcement with jurisdiction and the Louisiana Office of Juvenile Justice (OJJ).

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.**

115.364	Staff first responder duties
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> <li>- BTLA SART Protocol</li> </ul> <p><b>Interviews:</b></p> <ul style="list-style-type: none"> <li>- Staff (all trained as first responders)</li> </ul>

**Explanation of Determination:**

**115.364**

**(a & b):** According to the agency's PREA Policy on pages 23 and 24:

- Upon learning of an allegation that a resident was sexually abused, the first staff member to respond to the report shall be required to do the following:
  - Separate the alleged victim and abuser.
  - Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence.
  - If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged victim and the alleged abuser do not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.
  - The staff first responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and then notify the PREA Compliance Manager (facility director) or on-call administration.
  - The SART Team will be notified by the PREA Compliance Manager or on-call administrator. The SART team will conduct a preliminary investigation to determine if law enforcement should be contacted.
  - The PREA Compliance Manager or on-call administrator will then notify all necessary administration, OJJ, DCFS, about the situation.
  - Staff must maintain documentation on what has been told to them and all the actions they took. This must include times, person(s) who whom the staff spoke, evidence, etc. These notes must be maintained for questioning by the investigator and for writing the report.

To demonstrate how the BTLA program ensures compliance with staff first responder duties in responding to sexual abuse situations, the auditor received the first responder training curriculum and the Boys Town SART Protocol document. The training curriculum is provided to staff upon hiring and comprehensively covers all elements of the PREA standard. Additionally, the auditor confirmed that the SART Protocol serves as a detailed guide for staff to follow when adhering to prescribed protocols, safeguarding victims, and preserving usable physical evidence so that law enforcement can effectively collect and process the evidence available.

Additionally, the auditor conducted interviews with all available staff members working at the BTLA home (a total of 10; the only staff member not interviewed was on scheduled leave). Each staff member confirmed that in the event of any allegation of sexual abuse or sexual harassment involving a juvenile residing at the home, the state of Louisiana Office of Juvenile Justice (OJJ) is immediately notified. OJJ ensures that an administrative and/or criminal investigation is promptly initiated

by the state agency. Additionally, child protective services for the state of Louisiana and local police must be immediately contacted for any allegations of sexual abuse or assault at the home. Staff members also stated that in cases of sexual abuse or harassment allegations, they are required to contact their immediate supervisor, the PC, and the Boys Town main office without delay. Furthermore, the interviewed staff members affirmed that they have completed comprehensive PREA training, which outlined their mandatory reporting requirements and provided guidance on effectively responding to sexual abuse situations. As part of their training, staff members were instructed to act as first responders to ensure the safety and separation of the victim from the perpetrator immediately. They were also directed to make necessary calls to report the incident to relevant authorities and management, secure the scene, preserve evidence, protect it from contamination, and advise the victim and perpetrator not to take any actions that could compromise physical evidence.

**Note:** As per the PC's response in the PAQ, no instances of alleged sexual abuse involving youth at the BTLA program were reported during the previous 12-month audit review period. Consequently, there was no evidence available to demonstrate compliance with the elements of this specific PREA standard in response to an actual situation of sexual abuse.

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.**

115.365	Coordinated response
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> <li>- PREA Coordinated Response to Sexual Abuse Incidents</li> <li>- BTLA SART Protocol</li> </ul> <p><b>Interviews:</b></p> <ul style="list-style-type: none"> <li>- Executive Director (ED)</li> </ul>

- PREA Coordinator (PC)

- CAREs Center Director

**Explanation of Determination:**

**115.365**

**(a):** As documented in the agency's PREA Policy on page 24:

- "Boys Town Louisiana, Inc. has a written institutional plan, which consists of all PREA policies and procedures. The PREA Compliance Manager or PREA Coordinator will coordinate actions taken in response to an incident of sexual abuse among the staff first responders, medical and mental health practitioners, investigators, and external partners providing care for alleged victim."

Additionally, the auditor reviewed the BTLA SART Protocols and the BTLA PREA Coordinated Response to Sexual Abuse Incidents document, which serve as additional evidence confirming the program's implementation of an effective coordinated response plan in line with the reporting and response parameters outlined in the PREA standards. It is important to note that no incidents involving allegations of sexual abuse concerning youth were reported at the BTLA program during the audit review period. Consequently, there were no documented instances available for review to assess practical compliance with the applicable requirements of the PREA standards.

During their onsite interviews, both the ED and PC provided comprehensive explanations of the coordinated response protocols established at the BTLA for addressing instances of sexual abuse at the home. These protocols were described to align closely with the agency's outlined procedures for responding to such situations. This alignment ensures that the ED and PC understand and are prepared to implement the appropriate procedures in the event of sexual abuse incidents at the facility, underscoring a systematic and coordinated approach to managing and addressing such serious incidents.

The auditor also spoke with the Director of the CARE Center in New Orleans, who detailed the victim services offered by the organization to juvenile victims of sexual abuse and their cooperation in criminal investigations. The Director confirmed that the CARE Center has the capacity to provide specialized medical practitioners for examinations and evaluations, tailored to the specific situation. They also ensure the proper conduct of forensic interviews, working closely with specialized detectives. Additionally, the organization provides advocacy services to the survivor and their family, as well as access to therapeutic mental health services and treatment.

**Conclusion:**

	<p><b>Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.</b></p>
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<b>115.366</b>	<b>Preservation of ability to protect residents from contact with abusers</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> </ul> <p><b>Interviews:</b></p> <ul style="list-style-type: none"> <li>- The PC and Executive Director of the program confirmed that the BTLA does not enter into collective bargaining agreements or any other agreements that limit Boys Town Louisiana, Inc. ability to remove alleged staff sexual abusers from contact with residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted.</li> </ul> <p><b>Explanation of Determination:</b></p> <p><b><u>115.366</u></b></p> <p><b>(a):</b> As per the agency's PREA Policy on page 24:</p> <ul style="list-style-type: none"> <li>• "The first responding employee shall ensure that the alleged victim and aggressor are physically separated. A report shall be made to the PREA Compliance Manager or on-call administrator to confirm the separation of the victim from his or her assailant.</li> <li>• Boys Town Louisiana, Inc. does not enter into collective bargaining agreements or any other agreements that limit Boys Town Louisiana, Inc. ability to remove alleged staff sexual abusers from contact with residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted."</li> </ul> <p><b><u>Conclusion:</u></b></p> <p><b>Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.</b></p>

<b>115.367</b>	<b>Agency protection against retaliation</b>
	<p data-bbox="280 188 983 224"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="280 264 564 300"><b>Auditor Discussion</b></p> <p data-bbox="280 340 1318 376"><b>The following is a list of evidence used to determine compliance:</b></p> <ul data-bbox="280 425 1289 600" style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> <li>- Harassment, Discrimination, &amp; Retaliation Policy (FFBH Policy #4225)</li> </ul> <p data-bbox="280 649 459 685"><b>Interviews:</b></p> <ul data-bbox="280 734 638 842" style="list-style-type: none"> <li>- Executive Director (ED)</li> <li>- PREA Coordinator (PC)</li> </ul> <p data-bbox="280 891 762 927"><b>Explanation of Determination:</b></p> <p data-bbox="280 976 411 1012"><b><u>115.367</u></b></p> <p data-bbox="280 1061 1244 1097"><b><u>(a - e):</u></b> According to the agency's PREA Policy on pages 24 and 25:</p> <ul data-bbox="351 1160 1484 1863" style="list-style-type: none"> <li>• For at least 90 days following a report of sexual abuse, Boys Town Louisiana, Inc. shall monitor the conduct or treatment of residents or staff who reported the sexual abuse and 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 and shall act promptly to remedy any such retaliation.</li> <li>• Documentation such as resident disciplinary reports, housing or program changes, negative performance reviews, or reassignments of staff shall be monitored for possible retaliation. Boys Town Louisiana, Inc. shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need.</li> <li>• In the case of residents, such monitoring shall also include periodic status checks, to determine if levels are lost for legitimate causes. If any other individual who cooperates with an investigation expresses a fear of retaliation, Boys Town Louisiana, Inc. shall take appropriate measures to protect that individual against retaliation. Boys Town Louisiana, Inc. obligation to monitor shall terminate if it is determined that the allegation is unfounded."</li> </ul> <p data-bbox="280 1904 1455 2020">Furthermore, the auditor also includes further retaliation protection procedures in the agency's Harassment, Discrimination, &amp; Retaliation Policy, as confirmed by the auditor.</p>

	<p>During the interviews with the ED and PC, detailed information was provided regarding the retaliation monitoring procedures implemented at BTLA. It was clarified that the PC is responsible for overseeing the initiation of the monitoring for retaliation process following an allegation of sexual abuse, which would continue until either the victim is no longer in the program or for a minimum of 90 days. However, the PC emphasized that monitoring would extend for the entirety of the student's stay to ensure timely resolution of any emerging issues. The PC explained that regular status checks would be carried out at the home and the student's school to detect any signs of retaliation or inappropriate behavior linked to the incident. These checks would be documented, and the student's team of professionals would convene periodically to review the youth's progress in the program and address any concerning issues.</p> <p>The ED confirmed the practice of retaliation monitoring during her interview and added that a licensed therapist conducts weekly meetings with every student. Additionally, individual meetings for each youth, involving the youth's parent/guardian, caseworker, counselor, staff, among others, are conducted frequently. These measures underscore the commitment of BTLA to proactively monitor for retaliation and ensure the well-being and safety of the youth under their care.</p> <p><b>Note:</b> As per the PC's response in the PAQ, no instances of alleged sexual abuse involving youth at the BTLA program were reported during the previous 12-month audit review period. Consequently, there was no evidence available to demonstrate practical compliance for an actual retaliation monitoring situation during this audit review period.</p> <p><b>Conclusion:</b></p> <p><b>Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.</b></p>
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<b>115.368</b>	<b>Post-allegation protective custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> </ul> <p><b>Interviews:</b></p> <ul style="list-style-type: none"> <li>- Executive Director (ED)</li> </ul>



- PREA Coordinator (PC)

**Explanation of Determination:**

**115.368**

**(a):** According to the agency's PREA Policy on page 25:

- "Residents in Boys Town Louisiana, Inc. residential programs are not separated from each other unless safety is an issue and only as a last resort when less restrictive measures are inadequate to keep them and other residents safe. If separation does occur, all required exercise, educational programming, and medical or mental health services still occur. Boys Town Louisiana, Inc. does not utilize isolation holding or time out interventions. Residents who are separated from the group are not placed in a confined setting and are integrated back into the group at the earliest opportunity. If a resident represents a safety risk to others in the facility, then alternative action will be utilized to ensure that there is no safety risk to others and subject to the requirement of §115.342."

Furthermore, as noted in section 115.342 of this report, the BTLA is a non-secure program for youth who live in apartment type living situations. Therefore, youth are unable to be isolated from others. This information was confirmed by the auditor during the onsite observations made and through the interviews conducted onsite with staff, the ED, and PC.

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.**

115.371	Criminal and administrative agency investigations
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"><li>- Agency's PREA Policy</li><li>- Pre-Audit Questionnaire (PAQ)</li><li>- Contract Between OJJ Youth Services &amp; BTLA</li></ul>

**Interviews:**

- Executive Director (ED)
- PREA Coordinator (PC)
- Staff

**Site Review Observations:**

- During the onsite, the auditor verified that the BTLA program is a group home that is located in a residential community and allegations related to juvenile sexual abuse or sexual harassment are required to be immediately reported to local law enforcement (New Orleans Police Department) and Louisiana OJJ, as well as Louisiana's child protective services agency- the Department of Children and Family Service.

**Explanation of Determination:****115.371**

**(a - m):** As explained in sections 115.321 and 115.322 of this report, the BTLA does not conduct any form of criminal or administrative investigations into allegations of sexual abuse or sexual harassment of a youth at the program. The Louisiana Office of Juvenile Justice (OJJ) and child protective services are the entities with the authority to conduct administrative investigations, with the New Orleans Police Department (NOPD) contacted to conduct criminal investigations into sexual abuse at the program. Furthermore, as documented in the agency's PREA Policy on pages 25 and 26:

- "Father Flanagan's Boys' Home (a/k/a Boys Town) and its affiliate corporations (hereinafter collectively referred to as "Boys Town") have established an independent Youth Safety Audit Department. The scope of Youth Safety Audit encompasses, but is not limited to, the examination and evaluation of the adequacy and effectiveness of the organization's risk management and internal controls as well as the quality of performance in carrying out assigned responsibilities to achieve the organization's stated goals and objectives pertaining to the protection of youth. The Director of Youth Safety Audit reports administratively to the General Counsel of Boys Town and functionally to the Youth Care Committee of the Boys Town Board of Trustees.
- The Youth Safety Audit Department is not to be contacted first to report events that present an immediate threat to life and/or property. If the reporting person believes someone is in immediate danger or that there is an immediate threat to property, he or she should immediately call 9-1-1 or contact the appropriate authorities. The person then should contact the Youth Safety Audit Department as soon as practical.

- If an individual is concerned about the safety or well-being of service recipients and/or employees in a non- emergency situation, he or she is encouraged to call and leave a message on the Youth Safety Line or submit a concern to Ethics Point. The Youth Safety Reporting options are monitored by the Youth Safety Audit Department. For additional information, refer to Youth Methods of Reporting Procedure.
- All employees, volunteers, Foster Parents, or independent contractors – regardless of their position – have the responsibility to report all allegations where the safety of service recipients may be jeopardized or if there is a violation of service recipient rights. The report should be made immediately to the individual’s direct supervisor and, when applicable, to Child Protective Services (CPS) or local law enforcement, as required by state law. For additional information, refer to FFBH Policy, Reporting Abuse and Neglect. The supervisor must immediately inform the Youth Safety Audit Department of any allegations that must be reported under this policy. The Director of Youth Safety Audit will inform General Counsel. All allegations will be investigated by the Youth Safety Audit Department.
- All individuals who become aware of dangerous, illegal, unethical, immoral, or abusive activity, have the right, and may be required by state law, to report to the appropriate authorities including, but not limited to Child Protective Services and or law enforcement. For additional information, refer to FBH Policy. Reporting Abuse and Neglect.
- All employees, volunteers, Foster Parents, care providers, independent contractors, and service recipients are expected to cooperate fully and are expected to be available for interviews and to be honest, professional, and forthcoming during the investigation process. All events, reports, communications, and investigations must remain strictly confidential.
- In order for each investigation to be objective and free from influence, the Youth Safety Audit Department will have full access to the maximum extent allowed by law to all Boys Town activities, records, property, service recipients, and employees. All audit investigations should be completed and reported to appropriate management in accordance with the advice of the General Counsel at the earliest date possible following the receiving of a report of an event or activity covered by this policy. In accordance to the Safety Hold Investigations, Affiliate Site investigators who are assisting the Department with Safety Hold investigations must send their work to the Department within seven (7) days of the initial report of the Safety Hold being made to the department.
- After the completion of the audit/fact-finding investigation, the Youth Safety Audit Department will submit a report to the appropriate management, and others as directed by General Counsel. An exception to this distribution policy is that a report will not be distributed to the subject of an investigation or to any of the subject’s subordinates. The reports are protected by the attorney-client privilege, and some are attorney work products. Therefore, they are not to be released or further distributed by recipients without the approval in advance by General Counsel.

As a result of the findings noted in the Youth Safety Audit Department report, departmental management, in consultation with the Executive Vice President for the department or their designee, is responsible for developing an action plan and taking action as well as providing a written response to the Youth Safety Audit Department.

- In regard to §115.371. k, m, Boys Town will not allow the departure of the alleged abuser or victim from the employment or control of the facility or agency be provided as a basis for terminating an investigation; including when outside agencies investigate sexual abuse Boy Town will cooperate with investigators and shall endeavor to remain informed about the progress of the investigation."

It is essential to emphasize that while the Boys Town Audit Department is obligated, per agency policy, to carry out an independent audit or fact-finding investigation, the primary entity responsible for conducting administrative investigations into allegations of sexual abuse or harassment involving youth at the BTLA program is the Louisiana Office of Juvenile Justice (OJJ) and/or Louisiana Child Protective Services departments. This protocol is driven by state licensure requirements that mandate these agencies to handle such investigations. However, as documented above, the auditor confirmed that the administrative investigative requirements of this PREA standard are included in the agency's PREA Policy.

Additionally, the auditor received a fully executed contract for the placement of OJJ youth at the BTLA program. Upon examination of this document, it was confirmed that the following relevant information related to reporting and investigations is included:

- Youth Services {OJJ} staff shall have access to youth on or off the Contractor's premises at any time. YS officials or their designees may access and inspect the Contractor's premises at any time. Access and inspection includes, but is not limited to, youth, staff, the entire facility, and all books and records related to the operation of the facility.
- In the event that the Contractor has knowledge of or cause to suspect abuse or neglect of a youth under YS custody, the Contractor shall provide written notification to YS, the Department of Social Services, Office of Community Services, and the local law enforcement agency, in addition to complying with the Child Abuse Reporting and Investigation requirements of Children's Code Articles 609 et seq. Contractor will comply with the Prison Rape Elimination Act of 2003.), and with all applicable PREA Standards, YS Policies related to PREA and Standards related to PREA for preventing, detecting, monitoring, investigating, and eradicating any form of sexual abuse within YS Facilities/Programs/Offices owned, operated or contracted. Contractor acknowledges that, in addition to "self-monitoring requirements", YS will conduct announced or unannounced, compliant monitoring to include "on-site" monitoring. Contractor will also work with the Office of Juvenile Justice PREA Coordinator in scheduling audits in accordance with the agency audit

cycle established by YS. Failure to comply with PREA, including PREA Standards and US Policies, or to pass the PREA audit after any corrective action period may result in termination of the contract.

As per the interviews with the staff at the facility, it was confirmed that in the event of any allegation of sexual abuse or sexual harassment involving a juvenile residing at the home, the state of Louisiana Office of Juvenile Justice (OJJ) is immediately notified. OJJ ensures that an administrative and/or criminal investigation is promptly initiated by the state agency. Additionally, child protective services for the state of Louisiana and local police must be immediately contacted for any allegations of sexual abuse or assault at the home. Staff members also stated that in cases of sexual abuse or harassment allegations, they are required to contact their immediate supervisor, the PC, and the Boys Town main office without delay. Furthermore, the interviewed staff members affirmed that they have completed comprehensive PREA training, which outlined their mandatory reporting requirements and provided guidance on effectively responding to sexual abuse situations. As part of their training, staff members were instructed to act as first responders to ensure the safety and separation of the victim from the perpetrator immediately. They were also directed to make necessary calls to report the incident to relevant authorities and management, secure the scene, preserve evidence, protect it from contamination, and advise the victim and perpetrator not to take any actions that could compromise physical evidence.

Additionally, the ED and PC of BTLA were interviewed during the onsite and confirmed that the agency has a policy to ensure allegations of sexual abuse, sexual harassment, retaliation for reporting, and staff neglect are immediately referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior.

The investigative agencies include the Louisiana OJJ, child protective services for the state, and local law enforcement. The administrators shared how they would be there to assist the outside investigative agencies in ensuring full cooperation by ensuring youth, staff, and other individuals needed for the investigation are available; sharing requested documents and surveillance video; and having an open line of communication with investigators throughout the investigative process. They also confirmed that they cannot recall a situation since they have worked at the BTLA program involving a youth involved in any way with being a victim or perpetrator of sexual abuse or sexual harassment at the home.

**Note:** Based on the interviews conducted onsite and the review of documents for this PREA audit, there were no reported instances of alleged sexual abuse or sexual harassment involving youth at the BTLA home in the past three years prior to this audit. Consequently, there was no investigative evidence available to demonstrate compliance with the specific elements of the PREA standard in practice for an actual event within the audit review period.

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the**

	<b>auditor has determined that the agency meets all elements of this standard. No corrective action is required.</b>
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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><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> </ul> <p><b>Interviews:</b></p> <ul style="list-style-type: none"> <li>- Executive Director (ED)</li> <li>- PREA Coordinator (PC)</li> </ul> <p><b>Explanation of Determination:</b></p> <p><b><u>115.372</u></b></p> <p><b>(a):</b> Even though the BTLA program does not conduct administrative investigations into allegations of sexual abuse or sexual harassment, the agency still includes the preponderance of evidence standard of proof in the agency's PREA Policy on page 27, as outlined below:</p> <ul style="list-style-type: none"> <li>• "Boys Town Louisiana, Inc. shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated."</li> </ul> <p>The ED and PC of BTLA were interviewed during the onsite and confirmed that the agency has a policy to ensure allegations of sexual abuse, sexual harassment, retaliation for reporting, and staff neglect are immediately referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. The investigative agencies include the Louisiana OJJ, child protective services for the state, and local law enforcement.</p> <p><b>Note:</b> Based on the interviews conducted onsite and the review of documents for this PREA audit, there were no reported instances of alleged sexual abuse or sexual harassment involving youth at the BTLA home in the past three years prior to this audit. Consequently, there was no investigative evidence available to demonstrate</p>

	<p>compliance with the specific elements of the PREA standard in practice for an actual event within the audit review period.</p> <p><b><u>Conclusion:</u></b></p> <p><b>Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.</b></p>
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115.373	Reporting to residents
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> </ul> <p><b>Interviews:</b></p> <ul style="list-style-type: none"> <li>- Executive Director (ED)</li> <li>- PREA Coordinator (PC)</li> </ul> <p><b>Explanation of Determination:</b></p> <p><b><u>115.373</u></b></p> <p><b>(a - e):</b> As per the agency's PREA Policy on page 27:</p> <ul style="list-style-type: none"> <li>• "Following a resident's allegation that a staff member has committed sexual abuse against the resident, Boys Town Louisiana, Inc. shall subsequently inform the resident (unless law enforcement has determined that the allegation is unfounded) whenever: <ul style="list-style-type: none"> <li>◦ The staff member is no longer assigned within the resident's living unit;</li> <li>◦ The staff member is no longer employed at the facility.</li> <li>◦ The facility learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or</li> <li>◦ The facility learns that the staff member has been convicted on a charge related to sexual abuse within the facility.</li> </ul> </li> <li>• Since Boys Town Louisiana, Inc. does not conduct criminal investigations, the PREA Coordinator shall request the relevant information from the</li> </ul>

- investigative agency in order to inform the resident.
- Following a resident’s allegation that he has been sexually abused by another resident, Boys Town Louisiana, Inc. shall subsequently inform the alleged victim whenever:
  - The facility learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or
  - The facility learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.
- All such notifications or attempted notifications shall be documented. Boys Town Louisiana, Inc. obligation to report shall terminate if the resident is released from the agency’s custody.

During the onsite interviews, the ED and PC of BTLA confirmed that the agency has a policy in place to ensure that any allegations of sexual abuse, sexual harassment, retaliation for reporting, and staff neglect are promptly referred for investigation to an entity with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. The investigative agencies designated for such cases include the Louisiana Office of Juvenile Justice (OJJ), state child protective services, and local law enforcement. While BTLA itself does not conduct investigations into these types of allegations, the administrators affirmed that all required notifications outlined in the PREA standard would be completed and documentation of the process would be appropriately maintained.

**Note:** As per the PC's response in the PAQ, no instances of alleged sexual abuse involving youth at the BTLA program were reported during the previous 12-month audit review period (or for the past 3 years). Consequently, there was no evidence available to demonstrate practical compliance with the elements of this specific PREA standard related to the agency responding to an actual event of sexual abuse.

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.**

<b>115.376</b>	<b>Disciplinary sanctions for staff</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> </ul>



- Pre-Audit Questionnaire (PAQ)
- Staff PREA Training Course List and Corresponding Information
- Boys Town Code of Conduct
- Harassment, Discrimination, & Retaliation Policy (FFBH Policy #4225)
- Boys Town Employee Handbook

**Interviews:**

- HR Administrative Staff Designee (PREA Coordinator- PC)

**Site Review Observations:**

- During the onsite personnel file review with the HR Administrative Staff Member, no issues of concern related to staff disciplinary records were identified related to the PREA standards. The PC and Executive Director also confirmed during their individual onsite interviews that they have not had to discipline a staff member or student as a result of a PREA incident or allegation made.

**Explanation of Determination:**

**115.376**

**(a - d):** According to the agency's PREA Policy on page 28:

- Staff shall be subject to disciplinary sanctions up to and including termination for violating Boys Town Louisiana, Inc. sexual abuse or sexual harassment policies. Termination shall be the presumptive disciplinary sanction for staff who has engaged in sexual abuse.
- Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be 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.
- 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, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.

Additionally, as per the Boys Town Employee Handbook on pages 24 & 25:

- Boys Town is an "at-will" employer. Boys Town retains the right to terminate an employee's employment for any lawful reason. At any time, an employee also has the right to terminate employment with Boys Town, for any reason or no reason.

	<ul style="list-style-type: none"> <li>• Nothing in this policy or any other Boys Town policy mandates that any form of progressive discipline must precede the involuntary termination of a Boys Town employee, with or without cause, for any or no reason, unless such a right is limited by contract. This policy does not alter the at-will nature of employment for each employee.</li> <li>• Boys Town reserves the right to administer appropriate disciplinary action for all forms of disruptive or inappropriate behavior. Each situation will be dealt with on an individual basis. Again, while we generally follow the above steps in applying progressive discipline, there are times when deviation from this policy is appropriate. In other words, circumstances may warrant skipping steps or even immediately terminating an employee. It is also important for you to realize that it does not take violation of the same rule to proceed to the next step of the discipline process. Violations of different rules or reasonable management expectations can result in moving to the next step.</li> </ul> <p><b>Note:</b> As per the PC's response in the PAQ, no instances of alleged sexual abuse or sexual harassment involving youth at the BTLA program were reported during the previous 12-month audit review period. Consequently, there was no evidence available to demonstrate compliance with the elements of this specific PREA standard in responding to an actual event of sexual abuse or sexual harassment of a youth at the home. Furthermore, through the personnel file review process, the auditor did not observe or was notified of any staff who were involved in any way with a situation involving a violation or alleged violation of the agency's sexual abuse or sexual harassment policies.</p> <p><b>Conclusion:</b></p> <p><b>Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.</b></p>
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<b>115.377</b>	<b>Corrective action for contractors and volunteers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> </ul> <p><b>Interviews:</b></p> <ul style="list-style-type: none"> <li>- Executive Director (ED)</li> </ul>

**Site Review Observations:**

- No volunteers or contractors were observed at the BTLA home or office building during the two days the auditor was onsite.

**Explanation of Determination:**

**115.377**

**(a & b):** According to the agency's PREA Policy on page 28:

- "Any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with juveniles and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. Boys Town Louisiana, Inc. will take appropriate remedial measures, and will consider whether to prohibit further contact with residents in programming, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer."

The ED confirmed that the BTLA does not allow contractors or volunteers to meet with the students at the home due to the liabilities associated with such contact.

**Note:** As per the PC's response in the PAQ, no instances of alleged sexual abuse or sexual harassment involving youth at the BTLA program were reported during the previous 12-month audit review period. Consequently, there was no evidence available to demonstrate compliance with the elements of this specific PREA standard in responding to an actual event of sexual abuse or sexual harassment of a youth at the home. Additionally, during the personnel file review, the auditor did not observe or receive notification of any volunteers or contractors being implicated in any situation violating or allegedly violating the agency's sexual abuse or harassment policies.

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.**

<b>115.378</b>	<b>Interventions and disciplinary sanctions for residents</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<b>The following is a list of evidence used to determine compliance:</b>

- Agency's PREA Policy
- Pre-Audit Questionnaire (PAQ)

**Interviews:**

- Executive Director (ED)

**Site Review Observations:**

- During the onsite, the auditor confirmed that BTLA is a group type home that provides for a non-secure setting for the youth to live; therefore, isolation is not used by any means for the confinement of youth.

**Explanation of Determination:**

**115.378**

**(a - g):** The auditor confirmed that the following procedures are included in the agency's PREA Policy on page 28:

- "A resident may be subject to disciplinary sanctions by Boys Town Louisiana, Inc. only pursuant to a formal disciplinary process following an administrative finding that the resident engaged in juvenile-on-juvenile sexual abuse or following a criminal finding of guilt for juvenile-on-juvenile sexual abuse. Any disciplinary sanctions shall be commensurate with the nature and circumstances of the abuse committed, the resident's disciplinary history, and the sanctions imposed for comparable offenses by other resident with similar histories.
- Residents in Boys Town Louisiana, Inc. residential programs are not separated from each other unless safety is an issue and only as a last resort when less restrictive measures are inadequate to keep them and other resident safe. If separation does occur, all required exercise, educational programming, and medical or mental health services still occur. Boys Town Louisiana, Inc. does not utilize isolation, holding, or time out interventions. Residents who are separated from the group are not placed in a confined setting and are integrated back into the group at the earliest opportunity. If a resident represents a safety risk to others in the facility, then alternative action will be utilized to ensure that there is no safety risk to others.
- The disciplinary process will consider whether a resident's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed. Boys Town Louisiana, Inc. will offer counseling or other interventions designed to address and correct underlying reasons or motivations for the abuse. Boys Town Louisiana, Inc. may discipline a resident for sexual contact with a staff member only upon a finding that the staff member did not consent to such contact.

- 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 will not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation. Boys Town Louisiana, Inc. prohibits all sexual activity between residents in programming and may discipline residents for such activity, however, the activity will not constitute sexual abuse if the activity is not coerced.
- Boys Town Louisiana, Inc. shall offer therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for abuse. Boys Town Louisiana, Inc. shall also consider whether to require the offending resident to participate in such interventions as a condition of access to any rewards-based behavior management system or other behavior-based incentives."

The ED verified the established procedures at BTLA, including the inability to isolate students at the home. In cases where a youth is found to be a perpetrator of sexual abuse, the standard protocol involves immediately contacting Louisiana OJJ and the New Orleans Police Department (NOPD), with the NOPD determining if transporting the offending youth to a secure detention facility is the appropriate action for the offense of sexual assault. This would result in automatic discharge from the BTLA program. However, the ED emphasized that each situation regarding sexual abuse/sexual harassment would be individually assessed to determine the appropriate sanctions in alignment with the act committed.

Moreover, the ED elaborated on the provision of counseling as part of each student's individualized case plan, with specialized therapy being made available on a case-by-case basis. It was confirmed that no youth would face punitive measures for making a truthful and honest report of sexual abuse or harassment. This assurance was corroborated by the student interviews conducted during the onsite visit, where each student expressed confidence that reporting inappropriate behavior would not result in punishment.

Lastly, the ED reiterated BTLA's zero-tolerance policy towards all forms of sexual abuse, sexual harassment, and sexual activity at the home. This commitment, as per the ED, underscores the agency's dedication to maintaining a safe and supportive environment for the youth in their care, prioritizing their well-being and safety above all else.

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

**The following is a list of evidence used to determine compliance:**

- Agency's PREA Policy
- Pre-Audit Questionnaire (PAQ)
- Boys Town Residential Programs Log of Follow-Up Care

**Interviews:**

- PREA Coordinator (PC)
- Supervisor (Intake)
- Youth (all at the home during the onsite- 3)

**Site Review Observations:**

- During the onsite, the auditor confirmed that the sensitive data and records of the youth are stored in a secure and safe location at the BTLA office.

**Explanation of Determination:**

**115.381**

**(a - d):** According to the agency's PREA Policy on page 29:

- "It is the policy of the Boys Town Louisiana, Inc. to screen residents upon intake for prior sexual victimization or previously perpetrated sexual abuse and to ensure that the resident is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening.
- Any information related to sexual victimization or abusiveness that occurred in an institutional setting will be strictly limited to medical and mental health practitioners 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.
- Medical and mental health practitioners will obtain informed consent from residents before reporting information about prior sexual victimization that did not occur in an institutional setting unless the resident in programming is under the age of 18."

During the verification process, the auditor confirmed with the PC, an intake supervisor, and three youth at the BTLA home that each student participates in

scheduled meetings with a licensed therapist on a weekly basis. While the youth did confirm that they had met with a therapist shortly after commencing the BTLA program, they were uncertain about the specific date and could not definitively confirm whether these initial sessions occurred within a two-week timeframe following their arrival at the home.

**Non-Compliance Summary:**

Upon writing this PREA Audit Interim Report, the auditor did not receive documented evidence of follow-up meetings with a therapist within the initial two-week period for a sample of students at the home in the past 12 month audit review period. Furthermore, a risk assessment conducted in accordance with PREA standard 115.341 revealed that one youth had experienced prior sexual victimization; however, documentation was lacking regarding a counseling session with this specific student within the stipulated two-week timeframe from their arrival at the home.

Additionally, the therapist responsible for weekly sessions with the youth was not present on-site during the auditor's visit, therefore preventing further confirmation of this practice. It is advisable for the program to ensure proper documentation of the therapy sessions and consider ensure the therapist is available for future verification purposes during audits or reviews.

Upon identifying and communicating the deficiency regarding the lack of documented proof of timely mental health follow-up sessions with a counselor within two weeks of a youth's arrival at the home, the PC affirmed her commitment to taking corrective actions prior to the Interim Report being completed. The PC stated that all youth will be provided with a mental health follow-up session with a counselor within the prescribed two-week period and emphasized the new practice of completing the necessary documentation to ensure that these follow-up sessions are clearly recorded.

To demonstrate compliance with the PREA standard regarding mental health follow-up sessions within the required timeframe, the PC should provide examples of the documentation for these follow-up sessions to the auditor during the corrective action period. The documentation should clearly outline the dates and details of the counselor sessions conducted with each youth within the designated two-week period. Additionally, the counselor should be made available for an interview with the auditor to discuss the program's updated practices related to mental health services and adherence to the PREA standards. This interview will provide an opportunity to confirm that the program has effectively implemented the necessary changes to ensure timely and comprehensive mental health support services for all youth at the facility. Demonstrating these steps will indicate a commitment to compliance and continuous improvement in meeting the requirements outlined in the applicable PREA standards.

**Corrective Action Summary:**

As outlined in the program's correction action plan:

- "It was identified that one youth (DCFS custody) had prior sexual abuse history prior to his admission to Boys Town. He was admitted to Boys Town Bienville Home. Therefore, since Boys Town did not prior to PREA implementation include DCFS youths in PREA full practices there was no evidence of counseling services provided within 14 days of intake screening, which has changed to due to the review. However, to effectively gather this information at intake and identify if youth refuse counseling services the Sexual Vulnerability/Aggressiveness Assessment Form was revised to prompt staff to gather this information at intake and to ensure that all documentation of counseling services relative to sexual victimization history is properly documented in youth record. These systems were updated to ensure compliance with the standard and providing needed services in a timely manner. Attached is the updated form completed on a new youth admission in April and the previous DCFS youth identifying that he is not interested in counseling in regard to his previous sexual abuse history. (Please also note that if youth in DCFS custody have identified need for counseling related to sexual abuse, there are counselors that the referring agency would provide which would not be located on-site). Additionally, the Logs for 2023 and 2024 that are being maintained by Program Director to identify follow-up care status if needed and a monitoring tool within the program to verify compliance with standard."

In order to demonstrate compliance with the above updated procedures and practices, the auditor was provided the following documentary evidence:

- Boys Town Residential Programs Log of Follow-Up Care Year 2023 and 2024
- Screening for Risk of Sexual Victimization & Abusiveness

Upon the auditor's review, it was determined that each document provided for the corrective action process sufficiently demonstrate full compliance with the requirements of this PREA standard and rectified the deficiencies identified above.

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard and no corrective action is required at this time.**

<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>



**The following is a list of evidence used to determine compliance:**

- Agency's PREA Policy
- Pre-Audit Questionnaire (PAQ)
- MOU Between BTLA and Aubrey Hepburn Children at Risk Evaluation (CARE) Center at Children's Hospital

**Interviews:**

- Director of CAREs Center

**Explanation of Determination:**

**115.382**

**(a - d):** As per the language included in the agency's PREA Policy on page 29:

- "Victims of sexual assault shall be referred under appropriate security provisions to Children's Hospital for treatment and gathering of evidence. Boys Town Louisiana, Inc. shall offer all residents who experience sexual abuse access to forensic medical examinations without financial cost.
- Such examinations shall be performed by Aubrey Hepburn Children at Risk Evaluation (CARE) Center at Children's Hospital Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. Boys Town Louisiana, Inc. shall document its efforts to access SAFEs or SANEs.
- Victims of sexual assault will be offered timely information about and access to emergency contraception and sexually transmitted infections prophylaxis, as prescribed by medical personnel and agreed upon by the guardian."

Additionally, as outlined in section 115.321 (c-d) of this report, the executed Memorandum of Understanding (MOU) between BTLA and the CARE Center encompasses the obligation for the CARE Center to offer access to emergency medical and mental health services to a juvenile victim of sexual abuse.

During the onsite visit, the auditor reached out to the Director of the CARE Center in New Orleans, who outlined the victim services available to juvenile victims of sexual abuse and their collaboration in criminal investigations. The Director confirmed that the CARE Center is equipped to provide specialized medical and mental health professionals for evaluations tailored to each specific situation. Additionally, the organization offers advocacy services to both the survivor and their family, along with access to therapeutic mental health services and treatment.

The auditor verified with the Director that the CARE Center has the capability to deliver ongoing medical and mental health care for both victims of sexual abuse

	<p>and abusers, tailoring the services according to the individual circumstances and in alignment with the applicable PREA standard. This provision was also stipulated as a requirement in the Memorandum of Understanding (MOU) that the advocacy center has established with BTLA. This collaborative effort was found to provide the necessary victim services (including medical, mental health, advocacy, and treatment) are readily accessible to address the needs of individuals affected by sexual abuse incidents.</p> <p><b><u>Conclusion:</u></b></p> <p><b>Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.</b></p>
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<b>115.383</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> <li>- MOU Between BTLA and Aubrey Hepburn Children at Risk Evaluation (CARE) Center at Children's Hospital</li> </ul> <p><b>Interviews:</b></p> <ul style="list-style-type: none"> <li>- Director of CARE Center in New Orleans, LA</li> </ul> <p><b>Explanation of Determination:</b></p> <p><b><u>115.383</u></b></p> <p><b>(a - h):</b> As documented in the agency's PREA Policy on pages 29 and 30:</p> <ul style="list-style-type: none"> <li>• "Boys Town Louisiana, Inc. will ensure that a medical and mental health evaluation and, as appropriate, treatment is provided to all residents who have been victimized by sexual abuse. The evaluation and treatment of such victims will 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.</li> </ul>

- Boys Town Louisiana, Inc. will provide such victims with medical and mental health services consistent with the community level of care.
- Victims of sexual abuse while in placement will be offered tests for sexually transmitted infections and pregnancy as medically appropriate.
- If pregnancy results from sexual abuse, timely and comprehensive information about and access to all lawful pregnancy related medical services will be provided. Treatment services will be 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.
- Boys Town Louisiana, Inc. will attempt to conduct a mental health evaluation of all known participant-on-participant abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners.

Furthermore, as outlined in section 115.321 (c-d) of this report, the executed Memorandum of Understanding (MOU) between BTLA and the CARE Center encompasses the obligation for the CARE Center to offer access to emergency medical and mental health services to a juvenile victim of sexual abuse.

During the onsite visit, the auditor reached out to the Director of the CARE Center in New Orleans, who outlined the victim services available to juvenile victims of sexual abuse and their collaboration in criminal investigations. The Director confirmed that the CARE Center is equipped to provide specialized medical and mental health professionals for evaluations tailored to each specific situation. Additionally, the organization offers advocacy services to both the survivor and their family, along with access to therapeutic mental health services and treatment.

The auditor verified with the Director that the CARE Center has the capability to deliver ongoing medical and mental health care for both victims of sexual abuse and abusers, tailoring the services according to the individual circumstances and in alignment with the applicable PREA standard. This provision was also stipulated as a requirement in the Memorandum of Understanding (MOU) that the advocacy center has established with BTLA. This collaborative effort ensures that comprehensive victim services, including medical, mental health, advocacy, and treatment, are readily accessible to address the needs of individuals affected by sexual abuse incidents.

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.**

<b>115.386</b>	<b>Sexual abuse incident reviews</b>
	<b>Auditor Overall Determination:</b> Meets Standard

**Auditor Discussion**

**The following is a list of evidence used to determine compliance:**

- Agency's PREA Policy
- Pre-Audit Questionnaire (PAQ)
- Sexual Abuse Critical Incident Review Form

**Interviews:**

- Executive Director (ED)
- PREA Coordinator (PC)

**Explanation of Determination:**

**115.386**

**(a - e):** As confirmed by the auditor to be included in the agency's PREA Policy on page 30:

- Boys Town Louisiana, Inc. PREA Coordinator shall 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. Such review shall ordinarily occur within 30 days of the conclusion of the investigation.
- The incident review team consists of the PREA Coordinator, PREA Compliance Manager, Facility Assistant Director, and Executive Director.
- The review team shall:
  - Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse.
  - 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 at the facility.
  - Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse.
  - Assess the adequacy of staffing levels in that area during different shifts.
  - Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff.
  - Prepare a report of its findings, including but not necessarily limited to determinations made and any recommendations for improvement

and submit such report to the Boys Town Louisiana, Inc. Executive Director, PREA Coordinator, and PREA Compliance Manager.

- Boys Town Louisiana, Inc. shall implement the recommendations for improvement or shall document its reasons for not doing so.

Additionally, in order to demonstrate how the program would document the sexual abuse incident review (SAIR) process, the auditor was provided the program's form titled, 'Boys Town Louisiana Sexual Abuse Critical Incident Review.' This document is a three page comprehensive reporting template for documenting the entire sexual abuse incident review process, including recommendations for improvement.

During the onsite, the PC and ED were interviewed to inquire about the Sexual Abuse Incident Review (SAIR) process following a sexual abuse allegation. The administrators provided a detailed description of the process, which involves the management team convening within 30 days of concluding the investigation to thoroughly examine and evaluate all components required by the PREA standard. They explained that the team would assess whether any changes in policies, practices, training, or supervision are necessary to enhance student safety, as well as evaluate the underlying causes of the incident. Additionally, the location where the incident occurred would be reviewed to determine if any modifications are needed for improved safety measures.

Furthermore, the administrators outlined how the team would explore the potential deployment of new or enhanced monitoring technology as part of the post-incident assessment. The SAIR findings would be documented using the Boys Town Louisiana Sexual Abuse Critical Incident Review reporting form, which would then be submitted to the Boys Town administrative team.

**Note:** As per the PC's response in the PAQ, no instances of alleged sexual abuse involving youth at the BTLA program were reported during the previous 12-month audit review period. Consequently, there was no evidence available to demonstrate practical compliance with responding to an actual sexual abuse situation and conducted the required SAIR.

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.**

<b>115.387</b>	<b>Data collection</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

**The following is a list of evidence used to determine compliance:**

- Agency's PREA Policy
- Pre-Audit Questionnaire (PAQ)
- OJJ 2023 Annual PREA Report
- OJJ Website

**Explanation of Determination:**

**115.387**

**(a - f):** The agency's PREA Policy includes the requirements of this PREA standard therein, on pages 30 and 31 as outlined below:

- Boys Town Louisiana, Inc. shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control.
- Boys Town Louisiana, Inc. shall aggregate the incident based sexual abuse data at least annually.
- Boys Town Louisiana, Inc. shall maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.
- Upon request, Boys Town Louisiana, Inc. shall provide all such data from the previous calendar year to the Office of Juvenile Justice (OJJ) no later than June 30 of each year on the U.S. Justice Department's Survey of Sexual Violence, Form SSV-5 or form as identified by OJJ.

In addition, the auditor was able to verify that PREA data from BTLA is submitted to the Louisiana Office of Juvenile Justice (OJJ) and publicly available on the state agency's website at: [PREA Reports & Resources | Office of Juvenile Justice \(la.gov\)](#). The OJJ website publishes a comprehensive report containing PREA data from BTLA and all other contracted facilities and programs across Louisiana. This report analyzes and compares the previous three years of relevant PREA data, encompassing the data reported for BTLA for the calendar years 2021, 2022, and 2023. Importantly, the auditor confirmed that the published PREA reports associated with the BTLA program do not contain any personal identifiers.

Furthermore, during their individual interviews onsite, the PC and Executive Director (ED) of BTLA disclosed how data related to PREA is systematically aggregated and reviewed on a continuous basis to facilitate the preparation of mandatory reports. These reports are submitted monthly to the Louisiana Office of Juvenile Justice (OJJ) and the Boys Town corporate office. The OJJ utilizes the PREA data provided to compile the state's Annual PREA Report, which is subsequently published on the agency's website. The administrators further clarified that since the implementation of the PREA last year, they have not had any PREA-related data to review. As per the PC And ED, this absence of data is attributed to the fact that the program has

	<p>not received any allegations or reports of incidents related to sexual abuse or sexual harassment that would fall under the purview of PREA during the past three year period. This statement was verified by the auditor through the review of the OJJ PREA Annual Reports from 2021 to 2023, in which the BTLA program reported zero sexual abuse/sexual harassment allegations during this three year period.</p> <p><b>Note:</b> As explained in section 115.312 of this report, the BTLA does NOT contract with any public or private entity for the confinement of its youth.</p> <p><b>Conclusion:</b></p> <p><b>Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.</b></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><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> <li>- OJJ 2023 Annual PREA Report</li> <li>- OJJ Website</li> </ul> <p><b>Interviews:</b></p> <ul style="list-style-type: none"> <li>- Executive Director (ED)</li> <li>- PREA Coordinator (PC)</li> </ul> <p><b>Explanation of Determination:</b></p> <p><b><u>115.388</u></b></p> <p><b>(a - d):</b> The agency's PREA Policy includes all the required elements of this PREA standard in page 31, as documented below:</p> <ul style="list-style-type: none"> <li>• Boys Town Louisiana, Inc. PREA Coordinator shall annually review data collected and aggregated in order to assess and improve the effectiveness of the agency sexual abuse prevention, detection, and response policies and</li> </ul>

practices, and training including the following:

- Identifying problem areas;
- Taking corrective action on an ongoing basis; and
- Preparing an annual report of findings and corrective actions for each facility, as well as the agency.
- The annual PREA report shall include a comparison of the current year's data and corrective actions with those from prior years and shall provide an assessment of Boys Town Louisiana, Inc. progress in addressing sexual abuse. The annual PREA report shall be approved by the Executive Director and made available for review at each program site. Boys Town Louisiana, Inc. may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of the facility but must indicate the nature of the material redacted.

In addition, the auditor was able to verify that PREA data from BTLA is submitted to the Louisiana Office of Juvenile Justice (OJJ) and publicly available on the state agency's website at: [PREA Reports & Resources | Office of Juvenile Justice \(la.gov\)](https://www.la.gov/prea-reports-resources). The OJJ website includes a comprehensive report containing PREA data from BTLA and all other contracted facilities and programs across Louisiana. This report analyzes and compares the previous three years of relevant PREA data, encompassing the data reported for BTLA for the calendar years 2021, 2022, and 2023. Importantly, the auditor confirmed that the published PREA reports associated with the BTLA program do not contain any personal identifiers.

In conclusion, it is important to add the following excerpt from the OJJ Report in order to further demonstrate how the OJJ ensures compliance with this PREA standard in practice at the BTLA program:

- The Office of Juvenile Justice (OJJ) has a zero tolerance towards all forms of sexual abuse and sexual harassment and takes all reports of sexual misconduct seriously.
- In compliance with PREA Standard § 115.389 regarding publication of aggregated sexual abuse data, OJJ reports sexual abuse incidents as required in the Department of Justice's Survey of Sexual Victimization Summary.
- The information provided in this report is a review of sexual abuse and sexual harassment allegations made in the prior three years (2023, 2022, and 2021) and includes corrective action(s) taken by the Agency to reduce sexual misconduct. The data was obtained from the Office of Juvenile Justice's secure and contract facilities in accordance with the sexual abuse and sexual harassment definitions contained in the juvenile PREA standards. OJJ reviews sexual abuse and sexual harassment data to determine trends, patterns, and possible causes of sexual assault incidents occurring in its facilities to advance the Agency's efforts to prevent, detect, and respond to all forms of sexual misconduct.
- All personal identifiable information, including name, gender, and age has



been redacted from this report, in an effort to protect the identity of youths in the custody of the Office of Juvenile Justice and to reduce any potential security and safety risks. This report was prepared by the PREA Coordinator, reviewed by the Chief of Operations, and approved by the Deputy Secretary.

The auditor also interviewed the ED and PC during the onsite in order to discuss the requirements of the program's data review process pursuant to this PREA standard. During their individual interviews onsite, the PC and Executive Director of BTLA disclosed how data related to PREA is systematically aggregated and reviewed by the management team on a continuous basis to facilitate the preparation of mandatory reports. These reports are submitted monthly to the Louisiana Office of Juvenile Justice (OJJ) and the Boys Town corporate office. Furthermore, the OJJ utilizes the PREA data provided to compile the state's Annual PREA Report, which is subsequently published on the agency's website with excluding any personal identifiers.

The administrators further clarified that since the implementation of the PREA last year, they have not had any PREA-related data to review. This absence of data is attributed to the fact that the program has not received any allegations or reports of incidents related to sexual abuse or sexual harassment that would fall under the purview of PREA during the past three year period.

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.**

115.389	Data storage, publication, and destruction
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p><b>The following is a list of evidence used to determine compliance:</b></p> <ul style="list-style-type: none"> <li>- Agency's PREA Policy</li> <li>- Pre-Audit Questionnaire (PAQ)</li> <li>- State of Louisiana Office of Juvenile Justice (OJJ) Website</li> <li>- OJJ 2023 Annual PREA Report</li> </ul> <p><b>Interviews:</b></p>

- Executive Director (ED)

- PREA Coordinator (PC)

**Site Review Observations:**

- During the onsite phase of the audit, which encompassed observations conducted at both the BTLA home and office building, the auditor reported that no issues related to data security were identified. The audit findings indicated that the BTLA office building was secure, featuring a locked front door and monitoring of all entry and exit activities by administrative staff situated within the building.

**Explanation of Determination:**

**115.389**

**(a - d):** According to the agency's PREA Policy on page 31:

- Boys Town Louisiana, Inc. PREA Coordinator shall be responsible for compiling records and annually reporting statistical data to the Louisiana Office of Juvenile Justice.
- The Office of Juvenile Justice shall make all aggregated Sexual Abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website.
- Before making aggregated sexual abuse data publicly available, Boys Town Louisiana, Inc. shall remove all personal identifiers. All case records associated with claims of sexual abuse, including incident reports, investigative reports, resident information, case disposition, medical and counseling evaluation findings, and recommendations for post-release treatment and/or counseling shall be securely retained for at least 7 years.

Furthermore, the auditor as able to confirm that the PREA data from BTLA is submitted to the State of Louisiana OJJ and published on this state agency's website at: PREA Reports & Resources | Office of Juvenile Justice (la.gov). The OJJ's website includes a full comprehensive report with PREA data from not only BTLA but also from all other contracted facilities and programs across the state of Louisiana. Lastly, the auditor confirmed that the PREA reports published associated with the BTLA program do not include any personal identifiers.

To further exemplify how the Louisiana Office of Juvenile Justice (OJJ) enforces compliance with this PREA standard in practice at the BTLA program, the following excerpt from the OJJ Report is documented below:

- The Office of Juvenile Justice (OJJ) has a zero tolerance towards all forms of sexual abuse and sexual harassment and takes all reports of sexual misconduct seriously.

	<ul style="list-style-type: none"> <li>• In compliance with PREA Standard §115.389 regarding publication of aggregated sexual abuse data, OJJ reports sexual abuse incidents as required in the Department of Justice's Survey of Sexual Victimization Summary.</li> <li>• The information provided in this report is a review of sexual abuse and sexual harassment allegations made in the prior three years (2023, 2022, and 2021) and includes corrective action(s) taken by the Agency to reduce sexual misconduct. The data was obtained from the Office of Juvenile Justice's secure and contract facilities in accordance with the sexual abuse and sexual harassment definitions contained in the juvenile PREA standards. OJJ reviews sexual abuse and sexual harassment data to determine trends, patterns, and possible causes of sexual assault incidents occurring in its facilities to advance the Agency's efforts to prevent, detect, and respond to all forms of sexual misconduct.</li> <li>• All personal identifiable information, including name, gender, and age has been redacted from this report, in an effort to protect the identity of youths in the custody of the Office of Juvenile Justice and to reduce any potential security and safety risks. This report was prepared by the PREA Coordinator, reviewed by the Chief of Operations, and approved by the Deputy Secretary.</li> </ul> <p>The ED and PC were interviewed onsite and confirmed that all PREA data is securely retained by the administrative team, with the aggregate data made available to the public from the OJJ website.</p> <p><b><u>Conclusion:</u></b></p> <p><b>Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets all elements of this standard. No corrective action is required.</b></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>As per the agency's PREA Policy on page 32:</p> <ul style="list-style-type: none"> <li>• §115.401 - Frequency and Scope of Audits Boys Town Louisiana, Inc. shall cooperatively schedule and coordinate on-site monitoring at least once during each three-year period. Boys Town Louisiana, Inc. shall demonstrate compliance with the standards to include providing OJJ PREA Compliance Officer with any relevant documentation they request and access to all areas of the facilities. OJJ PREA Compliance Officer may interview any staff, resident, supervisor, administrator, or community-</li> </ul>

based or victim advocates who may have insight into relevant conditions at a Boys Town Louisiana, Inc. facility. Boys Town will execute standards as identified in §115.401 a-o.

The auditor was granted full and unimpeded access to all areas of the audited locations, including the BTLA home and office, during the onsite phase of the audit. The PREA Coordinator promptly provided the auditor with all requested documents, and there were no issues encountered during the onsite interviews or inspections. This cooperative and transparent approach demonstrated by BTLA's staff facilitated a smooth audit process, allowing the auditor to conduct thorough observations and assessments without any hindrances or challenges.

**Conclusion:**

**Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets the required elements of this standard. No corrective action is required.**

**115.403 Audit contents and findings**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

According to the agency's PREA Policy on page 32:

- §115.403 - Audit Contents and Findings  
Each audit shall include a certification by the auditor that no conflict of interest exists with respect to his or her ability to conduct an audit of the agency under review. Audit reports shall state whether Boys Town Louisiana, Inc. policies and procedures comply with relevant PREA standards. For each PREA standard, the auditor shall determine whether Boys Town Louisiana, Inc. reaches one of the following findings: "Exceeds Standard" (substantially exceeds requirement of standard); "Meets Standard" (substantial compliance; complies in all material ways with the standard for the relevant review period); or "Does Not Meet Standard" (requires corrective action). The audit summary shall indicate, among other things, the number of provisions Boys Town Louisiana, Inc. has achieved at each grade level. Boys Town Louisiana, Inc. shall ensure that the auditor's final report is available for review at each program site and made available for posting to the public through the Office of Juvenile Justice.

The PC was advised of the requirement to post the Final Audit Report on the agency's website within 30 days of receipt.

**Conclusion:**

	<p><b>Based upon the review and analysis of all the available evidence, the auditor has determined that the agency meets the required elements of this standard. No corrective action is required.</b></p>
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<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.)	na
	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.)	na
<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 )	na
	Is this policy and practice implemented for night shifts as well as day shifts? (N/A for non-secure facilities )	na
	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	na

	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)	na
<b>115.315 (e)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from searching or physically examining transgender or intersex residents for the sole purpose of determining the resident's genital status?	yes
	If a resident's genital status is unknown, does the facility	yes

	determine genital status during conversations with the resident, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner?	
<b>115.315 (f)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex residents in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
<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:	yes

	Residents who have speech disabilities?	
	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 communication with residents who are deaf or hard of hearing?	yes
	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	yes

	safety, the performance of first-response duties under §115.364, or the investigation of the resident’s allegations?	
<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 abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the bullet immediately above?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
<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</b>	<b>Hiring and promotion decisions</b>	

<b>(c)</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 maintained by the State or locality in which the employee would work?	yes
	Before hiring new employees who may have contact with residents, does the agency: Consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
<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	yes

	employees?	
	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.)	na
<b>115.321 (b)</b>	<b>Evidence protocol and forensic medical examinations</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.)	na
	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. )	na
<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 (e)</b>	<b>Evidence protocol and forensic medical examinations</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.)	na
<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))	na
<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
	Does the agency train all employees who may have contact with residents on: How to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming residents?	yes
	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 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?	yes
<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	yes

	comprehensive education to residents either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	
	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 video regarding: Agency policies and procedures for responding to such incidents?	yes
<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 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).)	na
<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).)	na
	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).)	na
	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).)	na
	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).)	na
<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).)	na

<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.)	na
	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 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.)	na
	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.)	na
	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.)	na
<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.)	na

<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.)	na
	Do medical and mental health care practitioners contracted by 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.)	na
<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
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Any gender nonconforming appearance or manner or identification as lesbian, gay, bisexual, transgender, or intersex, and whether the resident may therefore be vulnerable to sexual abuse?	yes
	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	yes



	the agency attempt to ascertain information about: Age?	
	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	yes

	pursuant to this standard in order to ensure that sensitive information is not exploited to the resident's detriment by staff or other residents?	
<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>	
	Does the agency always refrain from placing: Lesbian, gay, and bisexual residents in particular housing, bed, or other assignments solely on the basis of such identification or status?	yes
	Does the agency always refrain from placing: Transgender residents in particular housing, bed, or other assignments solely on the basis of such identification or status?	yes
	Does the agency always refrain from placing: Intersex residents in particular housing, bed, or other assignments solely on the basis of such identification or status?	yes
	Does the agency always refrain from considering lesbian, gay, bisexual, transgender, or intersex identification or status as an indicator or likelihood of being sexually abusive?	yes
<b>115.342 (d)</b>	<b>Placement of residents</b>	
	When deciding whether to assign a transgender or intersex resident to a facility for male or female residents, does the agency consider on a case-by-case basis whether a placement would ensure the resident's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns residents to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex residents, does the agency consider on a case-by-case basis whether a placement would ensure the resident's health and safety, and whether a placement would present management or security problems?	yes
<b>115.342 (e)</b>	<b>Placement of residents</b>	
	Are placement and programming assignments for each transgender or intersex resident reassessed at least twice each year to review any threats to safety experienced by the resident?	yes
<b>115.342 (f)</b>	<b>Placement of residents</b>	
	Are each transgender or intersex resident's own views with respect to his or her own safety given serious consideration when	yes

	making facility and housing placement decisions and programming assignments?	
<b>115.342 (g)</b>	<b>Placement of residents</b>	
	Are transgender and intersex residents given the opportunity to shower separately from other residents?	yes
<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?)	na
	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?)	na
<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 (a)</b>	<b>Resident reporting</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	yes

	entity or office that is not part of the agency?	
	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.)	na
	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.)	na
<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.)	na
	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.)	na
<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 standard.)	na
	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.)	na
	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.)	na
<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.)	na
	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.)	na
	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.)	na
	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.)	na
	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.)	na
<b>115.352 (f)</b>	<b>Exhaustion of administrative remedies</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.)	na
	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.)	na
	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.)	na

	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.)	na
	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.)	na
	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.)	na
	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.)	na
<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.)	na
<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 numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	yes
	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?	yes
	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	yes



	the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	
<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	yes

	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?	
<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	yes

	the parents or legal guardians? (N/A if the alleged victim is not under the guardianship of the child welfare system.)	
	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	yes

	accordance with these standards?	
<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?	no
<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	yes

	of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	
	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).)	na
	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).)	na
<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</b>	<b>Criminal and administrative agency investigations</b>	

<b>(f)</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?	no
	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?	no
<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 criminal referred for prosecution?	yes
<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?	no
<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	yes



	does not provide a basis for terminating an investigation?	
<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 responsible for conducting administrative and criminal investigations.)	yes
<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	yes

	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?	
	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 within the facility?	yes
<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 (c)</b>	<b>Interventions and disciplinary sanctions for residents</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 the resident is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening?	yes
<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 medical and mental health practitioners?	yes
<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	yes

	cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	
<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 § 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.)	na
<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	yes

	cooperates with any investigation arising out of the incident?	
<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 investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	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	na

	the confinement of its residents.)	
<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 addressing sexual abuse?	yes
<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	yes

	publication would present a clear and specific threat to the safety and security of a facility?	
<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? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.)	no
<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.)	no
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na

	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	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 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.)	na