

PREA Facility Audit Report: Final

Name of Facility: Advantage Treatment Centers Alamosa

Facility Type: Community Confinement

Date Interim Report Submitted: NA

Date Final Report Submitted: 07/24/2023

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"/>
Auditor Full Name as Signed: Karen d. Murray	Date of Signature: 07/24/ 2023

AUDITOR INFORMATION	
Auditor name:	Murray, Karen
Email:	kdmconsults1@gmail.com
Start Date of On-Site Audit:	06/13/2023
End Date of On-Site Audit:	06/14/2023

FACILITY INFORMATION	
Facility name:	Advantage Treatment Centers Alamosa
Facility physical address:	2017 Lava Lane, Alamosa, California - 81101
Facility mailing address:	2017 Lava Lane, Alamosa, Colorado - 81101

Primary Contact	
Name:	Kristie Garcia
Email Address:	kristie.garcia@atreatmentcenters.com
Telephone Number:	9705713983

Facility Director	
Name:	Glen Hodges
Email Address:	glen.hodges@atreatmentcenters.com
Telephone Number:	7195897511

Facility PREA Compliance Manager	
Name:	
Email Address:	
Telephone Number:	

Facility Characteristics	
Designed facility capacity:	123
Current population of facility:	82
Average daily population for the past 12 months:	83
Has the facility been over capacity at any point in the past 12 months?	No
Which population(s) does the facility hold?	Both females and males
Age range of population:	21-62
Facility security levels/resident custody levels:	low security
Number of staff currently employed at the	37

facility who may have contact with residents:	
Number of individual contractors who have contact with residents, currently authorized to enter the facility:	1
Number of volunteers who have contact with residents, currently authorized to enter the facility:	0

AGENCY INFORMATION	
Name of agency:	Advantage Treatment Centers, Inc.
Governing authority or parent agency (if applicable):	
Physical Address:	
Mailing Address:	
Telephone number:	

Agency Chief Executive Officer Information:	
Name:	
Email Address:	
Telephone Number:	

Agency-Wide PREA Coordinator Information			
Name:	Kristie Garcia	Email Address:	kristie.garcia@advantage-tx.com

Facility AUDIT FINDINGS
Summary of Audit Findings
The OAS automatically populates the number and list of Standards exceeded, the number of

Standards met, and the number and list of Standards not met.

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

Number of standards exceeded:

2

- 115.215 - Limits to cross-gender viewing and searches
- 115.286 - Sexual abuse incident reviews

Number of standards met:

39

Number of standards not met:

0

POST-AUDIT REPORTING INFORMATION

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2023-06-13
2. End date of the onsite portion of the audit:	2023-06-14

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	TuCasa Advocacy

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	122
15. Average daily population for the past 12 months:	98
16. Number of inmate/resident/detainee housing units:	2
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:	97
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:	2
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:	2
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:	0
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:	0
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:	0
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:	3

<p>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:</p>	<p>1</p>
<p>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:</p>	<p>0</p>
<p>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:</p>	<p>11</p>
<p>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:</p>	<p>0</p>
<p>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):</p>	<p>No text provided.</p>
<p>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</p>	
<p>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:</p>	<p>37</p>
<p>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:</p>	<p>0</p>

<p>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:</p>	<p>1</p>
<p>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:</p>	<p>No text provided.</p>
<p>INTERVIEWS</p>	
<p>Inmate/Resident/Detainee Interviews</p>	
<p>Random Inmate/Resident/Detainee Interviews</p>	
<p>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>8</p>
<p>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</p>	<p> <input type="checkbox"/> Age <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic) <input type="checkbox"/> Length of time in the facility <input checked="" type="checkbox"/> Housing assignment <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Other <input type="checkbox"/> None </p>
<p>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p>	<p>Upon arrival the facility provided Client random and targeted rosters. Once targeted names were chosen, random clients in the facility and not on work release were chosen by the Auditor.</p>

56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?	<input checked="" type="radio"/> Yes <input type="radio"/> No
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):	No text provided.
Targeted Inmate/Resident/Detainee Interviews	
58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:	8
<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>	
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:	1
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:	1

<p>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:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</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. 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).</p>	<p>After a tour of the facility, interviews with staff and clients and client file review, this targeted category of clients did not appear to be in the facility.</p>
<p>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:</p>	<p>1</p>
<p>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:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</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. 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).</p>	<p>After a tour of the facility, interviews with staff and clients and client file review, this targeted category of clients did not appear to be in the facility.</p>
<p>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:</p>	<p>3</p>
<p>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:</p>	<p>1</p>
<p>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:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</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. 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).</p>	<p>After a tour of the facility, interviews with staff and clients and client file review, this targeted category of clients did not appear to be in the facility.</p>

<p>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:</p>	<p>11</p>
<p>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:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</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. 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).</p>	<p>The facility does not utilize segregated housing.</p>
<p>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>No text provided.</p>
<p>Staff, Volunteer, and Contractor Interviews</p>	
<p>Random Staff Interviews</p>	
<p>71. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>8</p>

<p>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</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 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>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p>
<p>a. Select the reason(s) why you were unable to conduct the minimum number of RANDOM STAFF interviews: (select all that apply)</p>	<p><input type="checkbox"/> Too many staff declined to participate in interviews.</p> <p><input 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 checked="" 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>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):</p>	<p>No text provided.</p>

Specialized Staff, Volunteers, and Contractor Interviews

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.

75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):	1
76. Were you able to interview the Agency Head?	<input checked="" type="radio"/> Yes <input type="radio"/> No
77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?	<input checked="" type="radio"/> Yes <input type="radio"/> No
78. Were you able to interview the PREA Coordinator?	<input checked="" type="radio"/> Yes <input type="radio"/> No
79. Were you able to interview the PREA Compliance Manager?	<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
81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?	<input type="radio"/> Yes <input checked="" type="radio"/> No
82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Enter the total number of CONTRACTORS who were interviewed:	1
b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)	<input type="checkbox"/> Security/detention <input checked="" type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input type="checkbox"/> Other
83. Provide any additional comments regarding selecting or interviewing specialized staff.	No text provided.

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

84. Did you have access to all areas of the facility?

Yes

No

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

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)?

Yes

No

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)?

Yes

No

87. Informal conversations with inmates/residents/detainees during the site review (encouraged, not required)?

Yes

No

88. Informal conversations with staff during the site review (encouraged, not required)?

Yes

No

<p>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).</p>	<p>No text provided.</p>
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Documentation Sampling

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

<p>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?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
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<p>91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</p>	<p>No text provided.</p>
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SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

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

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

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

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

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

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual abuse	0	0	0	0
Staff-on-inmate sexual abuse	0	0	0	0
Total	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
Inmate-on-inmate sexual harassment	0	0	0	0	0
Staff-on-inmate sexual harassment	0	0	0	0	0
Total	0	0	0	0	0

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

	Ongoing	Unfounded	Unsubstantiated	Substantiated
Inmate-on-inmate sexual harassment	0	0	0	2
Staff-on-inmate sexual harassment	0	0	0	0
Total	0	0	0	2

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

98. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:	0
a. Explain why you were unable to review any sexual abuse investigation files:	The facility did not have any sexual abuse allegations in the past 12 months.

<p>99. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p>Inmate-on-inmate sexual abuse investigation files</p>	
<p>100. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>0</p>
<p>101. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>102. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>Staff-on-inmate sexual abuse investigation files</p>	
<p>103. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>0</p>
<p>104. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p>Sexual Harassment Investigation Files Selected for Review</p>	
<p>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>2</p>
<p>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p>Inmate-on-inmate sexual harassment investigation files</p>	
<p>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>2</p>
<p>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p>110. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

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

Standards	
Auditor Overall Determination Definitions	
<ul style="list-style-type: none"> • Exceeds Standard (Substantially exceeds requirement of standard) • Meets Standard (substantial compliance; complies in all material ways with the stand for the relevant review period) • Does Not Meet Standard (requires corrective actions) 	
Auditor Discussion Instructions	
<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>	

115.211	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ 2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022 3. ATC Organizational Chart, dated 6.1.2022 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random Clients 2. Targeted Clients 3. Client Managers Security Staff

4. Program Director / PREA Compliance Manager
5. PREA Coordinator
6. President

Through interviews with clients and staff and review of client and staff files, it is evident that this facility interweaves requirements for this standard in their daily protocols. Both clients and staff could speak to facility PREA practices and protocols being used as is described in the agency's PREA policy. The PREA Coordinator and PREA Compliance Manager could attest to having the required time to institute and implement PREA protocols.

Observation:

The facility is comprised of two separate residential buildings, one for the IRT - Intensive Residential Treatment for females and one for CC - Community Confinement female and male clients. Each of the residential buildings have bathrooms that have curtained showers, full and or $\frac{3}{4}$ doors for toileting areas except one male gang shower area did not have curtains. Although female showers were curtained, the PREA curtains have a clear area revealing female breasts.

PREA audit notices were observed to have been posted at the entrance to each building and large End the Silence posters with hotline numbers were displayed throughout each building in the facility. Cross gender announcements were made upon entering hallways and bedrooms for males and females. During the tour informal interviews were completed with staff and clients.

Informal and formal interviews with staff demonstrated each could speak to reporting procedures upon receipt of an allegation of abuse or harassment. Other positive comments included the following:

- Vice President always backs me up when implementing PREA protocols.
- Staff place a big emphasis on client safety.
- Program Director is very good about communicating PREA to us.
- Program Director does a phenomenal job with positive enforcement.

Informal and formal interview with clients demonstrated they were aware of PREA, reporting options to include telling staff or utilizing the phone and stated clients respect physical space and boundaries and felt extremely safe in the program.

Other positive comments included the following:

- If I wasn't here I wouldn't be almost two years sober.
- They structure PREA very well here.
- Staff and clients have all been pretty nice here.
- Pretty nice group of people here.
- I like our group and feel safe to share.
- They are pretty informative on PREA, biggest part of intake take-away.
- Client feels comfortable reporting, everyone respectable here, we keep an eye out for each other, family vibe here.
- Good people here, would report to Case Manager or staff.
- Would report to any staff, Case Manager as all are supportive staff on all shifts.

Recommendation:

Provide shower curtains for male gang shower and provide privacy shower curtains for female showers. Post audit shower curtains were placed in the men and women showers.

(a) The Advantage Treatment Centers Alamosa PAQ states the agency has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment in facilities it operates directly or under contract. The facility has a written policy outlining how it will implement the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment. The policy includes definitions of prohibited behaviors regarding sexual abuse and sexual harassment. The policy includes sanctions for those found to have participated in prohibited behaviors. The policy includes a description of agency strategies and responses to reduce and prevent sexual abuse and sexual harassment of residents.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 1, section Policy states, "Advantage Treatment Center facilities have a zero-tolerance policy for any sexual contact or sexual harassment, whether consensual or non-consensual, between clients and between clients and staff members. Any behavior of a sexual nature whether verbal, nonverbal, or physical is strictly prohibited at Advantage Treatment Center.

Prohibited sexual behavior includes sexual assault, sexual misconduct, staff sexual conduct in a correctional institution, and sexual harassment. Every report or observation of prohibited sexual behavior between clients or between clients and staff shall follow this policy for the prevention of, response to, training and education of, risk screening for, reporting of, response to, investigation of, for, medical and mental health care following, and data collection of incidents of prohibited sexual behavior.”

(b) The Advantage Treatment Centers Alamosa PAQ states the agency employs or designates an upper-level, agency-wide PREA Coordinator. The PREA Coordinator has sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its community confinement facilities. The position of the PREA Coordinator in the agency's organizational structure within the Human Resource Department.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 4, section d., states, “ATC has designated an upper-level, facility-wide PREA coordinator to develop, implement, and oversee ATC’s effort to comply with the PREA standards in all of its facilities.”

The facility provided an ATC Organization Chart. The organizational chart demonstrates the position of the PREA Coordinator is in the agency's organizational structure under Director of Training and PREA Coordinator. The PREA Coordinator reports to the President.

Through such reviews, the facility meets the standard requirements.

115.212	Contracting with other entities for the confinement of residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> <li data-bbox="274 1868 999 1906">1. Advantage Treatment Centers Alamosa PAQ <p>Interviews:</p>

	<p>1. PREA Coordinator</p> <p>During the pre-audit phase, the PREA Coordinator conveyed the agency did not have privatized contracts.</p> <p>(a) The Advantage Treatment Centers Alamosa PAQ states agency does not contract with private agencies for confinement services of their Residents.</p> <p>Through such reviews, the facility meets standard requirements.</p>
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115.213	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ 2. Alamosa Staffing Plan, not dated 3. ATC PREA Staffing Plan Annual Review Form – Alamosa, dated 3.22.2023 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random Clients 2. Targeted Clients 3. Client Managers Security Staff <p>Interviews with clients demonstrated staff complete ‘counts’ often and announce themselves by knocking on the door, stating, ‘count’ each time they enter the hallway and bedrooms.</p> <p>Interviews with Client Managers Security staff demonstrated ‘counts’ are completed multiple times throughout their shift.</p> <p>Site Observation:</p>

During the tour cross gender announcements were made each time staff entered the hallway and or bedroom of male and female areas.

(a) The Advantage Treatment Centers Alamosa PAQ states for each facility, the agency develops and documents a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring to protect residents against sexual abuse. Since August 20, 2012, or last PREA audit, whichever is later, the average daily number of residents is 83. Since August 20, 2012, or last PREA audit, whichever is later, the average daily number of residents on which the staffing plan was predicated is 100.

The facility provided at Alamosa staffing Plan. The staffing plan includes the following components:

1. This is a General schedule and changes are made based on facility staffing needs and any safety concerns that arise. DCJ standards - have 2 people on shift with increased coverage for high traffic times. OBH: requires 1:20 person at all times.
2. The physical layout of the building and video monitoring system information.
3. Alamosa has a capacity of 132 clients. The staffing plan is based on the facility being at max capacity. On average, we maintain between 75% of capacity therefore, client population has been taking into account in our staffing levels.
4. ATC management is dedicated to making adjustments to this plan based on substantiated and unsubstantiated reports that are made in the facility and will make necessary adjustments based on recommendations made by the review team as well as site management. We also discuss how the nature of any incidents may require a change in our staffing plan as part of the annual staffing plan review. ATC Alamosa prides itself on client education, client care and successful community integration. If incidents arise, we will review such needs on a case-by-case basis with the recommendations from the review team as previously mentioned.

(a) The Advantage Treatment Centers Alamosa PAQ states each time the staffing plan is not complied with, the facility documents and justifies all deviations from the staffing plan.

(c) The Advantage Treatment Centers Alamosa PAQ states at least once every year the facility, reviews the staffing plan to see whether adjustments are needed in (1) the staffing plan, (2) prevailing staffing patterns, (3) the deployment of video monitoring systems and other monitoring technologies, or (4) the allocation of

	<p>facility/agency resources to commit to the staffing plan to ensure compliance with the staffing plan</p> <p>The facility provided an ATC PREA Staffing Plan Annual Review form for Alamosa. The review consists of the following:</p> <ol style="list-style-type: none"> 1. Adjustments needed to prevailing staffing patterns? 2. Adjustments needed to deployment of video monitoring systems and other motoring technologies? 3. Is the allocation of additional resources necessary in order to commit to the staffing plan and ensure adequate staffing levels? 4. Any issues, concerns or changes required in order to adequately complete with the staffing plan? <p>Through such reviews, the facility meets the standards requirements.</p>
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115.215	Limits to cross-gender viewing and searches
	<p>Auditor Overall Determination: Exceeds Standard</p> <hr/> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ 2. Advantage Treatment Center Policy and Procedures Policy No. CS-030 Client Supervision - Contraband, dated 11.14.2017 3. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random Clients 2. Targeted Clients 3. Client Managers Security Staff <p>Interviews with client demonstrated the facility has respectable processes in place</p>

for searches and urinalysis testing. Every client interviewed stated searches and urinalysis were completed by same sex staff and all stated each process was conducted respectfully.

Interviews with Client Managers Security staff demonstrated cross-gender searches are not conducted. Staff stated the opposite gender staff only ask clients to empty their pockets and search through their bags/backpacks. Client Managers stated urinalysis testing was conducted with one staff and one client inside the restroom.

Site Observation:

During the tour of the facility the Auditor observed the Intake area, which is in the staff security desk area that houses a bathroom set up for urinalyses testing. The bathroom is behind a full door with mirrored walls, outside of camera view.

(a) Advantage Treatment Centers Alamosa PAQ states the facility does not conduct cross-gender strip or cross-gender visual body cavity searches of their residents. In the past 12 months the facility has conducted zero cross-gender strip or cross-gender visual body cavity searches of residents. In the past 12 months, the number of cross-gender strip or cross-gender visual body cavity searches of residents was zero. In the past 12 months, the number of cross-gender strip or cross-gender visual body cavity searches of residents that did not involve exigent circumstances or were performed by non-medical staff was zero. The PAQ states “the facility does not conduct strip searches or cavity searches of any resident.”

Advantage Treatment Center Policy and Procedures Policy No. CS-030 Client Supervision – Contraband, page 1, third through fifth paragraphs state, “Pat searches shall be conducted at a rate of no less than five (5) per month. Room searches shall be conducted at a rate of no less than one (1) per calendar month for each room. Facility searches shall be conducted at a rate of no less than one (1) per calendar month. Vehicle, canine, and limited visitor searches may be conducted whenever practical or warranted. Records of all client searches must be maintained in client case file. Records of all other searches must be maintained in a centralized file. Dates and times of searches should be randomized to increase contraband detection.”

(b) Advantage Treatment Center Alamosa PAQ states the facility policy does require that all cross-gender strip searches, cross-gender visual body cavity searches, and cross-gender pat-down searches be documented and justified as cross-gender strip searches and body cavity searches are not allowed. The number

of pat-down searches of female residents that were conducted by male staff was zero. Policy compliance can be found in provision (a) of this standard.

(a) Advantage Treatment Centers Alamosa PAQ states the facility policy requires that all cross-gender strip searches and cross-gender visual body cavity searches be documented. The PAQ states the facility will never conduct strip searches/cavity searches on any resident.

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

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 4, section A), states, "Staff of the opposite gender announce their presence when entering an area where residents are likely to be showering, performing bodily functions, or changing clothing."

(e) The Advantage Treatment Centers Alamosa PAQ states the facility has a policy prohibiting staff from searching or physically examining a transgender or intersex resident for the sole purpose of determining the resident's genital status. Such searches (described in 115.215(e)-1) occurred in the past 12 months was zero. Policy compliance can be found in provision (a) of this standard.

(f) The Advantage Treatment Centers Alamosa PAQ states zero percent of all security staff received training on conducting cross-gender pat-down searches and searches of transgender and intersex residents in a professional and respectful manner, consistent with security needs.

The agency does not train on cross gender searches as it is against agency policy to perform such searches. Reference provision (c) of this standard for policy compliance.

Through such reviews of the facility practice to never conduct strip searches and

cross-gender searches, the facility exceeds this standards requirements.

115.216

Residents with disabilities and residents who are limited English proficient

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

1. Advantage Treatment Centers Alamosa PAQ
2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022
3. Interpreter Services Instructions, Cesco Linguistic Services, not dated
4. Colorado Community Corrections PREA PowerPoint Staff Training, not dated

Interviews:

1. Client Managers Security Staff
2. PREA Coordinator
3. Program Director / PREA Compliance Manager

Interviews with security staff demonstrated they were clear in regard to interpreter procedures and were unaware of the instruction for language line services.

The interview with the PREA Compliance Manager and the PREA Coordinator demonstrated language line procedures were in place and a contract for services was current.

Recommendation:

Educate staff on instruction for proper interpreter and language line protocols. Post audit personnel were educated on instruction for language line protocols.

- (a) The Advantage Treatment Centers Alamosa PAQ states the agency has established procedures to provide disabled residents 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.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 4, section d. i., states, "Staff shall take appropriate steps to ensure that clients with disabilities (including, for example, clients 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 facility's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Such steps shall include, when necessary to ensure effective communication with clients who are deaf or hard of hearing, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. In addition, staff shall ensure that written materials are provided in formats or through methods that ensure effective communication with clients with disabilities, including clients who have intellectual disabilities, limited reading skills, or who are blind or have low vision. A facility is not required to take actions that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity, or in undue financial and administrative burdens, as those terms are used in regulations promulgated under title II of the Americans With Disabilities Act, 28 CFR 35.164."

(b) The Advantage Treatment Centers Alamosa PAQ states the agency has established procedures to provide residents with limited English proficiency 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. The facility addresses compliance in provision (a) of this standard.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 4, section d. ii., states, "Staff shall take reasonable steps to ensure meaningful access to all aspects of the facility's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to clients 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 within one (1) business day of arrival to the program."

The facility provided Interpreter Services Instructions for Cesco Linguistic Services. The instructions direct staff to:

1. Dial the designated number
2. When the operator answers, answer the following questions: customer code,

first and last name, office the caller is calling from, language needed

3. The operator then connects the caller with the interpreter requested.
4. Further instructions exist for “how to access an interpreter when the end user calls in to talk to a service provider.”

The facility provided a Colorado Community Corrections PREA PowerPoint Staff Training. Slide 53 of the PowerPoint training states the following:

1. “When employees or contract workers are not able to adequately translate, the services of qualified language translator for non-English speaking clients must be obtained.
2. This arrangement is at no cost to the client.
3. The interpreter information is in the PREA folder located in the ATC toolkit on the google drive.”

(c) The Advantage Treatment Centers Alamosa PAQ states the agency policy prohibits use of resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-response duties under §115.264, or the investigation of the resident's allegations. If YES, the agency or facility documents the limited circumstances in individual cases where resident interpreters, readers, or other types of resident assistants are used. In the past 12 months, the number of instances where resident interpreters, readers, or other types of resident assistants have been used and it was not the case that an extended delay in obtaining another interpreter could compromise the resident’s safety, the performance of first-response duties under § 115.264, or the investigation of the resident’s allegations was zero.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 4, section d. iii., states, “Staff shall not rely on client interpreters, client readers, or other types of client assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the client’s safety, the performance of first-response duties, or the investigation of the client’s allegations.”

Through such reviews, the facility meets standard requirements.

115.217	Hiring and promotion decisions
	<p data-bbox="280 188 983 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 264 564 297">Auditor Discussion</p> <p data-bbox="280 340 544 374">Document Review:</p> <ol data-bbox="280 412 1406 703" style="list-style-type: none"> <li data-bbox="280 412 970 445">1. Advantage Treatment Centers Alamosa PAQ <li data-bbox="280 483 1406 562">2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022 <li data-bbox="280 600 1299 633">3. Advantage Treatment Center, Inc., Hiring Process, dated 8.23.2021 <li data-bbox="280 672 1283 703">4. Advantage Treatment Center, Inc., Interview Questions, not dated <p data-bbox="280 815 437 848">Interviews:</p> <ol data-bbox="280 887 1002 987" style="list-style-type: none"> <li data-bbox="280 887 491 920">1. Controller <li data-bbox="280 958 1002 987">2. Program Director / PREA Compliance Manager <p data-bbox="280 1025 1449 1440">Interviews with Controller demonstrated applicants determined to have been convicted of sexual abuse or sexual harassment charges are screened out during the application review process. The Controller could demonstrate administrative adjudication questions were documented at hire and again during promotion, criminal history background checks were run every five years for staff, interns and contractors. The Controller stated the Community Corrections Information and Billing database will flag the facility if an employee is arrested or charged with a crime and staff have a responsibility to immediately report negative interactions with law enforcement. The Controller was not aware of the system for institutional reference checks and believed the Program Director completed these checks.</p> <p data-bbox="280 1552 1474 1664">The interview with the Program Director demonstrated he completed institutional reference checks but had not documented those checks or called all past employers for each applicant.</p> <p data-bbox="280 1776 528 1809">Site Observation:</p> <p data-bbox="280 1848 1465 2089">By utilizing the PREA Community Confinement Documentation Review Employee File/Records template, 12 employee files reviewed demonstrated each had background checks upon hire and within five years, thereafter. The facility was able to demonstrate administrative adjudication questions were asked during the application and promotion processes and institutional references were completed, but not documented for the one applicable employee.</p>

Recommendation:

Program Director to document institutional reference checks for all employers on applicant applications. Since the onsite review the facility received and implemented the form to document institutional reference checks.

(a) The Advantage Treatment Centers Alamosa PAQ states agency policy prohibits hiring or promoting anyone who may have contact with residents and prohibits enlisting the services of any contractor who may have contact with residents who: (1) 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); (2) Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or (3) Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.

Advantage Treatment Center, Inc., Hiring Process, page 3, section PREA Policy and Hiring Process, A. 1-3, states, "As an effort to be in compliance with PREA standard 115.217 the following hiring practices will be observed by all ATC facilities:

ATC will not hire or promote anyone who may have contact with residents, and shall not enlist the services of any contractor who may have contact with residents, who:

1. 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);
2. Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or
3. Has been civilly or administratively adjudicated to have engaged in the activity described above."

(b) The Advantage Treatment Centers Alamosa PAQ states 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.

Advantage Treatment Center, Inc., Hiring Process, page 3, section PREA Policy and Hiring Process, B., states, "ATC will 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."

(c) The Advantage Treatment Centers Alamosa PAQ states the agency policy requires that before it hires any new employees who may have contact with residents, it (a) conducts criminal background record checks, and (b) consistent with federal, state, and local law, makes its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. In the past 12 months, the number of persons hired who may have contact with residents who have had criminal background record checks was 21.

Advantage Treatment Center, Inc., Hiring Process, page 3, section PREA Policy and Hiring Process, C., states, "Before hiring new employees, who may have contact with residents, ATC will Perform a criminal background records check; and 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."

(d) The Advantage Treatment Centers Alamosa PAQ states the agency policy requires that a criminal background record check be completed before enlisting the services of any contractor who may have contact with residents. In the past 12 months, the number of contracts for services where criminal background record checks were conducted on all staff covered in the contract who might have contact with residents was zero. The PAQ states, "We follow the same process for contractors as it is required by the Division of Criminal Justice as well and done through our CCIB database."

Advantage Treatment Center, Inc., Hiring Process, page 3, section PREA Policy and Hiring Process, D., states, "ATC will also perform a criminal background record check before enlisting the services of any contractor who may have contact with residents."

(e) The Advantage Treatment Centers Alamosa PAQ states agency policy requires that either criminal background record checks be conducted at least every five

years for current employees and contractors who may have contact with residents or that a system is in place for otherwise capturing such information for current employees.

Advantage Treatment Center, Inc., Hiring Process, page 3, section PREA Policy and Hiring Process, E., states, "ATC will either conduct criminal background records check 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."

(f) Advantage Treatment Center, Inc., Hiring Process, page 3, section PREA Policy and Hiring Process, F., states, "ATC will ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in our written ATC application and in any interviews. ATC will also impose upon employees a continuing affirmative duty to disclose any such misconduct."

The facility provided interview questions given to applicants. Page three of the interview questions, asks the following questions: "Have you ever been accused, investigated, or convicted of any PREA violation, sexual assault, sexual harassment or sexual misconduct?"

(g) The Advantage Treatment Centers Alamosa PAQ agency policy states that material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.

Advantage Treatment Center, Inc., Hiring Process, page 3, section PREA Policy and Hiring Process, G., states, "Material omissions regarding such misconduct, or the provision of materially false information, are grounds for termination."

(h) Advantage Treatment Center, Inc., Hiring Process, page 3, section PREA Policy and Hiring Process, H., states, "ATC will 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."

Through such reviews, the facility meets standard requirements.

115.218	Upgrades to facilities and technology
	<p data-bbox="280 188 983 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 266 564 300">Auditor Discussion</p> <p data-bbox="280 344 544 378">Document Review:</p> <ol data-bbox="280 412 971 445" style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ <p data-bbox="280 557 437 591">Interviews:</p> <ol data-bbox="280 624 1003 736" style="list-style-type: none"> 1. Program Director / PREA Compliance Manager 2. President <p data-bbox="280 770 1469 893">Interviews with the Program Director demonstrated servers were updated to handle all cameras. Cameras are being upgraded in key areas, from analogue to digital, as the budget allows.</p> <p data-bbox="280 994 1469 1162">The interview with the President demonstrated the facility is currently modifying a building, providing a comfortable and safe area for the population with room to grow. During expansion cameras and technology are given thoughtful consideration when creating any new area.</p> <p data-bbox="280 1263 528 1296">Site Observation:</p> <p data-bbox="280 1341 1437 1498">During the onsite review cameras were witnessed in both residential areas, the kitchen and dining room, classrooms, hallways and all areas of the exterior of the building. Cameras were reviewed in the security room and all appeared to be operable.</p> <p data-bbox="280 1610 1453 1733">(a) The Advantage Treatment Centers Alamosa PAQ states the agency has not acquired a new facility or made substantial expansions or modifications to existing facilities since the last PREA audit.</p> <p data-bbox="280 1834 1466 2002">(a) The Advantage Treatment Centers Alamosa PAQ states the agency/facility has installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit. The PAQ states, "Replaced old system with digital."</p>

	Through such reviews, the facility meets standard requirements.
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115.221	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ 2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022 3. Memorandum of Understanding, Parkview Health Systems, dated 7.25.2022. 4. Advocate Email Communication Attempts, dated 6.14.2023 5. Memorandum of Understanding, Alamosa Police Department, dated 2.2020 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random Clients 2. Targeted Clients 3. Client Managers Security Staff 4. Program Director / PREA Compliance Manager 5. PREA Coordinator <p>Interviews with clients demonstrated none had made a report of sexual abuse or a need for a forensic medical examination.</p> <p>Interviews with facility staff interviewed demonstrated each were clearly aware of reporting protocols for sexual harassment and abuse. Each staff was aware clients would be offered and or provided medical care immediately following a sexual abuse allegation. Staff interviewed were comfortable reporting internally and understood the processes for reporting externally. Each employee badge has PREA Coordinated Response instructions on the reverse side of their identification badge. This coordinated response includes first responder steps to be completed by security staff and facility and agency emergency phone numbers.</p>

Site Observation:

There were zero investigations requiring a forensic medical examination in the last 12 months.

(a) The Advantage Treatment Centers Alamosa PAQ states the agency/facility is responsible for conducting administrative sexual abuse investigations (including resident-on-resident sexual abuse or staff sexual misconduct). The agency/facility is not responsible for conducting criminal sexual abuse investigations (including resident-on-resident sexual abuse or staff sexual misconduct). The Alamosa Police Department would conduct sexual abuse investigations. When conducting a sexual abuse investigation, the agency investigators follow a uniform evidence protocol.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 7, section F. a-b., "Where sexual harassment is alleged, the facility shall investigate promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports. If the incident is determined to be founded by the PREA Coordinator, the incident will be passed on to local law enforcement.

Where sexual abuse is alleged, the facility shall contact the local law enforcement agency to conduct the investigation. Promptly, thoroughly and objectively, the facility shall take into consideration all allegations, including third-party and anonymous reports that meet the definition of sexual abuse as defined in this policy."

(b) The Advantage Treatment Centers Alamosa PAQ states the protocol being developmentally appropriate for is not applicable as the facility does not house youthful offenders.

(c) The Advantage Treatment Centers Alamosa PAQ states the facility offers all residents who experience sexual abuse access to forensic medical examinations. Forensic medical examinations are offered without financial cost to the victim. Where possible, examinations are conducted by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs). When SANEs or SAFEs are not available, a qualified medical practitioner performs forensic medical examinations. The facility documents efforts to provide SANEs or SAFEs. The number of forensic medical exams conducted during the past 12 months is zero. The number of SANEs/SAFEs during the past 12 months was zero. The number of exams performed by a qualified medical practitioner during the past 12 months was zero.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 7, section F. ii., states, "The facility shall offer all victims of sexual abuse access to forensic medical examinations at an outside facility, without financial cost, where evidentiary or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible.

SANE locations are as follows:

§ Sterling - Sterling Regional Medical Center: 615 Fairhurst, Sterling Colorado, 80751.

§ Alamosa- Convenient Care Community Clinic Valley-Wide Health Systems: 1131 Main St, Alamosa, CO 81101

§ Lamar- Parkview Medical Center: 400 W. 16th Street Pueblo, CO, 81003

§ Montrose- Montrose Memorial Hospital Emergency Room: 800 S 3rd St, Montrose, CO 81401. Must call dispatch first.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 7, section F. iii., states, "If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners and staff shall document its efforts to provide SAFEs or SANEs."

The facility provided a memorandum of understanding between Advantage Treatment Center (ATC) and Parkview Health Systems. The provides at least one nearby medical facility or other facility that has sexual assault nurse examiners, sexual assault forensic examiners, or a medical forensic exam program. The memorandum seems to be current and is signed on 7.25.2022 by the Facility Director and the Emergency Department Director, Parkview Medical Center.

(d) The Advantage Treatment Centers Alamosa PAQ states the facility attempts to make available to the victim a victim advocate from a rape crisis center, either in person or by other means. The efforts are documented. If and when a rape crisis center is not available to provide victim advocate services, the facility provides a qualified staff member from a community-based organization or a qualified agency staff member. The PAQ states "the facility does not have a qualified staff member."

The facility provided email communications between the Chief of Police and the Program Director who requested a continued agreement to provide advocate services. Although the Chief of Police was not prepared to continue the past agreement, per the PREA Coordinator, TU CASA, Inc., has agreed to provide emotional support services to the facility, without a written agreement. Internet research yields the following information. 'Tu Casa, Ins.'s dynamic team is dedicated to crossing county-lines and cultural barriers to ensure all child and adult victims have access to our services.'

(e) The Advantage Treatment Centers Alamosa PAQ states if requested by the victim, a victim advocate, qualified agency staff member, or qualified community-based organization staff member accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provides emotional support, crisis intervention, information, and referrals.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 7, section F. iii. A., states, "As requested by the victim, the victim advocate will be a qualified community-based staff person and shall accompany and support the victim through the forensic medical examination process and investigatory interviews and shall provide emotional support, crisis intervention, information, and referrals."

(f) The Advantage Treatment Centers Alamosa PAQ states if the agency is not responsible for investigating allegations of sexual abuse and relies on another agency to conduct these investigations, the agency has requested that the responsible agency follow the requirements of paragraphs §115.221 (a) through (e) of the standards.

The facility provided an Advantage Treatment Centers, Inc., Memorandum of Understanding (MOU) between Advantage Treatment Centers and the Alamosa Police Department. The MOU requests consideration of standards 115.234 (d), and 115.271 (c)(g) and (h). The MOU does not appear to have an expiration date and is signed on 2.26.2020 by the Alamosa Police Department Chief and the facility Program Director.

(g) Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 7, section F. iii. B., states, "For the purposes of this policy, a community-based staff member shall be an individual who has been screened for appropriateness to serve in this role and has received education concerning sexual assault and forensic examination issues in general."

Through such reviews, the facility meets standard requirements.

115.222 Policies to ensure referrals of allegations for investigations

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

1. Advantage Treatment Centers Alamosa PAQ
2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022
3. Agency website: <https://www.atreatmentcenters.com/>

Interviews:

1. Client Managers Security Staff
2. Intensive Residential Treatment Supervisor / Investigator
3. Program Director / PREA Compliance Manager
4. PREA Coordinator

Interviews with all staff demonstrated each would contact the Community Confinement Supervisor, Intensive Residential Treatment Supervisor, team leads, or the Program Director with all allegations of sexual harassment and sexual abuse.

The interview with the Investigator demonstrated he or the Program Director would investigate any allegation, depending on the investigation they would trade off on who would investigate. The investigator stated investigation for either sexual abuse or sexual harassment begins within 48 hours.

Interviews with the Program Director and the PREA Coordinator both demonstrated all allegations are investigated and each keeps a detailed spreadsheet of investigations for up more than 12 months.

On Site Review:

The facility had two sexual harassment investigations in the past 12 months. One investigation was a third party report by a client and one investigation was through a verbal report to staff, from the client/victim.

(a) The Advantage Treatment Centers Alamosa PAQ states the agency ensures that an administrative or criminal investigations are completed for all allegations of sexual abuse and sexual harassment. In the past 12 months the facility has had two allegations of sexual abuse and sexual harassment that were received. Two investigations resulted in an administrative investigation and one was referred for criminal investigation.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 7, section F. a., states, "Where sexual harassment is alleged, the facility shall investigate promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports. If the incident is determined to be founded by the PREA Coordinator, the incident will be passed on to local law enforcement."

(b) The Advantage Treatment Centers Alamosa PAQ states the agency has a policy that requires that allegations of sexual abuse or sexual harassment be referred for investigation to an agency with the legal authority to conduct criminal investigations, including the agency if it conducts its own investigations, unless the allegation does not involve potentially criminal behavior. The agency's policy regarding the referral of allegations of sexual abuse or sexual harassment for criminal investigation is published on the agency website at <https://www.atreatmentcenters.com/>. The agency documents all referrals of allegations of sexual abuse or sexual harassment for criminal investigation.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 7, section F. d. iv., states, "Substantiated allegations of conduct that appears to be criminal shall be referred for prosecution."

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 7, section F. d. ii. B, states, "Shall be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings."

(c) Advantage Treatment Center Prison Rape Elimination Policy and Procedure

	<p>CS-070, page 7, section F. c., states, “For criminal investigations, local law enforcement investigators shall have the responsibility to gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator.”</p> <p>Through such reviews, the facility meets standard requirements.</p>
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115.231	Employee training
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ 2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022 3. Advantage Treatment Centers, Inc., Employee Handbook, dated 12.29.2022 4. Colorado Community Corrections PREA Staff Training PowerPoint, not dated 5. Advantage Treatment Centers, Inc., Training Roster, dated 2022 - 2023. <p>Interviews:</p> <ol style="list-style-type: none"> 1. Client Managers Security Staff 2. Security Coordinator 3. Administrative Assistant (Human Resources) <p>Interviews with staff demonstrated each were aware of and received initial and annual PREA training. Staff reported watching the same PREA video as residents, watching an agency PREA video and being trained by the Agency PREA Coordinator on facility and agency specific PREA protocols through in person PowerPoint presentations and on line trainings through the National Institute of Corrections website.</p> <p>Site Observation:</p>

Review Through utilization of the PREA Audit Community Confinement Documentation Review Employee File / Records Review template and the facility training spreadsheet demonstrated, 11 of 12 employee training files demonstrate annual training had been completed in 2022 and refresher training in 2023, thus far. One newly hired staff in her second week of employment had scheduled training but had not yet completed her new hire PREA training.

(a) The Advantage Treatment Centers Alamosa PAQ states the agency trains all employees who may have contact with residents on the agency's zero-tolerance policy for sexual abuse and sexual harassment. On the PAQ, the PREA Coordinator stated, "We have a set curriculum for in person and virtual training as well as a recording on a YouTube so it can be readily available."

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 1, section Policy, second paragraph, states, "Prohibited sexual behavior includes sexual assault, sexual misconduct, staff sexual conduct in a correctional institution, and sexual harassment. Every report or observation of prohibited sexual behavior between clients or between clients and staff shall follow this policy for the prevention of, response to, training and education of, risk screening for, reporting of, response to, investigation of, for, medical and mental health care following, and data collection of incidents of prohibited sexual behavior."

The facility provided an Advantage Treatment Centers, Inc., Employee Handbook. Section 2.4 Standards of Conduct, states, "Advantage Treatment Centers, Inc wishes to create a work environment that promotes job satisfaction, respect, responsibility, integrity, and value for all our staff members, clients, customers, and other stakeholders. We all share in the responsibility of improving the quality of our work environment. By deciding to work here, you agree to follow our rules.

While it is impossible to list everything that could be considered misconduct in the workplace, what is outlined here is a list of common-sense infractions that could result in discipline, up to and including immediate termination of employment. This policy is not intended to limit our right to discipline or discharge staff members for any reason permitted by law.

Examples of inappropriate conduct include:

- Violation of the policies and procedures set forth in this handbook.

- Possessing, using, distributing, selling, or negotiating the sale of illegal drugs or other controlled substances.
- Being under the influence of alcohol during working hours on Company property (including in Company vehicles), or on Company business.
- Inaccurate reporting of the hours worked by you or any other staff members.
- Providing knowingly inaccurate, incomplete, or misleading information when speaking on behalf of the Company or in the preparation of any employment-related documents including, but not limited to, job applications, personnel files, employment review documents, intra-company communications, or expense records.
- Taking or destroying Company property.
- Possession of potentially hazardous or dangerous property (where not permitted) such as firearms, weapons, chemicals, etc., without prior authorization.
- Fighting with, or harassment of (as defined in our EEO policy), any fellow employee, vendor, client, or customer.
- Disclosure of Company trade secrets and proprietary and confidential-sensitive information
- Refusal or failure to follow directions or to perform a requested or required job task.
- Refusal or failure to follow safety rules and procedures.
- Excessive tardiness or absences.
- Smoking in non-designated areas.
- Working unauthorized overtime.
- Solicitation of fellow employees on Company premises during working hours.
- Failure to dress according to Company policy.
- Use of obscene or harassing (as defined by our EEO policy) language in the workplace.
- Engaging in outside employment that interferes with your ability to perform your job at this Company.
- Lending keys or keycards to Company property to unauthorized persons.
- Inappropriate or unprofessional relationships with past or current clients (within 2 years of being in the program).
- Engaging in, or allowing another person to engage in, sexual behavior with a

client.

- Conduct that does not value the dignity or respect of our clients.
- Regardless of whether force is used or threatened, there can be no “consensual sex” between an employee of the program and an offender.
- Employees are prohibited from giving a client, or a former client, or any member of a client’s family, or to any person known to be associated with a client or former client, any article, favor, or service, which is not authorized in the performance of the program’s duties.
- Employees are prohibited from receiving any gifts, favors, or personal services from a client or former client or anyone known to be associated with or related to a client or former client. This prohibition includes becoming involved with offender’s families, or associates of any offender.
- Employees are prohibited from showing any type of favoritism or giving preferential treatment to one client or a group of clients, over any other client.
- Employees are prohibited from using profane, obscene, or otherwise abusive language when communicating with clients, fellow employees, or any other individual.
- Direct or indirect outside contact with current or past clients (within 2 years of being in the program) for non-work-related purposes outside of the program such as personal cell phones, social media, communication applications, etc.

Nothing in this policy is intended to limit your rights under the National Labor Relations Act, or to modify the at-will employment status where at-will is not prohibited by state law.

Violation of the Code of Ethics or standards of conduct can result in discipline, up to and including termination of employment. The degree of discipline imposed may be influenced by the existence of voluntary disclosure of any ethical violation and whether or not the violator cooperated in any subsequent investigation.

The facility provided an Advantage Treatment Centers, Inc., Employee Handbook. Section 2.4 a Prison Rape Elimination Act (PREA) Acknowledgment, states, “Advantage Treatment Centers, Inc is committed to the establishment of a zero-tolerance standard of client sexual assault, sexual violence, sexual misconduct and sexual contact by other clients, staff, or other non-staff persons. All substantiated violations of state statutes pertaining to sexual crimes will be aggressively pursued for prosecution. All established sanctions will also be pursued for violations as appropriate. Advantage Treatment Centers, Inc expects licensed staff to follow any

additional guidelines set forth by their licensing agency as well as complying with Advantage Treatment Centers, Inc policies.

It is strictly forbidden for any Advantage Treatment Centers, Inc employee, volunteer, contractor/vendor, or other government employee or any other non-ATC staff person who has access to the residential facility or clients in an official capacity, to engage in any act with a client that constitutes sexual assault, sexual violence, sexual misconduct, or sexual contact.

All suspected or reported acts of sexual assault, violence, misconduct, and contact alleged to be perpetrated by another client, Advantage Treatment Centers, Inc employee or any other person, must be immediately reported to the Program Director. This includes suspected behaviors on or off the premise and at Advantage Treatment Centers, Inc, or other facilities. This mandate to report is the responsibility of:

- All Advantage Treatment Centers, Inc employees and clients
- All contractors/vendors, to include mental health contractors, education contractors and food service/vending contractors
- All volunteers within the Advantage Treatment Centers, Inc facility

Advantage Treatment Centers, Inc imposes upon its employees, volunteers, and contractors a continuing affirmative duty to disclose of any such misconduct. Reports may be made to the Program Director, Kristie Garcia the Advantage Treatment Centers, Inc PREA Coordinator, at 970-571-3983, or the Staff tip line at 719-226-4621.

Failure on the part of any staff to immediately report any knowledge of perpetrated or threatened, sexual assault, violence, misconduct or contact upon any client will subject such contractor/vendor/volunteer or staff to immediately lose access to Advantage Treatment Centers, Inc. Material omissions regarding such misconduct, or the provision of materially false information, shall also be grounds for termination or loss of access to the facility.

By signing this handbook, you acknowledge that you understand the Advantage Treatment Centers, Inc Zero Tolerance Policy, and your duty to immediately report any forbidden acts to the Program Director.

The facility provided a Colorado Community Corrections PREA Staff Training PowerPoint. PowerPoint slides 5-7 includes the following: "Train staff on awareness, prevention, intervention, and reporting of sexual misconduct, sexual assault and sexual harassment."

The facility provided a Colorado Community Corrections PREA Staff Training PowerPoint. PowerPoint slides 43 includes the following: "Clients and employees have the right to be free from retaliation by other clients or staff when reporting an incident involving sexual assault, sexual misconduct or sexual harassment."

The facility provided a Colorado Community Corrections PREA Staff Training PowerPoint. PowerPoint slide 40 includes the following:

Frequent Reactions:

1. Suicidal feelings and depression
2. Post-traumatic stress disorder (PTSD)
3. Fear, anxiety and hyper vigilance
4. Alienation
5. Exacerbation of pre-existing psychiatric disorders
6. Substance abuse
7. Anger
8. Aggression toward other offenders or Community Corrections employees to escape the situation or as part of their anger

The Colorado Community Corrections PREA Staff Training PowerPoint includes all other training topics mandated in provision (a) of this standard.

(b) The Advantage Treatment Centers Alamosa PAQ states training is tailored to the gender of the residents at the facility. Employees who are reassigned from facilities housing the opposite gender are given additional training. Compliance can be found in provision (a) of this standard. The PREA Coordinator states, in the PAQ fields, "We have a set curriculum for in person and virtual training as well as it

recorded on a YouTube video so it can be more readily available.”

(c) The Advantage Treatment Centers Alamosa PAQ states between trainings the agency provides employees who may have contact with residents with refresher information about current policies regarding sexual abuse and harassment. The frequency with which employees who may have contact with residents receive refresher training on PREA requirements annually. The PAQ states, “we have a PREA jeopardy game we have used as a PREA refresher. Directors will individually do follow up with staff during their all employee meetings.”

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 1, section Policy, page 5, section i. A-B, states,

A) The program shall conduct an annual training on both PREA and sexual harassment.

B) Training will be documented and maintained in each employee personnel file.

(d) The Advantage Treatment Centers Alamosa PAQ states the agency documents that employees who may have contact with residents understand the training they have received through employee signature or electronic verification

The facility provided PREA training rosters. The rosters document the following training has been completed in the year 2023 and the following information for all staff:

1. Training topic
2. Facilitator Name
3. Date/Time
4. Name of Participant/Position/Signature and a second signature under the following statement: “I understand the materials presented in this training.”

Through such reviews, the facility meets standard requirements.

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

1. Advantage Treatment Centers Alamosa PAQ
2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022
3. Signed Volunteer and Contractor Advantage Treatment Center PREA Acknowledgment, not dated

Interviews:

1. Contractor

The interview with the contractor demonstrated he has been providing substitute classes in the Intensive Residential Treatment program for 10 years. The contractor stated he completes training on PREA every two years. The contractor stated if he received an allegation of sexual harassment or sexual abuse he would immediately go directly to his supervisor, the Intensive Residential Treatment Supervisor.

Site Observation:

During the pre-audit phase the facility uploaded the contractor's signed PREA Training Acknowledgement.

(a) The Advantage Treatment Centers Alamosa PAQ states all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response. The number of volunteers and contractors, who may have contact with residents, who have been trained in agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response is one. The PAQ states, "Volunteers and Contractors sign a PREA Acknowledgment and attend the same PREA staff training or are asked to the NIC E-Course."

The number of volunteers and individual contractors who have contact with residents who have been trained in agency policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response is one.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 5, section ii. Volunteers, states, "The program shall conduct an annual training on both PREA and sexual harassment."

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

(c) The Advantage Treatment Centers Alamosa PAQ states the agency maintains documentation confirming that volunteers and contractors who have contact with residents understand the training they have received. The PREA Coordinator states she maintains all training records and each sign a roster in addition to the PREA Acknowledgments.

The facility provided a signed PREA Acknowledgment by the one contractor. The first paragraph states, "Advantage Treatment Centers, Inc. is committed to the establishment of a zero-tolerance standard of client sexual assault, sexual violence, sexual misconduct and sexual contact by other clients, staff, or other non-staff persons. All substantiated violations of state statutes pertaining to sexual crimes will be aggressively pursued for prosecution. All established sanctions will also be pursued for violations as appropriate. Advantage Treatment Centers, Inc. expects licensed staff to follow any additional guidelines set forth by their licensing agency as well as complying with Advantage Treatment Centers, Inc. policies." Acknowledgments are signed and dated by all contractors and volunteers.

Through such reviews, the facility meets standard requirements.

115.233	Resident education
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review:

1. Advantage Treatment Centers Alamosa PAQ
2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022
3. Client Intake Checklist, English and Spanish, not dated
4. Speak Up - Get Help Posting

Interviews:

1. Random Clients
2. Targeted Clients
3. Client Managers Security Staff

Interviews with the eight random and eight targeted clients, each reported their knowledge on PREA, reporting options included telling a staff, writing a kite or a grievance, or using the hotline number to report by referencing the postings throughout the facility.

Interviews with all Client Managers Security staff demonstrated each completes intake procedures with residents and each completes PREA education with residents during the intake process.

Site Observation:

Of the 10 resident files reviewed, each demonstrated evidence of PREA education within one hour of intake. Files review was completed by utilizing the PREA Audit - Community Confinement Facilities Documentation Review - Resident Files/Records template. A computer is placed near the intake area for new residents to view the PREA video during their intake process.

(a) The Advantage Treatment Centers Alamosa PAQ states residents receive information at time of intake about the zero-tolerance policy, how to report incidents or suspicions of sexual abuse or harassment, their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. The number of residents admitted during past 12 months who were given this information at intake was 413.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 5, section e. iii, states, "During the intake process, all clients shall receive an orientation that includes Community Corrections policy and procedures relating to sexual assault, sexual abuse, sexual harassment and sexual misconduct. The information is communicated by video correspondence, verbally and in writing."

The facility provided an Advantage Treatment Center, Inc., Client Intake Packet. Page 20 of the intake packet informs clients of the following: Prison Rape Elimination Act Orientation Information, stating,

"Advantage Treatment Center Inc. has a zero tolerance towards sexual assault, sexual misconduct, staff sexual misconduct and sexual harassment. This includes any sexual act, touching, comments or gestures.

If you are a victim of sexual assault, sexual misconduct, sexual harassment or staff sexual misconduct, you can report it in one of the following ways:

- Notify a staff member
- Tell your case manager or community parole officer
- Contact the Director (Marci Amrine (719) 336-0650, 800 E Maple St. Lamar, Co 81052)
- Call the Colorado Department of Corrections (CDOC) TIPS line at: 1-877-DOC-TIPS (1-877-362-8477)
- Contact the CDOC PREA Coordinator at 2862 South Circle Drive, Colorado Springs, CO 80906
- Report the incident directly to the police

If you are in need of rape crisis counseling, please contact (719) 465-2819

If you need this information explained to you in a different language or format, please notify staff.

I have been provided with an orientation and written information regarding policies and procedures for reporting sexual assault, sexual misconduct and sexual harassment and how to access rape crisis counseling."

The client signature, assigned number, date, staff signature and date are required on the acknowledgement.

Page 21 of the Client Intake Packet is dedicated to Client Rights. Rights include the following:

Resident's at Advantage Treatment Center, Inc. have:

- The right to be treated with respect and dignity.
- The right to reasonable privacy.
- The right not to be isolated from other residents.
- The right not to be sexually, verbally, physically, or psychologically intimidated.
- The right to live free from financial exploitation.
- The right to be free from physical or chemical restraints as defined within these regulations except as otherwise provided in Section 27-10-101, et seq C.R.S. for those facilities which are licensed to provide services specifically for the mentally ill.
- The right to full use of the facility common areas, in compliance with the documented house rules.
- The right to voice grievances and recommend changes in policies and services.
- The right to access to legal and medical services.
- The right to access to religious services.
- The right to expect confidential information to remain within the confines of the program and the contracting agency unless a valid release of information is in effect.

(b) The Advantage Treatment Centers Alamosa PAQ states the facility provides residents who are transferred from a different community confinement facility with refresher information referenced in 115.233(a)-1. The number of residents transferred from a different community confinement facility during the past 12 months was two. The number of residents transferred from a different community confinement facility, during the past 12 months, who received refresher information was 50. The agency states residents who are transferred from a different community confinement facility will receive the same intake information as new clients.

(c) The Advantage Treatment Centers Alamosa PAQ states Resident PREA education is available in formats accessible to all residents, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled and those who have limited reading skills.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 4, section d. i., states, "Staff shall take appropriate steps to ensure that clients with disabilities (including, for example, clients 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 facility's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Such steps shall include, when necessary to ensure effective communication with clients who are deaf or hard of hearing, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. In addition, staff shall ensure that written materials are provided in formats or through methods that ensure effective communication with clients with disabilities, including clients who have intellectual disabilities, limited reading skills, or who are blind or have low vision. A facility is not required to take actions that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity, or in undue financial and administrative burdens, as those terms are used in regulations promulgated under title II of the Americans With Disabilities Act, 28 CFR 35.164."

(d) The Advantage Treatment Centers Alamosa PAQ states the agency maintains documentation of resident participation in PREA education sessions. Compliance can be found in provision (a) of this standard.

(e) The Advantage Treatment Centers Alamosa PAQ states the agency ensures that key information about the agency's PREA policies is continuously and readily available or visible through posters, resident handbooks, or other written formats.

The facility provided Speak Up Get Help posing with 1.877.DOC.TIPS (1.877.362.8477). On 5.24.2023 at 7:12 pm, this Auditor contacted the Colorado Department of Correction Tips. A request for a call back was not answered.

Through such reviews, the facility meets standard requirements.

115.234	Specialized training: Investigations
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ 2. One Certificate of Completion PREA Investigation Training 3. One National Institute of Corrections Certificates of Completion <p>Interviews:</p> <ol style="list-style-type: none"> 1. Intensive Residential Treatment Supervisor / Investigator <p>The interview with the Investigator demonstrated he had completed a two-day specialized investigator training through the Colorado Department of Corrections.</p> <p>On Site Observation:</p> <p>During the pre-audit phase training certificates for the Intensive Residential Treatment Supervisor and the Program Director, the two facility investigators, were uploaded to the online audit system. The training spreadsheet provided by the PREA Coordinator, also uploaded to the online audit system, demonstrated each had completed required training as is required in §115.231.</p> <p>(a) The Advantage Treatment Centers Alamosa PAQ states agency policy requires that investigators are trained in conducting sexual abuse investigations in confinement settings.</p> <p>The facility provided one National Institute of Corrections PREA Investigating Sexual Abuse in a Confinement Setting certificates, dated 12.13.202.</p> <p>The facility provided a Certificate of Completion 8 hour PREA Training dated 6.28.2017.</p> <p>(b) Specialized training shall include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence</p>

	<p>collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. Trainings are conducted through the National Institutions of Corrections website.</p> <p>(b) The Advantage Treatment Centers Alamosa PAQ states the agency maintains documentation showing that investigators have completed the required training. Documentation is maintained by the PREA Coordinator. The number of investigators currently employed who have completed the required training is two.</p> <p>Through such reviews the facility meets standard requirements.</p>
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115.235	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ 2. Revised Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Program Director / PREA Compliance Manager 2. PREA Coordinator <p>Interviews with the Program Director / PREA Compliance Manager and the PREA Coordinator demonstrated the facility does not have staff who provide medical or mental health services.</p> <p>(a) The Advantage Treatment Centers Alamosa PAQ states the agency has a policy related to the training of medical and mental health practitioners who work regularly in its facilities. The number of all medical and mental health care practitioners who work regularly at this facility and have received the training required by agency policy is zero.</p>

Revised Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 5-6, section A. a-c, state, "ATC will make sure to have full- and part-time medical and mental health care practitioners, volunteers and contractors who work regularly in its facilities trained in PREA standards and policies. Such specialized staff, volunteers and contractors will participate in the staff training as well as a specialized training designed specifically for medical and/or mental health practitioners who are credentialed and working clinically with clients within the residential facility. Such training will include:

- a. How to detect and assess signs of sexual abuse and sexual harassment
 - b. How to preserve physical evidence of sexual abuse
 - c. How to respond effectively and professionally to victims of sexual abuse and sexual harassment; and (4) How and to whom to report allegations or suspicions of sexual abuse and sexual harassment.
1. ATC staff will never conduct forensic medical examinations and such medical requirements will be referred to our local community partners."

The facility provided a PowerPoint PREA Training for Mental Health Professionals. The training modules include:

1. Detecting and Assessing Signs of Sexual Abuse and Harassment
2. Identify the dynamics and profile of sexual abuse while incarcerated and how it is defined in the Prison Rape Elimination Act
3. State, Federal, and agencies guidelines for reporting
4. Detect signs and symptoms of both acute and prior sexual abuse
5. Summarize the short and long term effects of trauma on the brain
6. Describe considerations for the development of intake screening tool requirement in PREA

(b) The Advantage Treatment Centers Alamosa PAQ states the agency has no medical staff at this facility.

(c) The Advantage Treatment Centers Alamosa PAQ states the agency maintains documentation showing that mental health practitioners have completed the required training, if applicable.

	<p>(d) This provision is not applicable as the facility does not employ medical or mental health staff.</p> <p>Through such reviews the facility meets the standard requirements.</p>
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115.241	Screening for risk of victimization and abusiveness
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ 2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022 3. Colorado Division of Criminal Justice - Office of Community Confinement Screening for Risk of Sexual Victim Vulnerability/Abusiveness, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random Clients 2. Targeted Clients 3. Client Manager Team Lead <p>Interviews with random and targeted clients demonstrated risk screening questions had been asked several times during the intake process, with their Case Managers and again by their therapist. However, clients remembered answering questions on a worksheet during the intake process.</p> <p>Interviews with the Client Manager Team Lead demonstrated that risk assessments are completed within the first hour of intake. The Client Manager Team Lead stated risk assessments are completed in a one on one setting in the intake room. The Client Manager Team Lead stated he explains to the clients he is asking risk screening questions to keep them safe in the program as well as explains every question he reads to clients as they complete the questions on the worksheet provided. The Client Manager Team Lead stated he reviews any collateral he may have, observes clients for anxiety if they are confused and medications they may take when completing the risk assessment</p>

Site Observation:

Through utilization of the PREA Community Confinement Documentation Review Resident File / Records Review template, 14 of 15 offender risk screenings were completed within the 72-hour time frame and 14 of 15 offender reassessment were completed within the 30-day requirement. Review of risk screening forms demonstrated some forms were misdated and or not completed in full.

Recommendation:

Facility staff to read risk screening questions to clients to ensure each comprehends information they are reading and risk screening forms are completed, accurately. Staff were retrained post audit to read risk screening questions to Clients.

(a) The Advantage Treatment Centers Alamosa PAQ states the agency has a policy that requires screening (upon admission to a facility or transfer to another facility) for risk of sexual abuse victimization or sexual abusiveness toward other residents.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 5, section D. a. i., states, "Each facility will complete an initial assessment interview within 72 hours and then again in 30 days (DOC/DIV) to review if a client is at risk or there is a history of sexual victimization or sexually aggressive behavior to assist in housing, work and program assignments."

(b) The Advantage Treatment Centers Alamosa PAQ states the agency policy requires that residents be screened for risk of sexual victimization or risk of sexually abusing other residents within 72 hours of their intake. The number of residents entering the facility (either through intake or transfer) within the past 12 months (whose length of stay in the facility was for 72 hours or more) who were screened for risk of sexual victimization or risk of sexually abusing other residents within 72 hours of their entry into the facility was 387.

Policy compliance can be found in provision (a) of this standard.

(c-e) The Advantage Treatment Centers Alamosa PAQ states the risk assessment is conducted using an objective screening instrument.

- Victim/Vulnerability Factors
- Victim Vulnerability
 - o Non victim; known victim, possible victim
- Aggressive/Abusiveness Factors
- Aggressive/Abusiveness
 - o Non victim; known victim, possible victim
- Risk factor information forwarded to staff responsible for room, work, education and programming assignments.
- Name
- Age
- Physical stature
- Mental or developmental disability
- Physical disability
- First incarceration
- History of sex offense convictions – against an adult or child
- Lesbian/Gay/Bi-sexual/Transgender/Gender non-conforming or Intersex
- History of sexual victimization – consider juvenile and adult experiences
- Offender’s perception of vulnerability
- History of institutional violence or sexual abuse
- Gang affiliation
- Other factors not addressed that may influence risk

(e) The Advantage Treatment Centers Alamosa PAQ states the policy requires that the facility reassess each resident’s risk of victimization or abusiveness within a set time period, not to exceed 30 days after the resident’s arrival at the facility, based upon any additional, relevant information received by the facility since the intake screening. The number of residents entering the facility (either through intake or transfer) within the past 12 months whose length of stay in the facility was for 30 days or more who were reassessed for their risk of sexual victimization or of being sexually abusive within 30 days after their arrival at the facility based upon any

additional, relevant information received since intake was 266.

Policy compliance can be found in provision (a) of this standard.

(f) The Advantage Treatment Centers Alamosa PAQ states the policy requires that a resident's risk level be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the resident's risk of sexual victimization or abusiveness.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 5, section D. a. i. A), states, "The client's risk level shall be reassessed in the following conditions: by referral, by request, an incident of sexual abuse, or receipt of additional information that bears on the resident's risk of sexual victimization or abusiveness."

(g) The Advantage Treatment Centers Alamosa PAQ states the policy prohibits disciplining residents for refusing to answer (or for not disclosing complete information related to) the questions regarding: (a) whether or not the resident has a mental, physical, or developmental disability; (b) whether or not the resident is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender non-conforming; (c) Whether or not the resident has previously experienced sexual victimization; and (d) the resident's own perception of vulnerability.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 5, section D. a. i. D), states, "Clients will not be disciplined for refusing to answer, or for not disclosing complete information in response to questions asked about being a known and/or potential sexual aggressor or victim."

(h) During the pre-audit phase the PREA Coordinator stated all screening forms are kept in the client individual file and files are maintained in a locked cabinet, behind a locked door, when not in use.

Through such reviews, the facility meets standard requirements.

Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

1. Advantage Treatment Centers Alamosa PAQ
2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022
3. Colorado Community Corrections PREA Staff Training PowerPoint, not dated

Interviews:

1. Targeted Clients
2. Client Manager Team Lead
3. Program Director / PREA Compliance Manager
4. PREA Coordinator

Targeted clients of three bisexual and one transgender believed they were housed appropriately and stated their roommates were “a good bunch of girls” and “don’t give me a hard time at this point.”

Interviews with administrative staff demonstrated resident risk assessment information is only shared with the Program Director, Case Management staff, Team Lead, Community Corrections Coordinator, Intensive Residential Treatment Coordinator and Outpatient Coordinator.

Site Observation:

Review of classification protocols and offender placement dedicated rooms demonstrated thought and consideration is placed on offenders who could be considered victims and or aggressors in order to ensure sexual safety throughout the facility. Review of risk assessments demonstrated staff circle LGBTQI as opposed to a designated sexual identification.

Recommendation:

Facility staff to circle the sexual identity designation for each client to ensure each are housed appropriately, especially if a transgender client is admitted. Staff were

retrained post audit to circle the designation of Client sexual identity. Moving forward, the Program Director will document categories in the 12-month average target key performance indicator.

(a) The Advantage Treatment Centers Alamosa PAQ states the agency/facility uses information from the risk screening required by §115.241 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 4, section iv., A), a-c, state, "ATC will make individualized determinations about how to ensure the safety of each resident.

A. Transgender and intersex residents may have special housing needs, where facility capacity can accommodate them. Housing may be determined using the following criteria:

a. Seriously consider the clients own ideas and concerns regarding housing placement.

b. Review facility capacity and accommodations with consideration of safety and security concerns.

c. Work with client to make the most appropriate placement to enhance their safety and security."

During the pre-audit phase the facility did not have a sound system in place to ensure the risk assessment was utilized to inform housing, bed, work, education and program assignments. Three weeks before the onsite review the facility implemented the following:

"Case managers will complete PREA assessment and enter info into room assignment into our electronic system (ETRAC). CM will make sure client's placement is compliant with PREA and move client if needed. Bunk assessments will be reviewed by program director monthly. During clients stay in the program any and all bunk movements will be done with PREA scores in mind. CM's will be completed PREA assessment per policy and double check bunk placement is compliant with PREA policy not assigning known victims and known abusers next in the same bunk."

(b) The Advantage Treatment Centers Alamosa PAQ states the agency/facility makes individualized determinations about how to ensure the safety of each resident. During the pre-audit phase, the PREA Coordinator stated the following: “yes, we would accommodate when necessary and appropriate for the individual needs of a client to ensure client safety non-residential status and even file for early termination so phase progression is a big motivator.”

(c) The Advantage Treatment Centers Alamosa PAQ states the agency/facility makes housing and program assignments for transgender or intersex residents in the facility on a case-by-case basis.

Colorado Community Corrections PREA Staff Training PowerPoint, slide 70, first bullet, states “Transgender and intersex residents may have special housing needs, where facility capacity can accommodate them.”

(d) Colorado Community Corrections PREA Staff Training PowerPoint, slide 70, second bullet, states, “Seriously consider the clients own ideas and concerns regarding housing placement.”

(e) Colorado Community Corrections PREA Staff Training PowerPoint, slide 70, third and fourth bullets, state,

- Review facility capacity and accommodations with consideration of safety and security concerns.
- Work with client to make the most appropriate placement to enhance their safety and security.”

(f) During the pre-audit phase of the audit, the PREA Coordinator stated the following: The layout of our building prevents us from being able to segregate clients. We would never segregate protected populations nor have the capacity to do so.”

Through such reviews, the facility meets standard requirements.

115.251	Resident reporting
	Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

1. Advantage Treatment Centers Alamosa PAQ
2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022
3. Alamosa Intake Packet, not dated
4. Colorado Community Corrections PREA PowerPoint Staff Training, not dated
5. ATC Employee Handbook, dated 12.29.2022
6. Post Audit: IRT Client PREA Hotline Instructions, not dated
7. Post Audit: ATC Training Rosters for Hotline IRT Females and Hotline IRT Males
8. Post Audit: IRT Client Asking to Call Hotline Instruction
9. Post Audit: ATC Staff Training Roster, dated 6.19.2023 - 6.21.2023

Interviews:

1. Random Clients
2. Targeted Clients
3. Client Manager Security Staff / Intake

Interviews with clients demonstrated each would call the number on the posters, go to the office and report to staff, fill out a grievance, write a letter or a kite, talk with Case Managers or anyone of authority.

Interviews with staff demonstrated each would accept reports verbally, written reports with or without a client name and or through a third party. Each of the Client Managers Security staff could provide intake education to intakes and one interviewed stated he explains zero tolerance for PREA, what to do if they suspected PREA and encourages each to report to staff or the hotline numbers. The security staff stated clients are given a tour and during the tour he points out the Speak Up and End the Silence postings with hotline numbers. The security staff stated every intake is provided education through the PREA education sheet in their intake packet and by viewing the PREA video within the first hour of intake.

Site Observations:

Large Speak Up and End the Silence posters with hotline phone numbers were observed throughout each building in the facility. Upon testing the client hall phone it was discovered the hotline numbers were not programmed and long distance calls could not be made from client phones.

Action Plan:

- Educate clients on access to emergency phone use for hotline calls.
- Provide training rosters to demonstrate client participation in the training.
- Upload training rosters to the OAS supplemental files

Post audit the facility provided the following instruction for IRT Clients to contact the PREA hotline. “

As an IRT client, if you feel you need to anonymously report PREA vs. talking directly to staff or you are in need of support from a known hotline the following is a procedure you may follow. At the security window you will let staff know you need to contact a hotline. Staff will bring you into the intake room in security and discreetly ask what hotline you want to call as well as if you have the number. Staff will dial the number and hand you the phone. They will close the door but observe you through the window. When you are finished they will retrieve the phone, and ask if you need immediate assistance or need to talk. Staff will also ensure that no other numbers were dialed. If other numbers were dialed, you will be given a write up.”

Post audit the facility provided ATC Training Rosters for Hotline IRT Females and Hotline IRT Males.

Post audit the facility provided the following IRT Client Asking to Call Hotline instruction. If an IRT client comes to the window and states they need to call the hotline, bring them into the intake room, discreetly ask them what hotline they need to call and if they have the number. Staff will dial number on cell phone hand to client and close door. Staff will monitor client through window and when call is ended retrieve phone. Ask client if they are ok, if they need assistance. If they are calling suicide hotline, ask if they need to talk to someone locally immediately. If not and they appear stable resume normal activity but let them know if they need to talk please come up and talk. Check phone to make sure they did not place other calls.”

Post audit the facility provided an ATC Staff Training roster demonstrating

appropriate staff have been trained on PREA screening too, Hotline Access IRT Clients, Interpreter Services.

(a) The Advantage Treatment Centers Alamosa PAQ states the agency has established procedures allowing for multiple internal ways for residents to report privately to agency officials about: (a) sexual abuse or sexual harassment; (b) retaliation by other residents or staff for reporting sexual abuse and sexual harassment; and (c) staff neglect or violation of responsibilities that may have contributed to such incidents.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 6, section b. i., states, "The facility shall establish a method to receive third-party reports of sexual abuse and sexual harassment and shall distribute or post publicly information on how to report sexual abuse and sexual harassment on behalf of a client. These methods are to be used in cases of allegations of sexual abuse, sexual harassment and retaliation and not the formal grievance process.

a. For DOC clients: PREA reporting @ 1-855-855-0611

b. All clients: Send a letter to the DOC PREA Manager, DCJ Director or contact the local Community Corrections Board.

How to report posters include information notifications for reporting to staff, parole officers, contacting the director, calling the Colorado Department of Corrections, writing the PREA Coordinator and reporting to the police. Contact phone and addresses are present.

The facility provided an Alamosa Intake Packet. Pages 13-14 include the following information.

If you are a victim of sexual assault, sexual misconduct, sexual harassment or staff sexual misconduct, you can report it in one of the following ways:

If you are a victim of sexual assault, sexual misconduct, sexual harassment or staff sexual misconduct, you can report it in one of the following ways:

- Notify a staff member in person, by phone, or in writing.
- Tell your case manager or community Parole Officer
- Contact the Program Director 719-589-7511
- Call the Colorado Department of Corrections (CDOC) PREA report line

at:1-855-855-0611

- Contact the CDOC PREA Coordinator at 2862 South Circle Drive, Colorado Springs, CO 80906
- Contact Local Community Corrections Board.
- Contact Probation Liaison Amanda Spangler 719-589-7671
- 3rd Party/Confidential report contact Victim Advocate: Chelsea Alderton 719-589-3691
- Report the incident directly to the police

If you are in need of emotional support services as a result of a sexual assault you may contact Tu Casa at the 24-hour hotline 719-589-2465, you may visit them personally at 202 Carson Ave, Alamosa, CO 81101, or you can mail them at P.O. Box 437 Alamosa CO 81101. The National Sexual Assault Hotline may be reached toll free at 1-800-656-HOPE (4673).

(b) The Advantage Treatment Centers Alamosa PAQ states the agency provides at least one way for residents to report abuse or harassment to a public or private entity or office that is not part of the agency.

Compliance can be found in provision (a) of this standard.

(c) The Advantage Treatment Centers Alamosa PAQ states the agency has a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 9, section G. a., ii., states, "If staff receives any information, regardless of its source, concerning any suspected prohibited sexual behavior, observes an incident of prohibited sexual behavior, or has suspicion or knowledge of retaliation against clients or staff for reporting an incident, staff is required to immediately report the incident to his/her supervisor."

Page 9, section G. a. ii., B), states, "The reporting staff will be asked to complete a detailed incident report."

Page 10, section G. a. iv., states, "All staff will report immediately and according to agency policy any knowledge, suspicion, or information regarding staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

The facility provided a Colorado Community Corrections PREA PowerPoint Staff Training. Slide 57, states, "Staff shall accept reports made verbally, in writing, anonymously, and from third parties and shall promptly document any verbal reports."

(d) The Advantage Treatment Centers Alamosa PAQ states the agency has established procedures for staff to privately report sexual abuse and sexual harassment of residents.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 9, section G. a., vi., states, "Staff Reporting Options

A) Call the Advantage Treatment Center Program Director or PREA Coordinator

B) Methods for staff to privately report sexual abuse and sexual harassment of residents:

a. For DOC clients: PREA reporting @ 1-855-855-0611

b. Call the PREA Staff line @ 719-226-4621.

c. All clients: Send a letter to the DOC PREA Manager, DCJ Director, or Contact the local Community Corrections Board.

The facility provided a Colorado Community Corrections PREA PowerPoint Staff Training. Slide 58, mirrors instruction for staff confidential options for reporting as is stated in provision (d) of this standard.

The facility provided an ATC Employee Handbook. Section 2.4a, fourth paragraph states, "Advantage Treatment Centers, Inc imposes upon its employees, volunteers, and contractors a continuing affirmative duty to disclose of any such misconduct. Reports may be made to the Program Director, Kristie Garcia the Advantage Treatment Centers, Inc PREA Coordinator, at 970-571-3983, or the Staff tip line at 719-226-4621."

Through such reviews, the facility meets standard requirements.

115.252	Exhaustion of administrative remedies
	<p data-bbox="280 188 983 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 266 564 300">Auditor Discussion</p> <p data-bbox="280 344 544 378">Document Review:</p> <ol data-bbox="280 412 1406 562" style="list-style-type: none"> <li data-bbox="280 412 970 445">1. Advantage Treatment Centers Alamosa PAQ <li data-bbox="280 483 1406 562">2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022 <p data-bbox="280 674 437 707">Interviews:</p> <ol data-bbox="280 741 1002 987" style="list-style-type: none"> <li data-bbox="280 741 576 775">1. Random Clients <li data-bbox="280 813 580 846">2. Targeted Clients <li data-bbox="280 884 1002 918">3. Program Director / PREA Compliance Manager <li data-bbox="280 956 603 990">4. PREA Coordinator <p data-bbox="280 1028 1477 1144">Residents interviewed were aware of the grievance procedures and understood they could complete a grievance. Although residents were aware of grievance procedures, none interviewed stated this process as one they had utilized.</p> <p data-bbox="280 1330 1437 1447">Interviews with the Program Director and the PREA Coordinator demonstrated the agency as a whole will immediately begin an investigation upon receipt of a grievance pertaining to PREA.</p> <p data-bbox="280 1559 528 1592">Site Observation:</p> <p data-bbox="280 1626 1477 1742">Grievance forms and boxes were placed near the staff station, at the entry of the residential building. In the last 12 months there were zero grievances files for sexual harassment or sexual abuse.</p> <p data-bbox="280 1854 1437 1971">(a) The Advantage Treatment Centers Alamosa PAQ states the agency does not have an administrative procedure for dealing with resident grievances regarding sexual abuse. The agency's grievance policy is as follows:</p>

	<p>Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 5, section D. a. i. D. b., states, "In the event that a client feels as though they have a complaint about a program issue, how they were treated, or the outcome of an incident report, they may file a Grievance or an Incident Report Appeal/ Explanation Form with the program following the guidelines outlined in their handbook."</p> <p>Through such reviews, the facility meets standard requirements.</p>
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115.253	Resident access to outside confidential support services
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ 2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022 3. Alamosa Intake Packet, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random Clients 2. Targeted Clients 3. Program Director / PREA Compliance Manager 4. PREA Coordinator <p>Due to the facility being in-between advocate providers, clients were not asked if they were aware of advocacy services.</p> <p>The interview with the Program Director demonstrated he was having current conversations with the Chief of Police attempting to renew the current memorandum of understanding for advocate services.</p> <p>The interview with the PREA Coordinator demonstrated the agency facilities in the</p>

area are able to utilize Tu Casa advocacy services; however, Tu Casa did not want to enter into an agreement for emotional support services.

Site Observation:

During the facility tour, postings of outside victim advocate information was not observed; however, the agency relies on their website where third-party reporting is available.

(a) The Advantage Treatment Centers Alamosa PAQ states the facility provides residents with access to outside victim advocates for emotional support services related to sexual abuse. The facility provides residents with access to such services by giving residents mailing addresses and telephone numbers (including toll-free hotline numbers where available) for local, state, or national victim advocacy or rape crisis organizations. The facility provides residents with access to such services by enabling reasonable communication between residents and these organizations in as confidential a manner as possible.

The facility provided a Client Intake Packet. Page 13 of the Intake Packet provides clients with instruction to report through the following options:

If you are a victim of sexual assault, sexual misconduct, sexual harassment or staff sexual misconduct, you can report it in one of the following ways:

- Notify a staff member in person, by phone, or in writing.
- Tell your case manager or community Parole Officer
- Contact the Program Director 719-589-7511
- Call the Colorado Department of Corrections (CDOC) PREA report line at:1-855-855-0611
- Contact the CDOC PREA Coordinator at 2862 South Circle Drive, Colorado Springs, CO 80906
- Contact Local Community Corrections Board.
- Contact Probation Liaison Amanda Spangler 719-589-7671
- 3rd Party/Confidential report contact Victim Advocate: Chelsea Alderton 719-589-3691
- Report the incident directly to the police

If you are in need of emotional support services as a result of a sexual assault you may contact Tu Casa at the 24-hour hotline 719-589-2465, you may visit them personally at 202 Carson Ave, Alamosa, CO 81101, or you can mail them at P.O. Box 437 Alamosa CO 81101. The National Sexual Assault Hotline may be reached toll free at 1-800-656-HOPE (4673).

(b) The Advantage Treatment Centers Alamosa PAQ states the facility informs residents, prior to giving them access to outside support services, of the extent to which such communications will be monitored. The PREA Coordinator states, the agency does not monitor any communications on payphones, client personal cell phones or passes in the facility.

(c) The Advantage Treatment Centers Alamosa PAQ states the agency or facility maintains memorandum of understanding (MOUs) or other agreements with community service providers that are able to provide residents with emotional support services related to sexual abuse. Compliance can be found in provision (a) of this standard.

Through such reviews, the facility meets standard requirements.

115.254	Third party reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ 2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random Clients 2. Targeted Clients 3. Client Managers Security Staff

4. Program Director / PREA Compliance Manager

Interviews with clients demonstrated many were not aware of third party reporting options.

Interviews with staff demonstrated each would accept any type of report regarding allegations received through a third party.

Site Observation:

During the facility tour, posting of agency third party information included names of staff members who no longer worked at the facility.

Recommendation:

Update third party reporting postings in visiting area with current third-party information. The facility revised third party information and provided postings in the supplemental files of the online audit system.

(a) The Advantage Treatment Centers Alamosa PAQ states the agency or facility provides a method to receive third-party reports of resident sexual abuse or sexual harassment. The agency or facility publicly distributes information on how to report resident sexual abuse or sexual harassment on behalf of residents.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 6, b. i., states, "The facility shall establish a method to receive third-party reports of sexual abuse and sexual harassment and shall distribute or post publicly information on how to report sexual abuse and sexual harassment on behalf of a client. These methods are to be used in cases of allegations of sexual abuse, sexual harassment and retaliation and not the formal grievance process.

A. For DOC clients: PREA reporting @ 1-855-855-0611

B. All clients: Send a letter to the DOC PREA Manager, DCJ Director or contact the local Community Corrections Board.

Third party reporting is available at <https://www.atctreatmentcenters.com/>. Once on the website there is a PREA option at the top of the page. Once PREA is selected the user is taken to a page that speaks to the agency policy on the Prison Rape Elimination Act. In the middle of the page, there is information for fellow residents,

family members, attorneys, medical personal, or outside advocates being encouraged to report any suspicion or allegations as well through any of the following avenues.

- Direct verbal or written report to any ATC staff member, contractor/vendor, or ATC volunteer
- Contacting local law enforcement
- U.S. Mail, kite, note, or any other written method
- Calling the ATC PREA Coordinator, Kristie Garcia, at 970-571-3983
- Emailing the ATC PREA Coordinator, Kristie Garcia, at kristie.garcia@advantage-tx.com
- Emailing the VP of Operations, Josh Mayhugh, at josh.mayhugh@advantage-tx.com

On 5.24.2023 at 9:07 pm a third-party request was emailed to kristie.garcia@advantage-tx.com. On 5.25.2023 at 7:19 am a response was received, which states, "If this was a third party report done through email, more than likely i would have their name or at a minimum their contact information (email address), so i would be able to try make an attempt to follow up with them and capture any missing information: dates, times, places, etc. as well as get their consent to pass on their contact info to the site investigator or verify if they are wanting to stay anonymous. I would also let them know that we will get the site investigator starting an investigation and that I would oversee the process as the coordinator. I would let them know they can contact me with any questions or if more details come to mind they want to share.

I would contact the site's investigator, in the case of Alamosa I would call Antonio and we would discuss what he needs to do to follow up. The site investigators keep me apprised of progress and gets me a report at the conclusion of the investigation. If there are questions or critical things that come out of the investigation they will contact me with updates. If it's criminal, site investigators would be advised to contact law enforcement. We separate the investigators duties from the coordinators duties to make sure that the coordinator is making an unbiased and impartial decision. I try to stay as neutral as possible. I give advice, suggestions and directives to the investigators in accordance with the standards. We have to notify DCJ (state oversight agency) within 24 hours so I always write a notification email. Often, I will also call the rep at DCJ who handles PREA and see if he feels that my findings make sense and follow the standards. DCJ wants a report in the next 48 hours so even if we are still investigating I try to send them either an updated email

	<p>or a preliminary report. As part of that notification I attach the community corrections board (we are required to notify them of PREA complaints) and the site forwards the report to their referring agency (parole, probation, etc.). I track the critical events in a spreadsheet and keep records of all reports. I'll send a follow up form to the site if it's an unsubstantiated or founded claim to make sure we are following up with the client for emotional support services, check ins, and monitoring for retaliation. I would make sure to wrap around to the reporting party and give them as much information as I'm allowed to on the outcome of the investigation.”</p> <p>Through such reviews, the facility meets standard requirements.</p>
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115.261	Staff and agency reporting duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ 2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random Clients 2. Targeted Clients 3. Client Managers Security Staff 4. Program Director / PREA Compliance Manager 5. PREA Coordinator <p>Interviews with the all staff and clients demonstrated each actively practices and understood the importance of immediately reporting all allegations of sexual abuse and sexual harassment. None of the clients interviewed stated they had not made a report of sexual harassment or sexual abuse.</p>

On Site Observation:

The facility has had two sexual harassment allegations in the past 12 months. Both investigations demonstrate investigations began the day allegations were received and completed within three days the investigation began.

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

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 10, section iv., states, "All staff will report immediately and according to agency policy any knowledge, suspicion, or information regarding staff neglect or violation of responsibilities that may have contributed to an incident or retaliation."

(b) The Advantage Treatment Centers Alamosa PAQ states, apart from reporting to designated supervisors or officials and designated state or local services agencies, agency policy prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 9, section G. a. i., states, "Apart from reporting to designated supervisors or officials, staff shall not reveal any information related to a sexual abuse report to anyone, other than to the extent necessary to make treatment, investigation, and other security and management decisions."

(c) This provision is not applicable as the facility does not have medical or mental health staff.

(d) Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 10, section v., states, "If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, ATC

	<p>staff will report the allegation to the designated State or local services agency under applicable mandatory reporting laws.”</p> <p>(e) Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 7, section F. a., states, “Where sexual harassment is alleged, the facility shall investigate promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports. If the incident is determined to be founded by the PREA Coordinator, the incident will be passed on to local law enforcement.”</p> <p>Through such reviews, the facility meets standard requirements.</p>
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115.262	Agency protection duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ 2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Client Managers Security Staff 2. Program Director / PREA Compliance Manager 3. PREA Coordinator <p>Interviews with staff demonstrated knowledge of any type of allegation, regardless of how reported is taken seriously and immediately reported to supervisory staff and local law enforcement if appropriate. Staff clearly articulated separating, preserving and reporting for any allegation.</p> <p>(a) The Advantage Treatment Centers Alamosa PAQ states when the agency or facility learns that a resident is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the resident. In the past 12 months, the</p>

	<p>number of times the agency or facility determined that a resident was subject to a substantial risk of imminent sexual abuse was zero.</p> <p>Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 3, section C., b. i., “When staff learns that a client is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the client.”</p> <p>Through such reviews the facility meets standard requirements.</p>
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115.263	Reporting to other confinement facilities
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ 2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022 <p>Interviews:</p> <ol style="list-style-type: none"> 1. President <p>The interview with the President demonstrated that he was aware that upon receiving an allegation that a resident was sexually abused while confined at another facility, he had the responsibility to notify the head of the facility where the allegation occurred.</p> <p>(a-b) The Advantage Treatment Centers Alamosa PAQ states the agency has a policy requiring that, upon receiving an allegation that a resident was sexually abused while confined at another facility, the head of the facility must notify the head of the facility or appropriate office of the agency or facility where sexual abuse is alleged to have occurred. During the past 12 months, the number of allegations the facility received that a resident was abused while confined at another facility was zero.</p> <p>Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070,</p>

page 11, section F. a., states, "Upon receiving an allegation that a client was sexually abused while confined at another facility, the Program Director or designee of the facility that received the allegation shall notify the administrator of the facility or appropriate office of the facility where the alleged abuse occurred."

(c) The Advantage Treatment Centers Alamosa PAQ states the agency or facility documents that it has provided such notification within 72 hours of receiving the allegation.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 11, section F. b-c., states,

b. "Such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation."

c. The Program Director or designee shall document that he/she has provided such notification."

(d) The Advantage Treatment Centers Alamosa PAQ states the agency or facility policy requires that allegations received from other facilities and agencies are investigated in accordance with the PREA standards. In the past 12 months, the number of allegations of sexual abuse the facility received from other facilities was zero.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 11, section F. d., states, "If the Program Director or designee receives notification that a client under his/her supervision was sexually abused while confined at another facility, he/she shall ensure that the allegation is investigated in accordance with these policies."

Through such reviews, the facility meets the standard requirements.

115.264	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review:

1. Advantage Treatment Centers Alamosa PAQ
2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022
3. PREA Coordination Reports, dates not shown on this report to protect victims.

Interviews:

1. Client Managers Security Staff

Interviews with Client Managers Security staff demonstrated each were aware of their first responder responsibilities and spoke to preserving evidence in the area where the allegation may have occurred and the separation of victims and aggressors, ensuring neither changed clothes, smoked, ate, drank, or washed until law enforcement provided permission. Staff stated reporting information is carried with them on their PREA cards which are on the reverse side of their identification badges, also part of their uniform requirements.

(a) The Advantage Treatment Centers Alamosa PAQ states the agency has a first responder policy for allegations of sexual abuse. The policy requires that, upon learning of an allegation that a resident was sexually abused, the first security staff member to respond to the report shall be required to separate the alleged victim and abuser. The policy requires that, upon learning of an allegation that a resident was sexually abused, the first security staff member to respond to the report shall be required to preserve and protect any crime scene until appropriate steps can be taken to collect any evidence. The policy requires that, upon learning of an allegation that a resident was sexually abused and the abuse occurred within a time period that still allows for the collection of physical evidence, the first security staff member to respond to the report shall be 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. The policy requires that, upon learning of an allegation that a resident was sexually abused and the abuse occurred within a time period that still allows for the collection of physical evidence, the first security staff member to respond to the report shall be required to ensure that the alleged abuser not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.

In the past 12 months, zero allegations occurred where an inmate was sexually abused.

In the past 12 months, the number of allegations where staff were notified within a time period that still allowed for the collection of physical evidence was zero.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, pages 6-7, section E. a. i. A-F, states, "Staff First Responder Duties - Upon learning of an allegation that a client was sexually abused, the first staff member to respond to the report shall be required to:

- A) Separate and isolate both the victim and the alleged perpetrator until instructed otherwise by the Program Director.
- B) Immediately notify the Program Director and local law enforcement
- C) Instruct both the victim and the alleged perpetrator not to shower, wash, brush their teeth, use the restroom, change clothing or anything else that could potentially compromise evidence.
- D) Staff shall separate and isolate any and all witnesses to the alleged incident until instructed otherwise by the Program Director.
- E) Follow the crime scene management priorities of: personal safety, preserve life, prevent further hostilities, protect the scene, and preserve evidence.
- F) Cordon off the crime scene and keep a log of all people entering and their purpose. Staff shall be aware of and prevent common crime scene destruction factors by not stepping through blood, not touching weapons, not moving or touching evidence, and not allowing non-critical response personnel to enter the scene.

(b) The Advantage Treatment Centers Alamosa PAQ states the facility's' policy requires that if the first staff responder is not a security staff member, that responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and notify security staff. Of the allegations that a resident was sexually abused made in the past 12 months, the number of times a non-security staff member was the first responder was zero.

Through such reviews, the facility meets standard requirements.

115.265	Coordinated response
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Document Review:

1. Advantage Treatment Centers Alamosa PAQ
2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022
3. Advantage Treatment Centers, Inc., Coordination Plan, not dated

Interviews:

1. Client Managers Security Staff
2. Program Director / PREA Compliance Manager
3. PREA Coordinator

Interviews with the staff demonstrated the response to allegations of sexual assault is written in the flow chart and is to be followed in response to sexual abuse and sexual harassment incidents. Staff are aware of the flow of responding to incidents as directives are printed on the backside of their identification badges.

Site Observation:

Review of the Coordination Plan demonstrates clear direction to staff to ensure first responder duties are fulfilled.

(a) The Advantage Treatment Centers Alamosa PAQ states the facility has developed a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership.

The agency provided an Advantage Treatment Centers, Inc., Coordination Plan. The plan includes the following components:

1. Introduction of the Federal Prison Rape Elimination Act
2. PREA Federal Standards Referenced
3. Notification to entities
4. Definitions Related to Sexual Abuse
5. Investigations

	<ol style="list-style-type: none"> 6. Staff First Responder Duties 7. Criminal Investigator Duties 8. Victim Services – SANE 9. SAFE/SAFE and Victim Advocate requirements 10. Mental Health provider requirements 11. Review teams <p>Through such reviews, the facility meets standard requirements.</p>
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115.266	Preservation of ability to protect residents from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ <p>Interviews:</p> <ol style="list-style-type: none"> 1. PREA Coordinator <p>The PREA Coordinator stated the agency has not entered into collective bargaining agreements of any kind.</p> <p>(a) The Advantage Treatment Centers Alamosa PAQ states the agency, facility, or any other governmental entity is not responsible for collective bargaining on the agency’s behalf has not entered into or renewed any collective bargaining agreement or other agreement since August 20, 2012, or since the last PREA audit, whichever is later.</p> <p>Through such reviews, the facility meets standard requirements.</p>

115.267	Agency protection against retaliation
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Auditor Overall Determination: Meets Standard

Auditor Discussion

Document Review:

1. Advantage Treatment Centers Alamosa PAQ
2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022
3. PREA Follow Up/Monitoring Form, not dated

Interviews:

1. Intensive Residential Treatment Supervisor

Interviews with the Intensive Residential Treatment Supervisor demonstrated that he would begin retaliation monitoring upon receipt of an allegation of sexual abuse when he would introduce processes of monitoring to victims. The supervisor stated he would check in with the victim on a daily basis and would make judgement on if client could safely stay in the program or if a different location would be a better fit. The supervisor stated he would document retaliation monitoring upon the first 24, 48, and 72 hours of receiving the allegation and every 30, 60, and 90 days thereafter.

(a) The Advantage Treatment Centers Alamosa PAQ states the agency has a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff. The Program Director is the designated staff completing retaliation monitoring.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 12, section b. i., "The facility shall protect all clients and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other clients or staff. Staff is required to immediately report any suspicion or knowledge of retaliation or negligence of duties that result in retaliation."

(b) Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 12, section b. ii., states, "The facility shall implement protection measures, such as housing changes or transfers for client victims or abusers, removal of alleged staff or client abusers from contact with victims, and emotional

support services for clients or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations. “

(c) The Advantage Treatment Centers Alamosa PAQ states the facility monitors the conduct or treatment of Inmates or staff who reported sexual abuse and of inmates who were reported to have suffered sexual abuse to ascertain if there are any changes that may suggest possible retaliation by Inmates or staff. The facility will monitor conduct or treatment until the Inmate is discharged. The facility acts promptly to remedy any such retaliation. In the past 12 months, the facility has had zero incidents of retaliation.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 12, section b. iii., states, “For at least 90 days following a report of sexual abuse, staff shall monitor the conduct and treatment of clients or staff who reported the sexual abuse and of clients who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by clients or staff, and shall act promptly to remedy any such retaliation. Items staff should monitor include any client disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. The facility shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need.”

The facility provided a PREA Follow Up/Monitoring Form. This form is used for retaliation monitoring, includes directional steps for those utilizing this form and documents the following:

1. Step 1: Follow up with client/staff member on needs for emotional support services, medical services, HIV/STD testing, and pregnancy tests (if female) or EAP services if staff. – Summarize follow up meeting below. Date completed
2. Step 2: Notify client of the outcome of the investigation. Summarize the details of the notification below: Date completed
3. Step 3: Monitor client/staff member for retaliation from other clients or staff members (review CM meeting notes, whether there has been an increase in IR's, negative performance reviews, drastic change in appearance, request for a bed/room change, and change in behavior/emotions). Summarize efforts and actions taken below. Dates completed
4. Step 4: Complete a status check in meeting at a minimum of every 30 days for the next 90 days. Follow up with client on any issues or concerns. Pay attention to evidence or reports that they are being retaliated against. Detail Check in meeting and actions taken (if necessary) below. Dates completed

	<p>(d) In the case of residents, such monitoring does include periodic checks. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 12, section b. iv., states, “In the case of clients, such monitoring shall also include documented periodic status checks.”</p> <p>(e) In the case of residents, such monitoring does include periodic checks. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 13, section b. v., “If any other individual who cooperates with an investigation expresses a fear of retaliation, the facility shall take appropriate measures to protect that individual against retaliation.”</p> <p>Through such reviews, the facility meets standard requirements.</p>
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115.271	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ 2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Intensive Residential Treatment Supervisor / Investigator 2. Facility Director / PREA Compliance Manager / Investigator <p>The Facility Director and the Intensive Residential Treatment Supervisor are both investigators for the facility. Each will complete administrative investigations and the Alamosa Police Department completes all criminal investigations.</p> <p>Site Observation:</p> <p>Review of investigations by utilizing the PREA Audit – Community Confinement Documentation Review – Investigations template Two of two sexual harassment</p>

investigations reviewed had completed administrative investigations, both thorough, timely, objectively and in accordance with standard requirements.

(a) The Advantage Treatment Centers Alamosa PAQ states the agency/facility has a policy related to criminal and administrative agency investigations.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 7, section F. a., states, "Where sexual harassment is alleged, the facility shall investigate promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports. If the incident is determined to be founded by the PREA Coordinator, the incident will be passed on to local law enforcement."

(b) Policy compliance can be found in provision (a) of this standard.

(c) Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 7, section F. c., states, "For criminal investigations, local law enforcement investigators shall have the responsibility to gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator."

(d-e) Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 7, section F. d. i., states, "When the quality of evidence appears to support criminal prosecution, the assigned investigator shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.

i. Investigators shall assess the credibility of an alleged victim, suspect, or witness on an individual basis and shall not be determined by the person's status as client or staff. No investigator shall require a client who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation."

(d) Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 7-8, section F. d. ii. A, states, "Administrative investigations into allegations: Shall include an effort to determine whether staff actions or failures to act contributed to the abuse."

(e) Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 7-8, section F. d. ii. B, states, “Shall be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.”

(h) Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 8, section F. d. iv, states, “Substantiated allegations of conduct that appears to be criminal shall be referred for prosecution.” There have been one substantiated allegations of conduct that appear to be criminal that were referred for prosecution since the last audit. The PAQ states, “Law Enforcement refused to investigate or press charges (sexual harassment allegation.)”

(i) Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 8, section F. d. iii., states, “Criminal investigations shall be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible. “

(j) Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 8, section F. d. v., states, “The departure of the alleged perpetrator or victim from the employment or control of the facility shall not provide a basis for terminating an investigation.”

(l) Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 8, section F. d. vi., states, “When a law enforcement agency investigates sexual abuse, the facility shall cooperate with outside investigators and shall endeavor to remain informed about the progress of the investigation.”

Through such reviews, the facility meets standard requirements.

115.272	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review:

	<p>1. Advantage Treatment Centers Alamosa PAQ</p> <p>2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022</p> <p>Interviews:</p> <p>1. Intensive Residential Treatment Supervisor / Investigator</p> <p>Interviews with the Intensive Residential Treatment Supervisor demonstrated he would apply a preponderance of evidence when deciding the outcome for investigation.</p> <p>Site Observation:</p> <p>The facility has had two substantiated sexual harassment investigations in the past 12 months.</p> <p>(a) The Advantage Treatment Centers Alamosa PAQ Bureau states the agency imposes a standard of a preponderance of the evidence or a lower standard of proof for determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 8, section e. i., states, "The facility shall impose no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated."</p> <p>Through such reviews, the facility meets standard requirements.</p>
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115.273	Reporting to residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <p>1. Advantage Treatment Centers Alamosa PAQ</p>

2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022

Interviews:

1. Intensive Residential Treatment Supervisor
2. PREA Coordinator

Interviews with the Intensive Residential Treatment Supervisor and the PREA Coordinator demonstrated either would report sexual abuse investigations to victims and document the report electronically in the investigation narrative.

Site Observation:

The facility has not had an allegation of sexual abuse in the past 12 months.

(a) The Advantage Treatment Centers Alamosa PAQ states the agency has a policy requiring that any resident who makes an allegation that he or she suffered sexual abuse in an agency facility is informed, verbally or in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation by the agency. The number of criminal and/or administrative investigations of alleged resident sexual abuse that were completed by the agency/facility in the past 12 months was zero.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 11, section ix. A., states,

A. "Following an investigation into a client's allegation of sexual abuse suffered in a facility, the Program Director or designee shall inform the client as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.

B. If the facility did not conduct the investigation, the Program Director or designee shall request the relevant information from the investigative facility in order to inform the client.

C. Following a client's allegation that a staff member has committed sexual abuse against the client, the Program Director or designee shall subsequently inform the client (unless the facility has determined that the allegation is unfounded) whenever:

- a. The staff member is no longer employed at the facility;
- b. The facility learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or
- c. The facility learns that the staff member has been convicted on a charge related to sexual abuse within the facility.
- d. Following a client's allegation that they have been sexually abused by another client, the Program Director or designee shall subsequently inform the alleged victim whenever:
- e. The facility learns that the alleged perpetrator has been indicted on a charge related to sexual abuse within the facility; or
- f. The facility learns that the alleged perpetrator has been convicted on a charge related to sexual abuse within the facility.
- g. All such notifications or attempted notifications shall be documented."

The facility provided two PREA Coordinator Reports summarizing the allegations, providing information on the incident, status of the investigation, outcome of the investigation. Retaliation was not completed as one investigation was unfounded and the client exited the program due to feeling unsafe.

(b) The Advantage Treatment Centers Alamosa PAQ states an outside entity conducts such investigations, the agency requests the relevant information from the investigative entity in order to inform the resident of the outcome of the investigation. The number of investigations of alleged resident sexual abuse in the facility that were completed by an outside agency in the past 12 months was zero.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 11, section ix. B., states, "If an outside entity conducts such investigations, the agency requests the relevant information from the investigative entity in order to inform the resident of the outcome of the investigation."

(c) The Advantage Treatment Centers Alamosa PAQ states following a resident's allegation that a staff member has committed sexual abuse against the resident, the agency/facility subsequently informs the resident (unless the agency has determined that the allegation is unfounded) whenever: (a) the staff member is no longer posted within the resident's unit; (b) the staff member is no longer employed at the facility; (c) the agency learns that the staff member has been indicted on a

charge related to sexual abuse within the facility; or (d) the agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility. There have been zero substantiated and unsubstantiated complaints in the past 12 months.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 11, section ix. C. a-e, states, "Following a client's allegation that a staff member has committed sexual abuse against the client, the Program Director or designee shall subsequently inform the client (unless the facility has determined that the allegation is unfounded) whenever:

- a. The staff member is no longer employed at the facility;
- b. The facility learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or
- c. The facility learns that the staff member has been convicted on a charge related to sexual abuse within the facility.
- d. Following a client's allegation that they have been sexually abused by another client, the Program Director or designee shall subsequently inform the alleged victim whenever:
 - e. The facility learns that the alleged perpetrator has been indicted on a charge related to sexual abuse within the facility; or
 - f. The facility learns that the alleged perpetrator has been convicted on a charge related to sexual abuse within the facility.
 - g. All such notifications or attempted notifications shall be documented."

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

Policy compliance can be found in provision (c) of this standard.

(e) The Advantage Treatment Centers Alamosa PAQ states the agency has a policy that all notifications to residents described under this standard are documented. In the past 12 months, there has been zero notifications to an inmate, pursuant to this

	<p>standard.</p> <p>Through such reviews, the facility meets the standards requirements.</p>
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115.276	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ 2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Program Director / PREA Compliance Manager <p>Interviews with the Program Director demonstrated the facility has had zero staff who have been disciplined for violation of an agency sexual abuse or sexual harassment policy in the past 12 months.</p> <p>(a) The Advantage Treatment Centers Alamosa PAQ states staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.</p> <p>Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 14, section a., states, "Staff including interns, volunteers or contractors shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse."</p> <p>(b) The Advantage Treatment Centers Alamosa PAQ states in the last 12 months, there has been one staff from the facility that had violated agency sexual abuse or sexual harassment policies.</p> <p>In the past 12 months, the number of staff from the facility who have been</p>

terminated (or resigned prior to termination) for violating agency sexual abuse or sexual harassment policies is zero.

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

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 14, section a. i., states, "Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) will be based on 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."

(d) The Advantage Treatment Centers Alamosa PAQ states all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies. In the past 12 months, zero staff have been terminated for sexual abuse or harassment.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 14, section a. iv., states, "All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff (or any contractor or volunteer) 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."

Through such reviews, the facility meets standard requirements.

115.277	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Document Review:

1. Advantage Treatment Centers Alamosa PAQ
2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022

Interviews:

1. Program Director / PREA Compliance Manager

The Program Director reported the facility did not have any volunteers or contractors subject to disciplinary action due to violating sexual abuse or sexual harassment policies in the past 12 months.

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

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 14, section a. i., states, "Staff including interns, volunteers or contractors shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.

i. Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) will be based on 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."

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 14, section a. iii., states, "The facility shall take appropriate remedial measures, and shall consider whether to prohibit further contact with residents, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer."

	<p>Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 14, section a. iv., states, "All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff (or any contractor or volunteer) 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."</p> <p>(b) The Advantage Treatment Centers Alamosa PAQ the facility takes appropriate remedial measures and considers whether to prohibit further contact with Inmates in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.</p> <p>Policy compliance can be found in provision (a) of this standard.</p> <p>Through such reviews, the facility meets standard requirements.</p>
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115.278	Disciplinary sanctions for residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ 2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Program Director / PREA Compliance Manager <p>The interview with the Program Director demonstrated residents who falsely reported PREA allegations would typically be moved to another dorm or removed from the facility, depending on the severity and outcome of the allegation.</p> <p>(a-b) The Advantage Treatment Centers Alamosa PAQ states residents are subject</p>

to disciplinary sanctions only pursuant to a formal disciplinary process following an administrative finding that a resident engaged in resident-on-resident sexual abuse. Residents are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for resident-on-resident sexual abuse. In the past 12 months, the number of administrative findings of resident-on-resident sexual abuse that have occurred at the facility was one. In the past 12 months, the number of criminal findings of guilt for resident-on-resident sexual abuse that have occurred at the facility was zero.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 14, section b., states, "Clients guilty of sexual behavior/misconduct of any kind with other employees or clients will be immediately regressed."

(c) Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 14, section d., states, "For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation."

(c) The Advantage Treatment Centers Alamosa PAQ states, "The facility does not offer therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse.

(d) The Advantage Treatment Centers Alamosa PAQ states the agency disciplines residents for sexual conduct with staff only upon finding that the staff member did not consent to such contact.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 14, section c., states, "A client will only be disciplined for sexual contact with staff only upon a finding that the staff member did not consent to such contact."

(e) Advantage Treatment Centers Alamosa PAQ states the agency prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 14, section d., states, "For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation."

(f) Advantage Treatment Centers Alamosa PAQ states the agency prohibits all sexual activity between residents.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 1, section policy, states, "Advantage Treatment Center facilities have a zero-tolerance policy for any sexual contact or sexual harassment, whether consensual or non-consensual, between clients and between clients and staff members. Any behavior of a sexual nature whether verbal, nonverbal, or physical is strictly prohibited at Advantage Treatment Center.

Prohibited sexual behavior includes sexual assault, sexual misconduct, staff sexual conduct in a correctional institution, and sexual harassment. Every report or observation of prohibited sexual behavior between clients or between clients and staff shall follow this policy for the prevention of, response to, training and education of, risk screening for, reporting of, response to, investigation of, for, medical and mental health care following, and data collection of incidents of prohibited sexual behavior."

Through such reviews, the facility meets standard requirements.

115.282	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ 2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022

Interviews:

1. Program Director / PREA Compliance Manager
2. PREA Coordinator

The interview with the Program Director demonstrated clients would be transported to the San Luis Valley Health Regional Medical Center for emergency services for any sexual assault victims.

The PREA Coordinator stated mental health services would be offered to residents through a community organization, if requested by the victim.

(a) The Advantage Treatment Centers Alamosa PAQ states resident victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. The nature and scope of such services are determined by medical and mental health practitioners according to their professional judgment. The facility would always refer out to local mental health or the emergency room for medical and mental health emergency situations. The PAQ states, "we would always refer out to local mental health or the emergency room for medical and mental health emergency situations attached is our MH screener tool used by CMs during their assessments."

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 13, section I.e. i., states, "Client victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment. "

(b) Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 13, section I. a. ii., states, "At the time a report of recent abuse is made, staff first responders shall take preliminary steps to protect the victim and shall immediately notify the appropriate medical and mental health practitioners."

(c) The Advantage Treatment Centers Alamosa PAQ states, resident victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.

	<p>Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 13, section I. a. iii., states, “Client victims of sexual abuse while in ATC’s custody shall be offered by a medical provider 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. “</p> <p>(d) The Advantage Treatment Centers Alamosa PAQ states, treatment services are provided to every victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 13, section I. a. iv., states, “Treatment services shall 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.”</p> <p>Through such reviews, the facility meets standard requirements.</p>
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<p>115.283</p>	<p>Ongoing medical and mental health care for sexual abuse victims and abusers</p>
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Document Review:</p> <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ 2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022 <p>Interviews:</p> <ol style="list-style-type: none"> 1. Random Clients 2. Targeted Client 3. Program Director / PREA Compliance Manager <p>Interviews with clients demonstrated none had reported sexual abuse.</p>

The interview with the Program Director demonstrated victims would be offered ongoing medical and mental health services through community providers.

(a) The Advantage Treatment Centers Alamosa PAQ states the facility offers medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility. The PAQ states, "it's available in the community and clients have access but not offered inside the facility."

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 13, section b. i., states, "The facility shall refer for medical and mental health evaluation and, as appropriate, treatment to all clients who have been victimized by sexual abuse in confinement."

(b) Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 13, section b. ii., states, "Referral for evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody. "

(c) Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 13, section b. iii., states, "The facility shall refer such victims for medical and mental health services consistent with the community level of care. "

(d-e) The Advantage Treatment Centers Alamosa PAQ states these provisions are not applicable as the facility does not house female residents.

(f) The Advantage Treatment Centers Alamosa PAQ states resident victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 8, section E., states, "Client victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections as medically appropriate."

(g) Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 7, section f. ii., states, “The facility shall offer all victims of sexual abuse access to forensic medical examinations at an outside facility, without financial cost, where evidentiary or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible.”

(h) This Advantage Treatment Centers Alamosa PAQ states the facility does not attempt to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offers treatment when deemed appropriate by mental health practitioners.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 13, section b. iv., states, “The facility shall attempt to conduct or refer for a mental health evaluation of all known client-on-client abusers within 60 days of learning of such abuse history and refer for treatment when deemed appropriate by mental health practitioners.”

Through such reviews, the facility meets standard requirements.

115.286	Sexual abuse incident reviews
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ 2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022 3. Advantage Treatment Center Prison Rape Elimination Act Review Team Form, not dated <p>Interviews:</p> <ol style="list-style-type: none"> 1. PREA Coordinator

The PREA Coordinator clearly articulated her review of all sexual abuse investigations are completed with all agency Program Directors, the PREA Coordinator, agency Vice President and President. Information and or recommendations generated from reviews are implemented agency wide.

(a) The Advantage Treatment Centers Alamosa PAQ states the facility conducts a sexual abuse incident review at the conclusion of every criminal or administrative sexual abuse investigation, unless the allegation has been determined to be unfounded. In the past 12 months there have been zero criminal and or administrative investigations of alleged sexual abuse completed at the facility,

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 14, section K. a. i., states, "ATC 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."

The facility provided an Advantage Treatment Center Prison Rape Elimination Act Review Team Form. This form documents the following:

1. Does the allegation or investigation indicate a need to change policy or practice to better prevent, detect, or respond to sexual abuse?
2. Was the incident or allegation 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.
3. Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse.
4. Assess the adequacy of staffing levels in that area during different shifts.
5. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff.
6. Written report completed and includes findings; notification made to DCJ, review from submitted to PREA Coordinator and Facility Head.

(b) The Advantage Treatment Centers Alamosa PAQ states sexual abuse incident reviews are ordinarily conducted within 30 days of concluding the criminal or administrative investigation. In the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility that

were followed by a sexual abuse incident review within 30 days, excluding only “unfounded” incidents were zero.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 14, section K. a. ii., states, “Such review shall ordinarily occur within 30 days of the conclusion of the investigation.”

(c) The Advantage Treatment Centers Alamosa PAQ states the sexual abuse incident review team includes upper-level management officials and allows for input from line supervisors, investigators, and medical or mental health practitioners.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 14, section K. a. iii., states, “The review team shall include upper-level management officials, with input from line supervisors, investigators, and medical or mental health.”

(d) The Advantage Treatment Centers Alamosa PAQ states the facility prepares a report of its findings from sexual abuse incident reviews, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1) -(d)(5) of this section, and any recommendations for improvement and submits such report to the facility head and PREA Coordinator.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 15, section K. a. vi., states, “The review team shall:

A) Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;

B) Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility;

C) Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse;

D) Assess the adequacy of staffing levels in that area during different shifts;

E) Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and

	<p>F) Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to paragraphs (iv)(1) -(iv)(5) of this section, and any recommendations for improvement, and submit such report to the PREA Coordinator.”</p> <p>(e) The Advantage Treatment Centers Alamosa PAQ states, the facility implements the recommendations for improvement or documents its reasons for not doing so.</p> <p>Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 15, section K. a. vii., states, “The facility shall implement the recommendations for improvement, or shall document its reasons for not doing so.”</p> <p>Through such reviews of the agency administration completing all sexual abuse incident reviews as a team, the facility exceeds standard requirements.</p>
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115.287	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ 2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022 3. 2022 Advantage Treatment Center, Inc., PREA Annual Report, dated 3.15.2023 4. PREA Tracking Spreadsheet <p>(a) The Advantage Treatment Centers Alamosa PAQ states the agency collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions.</p> <p>Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 15, section b. i., states, “ATC shall collect accurate, uniform data for every</p>

allegation of sexual abuse using a standardized instrument and set of definitions. The PREA Coordinator will collect, analyze and report the findings as outlined in this policy.”

The facility provided the 2022 Advantage Treatment Center, Inc., PREA Annual Report. The Plan aggregates and analysis the following data:

1. Total allegations reported
2. Total allegations founded (all types)
3. Total allegations that occurred in outside facilities
4. Total staff on client allegations
5. Total client on client allegations

ATC PREA Goals and Values:

1. Prevention/Identification
2. Policies and Procedures
3. Investigation/Response

Commitment to Reaching Goals:

1. Culture and Community
2. Treatment Services
3. Good Practices

Analysis of the Data:

1. Comparing Previous Years Data
2. Past Audit Responses and Progress Made
3. Analysis of Aggregated Data

(b) The Advantage Treatment Centers Alamosa PAQ states the agency aggregates

the incident-based sexual abuse at least annually.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 15, section b. ii., states, "ATC shall aggregate the incident-based sexual abuse data at least annually."

(c) The Advantage Treatment Centers Alamosa PAQ states the standardized instrument includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 15, section b. iii., states, "The incident-based data collected shall 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."

The facility provided a PREA Investigation Tracking spreadsheet which documents the following information for the facility.

- Site
- Timeline
- Date of discovery
- Investigator
- First Responder - date/details
- Coordinated Response
- Allegation
- Finding
- Allegation Type
- Law Enforcement Involvement
- Completion of investigation and finding
- Disciplinary Sanctions
- Notification of facility leadership (include DCJ)

	<ul style="list-style-type: none"> · Protect victim/staff against retaliation (founded or unsubstantiated) · Client notification of outcome · 30-day Sexual Abuse Incident Review · Monitor for retaliation – 90 day follow up <p>(d) The Advantage Treatment Centers Alamosa PAQ states the agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. The PAQ states, “PREA Coordinator is in charge of collecting, reviewing and maintaining documentation and interpreting and analyzing the data.”</p> <p>Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 15, section b. iv., states, “The company shall maintain, review, and collect data as needed from all available incident-based documents including reports, investigation files, and sexual abuse incident reviews.”</p> <p>(e) This provision is not applicable as Advantage Treatment Center, Inc., as they do not have private facilities.</p> <p>(f) The Advantage Treatment Centers Alamosa PAQ states the agency did not provide the Department of Justice (DOJ) with data from the previous calendar year upon request.</p> <p>Through such reviews, the facility meets the standard requirements.</p>
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115.288	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Document Review: <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ 2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022

3. 2022 Advantage Treatment Center, Inc., PREA Annual Report, signed by Agency President, dated 3.15.2023

4. Agency website: <https://www.atreatmentcenters.com/>

(a) The Advantage Treatment Centers Alamosa PAQ states the agency reviews data collected and aggregated pursuant to §115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training, including: (a) identifying problem areas; (b) taking corrective action on an ongoing basis; and (c) preparing an annual report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 15-16, section c. i. A-C., states, "ATC shall review data collected in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including:

1. Identifying problem areas;
2. Taking corrective action on an ongoing basis; and
3. Preparing an annual report of its findings and corrective actions for each facility, as well as the company as a whole."

The facility provided the 2021 Advantage Treatment Center, Inc., PREA Annual Report. The Plan aggregates and analysis the following data:

ATC PREA Goals and Values:

1. Prevention/Identification
2. Policies and Procedures
3. Investigation/Response

Commitment to Reaching Goals:

1. Culture and Community
2. Treatment Services
3. Good Practices

Analysis of the Data:

1. Comparing Previous Years Data
2. Past Audit Responses and Progress Made
3. Analysis of Aggregated Data

The report is signed by the President of Advantage Treatment Centers Inc. and dated on 3.15.2023.

(b) The Advantage Treatment Centers Alamosa PAQ states the annual report includes a comparison of the current year's data and corrective actions to those from prior years. The annual report provides an assessment of the agency's progress in addressing sexual abuse. The annual report compares data 2020 and 2021 data. The annual report provides progress in addressing sexual abuse.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 16, section c. ii., states, "Such 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 the facility's progress in addressing sexual abuse."

(c) The Advantage Treatment Centers Alamosa PAQ states the agency makes its annual report readily available to the public, at least annually, through its website. Annual reports are approved by the agency head. The President, Advantage Treatment Center signs the annual report.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 16, section c. iii., states, "The company's report shall be made readily available to the public through its website or, if it does not have one, through other means."

The Agency Annual Report is available on the following website at <https://www.atreatmentcenters.com/>

(d) The Advantage Treatment Centers Alamosa PAQ states when the agency

	<p>redacts material from an annual report for publication, the redactions are limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility.</p> <p>Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 16, section c. iv., states, “The company may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility, but must indicate the nature of the material redacted.”</p> <p>Through such reviews, the facility meets standard requirements.</p>
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115.289	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Document Review:</p> <ol style="list-style-type: none"> 1. Advantage Treatment Centers Alamosa PAQ 2. Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, dated 3.17.2022 <p>(a) The Advantage Treatment Centers Alamosa PAQ states the agency ensures that incident-based and aggregate data are securely retained. The PAQ states, “secured in my google drive/hard drive electronically which on one else has access to. I work alone from home and my computer is always locked.”</p> <p>Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 16, section d. i., states, “ATC shall ensure that data collected pursuant is securely retained according to policy.”</p> <p>(b) The Advantage Treatment Centers Alamosa PAQ states agency policy requires that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public at least annually through its website.</p>

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 16, section d. ii., states, "ATC shall make all aggregated sexual abuse data, from facilities under its direct control, readily available to the public at least annually through its website or, if it does not have one, through other means."

(c) The Advantage Treatment Centers Alamosa PAQ states before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers. The PAQ states, "I have been maintaining records since late 2020; anything prior was kept onsite by the program directors."

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 16, section d. iii., states, "Before making aggregated sexual abuse data publicly available, ATC shall remove all personal identifiers."

(d) Compliance can be found in provision (a) of this standard.

Advantage Treatment Center Prison Rape Elimination Policy and Procedure CS-070, page 16, section d. iv., states, "ATC shall maintain sexual abuse data collected for at least 10 years after the date of the initial collection."

Through such reviews, the facility meets standard requirements.

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion (a) During the prior three-year audit period, the agency ensured that each facility operated was audited, once. (b) This is the fourth audit cycle for Advantage Treatment Center Alamosa and the first year of the fourth audit cycle. (h) The Auditor was granted complete access to, and the ability to observe, all

	<p>areas of the facility.</p> <p>(i) The Auditor was permitted to request and receive copies of any relevant documents (including electronically stored information).</p> <p>(m) The Auditor was permitted to conduct private interviews with residents.</p> <p>(n) Residents permitted to send confidential information or correspondence to the Auditor in the same manner as if they were communicating with legal counsel.</p> <p>Through such reviews, the facility meets the standard requirements.</p>
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115.403	Audit contents and findings
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>(b) The agency has posted the current 2020 PREA audit report, on their website.</p> <p>Through such reviews, the facility meets the standard requirements.</p>

Appendix: Provision Findings		
115.211 (a)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	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
115.211 (b)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	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 community confinement facilities?	yes
115.212 (a)	Contracting with other entities for the confinement of residents	
	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
115.212 (b)	Contracting with other entities for the confinement of residents	
	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.)	na
115.212 (c)	Contracting with other entities for the confinement of residents	
	If the agency has entered into a contract with an entity that fails to comply with the PREA standards, did the agency do so only in	na

	emergency circumstances after making all reasonable attempts to find a PREA compliant private agency or other entity to confine residents? (N/A if the agency has not entered into a contract with an entity that fails to comply with the PREA standards.)	
	In such a case, does the agency document its unsuccessful attempts to find an entity in compliance with the standards? (N/A if the agency has not entered into a contract with an entity that fails to comply with the PREA standards.)	na
115.213 (a)	Supervision and monitoring	
	Does the facility have a documented staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring to protect residents against sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The physical layout of each facility?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The composition of the resident population?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	In calculating adequate staffing levels and determining the need for video monitoring, does the staffing plan take into consideration: Any other relevant factors?	yes
115.213 (b)	Supervision and monitoring	
	In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (NA if no deviations from staffing plan.)	na
115.213 (c)	Supervision and monitoring	
	In the past 12 months, has the facility 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 assessed, determined, and documented whether adjustments are needed to prevailing	yes

	staffing patterns?	
	In the past 12 months, has the facility 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 assessed, determined, and documented whether adjustments are needed to the resources the facility has available to commit to ensure adequate staffing levels?	yes
115.215 (a)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting any cross-gender strip searches or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.215 (b)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting cross-gender pat-down searches of female residents, except in exigent circumstances? (N/A if the facility does not have female inmates.)	yes
	Does the facility always refrain from restricting female residents' access to regularly available programming or other outside opportunities in order to comply with this provision? (N/A if the facility does not have female inmates.)	yes
115.215 (c)	Limits to cross-gender viewing and searches	
	Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches of female residents?	yes
115.215 (d)	Limits to cross-gender viewing and searches	
	Does the facility have policies that enable residents to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility have procedures that enable residents to shower,	yes

	perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	
	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?	yes
115.215 (e)	Limits to cross-gender viewing and searches	
	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 the resident's genital status is unknown, does the facility 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?	yes
115.215 (f)	Limits to cross-gender viewing and searches	
	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
115.216 (a)	Residents with disabilities and residents who are limited English proficient	
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who are blind or have low vision?	yes

	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other (if "other," please explain in overall determination notes.)	yes
	Do such steps include, when necessary, ensuring effective 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
115.216 (b)	Residents with disabilities and residents who are limited English proficient	

	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
115.216 (c)	Residents with disabilities and residents who are limited English proficient	
	Does the agency always refrain from relying on resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-response duties under §115.264, or the investigation of the resident's allegations?	yes
115.217 (a)	Hiring and promotion decisions	
	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 two questions immediately above ?	yes
	Does the agency prohibit the enlistment of the 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 the 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	yes

	force, or coercion, or if the victim did not consent or was unable to consent or refuse?	
	Does the agency prohibit the enlistment of the 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 questions immediately above ?	yes
115.217 (b)	Hiring and promotion decisions	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone who may have contact with residents?	yes
	Does the agency consider any incidents of sexual harassment in determining to enlist the services of any contractor who may have contact with residents?	yes
115.217 (c)	Hiring and promotion decisions	
	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, 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
115.217 (d)	Hiring and promotion decisions	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with residents?	yes
115.217 (e)	Hiring and promotion decisions	
	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
115.217	Hiring and promotion decisions	

(f)		
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.217 (g)	Hiring and promotion decisions	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.217 (h)	Hiring and promotion decisions	
	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
115.218 (a)	Upgrades to facilities and technology	
	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
115.218 (b)	Upgrades to facilities and technology	
	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	yes

	agency's ability to protect residents from sexual abuse? (N/A if agency/facility has not installed or updated any video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012 or since the last PREA audit, whichever is later.)	
115.221 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal or administrative sexual abuse investigations.)	yes
115.221 (b)	Evidence protocol and forensic medical examinations	
	Is this protocol developmentally appropriate for youth where applicable? (NA 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? (NA if the agency/facility is not responsible for conducting any form of criminal or administrative sexual abuse investigations.)	na
115.221 (c)	Evidence protocol and forensic medical examinations	
	Does the agency offer all victims of 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
115.221 (d)	Evidence protocol and forensic medical examinations	
	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
115.221 (e)	Evidence protocol and forensic medical examinations	
	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
115.221 (f)	Evidence protocol and forensic medical examinations	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating agency follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	yes
115.221 (h)	Evidence protocol and forensic medical examinations	
	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? (N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.221(d) above).	yes

115.222 (a)	Policies to ensure referrals of allegations for investigations	
	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
115.222 (b)	Policies to ensure referrals of allegations for investigations	
	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
115.222 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does the policy describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for conducting criminal investigations. See 115.221(a).)	yes
115.231 (a)	Employee training	
	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	yes

	residents on: The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	
	Does the agency train all employees who may have contact with residents on: The dynamics of sexual abuse and sexual harassment in confinement?	yes
	Does the agency train all employees who may have contact with residents on: The common reactions of sexual abuse and sexual harassment victims?	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?	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
115.231 (b)	Employee training	
	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
115.231 (c)	Employee training	
	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,	yes

	does the agency provide refresher information on current sexual abuse and sexual harassment policies?	
115.231 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.232 (a)	Volunteer and contractor training	
	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
115.232 (b)	Volunteer and contractor training	
	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
115.232 (c)	Volunteer and contractor training	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.233 (a)	Resident education	
	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
	During intake, do residents receive information explaining: Their rights to be free from sexual abuse and sexual harassment?	yes

	During intake, do residents receive information explaining: Their rights to be free from retaliation for reporting such incidents?	yes
	During intake, do residents receive information regarding agency policies and procedures for responding to such incidents?	yes
115.233 (b)	Resident education	
	Does the agency provide refresher information whenever a resident is transferred to a different facility?	yes
115.233 (c)	Resident education	
	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
115.233 (d)	Resident education	
	Does the agency maintain documentation of resident participation in these education sessions?	yes
115.233 (e)	Resident education	
	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
115.234 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.231, does the agency ensure that, to the extent	yes

	the agency itself conducts sexual abuse investigations, its investigators receive training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).	
115.234 (b)	Specialized training: Investigations	
	Does this specialized training include: Techniques for interviewing sexual abuse victims?(N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).	yes
	Does this specialized training include: Proper use of Miranda and Garrity warnings?(N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).	yes
	Does this specialized training include: Sexual abuse evidence collection in confinement settings?(N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).	yes
	Does this specialized training include: The criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a)).	yes
115.234 (c)	Specialized training: Investigations	
	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 criminal or administrative sexual abuse investigations. See 115.221(a).)	yes
115.235 (a)	Specialized training: Medical and mental health care	
	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 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
115.235 (b)	Specialized training: Medical and mental health care	
	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 does not employ medical staff or the medical staff employed by the agency do not conduct forensic exams.)	na
115.235 (c)	Specialized training: Medical and mental health care	
	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
115.235 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.231? (N/A for circumstances in which a particular status (employee or contractor/volunteer) does not apply.)	na
	Do medical and mental health care practitioners contracted by	na

	and volunteering for the agency also receive training mandated for contractors and volunteers by §115.232? (N/A for circumstances in which a particular status (employee or contractor/volunteer) does not apply.)	
115.241 (a)	Screening for risk of victimization and abusiveness	
	Are all residents assessed during an intake screening for their risk of being sexually abused by other residents or sexually abusive toward other residents?	yes
	Are all residents assessed upon transfer to another facility for their risk of being sexually abused by other residents or sexually abusive toward other residents?	yes
115.241 (b)	Screening for risk of victimization and abusiveness	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
115.241 (c)	Screening for risk of victimization and abusiveness	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes
115.241 (d)	Screening for risk of victimization and abusiveness	
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident has a mental, physical, or developmental disability?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: The age of the resident?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: The physical build of the resident?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident has previously been incarcerated?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization:	yes

	Whether the resident's criminal history is exclusively nonviolent?	
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident has prior convictions for sex offenses against an adult or child?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the resident about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the resident is gender non-conforming or otherwise may be perceived to be LGBTI)?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: Whether the resident has previously experienced sexual victimization?	yes
	Does the intake screening consider, at a minimum, the following criteria to assess residents for risk of sexual victimization: The resident's own perception of vulnerability?	yes
115.241 (e)	Screening for risk of victimization and abusiveness	
	In assessing residents for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior acts of sexual abuse?	yes
	In assessing residents for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior convictions for violent offenses?	yes
	In assessing residents for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: history of prior institutional violence or sexual abuse?	yes
115.241 (f)	Screening for risk of victimization and abusiveness	
	Within a set time period not more than 30 days from the resident's arrival at the facility, does the facility reassess the resident's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes

115.241 (g)	Screening for risk of victimization and abusiveness	
	Does the facility reassess a resident’s risk level when warranted due to a: Referral?	yes
	Does the facility reassess a resident’s risk level when warranted due to a: Request?	yes
	Does the facility reassess a resident’s risk level when warranted due to a: Incident of sexual abuse?	yes
	Does the facility reassess a resident’s risk level when warranted due to a: Receipt of additional information that bears on the resident’s risk of sexual victimization or abusiveness?	yes
115.241 (h)	Screening for risk of victimization and abusiveness	
	Is it the case that residents are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes
115.241 (i)	Screening for risk of victimization and abusiveness	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the resident’s detriment by staff or other residents?	yes
115.242 (a)	Use of screening information	
	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments?	yes
	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments?	yes
	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments?	yes

	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments?	yes
	Does the agency use information from the risk screening required by § 115.241, with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments?	yes
115.242 (b)	Use of screening information	
	Does the agency make individualized determinations about how to ensure the safety of each resident?	yes
115.242 (c)	Use of screening information	
	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
115.242 (d)	Use of screening information	
	Are each transgender or intersex resident's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes
115.242 (e)	Use of screening information	
	Are transgender and intersex residents given the opportunity to shower separately from other residents?	yes
115.242	Use of screening information	

(f)		
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing: lesbian, gay, and bisexual residents in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I residents pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing: transgender residents in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I residents pursuant to a consent decree, legal settlement, or legal judgement.)	yes
	Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex residents, does the agency always refrain from placing: intersex residents in dedicated facilities, units, or wings solely on the basis of such identification or status? (N/A if the agency has a dedicated facility, unit, or wing solely for the placement of LGBT or I residents pursuant to a consent decree, legal settlement, or legal judgement.)	yes
115.251 (a)	Resident reporting	
	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: 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
115.251 (b)	Resident reporting	

	Does the agency also provide at least one way for residents to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the resident to remain anonymous upon request?	yes
115.251 (c)	Resident reporting	
	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
115.251 (d)	Resident reporting	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of residents?	no
115.252 (a)	Exhaustion of administrative remedies	
	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
115.252 (b)	Exhaustion of administrative remedies	
	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 a resident to use any informal grievance process, or to otherwise attempt to resolve	na

	with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	
115.252 (c)	Exhaustion of administrative remedies	
	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
115.252 (d)	Exhaustion of administrative remedies	
	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 is 70 days per 115.252(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
115.252 (e)	Exhaustion of administrative remedies	
	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 files such a request on behalf	na

	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.)	
	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
115.252 (f)	Exhaustion of administrative remedies	
	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
115.252 (g)	Exhaustion of administrative remedies	
	If the agency disciplines a resident for filing a grievance related to	na

	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.)	
115.253 (a)	Resident access to outside confidential support services	
	Does the facility provide residents with access to outside victim advocates for emotional support services related to sexual abuse by giving residents 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 enable reasonable communication between residents and these organizations, in as confidential a manner as possible?	yes
115.253 (b)	Resident access to outside confidential support services	
	Does the facility inform residents, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.253 (c)	Resident access to outside confidential support services	
	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
115.254 (a)	Third party reporting	
	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
115.261 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or	yes

	information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against residents or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
115.261 (b)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials, do staff always refrain 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
115.261 (c)	Staff and agency reporting duties	
	Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section?	yes
	Are medical and mental health practitioners required to inform residents of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services?	yes
115.261 (d)	Staff and agency reporting duties	
	If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws?	yes
115.261 (e)	Staff and agency reporting duties	
	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

115.262 (a)	Agency protection duties	
	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
115.263 (a)	Reporting to other confinement facilities	
	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
115.263 (b)	Reporting to other confinement facilities	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
115.263 (c)	Reporting to other confinement facilities	
	Does the agency document that it has provided such notification?	yes
115.263 (d)	Reporting to other confinement facilities	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
115.264 (a)	Staff first responder duties	
	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,	yes

	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?	
	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
115.264 (b)	Staff first responder duties	
	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
115.265 (a)	Coordinated response	
	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
115.266 (a)	Preservation of ability to protect residents from contact with abusers	
	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
115.267 (a)	Agency protection against retaliation	
	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
115.267 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures, 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 for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?	yes
115.267 (c)	Agency protection against 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 the conduct and treatment of residents or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any resident disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency:4. 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 reassignment of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.267 (d)	Agency protection against retaliation	
	In the case of residents, does such monitoring also include periodic status checks?	yes
115.267 (e)	Agency protection against retaliation	
	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
115.271 (a)	Criminal and administrative agency investigations	
	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/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.221(a).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.221(a).)	yes
115.271 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.234?	yes
115.271 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial	yes

	evidence, including any available physical and DNA evidence and any available electronic monitoring data?	
	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
115.271 (d)	Criminal and administrative agency investigations	
	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
115.271 (e)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as resident or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring a resident who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.271 (f)	Criminal and administrative agency investigations	
	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
115.271 (g)	Criminal and administrative agency investigations	
	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
115.271	Criminal and administrative agency investigations	

(h)		
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
115.271 (i)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.271(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years?	yes
115.271 (j)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the facility or agency does not provide a basis for terminating an investigation?	yes
115.271 (l)	Criminal and administrative agency investigations	
	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 any form of administrative or criminal sexual abuse investigations. See 115.221(a).)	yes
115.272 (a)	Evidentiary standard for administrative investigations	
	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
115.273 (a)	Reporting to residents	
	Following an investigation into a resident's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
115.273 (b)	Reporting to residents	
	If the agency did not conduct the investigation into a resident's allegation of sexual abuse in an agency facility, does the agency	yes

	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.)	
115.273 (c)	Reporting to residents	
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the resident's unit?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.273 (d)	Reporting to residents	
	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	yes

	the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility?	
115.273 (e)	Reporting to residents	
	Does the agency document all such notifications or attempted notifications?	yes
115.276 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
115.276 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
115.276 (c)	Disciplinary sanctions for staff	
	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
115.276 (d)	Disciplinary sanctions for staff	
	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
115.277 (a)	Corrective action for contractors and volunteers	

	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
115.277 (b)	Corrective action for contractors and volunteers	
	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
115.278 (a)	Disciplinary sanctions for residents	
	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, are residents subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
115.278 (b)	Disciplinary sanctions for residents	
	Are 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
115.278 (c)	Disciplinary sanctions for residents	
	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
115.278 (d)	Disciplinary sanctions for residents	
	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 require the offending resident to participate in such interventions as a	no

	condition of access to programming and other benefits?	
115.278 (e)	Disciplinary sanctions for residents	
	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
115.278 (f)	Disciplinary sanctions for residents	
	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
115.278 (g)	Disciplinary sanctions for residents	
	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
115.282 (a)	Access to emergency medical and mental health services	
	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
115.282 (b)	Access to emergency medical and mental health services	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.262?	yes
	Do security staff first responders immediately notify the appropriate medical and mental health practitioners?	yes
115.282 (c)	Access to emergency medical and mental health services	
	Are resident victims of sexual abuse offered timely information	yes

	about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	
115.282 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.283 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	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
115.283 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	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
115.283 (c)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.283 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are resident victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if "all-male" facility. Note: in "all-male" facilities, there may be residents who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	yes
115.283 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph § 115.283(d), do such victims receive timely and comprehensive	yes

	information about and timely access to all lawful pregnancy-related medical services? (N/A if “all-male” facility. Note: in “all-male” facilities, there may be residents who identify as transgender men who may have female genitalia. Auditors should be sure to know whether such individuals may be in the population and whether this provision may apply in specific circumstances.)	
115.283 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are resident victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.283 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.283 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	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
115.286 (a)	Sexual abuse incident reviews	
	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
115.286 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.286 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes

115.286 (d)	Sexual abuse incident reviews	
	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 §§ 115.286(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.286 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
115.287 (a)	Data collection	
	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
115.287 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.287	Data collection	

(c)		
	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
115.287 (d)	Data collection	
	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
115.287 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents? (N/A if agency does not contract for the confinement of its residents.)	na
115.287 (f)	Data collection	
	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.)	na
115.288 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.287 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 § 115.287 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 § 115.287 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

115.288 (b)	Data review for corrective action	
	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
115.288 (c)	Data review for corrective action	
	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
115.288 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
115.289 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.287 are securely retained?	yes
115.289 (b)	Data storage, publication, and destruction	
	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
115.289 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.289 (d)	Data storage, publication, and destruction	
	Does the agency maintain sexual abuse data collected pursuant to § 115.287 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes

115.401 (a)	Frequency and scope of audits	
	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.)	yes
115.401 (b)	Frequency and scope of audits	
	Is this the first year of the current audit cycle? (Note: a "no" response does not impact overall compliance with this standard.)	yes
	If this is the second year of the current audit cycle, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited during the first year of the current audit cycle? (N/A if this is not the second year of the current audit cycle.)	na
	If this is the third year of the current audit cycle, did the agency ensure that at least two-thirds of each facility type operated by the agency, or by a private organization on behalf of the agency, were audited during the first two years of the current audit cycle? (N/A if this is not the third year of the current audit cycle.)	na
115.401 (h)	Frequency and scope of audits	
	Did the auditor have access to, and the ability to observe, all areas of the audited facility?	yes
115.401 (i)	Frequency and scope of audits	
	Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)?	yes
115.401 (m)	Frequency and scope of audits	
	Was the auditor permitted to conduct private interviews with residents?	yes
115.401 (n)	Frequency and scope of audits	
	Were inmates, residents, and detainees permitted to send confidential information or correspondence to the auditor in the	yes

	same manner as if they were communicating with legal counsel?	
115.403 (f)	Audit contents and findings	
	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.)	yes