

# PREA Facility Audit Report: Final

**Name of Facility:** Edinburg Transitional Center

**Facility Type:** Community Confinement

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 02/02/2024

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" 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 checked="" type="checkbox"/>
<b>Auditor Full Name as Signed:</b> Karen d. Murray	<b>Date of Signature:</b> 02/02/ 2024

AUDITOR INFORMATION	
<b>Auditor name:</b>	Murray, Karen
<b>Email:</b>	kdmconsults1@gmail.com
<b>Start Date of On-Site Audit:</b>	01/16/2024
<b>End Date of On-Site Audit:</b>	01/17/2024

FACILITY INFORMATION	
<b>Facility name:</b>	Edinburg Transitional Center
<b>Facility physical address:</b>	402 West Chapin Street, Edinburg, Texas - 78541
<b>Facility mailing address:</b>	402 W Chapin, Edinburg, Texas - 78541

<b>Primary Contact</b>	
<b>Name:</b>	Juan Cruz
<b>Email Address:</b>	juan.cruz@csgprograms.com
<b>Telephone Number:</b>	19569001467

<b>Facility Director</b>	
<b>Name:</b>	Juan Cruz
<b>Email Address:</b>	juan.cruz@csgprograms.com
<b>Telephone Number:</b>	19569001467

<b>Facility PREA Compliance Manager</b>	
<b>Name:</b>	Juan Cruz
<b>Email Address:</b>	juan.cruz@csgprograms.com
<b>Telephone Number:</b>	
<b>Name:</b>	Richard Lopez
<b>Email Address:</b>	richard.lopez@csgprograms.com
<b>Telephone Number:</b>	
<b>Name:</b>	Carina Saenz
<b>Email Address:</b>	c.saenz@csgprograms.com
<b>Telephone Number:</b>	

<b>Facility Characteristics</b>	
<b>Designed facility capacity:</b>	120
<b>Current population of facility:</b>	117
<b>Average daily population for the past 12 months:</b>	114

<b>Has the facility been over capacity at any point in the past 12 months?</b>	No
<b>Which population(s) does the facility hold?</b>	Both females and males
<b>Age range of population:</b>	18-75
<b>Facility security levels/resident custody levels:</b>	L/M/H
<b>Number of staff currently employed at the facility who may have contact with residents:</b>	24
<b>Number of individual contractors who have contact with residents, currently authorized to enter the facility:</b>	1
<b>Number of volunteers who have contact with residents, currently authorized to enter the facility:</b>	1

#### **AGENCY INFORMATION**

<b>Name of agency:</b>	Correctional Solutions Group, LLC.
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	305 S. Broadway St., Tyler, Texas - 75702
<b>Mailing Address:</b>	P.O. Box 7760, Tyler, Texas - 75711
<b>Telephone number:</b>	9036306291

#### **Agency Chief Executive Officer Information:**

<b>Name:</b>	John Forren
<b>Email Address:</b>	forren@aol.com
<b>Telephone Number:</b>	(619) 249-9816

#### **Agency-Wide PREA Coordinator Information**

<b>Name:</b>	Carol Powell	<b>Email Address:</b>	carol.powell@csgprograms.com
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## Facility AUDIT FINDINGS

### Summary of Audit Findings

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

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

#### Number of standards exceeded:

4	<ul style="list-style-type: none"> <li>• 115.211 - Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</li> <li>• 115.213 - Supervision and monitoring</li> <li>• 115.217 - Hiring and promotion decisions</li> <li>• 115.232 - Volunteer and contractor training</li> </ul>
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#### Number of standards met:

37

#### 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:	2024-01-16
2. End date of the onsite portion of the audit:	2024-01-17

#### 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:	Women Together - Edinburg Advocacy Center Ombudsman Office - Texas Board of Criminal Justice - PREA Hotline Agency website - Third Pary

### AUDITED FACILITY INFORMATION

14. Designated facility capacity:	120
15. Average daily population for the past 12 months:	116
16. Number of inmate/resident/detainee housing units:	5
17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)

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

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

<b>36. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:</b>	114
<b>38. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:</b>	9
<b>39. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:</b>	66
<b>40. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>41. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:</b>	0
<b>42. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:</b>	6
<b>43. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:</b>	5

<p><b>44. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>1</p>
<p><b>45. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>0</p>
<p><b>46. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>6</p>
<p><b>47. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>0</p>
<p><b>48. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):</b></p>	<p>No text provided.</p>
<p><b>Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit</b></p>	
<p><b>49. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:</b></p>	<p>24</p>
<p><b>50. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b></p>	<p>1</p>

<p><b>51. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:</b></p>	<p>5</p>
<p><b>52. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:</b></p>	<p>No text provided.</p>
<p><b>INTERVIEWS</b></p>	
<p><b>Inmate/Resident/Detainee Interviews</b></p>	
<p><b>Random Inmate/Resident/Detainee Interviews</b></p>	
<p><b>53. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:</b></p>	<p>10</p>
<p><b>54. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</b></p>	<p> <input type="checkbox"/> Age  <input type="checkbox"/> Race  <input 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><b>55. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</b></p>	<p>One week before the onsite review the facility provided client rosters by target and housing assignment. Once the Auditor randomly chose targeted client's, random clients were randomly chosen by gender and housing assignment.</p>



<b>56. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>57. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b>	No text provided.
<b>Targeted Inmate/Resident/Detainee Interviews</b>	
<b>58. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</b>	10
<p>As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".</p>	
<b>60. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</b>	0
<b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b>	<input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.  <input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.

<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The facility provided rosters by targeted and random categories and none of the categories included disabled clients.</p>
<p><b>61. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>1</p>
<p><b>62. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The facility provided rosters by targeted and random categories and none of the categories included blind clients.</p>
<p><b>63. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>0</p>

<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The facility provided rosters by targeted and random categories and none of the categories included deaf clients.</p>
<p><b>64. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</b></p>	<p>1</p>
<p><b>65. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>5</p>
<p><b>66. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</b></p>	<p>1</p>
<p><b>67. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</b></p>	<p>0</p>

<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The facility has not experienced a sexual harassment or sexual abuse allegation in the past 12 months.</p>
<p><b>68. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</b></p>	<p>3</p>
<p><b>69. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</b></p>	<p>0</p>
<p><b>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</b></p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>

<p><b>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</b></p>	<p>The facility does not utilize segregation.</p>
<p><b>70. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</b></p>	<p>No text provided.</p>
<p><b>Staff, Volunteer, and Contractor Interviews</b></p>	
<p><b>Random Staff Interviews</b></p>	
<p><b>71. Enter the total number of RANDOM STAFF who were interviewed:</b></p>	<p>7</p>
<p><b>72. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</b></p>	<p> <input type="checkbox"/> Length of tenure in the facility  <input checked="" type="checkbox"/> Shift assignment  <input checked="" type="checkbox"/> Work assignment  <input checked="" type="checkbox"/> Rank (or equivalent)  <input type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)  <input type="checkbox"/> None </p>
<p><b>73. Were you able to conduct the minimum number of RANDOM STAFF interviews?</b></p>	<p> <input type="radio"/> Yes  <input checked="" type="radio"/> No </p>

<p><b>a. Select the reason(s) why you were unable to conduct the minimum number of RANDOM STAFF interviews: (select all that apply)</b></p>	<p><input type="checkbox"/> Too many staff declined to participate in interviews.</p> <p><input 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><b>74. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</b></p>	<p>All security staff were interviewed on each of the three shifts at the facility.</p>
<p><b>Specialized Staff, Volunteers, and Contractor Interviews</b></p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p><b>75. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</b></p>	<p>12</p>
<p><b>76. Were you able to interview the Agency Head?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p><b>77. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</b></p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

<b>78. Were you able to interview the PREA Coordinator?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>79. Were you able to interview the PREA Compliance Manager?</b>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)

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

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



	<input type="checkbox"/> Other
<b>81. Did you interview VOLUNTEERS who may have contact with inmates/residents/detainees in this facility?</b>	<input type="radio"/> Yes <input checked="" type="radio"/> No
<b>82. Did you interview CONTRACTORS who may have contact with inmates/residents/detainees in this facility?</b>	<input checked="" type="radio"/> Yes <input type="radio"/> No
<b>a. Enter the total number of CONTRACTORS who were interviewed:</b>	2
<b>b. Select which specialized CONTRACTOR role(s) were interviewed as part of this audit from the list below: (select all that apply)</b>	<input type="checkbox"/> Security/detention <input type="checkbox"/> Education/programming <input type="checkbox"/> Medical/dental <input type="checkbox"/> Food service <input type="checkbox"/> Maintenance/construction <input checked="" type="checkbox"/> Other
<b>83. Provide any additional comments regarding selecting or interviewing specialized staff.</b>	No text provided.

## SITE REVIEW AND DOCUMENTATION SAMPLING

### Site Review

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

**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><b>89. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</b></p>	<p>No text provided.</p>
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**Documentation Sampling**

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

<p><b>90. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</b></p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
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<p><b>91. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</b></p>	<p>No text provided.</p>
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**SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY**

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

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

**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
<b>Inmate-on-inmate sexual abuse</b>	0	0	0	0
<b>Staff-on-inmate sexual abuse</b>	0	0	0	0
<b>Total</b>	0	0	0	0

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

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

## Sexual Abuse and Sexual Harassment Investigation Outcomes

### Sexual Abuse Investigation Outcomes

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

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

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

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

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

### Sexual Harassment Investigation Outcomes

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

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

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

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

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

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

**Sexual Abuse Investigation Files Selected for Review**

<b>98. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:</b>	0
<b>a. Explain why you were unable to review any sexual abuse investigation files:</b>	The facility has not experienced a sexual harassment or sexual abuse allegation in the past 12 months.

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

<p><b>105. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p><b>Sexual Harassment Investigation Files Selected for Review</b></p>	
<p><b>106. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>0</p>
<p><b>a. Explain why you were unable to review any sexual harassment investigation files:</b></p>	<p>The facility has not experienced a sexual harassment or sexual abuse allegation in the past 12 months.</p>
<p><b>107. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p><b>Inmate-on-inmate sexual harassment investigation files</b></p>	
<p><b>108. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</b></p>	<p>0</p>
<p><b>109. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</b></p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>



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

## SUPPORT STAFF INFORMATION

### DOJ-certified PREA Auditors Support Staff

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

- Yes  
 No

### Non-certified Support Staff

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

- Yes  
 No

## AUDITING ARRANGEMENTS AND COMPENSATION

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

- The audited facility or its parent agency
- My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)
- A third-party auditing entity (e.g., accreditation body, consulting firm)
- Other

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

<b>115.211</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<p><b>Auditor Overall Determination:</b> Exceeds Standard</p>
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Edinburg Transitional Center PAQ</li> <li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li> <li>3. PREA Coordinator Organizational Structure, dated 11.2023</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Random Clients</li> <li>2. Targeted Clients</li> <li>3. Monitors</li> </ol>

4. Shift Supervisors
5. PREA Coordinator
6. Chief of Security
7. Facility Administrator

Through interviews with clients and personnel 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 policies. The PREA Coordinator could attest to having the required time to institute and implement PREA protocols.

During interviews with clients, the following unsolicited comments were given.

- No harassment or disrespect here.
- I feel safe and don't worry about staff like that.
- Everything has been smooth here.

Onsite Observation:

The facility is comprised of one building with an administrative office hall, classrooms, one female dorm and four male dorms, an entrance into the building with a connected staff monitoring booth, a dining hall and kitchen outdoor recreation areas with a garden, all under a camera surveillance system. Many areas of the facility are also monitored with mirrors. The facility has multiple cameras in the interior and exterior of the building, all in seemingly working order. All cameras were reviewed with three inoperable; however, work orders had been submitted with an expected 24-hour turnaround for repairs.

PREA audit notices were observed to have been posted at the entrance to the building and each dormitory. Dormitories were observed to have PREA postings consisting of Quick Response (QR) codes giving clients instant access to Case Managers, grievances, and access to internal and external reporting options.

(a) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 2, section Zero Tolerance of Sexual Abuse and Sexual Harassment, states, “The Prison Rape Elimination Act of 2003 is a federal law that prohibits sexual misconduct in correctional settings such as prisons, jails, lockups, juvenile facilities, and community corrections. Sexual misconduct under this law includes:

- Resident-on-resident sexual abuse and sexual harassment
- staff-on-resident sexual abuse and sexual harassment
- It also applies to Edinburg Transition Centers and volunteers”

(b) The Edinburg Transitional Center 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 facility provided a PREA Coordinator Organizational Structure chart. The structure demonstrates the PREA Coordinator reports directly to the Chief Operating Officer.

Through such reviews of the facility multiple PREA postings to include the Quick Response (QR) Codes, the facility exceeds the standard requirements.

<b>115.212</b>	<b>Contracting with other entities for the confinement of residents</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Document Review:  1. Edinburg Transitional Center PAQ

	<p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Facility Administrator</li> </ol> <p>During the pre-audit phase, the Facility Administrator conveyed the agency did not have privatized contracts.</p> <p>(a) The Edinburg Transitional Center PAQ states agency does not contract with private agencies for confinement services of their residents. The PAQ states, "The Edinburg Transitional Center has not entered into any contracts with a private agency or other entity for fiscal years '21 '22 and '23."</p> <p>Through such reviews, the facility meets standard requirements.</p>
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<b>115.213</b>	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Edinburg Transitional Center PAQ</li> <li>2. Correctional Solutions Group Edinburg Transition Center Annual PREA Staffing Plan</li> <li>3. Correctional Solutions Group, LLC, Annual Review of Staffing Assignments and Video Monitoring 2023</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Random Clients</li> <li>2. Targeted Clients</li> <li>3. Monitors</li> <li>4. Shift Supervisors</li> </ol> <p>Interviews with clients demonstrated staff complete room checks often and male and female staff announce themselves 'loudly' before entering into dorms.</p>

Interviews with Monitors and Shift Supervisors demonstrated 'counts' are completed multiple times throughout their shift.

Site Observation:

During the tour cross gender announcements were made each time staff entered all dorms. The facility also houses an electronic count system where staff have a wand and must tap QR codes throughout the facility while conducting rounds.

(a) The Edinburg Transitional Center 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 114. 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 120.

The facility provided an annual Staffing Assignments and Video Monitoring 2023. The plan consists of the following.

1. Physical layout
2. Composition of the resident population
3. Prevalence of substantiated and un-substantiated incidents of sexual abuse
4. Rounds of the facility
5. Staffing adjustments / Schedules
6. Camera placement
7. Adequate levels of staffing
8. Generally accepted detention and correctional practices
9. Any judicial findings of inadequacy from Federal investigative agencies
10. Any findings of inadequacy from internal or external oversight bodies
11. All components of the facility's physical plan
12. The composition of the resident populations
13. The number and placement of supervisor staff

	<p>14. Programs occurring on a particular shift</p> <p>15. Any applicable state or local laws, regulations, or standards</p> <p>16. The prevalence of substantiated and unsubstantiated incidents of sexual abuse and other relevant factors.</p> <p>(a) The Edinburg Transitional Center PAQ states each time the staffing plan is not complied with, the facility documents and justifies all deviations from the staffing plan. The PAQ states, “There has been (0) deviations from the staffing plan in the past 12 months.”</p> <p>(c) The Edinburg Transitional Center 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 facility/agency resources to commit to the staffing plan to ensure compliance with the staffing plan. The staffing plan in its entirety is completed again, annually.</p> <p>The facility provided an annual PREA Staffing Plan demonstrating the following is assessed annually.</p> <ol style="list-style-type: none"> <li>1. General layout of the facility has been reviewed</li> <li>2. Composition of the resident population has been reviewed</li> <li>3. Incidents of reported sexual abuse reviewed</li> <li>4. Current staffing patterns reviewed</li> <li>5. Current video monitoring reviewed</li> <li>6. Any other relevant factors reviewed</li> </ol> <p>The review is signed and dated by the Facility Director and the agency PREA Coordinator.</p> <p>Through such reviews of the facility completing hourly unannounced rounds, the facility exceeds the standards requirements.</p>
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<b>115.215</b>	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard



## **Auditor Discussion**

### Document Review:

1. Edinburg Transitional Center PAQ
2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023
3. Dorm Postings - Opposite Gender Must Announce
4. Video: National PREA Resource Center and the Bureau of Justice Assistance, Guidance in Cross-Gender and Transgender Pat Searches, dated 2.2015
5. Post Audit: Revised CSG Policy 2-A-10, Searches, dated 1.25.2024
6. CSG Monthly Meeting Agenda with Training Roster, dated 1.24.2024

### Interviews:

1. Random Clients
2. Targeted Clients
3. Monitors
4. Shift Supervisors
5. Facility Administrator

Interviews with clients demonstrated the facility has a respectable process in place for searches and urinalysis testing. 90% of clients interviewed stated searches and urinalysis were completed by same sex staff and all stated each process was conducted respectfully. Of the 10% who did not state searches were respectable spoke to experiencing staff members who did searches per policy causing a belief that searches should not be as regimented.

Interviews with Monitors and Shift Supervisors demonstrated cross-gender searches are not conducted and a both gender staff are always on shift together. Monitors and Shift Supervisors stated clients are encouraged to change clothing behind restroom closed doors.

The interview with the Facility Administrator demonstrated searches are conducted with one staff and one client in the restroom with a full door and one staff on the outside of the door during the search. During the urinalysis one staff and one client are present, in the restroom with the door closed.

Site Observation:

During the tour of the facility the Auditor observed the bathroom in the administrative office hallway used for strip searches and urinalysis. The bathroom is out of line of sight from cameras and those passing by.

Action plan:

- Facility to write and implement a policy for opposite gender staff to strip search transgender and intersex clients of the opposite gender.
- Train staff on cross-gender strip searches of transgender and intersex clients.
- Upload the agency policy and training records to the supplemental files.

Post audit the facility provided a revised policy, demonstrating cross gender strip searches will now take place.

Post audit the facility provided CSG Monthly Meeting Agenda with a training roster demonstrating meeting notes include 'Transgender past and strip search training / TAB Transgender Administrative Review' with printed names and signatures of all facility staff.

(a) Edinburg Transitional Center 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 were zero.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 19, section 115.215 (a), states, "The facility shall not conduct cross-gender strip searches or cross-gender visual body cavity searches (meaning a search of the anal or genital opening) except in exigent circumstances or when performed by medical practitioners."

(b) Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 19, section 115.215 (b), states, "As of August 20, 2015, or August 20, 2017, for a facility whose rated capacity does not exceed 50 residents, the facility shall not permit cross-gender pat-down searches of female residents, absent exigent circumstances. Facilities shall not restrict female residents' access to regularly available programming or other outside opportunities in order to comply with this provision. N/A-All CSG/EDINBURG TRANSITION CENTER Facilities exceed 50 residents."

(a) Edinburg Transitional Center PAQ states the facility policy requires that all cross-gender strip searches and cross-gender visual body cavity searches be documented. Policy compliance can be found in provision (a) of this standard. The PAQ states, "There is always male and female staff on duty 24/7."

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 19, section 115.215 (c), states, "The facility shall document all cross-gender strip searches and cross-gender visual body cavity searches and shall document all cross-gender pat-down searches of female residents."

(d) Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 19, section 115.215 (d), states, "The facility shall implement policies and procedures that enable residents to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. Such policies and procedures shall 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."

The facility provided postings that state, "Dorm 2 - Female Dorm - (Opposite gender must announce themselves before entering.)" "Dorm 1 - Male Dorm - (Opposite gender must announce themselves before entering.)"

(e) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 19, section 115.215 (e), states, "The facility shall not search or physically examine a transgender or intersex resident for the sole purpose of determining the resident's genital status. If the resident's genital status is unknown, it may be determined during conversations with the resident, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner."

(f) The Edinburg Transitional Center PAQ states 100 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 PAQ states, "Cross-gender and transgender pat search training video approved by PREA."

The facility provided a video staff view from the National PREA Resource Center and the Bureau of Justice Assistance, Guidance in Cross-Gender and Transgender Pat Searches, dated 2.2015. The video includes the following training objectives.

- Introduction to Cross-Gender Pat Searches
- Conducting Cross-Gender Pat Searches
- Searches of Transgender and Intersex Inmates and Residents
- Summary of Key Points
- o All cross-gender pat searches must be documented
- o Pat Search Considerations
- § Locations and monitoring
- § Gender-specific concerns

	<ul style="list-style-type: none"> <li>§ Verbal and non-verbal cues <ul style="list-style-type: none"> <li>o Transgender Considerations</li> </ul> </li> <li>§ Case by case determination</li> <li>§ Dual search techniques prohibited</li> <li>§ Searching to determine genital status is prohibited</li> </ul> <p>Through such reviews, the facility meets standard requirements.</p>
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<b>115.216</b>	<b>Residents with disabilities and residents who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Edinburg Transitional Center PAQ</li> <li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Targeted Client</li> <li>2. Monitors</li> <li>3. Shift Supervisors</li> <li>4. Case Manager</li> </ol> <p>The interview with one LEP client was completed without the need for an interpreter. The Client was able to describe his PREA education was provided to him by staff reading to him, in Spanish. Although the LEP Client had never been in a PREA compliant program and did not read, he was able to state he knew what the acronym of PREA stood for, it was his right not to be sexually harassed or sexually assaulted, he would chose to report to the 'boss man', reporting through a grievance and forms were nearby in the dorm and advocate services available to him.</p>

Interviews with Monitors and Shift Supervisors demonstrated they were clear regarding not using clients for interpreter services and would utilize a staff member or language line services when necessary.

The interview with the Case Manager demonstrated all clients are read PREA education to include the agency zero tolerance policy, rights and internal and external reporting options for sexual harassment and sexual abuse.

(a) The Edinburg Transitional Center 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. The PAQ states, "The Edinburg Transitional Center is handicap accessible and the staff is bilingual. Communication with residents has not been an issue and translations are done upon request from the resident. Review of Policy 7-A-2. Resident rights are reviewed annually by all ETC staff and include PREA practices for residents with disabilities."

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 19-20, section 115.216 (a), states, "The agency shall take appropriate steps to ensure that residents with disabilities (including, for example, residents who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Such steps shall include, when necessary to ensure effective communication with residents 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, the agency shall 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, limited reading skills, or who are blind or have low vision. An agency is not required to take actions that it can demonstrate would result in a fundamental alteration 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 Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 20, section 115.216 (b), states, “The agency shall 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, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.”

(c) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 20, section 115.216 (c), states, “The agency shall not rely 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.”

Through such reviews, the facility meets standard requirements.

<b>115.217</b>	<b>Hiring and promotion decisions</b>
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	Document Review:  1. Edinburg Transitional Center PAQ

2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023

Interviews:

1. Bookkeeper

Interviews with Bookkeeper demonstrated criminal background checks and administrative adjudication questions are completed during the interview and hiring processes. The bookkeeper stated criminal background checks are completed every two years for all employees. The bookkeeper stated all hires are approved by the Texas Department of Criminal Justice, who also considers past incidents of sexual harassment. The Texas Department of Criminal Justice also completes in depth background checks on all Edinburg Transitional Center employees which include institutional reference checks.

Site Observation:

Utilizing the PREA Community Confinement Documentation Review Employee File/ Records template, 10 employee files reviewed demonstrated 11 of 11 employees had background checks completed upon hire and within two years, thereafter. Each employee had completed documented administrative adjudication questions and institutional reference checks for applicable employees through the Texas Department of Criminal Justice.

(a) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 20, section 115.217 (a), states, "The agency shall not hire or promote anyone who may have contact with residents, and shall not enlist the services of any Edinburg Transition Center 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. “

(b) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 20, section 115.217 (b), states, “The agency shall consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any Edinburg Transition Center, who may have contact with residents.”

(c) The Edinburg Transitional Center 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 16.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 20, section 115.217 (c), states, “Before hiring new employees who may have contact with residents, the agency shall:

1. Perform a criminal background records check; and
2. 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. “

(d) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 20, section 115.217 (d), states, "The agency shall also perform a criminal background record check before enlisting the services of any Edinburg Transition Center who may have contact with residents."

(e) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 20, section 115.217 (e), states, "The agency shall either conduct criminal background records checks at least every five years of current employees and Edinburg Transition Centers who may have contact with residents or have in place a system for otherwise capturing such information for current employees."

(f) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 20, section 115.217 (f), states, "The agency shall also 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 and in any interviews or written self- evaluations conducted as part of reviews of current employees. The agency shall also impose upon employees a continuing affirmative duty to disclose any such misconduct."

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

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 21, section 115.217 (g), states, "Material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination."

(h) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 21, section 115.217 (h), states, "Unless prohibited by law, the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a

	<p>former employee upon receiving a request from an institutional employer for whom such employee has applied to work.”</p> <p>Through such reviews of the facility conducting criminal background checks every two years for each employee, the facility exceeds standard requirements.</p>
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<b>115.218</b>	<b>Upgrades to facilities and technology</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Edinburg Transitional Center PAQ</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Facility Administrator</li> </ol> <p>An informal interview with the Facility Administrator stated the cameras are rarely down and repairs took place within 24 hours.</p> <p>Site Observation:</p> <p>During the onsite review cameras were reviewed in the Monitor station and all but three cameras were operable; however, work orders had been submitted and the facility administrator stated camera repairs are completed within 24 hours.</p> <p>(a) The Edinburg Transitional Center PAQ states the agency has not acquired a new facility or made substantial expansions or modifications to existing facilities since the last PREA audit. The PAQ states, “The Edinburg Transitional Center has made no revisions or additions to the facility's security in the last MEMO date. 2/11/2023.”</p> <p>(a) The Edinburg Transitional Center 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.</p>

	Through such reviews, the facility meets standard requirements.
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<b>115.221</b>	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Edinburg Transitional Center PAQ</li> <li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li> <li>3. CSG PREA Investigational Summary Report - Uniform Evidence Protocol, dated 2.2017</li> <li>4. DHR Health (Hospital) MOU Attempt, dated 12.26.2023</li> <li>5. Memorandum of Understanding, Women Together, dated 11.21.2023</li> <li>6. Law Enforcement Memorandum Attempt, dated 12.18.2023</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Random Clients</li> <li>2. Targeted Clients</li> <li>3. LVN</li> </ol> <p>Interviews with clients demonstrated none had made a report of sexual abuse or had a need for a forensic medical examination.</p> <p>The interview with the LVN demonstrated the facility had a protocol she followed for all incidents of sexual abuse to include sending victims to the Edinburg Regional Hospital for forensic exams.</p> <p>Site Observation:</p> <p>There facility has not experienced a need for a forensic medical examination in the past 12 months.</p>

(a) The Edinburg Transitional Center 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 Hidalgo Police Department would conduct sexual abuse investigations. When conducting a sexual abuse investigation, the agency investigators follow a uniform evidence protocol.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 21, section 115.221 (a), states, "To the extent the agency is responsible for investigating allegations of sexual abuse, the agency shall follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions."

The facility provided a CSG PREA Investigational Summary Report to demonstrate they follow a Uniform Evidence Protocol. The summary report documents the following information.

- Investigation Staff
- Report completed by
- Report Distribution
- Relevant PREA Standard
- Definitions
- Allegation Summary
- Summary of Investigation
- Conclusion
- Conclusion definitions
- Notations - further information
- Resident access to confidential outside support services
- Offering mental health care for sexual abuse victims
- Informing residents victims of sexual abuse of the investigation findings
- Sexual Abuse Incident Review
- Attached Supporting Documentation

(b) The Edinburg Transitional Center PAQ states the protocol being developmentally appropriate for is not applicable for youth as the facility does not house youthful offenders. The protocol was adapted from or otherwise based on the most recent edition of the DOJ's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011.

(c) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 21, section 115.221 (c), states, "The agency shall offer all victims of sexual abuse access to forensic medical examinations whether on-site or 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. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. The agency shall document its efforts to provide SAFEs or SANEs."

The facility provided an attempt for forensic exam services to DHR Hospital on 12.26.2023, stating, "The Edinburg Transition Center] is making every effort to meet the compliance of the federal Prison Rape Elimination Act standards in particular §115.221 (c). In doing so, we are reaching out to your office to support our efforts. This letter is requesting DHR Hospital be the provider forensic sexual assault examinations in the event an offender is victim to sexual assault while in custody.

(d) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 21, section 115.221 (d), states, "The agency shall attempt to make available to the victim a victim advocate from a rape crisis center. If a rape crisis center is not available to provide victim advocate services, the agency shall make available to provide these services a qualified staff member from a community-based organization or a qualified agency staff member. Agencies shall document efforts to secure services from rape crisis centers. For the purpose of this standard, a rape crisis center refers to an entity that provides intervention and related assistance, such as the services specified in 42 U.S.C. 14043 g (b)(2)(C), to victims of sexual assault of all ages. The agency may utilize a rape crisis center that is part of a governmental unit if the center is not part of the criminal justice system (such as a law enforcement agency) and offers a comparable level of confidentiality as a nongovernmental entity that provides similar victim services."

The facility provided a memorandum of understanding from the Women Together (Rape Crisis Center). The memorandum does not appear to have an expiration date and is signed and dated by the advocate representative and ETC Facility Administrator.

(e) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 21, section (e), states, "As requested by the victim, the victim advocate, qualified agency staff member, or qualified community-based organization staff member 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 Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 21, section (f),

	<p>states, "To the extent the agency itself is not responsible for investigating allegations of sexual abuse, the agency shall request that the investigating agency follow the requirements of paragraphs (a) through (e) of this section."</p> <p>Although the community has come together and rallies to provide services to all sexual abuse victims, the facility provided communication requesting the Edinburg Police Department sign a memorandum of understanding in regard to sexual abuse investigations.</p> <p>Through such reviews, the facility meets standard requirements.</p>
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<b>115.222</b>	<b>Policies to ensure referrals of allegations for investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Edinburg Transitional Center PAQ</li> <li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Monitors</li> <li>2. Shift Supervisors</li> <li>3. Chief of Security / Investigator</li> </ol> <p>Interviews with all personnel demonstrated each would contact the Chief of Security or the Facility Administrator with all allegations of sexual harassment and sexual abuse.</p> <p>The interview with the Investigator demonstrated an investigation would begin immediately upon receipt of an allegation of sexual harassment or sexual abuse.</p> <p>On Site Review:</p>



The facility has not experienced a sexual harassment or sexual abuse allegation in the past 12 months.

(a) The Edinburg Transitional Center 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 zero allegations of sexual abuse and sexual harassment that were received.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 22, section 115.222 (a), states, "The agency shall ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment."

(b/c) The Edinburg Transitional Center 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 PAQ states, <https://www.correctionalsolutionsgroup.com/copy-of-reporting-prison-rape>

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 22, section 115.222 (b) (c), state,

(b) "The agency shall have in place a policy 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. The agency shall publish such a policy on its website or, if it does not have one, make the policy available through other means. The agency shall document all such referrals.

(c) If a separate entity is responsible for conducting criminal investigations, such publication shall describe the responsibilities of both the agency and the investigating entity."

Through such reviews, the facility meets standard requirements.

115.231	Employee training
	<p data-bbox="280 188 983 221"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="280 266 564 300"><b>Auditor Discussion</b></p> <p data-bbox="280 344 544 378">Document Review:</p> <ol data-bbox="280 412 1401 734" style="list-style-type: none"> <li data-bbox="280 412 820 445">1. Edinburg Transitional Center PAQ</li> <li data-bbox="280 479 1401 512">2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li> <li data-bbox="280 546 751 580">3. PREA Pt 1: Course Overview</li> <li data-bbox="280 613 1350 647">4. Edinburg Transition Center Pre-Service Training Document, dated 2023</li> <li data-bbox="280 680 1331 714">5. Edinburg Transition Center In-Service Training Document, dated 2023</li> </ol> <p data-bbox="280 837 437 871">Interviews:</p> <ol data-bbox="280 904 592 1016" style="list-style-type: none"> <li data-bbox="280 904 477 938">1. Monitors</li> <li data-bbox="280 972 592 1005">2. Shift Supervisors</li> </ol> <p data-bbox="280 1061 1430 1173">Interviews with Monitors and Shift Supervisors demonstrated each were aware of and received initial and annual PREA training through in person policy review trainings and PREA videos.</p> <p data-bbox="280 1285 528 1319">Site Observation:</p> <p data-bbox="280 1352 1437 1554">Utilization of the PREA Audit Community Confinement Documentation Review Employee File / Records Review template and the facility training spreadsheet demonstrated, 11 of 11 employee training files demonstrate annual training had been completed in 2023 and refresher training in 2022 and throughout the yearly management meetings.</p> <p data-bbox="280 1666 1430 1778">(a) The Edinburg Transitional Center 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.</p> <p data-bbox="280 1890 1430 2002">CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 22-23, section 115.231 (a), states, "The agency shall train all employees who may have contact with residents on:</p> <ol data-bbox="280 2047 1307 2080" style="list-style-type: none"> <li data-bbox="280 2047 1307 2080">1. Its zero-tolerance policy for sexual abuse and sexual harassment;</li> </ol>

2. How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures;
3. Residents' right to be free from sexual abuse and sexual harassment;
4. The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment;
5. The dynamics of sexual abuse and sexual harassment in confinement;
6. The common reactions of sexual abuse and sexual harassment victims;
7. How to detect and respond to signs of threatened and actual sexual abuse;
8. How to avoid inappropriate relationships with residents;
9. How to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming residents; and
10. How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities."

The facility provided the following course overview. PREA Pt 1: Course Overview includes the following learning objectives.

1. Introduction
2. PREA and How it Defines Sexual Abuse and Sexual Harassment
  - a. Purpose of the Prison Rape Elimination Act and PREA National Standards
  - b. Sexual Abuse and Sexual Harassment Defined
  - c. Exigent Circumstances
3. Liabilities, Policies, and Requirements
  - a. Consequences and Liabilities for Non-Compliance with the PREA National Standards
  - b. Zero-Tolerance Policy Requirement
  - c. PREA Training Requirements
4. Course Summary
  - a. Course Contributors
  - b. Resources

c. References

The facility provided an Edinburg Transition Center Pre-Service Training document demonstrating the following topics are trained.

- PREA: An Introduction and Overview
- PREA: Dynamics of Sexual Abuse in correctional Systems
- PREA: Reporting Obligations and Retaliation Protections

The pre-service training document is signed and dated by the staff member and Facility Director.

(b) The Edinburg Transitional Center 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. The facility has both gender Clients, and all staff are trained to work with each gender.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 22-23, section 115.231 (b), states, "Such training shall be tailored to the gender of the residents at the employee's facility. The employee shall receive additional training if the employee is reassigned from a facility that houses only male residents to a facility that houses only female residents, or vice versa."

(c) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 22-23, section 115.231 (c), states, "All current employees who have not received such training shall be trained within one year of the effective date of the PREA standards, and the agency shall 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. In years in which an employee does not receive refresher training, the agency shall provide refresher information on current sexual abuse and sexual harassment policies."

(d) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 22-23, section 115.231 (d), states, "The agency shall document, through employee signature or electronic verification, that employees understand the training they have received."

The facility provided an Edinburg Transition Center In-Service Training document demonstrating the following topics are trained.

- PREA: An Introduction and Overview
- PREA: Dynamics of Sexual Abuse in correctional Systems
- PREA: Reporting Obligations and Retaliation Protections

The pre-service training document is signed and dated by the staff member and Facility Director attesting to "With my signature I acknowledge and understand that I have completed the training files listed above."

Through such reviews, the facility meets standard requirements.

115.232	Volunteer and contractor training
	<b>Auditor Overall Determination:</b> Exceeds Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"><li>1. Edinburg Transitional Center PAQ</li><li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li><li>3. Prison Rape Elimination Act (PREA) Notice to Contractors/Volunteers, not dated</li><li>4. Two Contractor or Volunteer Signed Training Attestations, dated 10.2.2023 and 10.3.2023</li></ol> <p>Interviews:</p>

1. QA Contractor – Compliance Officer
2. Texas Department of Criminal Justice Contract Monitor

The interview with two of the facility contractors demonstrated they complete training on the agency zero tolerance policy, annually. Both contractors are aware of reporting options, and both stated they would notify supervisory staff as soon as possible.

Site Observation:

Utilization of the PREA Audit Community Confinement Documentation Review Employee File / Records Review template demonstrated both contractors had completed training on the agency zero tolerance policy annually for the past three years.

(a) The Edinburg Transitional Center 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 four.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 23, section 115.232 (a), states, “The agency shall ensure that all volunteers and Edinburg Transition Centers 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.”

The facility provided a Prison Rape Elimination Act (PREA) Notice to Contractors/ Volunteers, demonstrating the following is trained.

- The Prison Rape Elimination Act
- Correctional Solutions Group Zero Tolerance Policy
- Definitions
- Contractor/Volunteer Requirements
- Reporting Sexual Abuse/Sexual Harassment

The Notice includes an attestation of acknowledgment and understanding and is

signed and dated by the contractor or volunteer and staff member.

(b) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 23, section 115.232 (b), states, "The level and type of training provided to volunteers and Edinburg Transition Centers shall be based on the services they provide and level of contact they have with residents, but all volunteers and Edinburg Transition Centers who have contact with residents shall be notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents."

(c) The Edinburg Transitional Center PAQ states the agency maintains documentation confirming that volunteers and contractors who have contact with residents understand the training they have received.

The facility provided two signed Prison Rape Elimination Act (PREA) Notice to Contractors/Volunteers.

Through such reviews of the facility completing annually training with contractors, the facility exceeds standard requirements.

115.233	Resident education
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Document Review:  1. Edinburg Transitional Center PAQ  2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023

3. Correctional Solutions Group LLC Prison Rape Elimination Act Zero Tolerance Acknowledgment for Offenders, not dated
4. No Means No Posting
5. Client Handbook Language

Interviews:

1. Random Clients
2. Targeted Clients
3. Case Manager

Interviews with clients demonstrated each were aware of their knowledge of PREA, their rights, internal and external reporting through using QR codes posted in their dormitories which immediately direct clients to their case managers and or third-party reporting on the agency website. Clients were aware they could report through the grievance process or to the Texas Ombudsman office.

The interview with the Case Manager demonstrated all clients are read PREA education to include the agency zero tolerance policy, rights and internal and external reporting options for sexual harassment and sexual abuse. Once clients have been educated on PREA, they sign the Client Handbook Acknowledgement.

Site Observation:

Utilizing the PREA Audit - Community Confinement Facilities Documentation Review - Resident Files/Records template demonstrated 16 of 20 clients interviewed have been in the program under 12 months and all had received PREA education on the day of admission or the following day upon being admitted into the facility.

(a) The Edinburg Transitional Center 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 the past 12 months who were given this information at intake was 384.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 23, section



115.233 (a), states, "During the intake process, residents shall receive information explaining the agency's zero- tolerance policy regarding sexual abuse and sexual harassment, how to report incidents or suspicions of sexual abuse or sexual 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 facility provided a Correctional Solutions Group LLC Prison Rape Elimination Act Zero Tolerance Acknowledgment for Offenders. This acknowledgment speaks to the agency zero tolerance for sexual harassment and sexual abuse, how to report abuse or harassment and offender rights to be free from sexual abuse, sexual harassment and retaliation.

(b) The Edinburg Transitional Center 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 384. The number of residents transferred from a different community confinement facility, during the past 12 months, who received refresher information was 384.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 23, section 115.233 (b), states, "The agency shall provide refresher information whenever a resident is transferred to a different facility."

(c) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 23, section 115.233 (c), states, "The agency shall provide resident education in formats accessible to all residents, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled as well as residents who have limited reading skills."

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 19-20, section 115.216 (a), states, "The agency shall take appropriate steps to ensure that residents with disabilities (including, for example, residents who are deaf or hard of

hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Such steps shall include, when necessary to ensure effective communication with residents 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, the agency shall 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, limited reading skills, or who are blind or have low vision. An agency is not required to take actions that it can demonstrate would result in a fundamental alteration 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 Edinburg Transitional Center PAQ states the agency maintains documentation of resident participation in PREA education sessions. Practice documentation can be found in provision (a) of this standard.

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

The facility provided a No Means No posting with the following information.

- Right to Report
- How to Report - internal and external reporting options with contact information.
- Victim Support Services with physical address and phone contact information.

The facility provided pages from the Client handbook demonstrating the following information is readily available.

- Zero Tolerance Policy
- Reporting Sexual Abuse & Sexual Harassment
- Clients
- Family and Friends reporting information

	<ul style="list-style-type: none"> <li>· Reporting Allegations</li> <li>· Contact information: <ul style="list-style-type: none"> <li>o PREA Ombudsman Office</li> <li>o Office of Inspector General (OIG)</li> <li>o TDCJ Ombudsman Coordinator</li> </ul> </li> <li>· TDCJ Correctional Institutions Division: <ul style="list-style-type: none"> <li>o Safe Prisons Program Management Office</li> <li>o CID Ombudsman Office</li> </ul> </li> </ul> <p>§ General offender status information may be obtained at <a href="http://www.tdcj.state.tx.us">www.tdcj.state.tx.us</a></p> <ul style="list-style-type: none"> <li>· Agency Toll-Free Telephone Number</li> <li>· Report Sexual Abuse or Sexual Harassment CSG PREA Coordinator phone and address</li> </ul> <p>Through such reviews, the facility meets standard requirements.</p>
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<b>115.234</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Edinburg Transitional Center PAQ</li> <li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li> <li>3. PREA: Investigation Protocols Curriculum, dated 2013</li> <li>4. Two CSG PREA Investigation's Protocols Certificates</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Chief of Security / Investigator</li> </ol> <p>The interview with the Investigator demonstrated she had completed specialized training for investigators on the Relias Learning Management System.</p>

Site Observation:

During the pre-audit phase training records for the Investigator were uploaded to the online audit system.

(a) The Edinburg Transitional Center PAQ states agency policy requires that investigators are trained in conducting sexual abuse investigations in confinement settings.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 24, section 115.234 (a), states, "In addition to the general training provided to all employees pursuant to § 115.231, the agency shall ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings."

(b) Specialized training shall include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral.

The facility provided a PREA: Investigation Protocols Curriculum. The curriculum includes the following training objectives.

Section 1: Introduction

Section 2: PREA Investigations and the Standards

Section 3: Unique Nature of Sexual Abuse Investigations

Section 4: General Investigative Considerations

Section 5: Investigative Protocols

Section 6: Conclusion

(b) The Edinburg Transitional Center 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

	<p>currently employed who have completed the required training is two.</p> <p>The facility provided two CSG PREA Investigation's Protocols Certificates, dated 12.27.2021 and 9.26.2022.</p> <p>Through such reviews the facility meets standard requirements.</p>
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115.235	Specialized training: Medical and mental health care
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Edinburg Transitional Center PAQ</li> <li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li> <li>3. Medical and Mental Health Training Course Overview</li> <li>4. Medical and Mental Health Training Certificate</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. LVN</li> </ol> <p>Interviews with the LVN demonstrated she had completed specialized training for medical and mental health personnel through the Relias Learning Management System.</p> <p>(a) The Edinburg Transitional Center 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> <p>(b) The Edinburg Transitional Center PAQ states agency medical staff at this facility do not conduct forensic medical exams. The PAQ states, "This is referred to Edinburg Regional Hospital and local law enforcement."</p>

(c) The Edinburg Transitional Center PAQ states the agency maintains documentation showing that medical and mental health practitioners have completed the required training.

The facility provided a Medical and Mental Health Training Course Overview. The course overview includes the following learning objectives.

1. How to recognize signs of sexual abuse and sexual harassment
2. How to preserve physical evidence of sexual abuse
3. How to respond effectively and professionally when communicating with alleged victims of sexual abuse and sexual harassment
4. The methods for reporting suspected sexual abuse or sexual harassment
5. The facility's response protocol in situations of suspected sexual abuse or sexual harassment.

The facility provided a Medical and Mental Health Training Certificate demonstrating the facilities one medical provider has completed the required training.

Through such reviews, the facility meets the standard requirements.

115.241	Screening for risk of victimization and abusiveness
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>  Document Review: <ol style="list-style-type: none"><li>1. Edinburg Transitional Center PAQ</li><li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li><li>3. CSG Edinburg Transitional Center PREA Risk Assessment Form, not dated</li><li>4. Edinburg Reassessment Form, not dated</li></ol> Interviews:

1. Random Clients
2. Targeted Clients
3. Case Manager

Interviews with random and targeted clients demonstrated risk screening questions had been asked during the intake process to include questions regarding their criminal history, prior sexual victimization, how each identified sexually and if they had concerns of being sexually abused while at the facility.

The interview with the Case Manager demonstrated risk assessments are completed for every client admitted into the facility, in a one-on-one environment, where case managers assess body language, past victimization, size, truthfulness, how each identifies, and review of each client's collateral information.

Site Observation:

Utilization of the PREA Community Confinement Documentation Review Resident File / Records Review template demonstrated 16 of 20 offenders have been in the facility for 12 months or less. Of those 16 offenders risk screenings were completed within the 72-hour time frame and again within 30 days of intake.

(a) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 24, section 115.241 (a), states, "All residents shall be assessed during an intake screening and upon transfer to another facility for their risk of being sexually abused by other residents or sexually abusive toward other residents."

(b) The Edinburg Transitional Center 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 384.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 24, section 115.241 (b), states, "Intake screening shall ordinarily take place within 72 hours of arrival at the facility."

(c-e) The Edinburg Transitional Center PAQ states the risk assessment is conducted using an objective screening instrument.

The facility provided a CSG Edinburg Transitional Center PREA Risk Assessment form, demonstrating the following is documented.

Resident Name / TDCJ# / Race / Current Offense

#### At Risk of Victimization

1. Have you ever been approached for sex/threatened with sexual assault while incarcerated?
2. Have you ever been the victim of sexual assault?
3. Do you have any reason to fear placement in the general population?
4. Younger or elderly detainee ( $\leq 21$  or  $\geq 65$ )
5. Small physical stature
6. Does the detainee have a developmental/mental/medical disability?
7. Is or is perceived to be Homosexual, Bisexual, Transgender, Intersex, or Gender Nonconforming.
8. First-time offender.
9. Criminal history of sexual offenses with adult/child victims.
10. History of consensual sex while incarcerated (add 1 point for each incident)
11. History of prior sexual victimization while incarcerated.

#### At Risk Abusiveness

12. Sex offender with adult/child/victims.
13. History of domestic violence as a perpetrator.



- 14. Prior crimes of violence (excluding sex offenses, domestic violence)
- 15. Incident reports for violent offenses while incarcerated (excluding sexual misconduct)
- 16. Incident reports for sexual misconduct while incarcerated
- 17. History of prior sexual abuse perpetration while incarcerated.

The risk assessment has scoring instruction at the top of the form. The bottom of the form instructs "referral must take place within 48 hours and the Supervisor must be notified prior to housing.)

(e) The Edinburg Transitional Center 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 384.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 25, section (f), states, "Within a set time period, not to exceed 30 days from the resident's arrival at the facility, the facility will reassess the resident's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening."

The facility provided an Edinburg Reassessment form. The reassessment form demonstrates the following is documented.

Name / REG# / Case Manager

Date of Arrival / Facility

Date of Intake Assessment

Date of Reassessment (30 Days after Intake Assessment)

Date of Reassessment Based on Need

Risk of Sexual Victimization Factors

1. Has the Client previously experienced sexual victimization?
2. Is the Client under 21 years of age or over 65 years of age?
3. Is the Clients height less than 5'6" and weight less than 140 lbs?
4. Is this the Clients first incarceration that has lasted longer than 30 days?
5. Is the Clients criminal history exclusively non-violent?
6. Does the Client have prior convictions for sex offenses against an adult or child?
7. Is the Client perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming?
8. Does the Client have a mental, physical, or developmental disability?
9. Does the Client perceive himself/herself as vulnerable?

Risk of Sexual Predator Factors

1. Does the Client have a history of institutional predatory sexual behavior within the past 10 years?
2. Does the Client have a history of prior sexual abuse (regardless of conviction)?
3. Does the Client have a history of conviction for violent offenses within the past 10 years?
4. Has the Client committed acts of violence within an institution during the past 10 years?
5. Has the Client committed an act of sexual behavior while incarcerated within the last 10 years (no evidence of coercion or force)?

What The Victim Risk Factors Indicates: / What the Predator Risk Factors Indicate

Were Housing Considerations Needed?

Signature of Person Conducting Assessment

Date

(f) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 25, section (g), states, "A resident's risk level shall 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."

(g) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 25, section (h), states, "Residents may not be 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."

(h) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 25, section (i), states, "The agency shall implement 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."

Through such reviews, the facility meets standard requirements.

<b>115.242</b>	<b>Use of screening information</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Document Review:

1. Edinburg Transitional Center PAQ
2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023

Interviews:

1. Targeted Clients
2. Case Manager
3. Facility Administrator

Interviews with two bisexual, one transgender and two gay clients demonstrated each were comfortable in their dorms and asked if they had concerns about sexual victimization while in the program. The transgender client was not asked if he needed a private shower as all showers at the facility are private.

The interview with the Case Manager demonstrated clients at risk of victimization are placed in the front, under cameras, by the exit door, of each dorm.

Interviews with the Facility Administrator demonstrated due to the size of the facility, all staff can see client complete risk assessments as all staff complete risk assessments during the intake process.

Site Observation:

Review of classification protocols and offender placement at the front of dorms 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.

(a) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 25, section 115.242 (a), states, "The agency shall use 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.”

(b) The Edinburg Transitional Center PAQ states the agency/facility makes individualized determinations about how to ensure the safety of each resident. The PAQ states, “The Edinburg Transition Center will make housing, bed, and program assignments on a case by case. The goal is separate housing for those residents with a high risk of being sexually victimized from those with a high risk of being sexually abusive.”

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 25, section (b) states, “The agency shall make individualized determinations about how to ensure the safety of each resident.”

(c-f) The Edinburg Transitional Center PAQ states the agency/facility makes housing and program assignments for transgender or intersex residents in the facility on a case-by-case basis.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 25, section (c) (d) (e) and (f) state, “

(c) “In deciding whether to assign a transgender or intersex resident to a facility for male or female residents, and in making other housing and programming assignments, the agency shall consider on a case-by-case basis whether a placement would ensure the resident’s health and safety, and whether the placement would present management or security problems.

(d) A transgender or intersex resident’s own view with respect to his or her own safety shall be given serious consideration.

(e) Transgender and intersex residents shall be given the opportunity to shower separately from other residents.

(f) The agency shall not place lesbian, gay, bisexual, transgender, or intersex residents in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such 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 such residents.”

Through such reviews, the facility meets standard requirements.

**115.251 Resident reporting**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Document Review:

1. Edinburg Transitional Center PAQ
2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023
3. No Means No Posting
4. Client Handbook Language
5. Staff Handbook Acknowledgment

Interviews:

1. Random Clients
2. Targeted Clients
3. Monitors

Interviews with clients demonstrated each would report to a staff, use QR codes, report anonymously, report to staff or tell the PREA people.

Interviews with staff demonstrated each would accept reports verbally, written reports with or without a client name and or through a third party.

Site Observation:

During the tour, bulletin boards with contact numbers for reporting allegations of sexual harassment or sexual abuse were observed to include the PREA Hotline, 911 and the advocacy agency. During the tour the Auditor phoned the PREA hotline on 1.17.2024 at 11:30 am, which rang the Texas Ombudsman Office with the Texas Board of Criminal Justice. The following day the call was returned at 7:30 am. The

caller stated when they receive a call, they initiate an investigation and contact the facility to perform the investigation.

(a) The Edinburg Transitional Center 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. The PAQ states, "The Edinburg Transitional Center has (0) verbal reports of sexual assault and sexual harassment since day 1 of operation."

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 26, section 115.251 (a), states, "The agency shall provide multiple internal ways for residents to privately report sexual abuse and sexual harassment, retaliation by other residents or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. "

The facility provided a No Means No posting with the following information.

- Right to Report
- How to Report - internal and external reporting options with contact information.
- Victim Support Services with physical address and phone contact information.

The facility provided pages from the Client handbook demonstrating the following information is readily available.

- Zero Tolerance Policy
- Reporting Sexual Abuse & Sexual Harassment
- Clients
- Family and Friends reporting information.
- Reporting Allegations
- Contact information:
  - o PREA Ombudsman Office
  - o Office of Inspector General (OIG)

- o TDCJ Ombudsman Coordinator

- TDCJ Correctional Institutions Division:

- o Safe Prisons Program Management Office

- o CID Ombudsman Office

§ General offender status information may be obtained at [www.tdcj.state.tx.us](http://www.tdcj.state.tx.us)

- Agency Toll-Free Telephone Number

- Report Sexual Abuse or Sexual Harassment CSG PREA Coordinator phone and address.

(b) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 26, section 115.251 (b), states, "The agency shall also inform residents of at least one way to report abuse or harassment to a public or private entity or office that is not part of the agency and that is able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials, allowing the resident to remain anonymous upon request."

(c) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 26, section (c), states, "Staff shall accept reports made verbally, in writing, anonymously, and from third parties and shall promptly document any verbal reports."

The facility provided a Staff Handbook Acknowledgment where employees affirm acknowledgment of the following information.

- o Undue Familiarity

- o Sexual Misconduct

- o Sexual Abuse



	<ul style="list-style-type: none"> <li>o Sexual contact</li> <li>o Reporting Allegations of Sexual Misconduct (encouraged to report to any department)</li> <li>o Investigation of Allegations of Sexual Misconduct</li> <li>o Disciplinary Actions</li> </ul> <p>Employees attest to reading and acknowledging the Correctional Solutions Group, Sexual Misconduct Policy through signature and date.</p> <p>(d) The Edinburg Transitional Center PAQ states the agency has established procedures for staff to privately report sexual abuse and sexual harassment of residents.</p> <p>CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 26, section 115.251 (d), states, “The agency shall provide a method for staff to privately report sexual abuse and sexual harassment of residents.”</p> <p>Through such reviews, the facility meets standard requirements.</p>
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<b>115.252</b>	<b>Exhaustion of administrative remedies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Edinburg Transitional Center PAQ</li> <li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li> <li>3. Client Handbook</li> <li>4. Post Audit: CSG Memorandum, re: 115.252 (f)(2), dated 1.22.2024</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Random Clients</li> <li>2. Targeted Clients</li> </ol>

3. PREA Coordinator

4. Facility Administrator

Interviews with clients demonstrated most were aware of the grievance procedures and understood they could complete a grievance when reporting sexual harassment and or sexual abuse. Clients stated they could obtain grievances in their dorms.

The interview with the PREA Coordinator demonstrated the facility will begin an investigation upon receipt of a grievance pertaining to PREA.

The interview with the Facility Administrator demonstrated grievance boxes were checked every day during the work week, Monday through Friday.

Site Observation:

During the tour grievance forms were observed in client dormitories and the grievance box was observed just outside of client dorms.

Action Plan:

- Facility Administrator to write a memorandum, addressed to the DOJ PREA Auditor, stating which facility staff will ensure the grievance box is checked at least six days per week to ensure ongoing compliance with this provision.
- Upload the facility memorandum to the supplemental files.

Post audit the facility provided a memorandum, re: 115.252 (f)(2), to the DOJ PREA Auditor, from the Director, stating, "Effective immediately the Edinburg Transition Center / CSG will ensure the Grievance Box is checked daily to ensure ongoing compliance with provision. The Facility Director or designee will check the grievance box Monday through Friday. During the weekend a Shift Supervisor will be assigned such duty. If there is a grievance the supervisor will call on duty upper management, and management will report to the facility to retrieve and respond to the grievance."

(a) The Edinburg Transitional Center PAQ states the agency does have an administrative procedure for dealing with resident grievances regarding sexual abuse.

The facility provided pages from the Client Handbook demonstrating pages 7-11 include in-depth grievance procedures to include the following information.

- Filing of Complaints
- Grievance Classification
- Informal Grievances
- Standard Grievance
- Emergency Grievance
- Processing of Grievances
- o Step One
- o Step Two
  - Administrative Review
  - Abuse of Grievance Procedure
  - Staff Training
  - Client Orientation
  - Grievance Recordkeeping
  - Confidentiality
  - PREA Related Grievances

(b) The Edinburg Transitional Center PAQ states the agency policy or procedure allows a resident to submit a grievance regarding an allegation of sexual abuse at any time, regardless of when the incident is alleged to have occurred.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 26, section 115.252 (b), states,

1. "The agency shall not impose a time limit on when a resident may submit a grievance regarding an allegation of sexual abuse.
2. The agency may apply otherwise-applicable time limits on any portion of a grievance that does not allege an incident of sexual abuse.
3. The agency shall not require a resident to use any informal grievance process, or

to otherwise attempt to resolve with staff an alleged incident of sexual abuse.

4. Nothing in this section shall restrict the agency's ability to defend against a lawsuit filed by a resident on the ground that the applicable statute of limitations has expired. "

(c) The Edinburg Transitional Center PAQ states the agency's policy and procedure allows a resident to submit a grievance alleging sexual abuse without submitting it to the staff member who is the subject of the complaint. The agency's policy and procedure require that a resident grievance alleging sexual abuse not be referred to the staff member who is the subject of the complaint.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 26, section 115.252 (c), states, "The agency shall ensure that—

1. A resident who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and
2. Such grievance is not referred to a staff member who is the subject of the complaint."

(d) The Edinburg Transitional Center PAQ states the agency policy and procedure requires that a decision on the merits of any grievance or portion of a grievance alleging sexual abuse be made within 90 days of the filing of the grievance. In the past 12 months, the number of grievances filed that alleged sexual abuse was zero. In the past 12 months, the number of grievances alleging sexual abuse that reached final decision within 90 days after being filed was zero.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 26, section 115.252 (d), states,

1. "The agency shall issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance.
2. Computation of the 90-day time period shall not include time consumed by residents in preparing any administrative appeal.
3. The agency may claim an extension of time to respond, of up to 70 days, if the normal time period for response is insufficient to make an appropriate decision. The agency shall notify the resident in writing of any such extension and provide a date by which a decision will be made.

4. 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, the resident may consider the absence of a response to be a denial at that level. “

(e) The Edinburg Transitional Center PAQ states agency policy and procedure permits third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse and to file such requests on behalf of residents. Agency policy and procedure requires that if a resident declines to have third-party assistance in filing a grievance alleging sexual abuse, the agency documents the resident's decision to decline. The number of grievances alleging sexual abuse filed by residents in the past 12 months in which the resident declined third-party assistance, containing documentation of the resident's decision to decline was zero.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 26-27, section 115.252 (e), states,

1. “Third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, shall be permitted to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of residents.

2. If a third-party files such a request on behalf of a resident, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.

3. If the resident declines to have the request processed on his or her behalf, the agency shall document the resident's decision.”

(f) The Edinburg Transitional Center PAQ states the agency has a policy and established procedures for filing an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse. Agency policy and procedure for emergency grievances alleging substantial risk of imminent sexual abuse requires an initial response within 48 hours. The number of emergency grievances alleging substantial risk of imminent sexual abuse that were filed in the past 12 months was zero. The agency's policy and procedure for emergency grievances alleging substantial risk of imminent sexual abuse requires that a final agency decision be issued within 5 days. The number of grievances alleging substantial risk of imminent sexual abuse filed in the past 12 months that reached final decisions within 5 days was zero.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 27, section 115.252 (f), states, “

1. “The agency shall establish procedures for the filing of an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse.
2. After receiving an emergency grievance alleging a resident is subject to a substantial risk of imminent sexual abuse, the agency shall 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, shall provide an initial response within 48 hours, and shall issue a final agency decision within 5 calendar days. The initial response and final agency decision shall document the agency’s determination whether the resident is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.”

(g) The Edinburg Transitional Center PAQ states the agency has a written policy that limits its ability to discipline a resident for filing a grievance alleging sexual abuse to occasions where the agency demonstrates that the resident filed the grievance in bad faith. In the past 12 months, the number of resident grievances alleging sexual abuse that resulted in disciplinary action by the agency against the resident for having filed the grievance in bad faith was zero.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 27, section 115.252 (g), states, “The agency may discipline a resident for filing a grievance related to alleged sexual abuse only where the agency demonstrates that the resident filed the grievance in bad faith.”

Through such reviews, the facility meets standard requirements.

<b>115.253</b>	<b>Resident access to outside confidential support services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Document Review: <ol style="list-style-type: none"><li>1. Edinburg Transitional Center PAQ</li><li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li></ol>

3. Memorandum of Understanding, Women Together, dated 11.21.2023

4. No Means No Posting

Interviews:

1. Random Clients

2. Targeted Clients

3. Facility Administrator

Interviews with three clients who disclosed victimization during screening and the 17 remaining clients demonstrated they were aware of advocacy services and the purpose of the services the advocacy agency provides.

The interview with the Facility Administrator demonstrated clients could contact the advocacy agency through phones in the dormitories and or from their personal cell phones.

Site Observation:

During the facility tour, postings of outside victim advocate information was observed on bulletin boards in the female and male dorms. The Auditor attempted to dial the advocate from client phones and was unsuccessful. All clients are allowed to have their cell phones all day, each day, and know they can contact the advocacy agency at any time.

Post Audit:

On 1.5.2024 at 3:29 pm, the Auditor phoned the Women Together advocacy agency at 956.630.4878. After proper introductions and the reason, the for the call the center stated she was aware of the agreement with the transitional center and if clients from the Edinburg need a hospital companion or ongoing crisis services, they will provide those services via telehealth.

(a) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 27, section 115.253 (a), states, "The facility shall 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, and by enabling reasonable communication between residents and these organizations, in as confidential a manner as possible."

The facility provided a No Means No posting with the Women Together Advocate address and toll-free telephone number.

(b) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 27, section 115.253 (b), states, "The facility shall inform residents, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws."

(c) The Edinburg Transitional Center 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.

The facility provided a memorandum of understanding from the Women Together (Rape Crisis Center). The memorandum does not appear to have an expiration date and is signed and dated by the advocate representative and ETC Facility Administrator.

Through such reviews, the facility meets standard requirements.



**115.254 Third party reporting**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

## Document Review:

1. Edinburg Transitional Center PAQ
2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023
3. No Means No Posting

## Interviews:

1. Random Clients
2. Targeted Clients
3. Monitors
4. Shift Supervisors
5. PREA Coordinator
6. Facility Administrator

Interviews with clients demonstrated they were aware they could report through a trusted adult in the community.

Interviews with personnel 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 was observed in the entrance area of the facility.

(a) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 27, section 115.254 (a), states, "The agency shall establish a method to receive third-party reports of sexual abuse and sexual harassment and shall distribute publicly information on how to report sexual abuse and sexual harassment on behalf of a resident."

The facility provided a No Means No posting with third party reporting options to include the following:

- Reporting to any staff, volunteer, contractor, or medical or mental health staff.
- Report to the PREA Coordinator or PREA Compliance Manager
  - o Corporate PREA Manager 405.474.9233
  - o [www.csgprograms.com](http://www.csgprograms.com)
- Tell a family member, friend, legal counsel, or anyone else outside the facility. They can report on your behalf by calling 1.800.580.4879.
- You also can submit a report on someone's behalf, or someone at the facility can report for you using the ways listed here.

On 12.14.2023 at 2:42 pm MST this Auditor sent the following third-party test request to test the agency third-party website request. "My name is Karen Murray, and I am the PREA Auditor preparing to audit the Edinburg Transitional Center. Could you tell me the procedures that are followed when a third-party report through this website." On 12.15.2023 at 10:53 am, MST, the following message was provided by the agency PREA Coordinator. "Good morning! This is Carol Powell. I'm the PREA Coordinator for Correctional Solutions Group.

There are several methods for a person to make a third-party report related to a PREA violation. One of the ways is the method you just employed - reporting it electronically via the facility's website. Once I receive the notification, I will report it to the facility for investigation.

A third-party may also report to individual staff members, or an outside entity. Reporting information is located on posters throughout the facility. Inmates are informed about third-party reporting during their training.

During the reporting process, the flow of information is limited to only those who

	<p>need to know.”</p> <p>Through such reviews, the facility meets standard requirements.</p>
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<b>115.261</b>	<b>Staff and agency reporting duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Edinburg Transitional Center PAQ</li> <li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Random Clients</li> <li>2. Targeted Clients</li> <li>3. Monitors</li> <li>4. Shift Supervisors</li> <li>5. PREA Coordinator</li> <li>6. Facility Administrator</li> </ol> <p>Interviews with the personnel and clients demonstrated each actively practices and understood the importance of immediately reporting all allegations of sexual abuse and sexual harassment.</p> <p>On Site Observation:</p> <p>The facility has not experienced a sexual harassment or sexual abuse investigation in the past 12 months.</p> <p>(a) The Edinburg Transitional Center 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</p>

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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 27, section 115.261 (a), states, "The agency shall require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency; retaliation against residents or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation."

(b) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 28, section 115.261 (b), 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, as specified in agency policy, to make treatment, investigation, and other security and management decisions."

(c) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 28, section 115.261 (c), states, "Unless otherwise precluded by Federal, State, or local law, medical and mental health practitioners shall be required to report sexual abuse pursuant to paragraph (a) of this section and to inform residents of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services."

(d) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 28, section 115.261 (d), states, "If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable person's statute, the agency shall report the allegation to the designated State or local services agency under applicable mandatory reporting laws."

	<p>(e) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 28, states, “The facility shall report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility’s designated investigators.”</p> <p>Through such reviews, the facility meets standard requirements.</p>
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<b>115.262</b>	<b>Agency protection duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Edinburg Transitional Center PAQ</li> <li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Monitors</li> <li>2. Shift Supervisors</li> <li>3. PREA Coordinator</li> <li>4. Facility Administrator</li> </ol> <p>Interviews with facility personnel demonstrated knowledge of any type of allegation, regardless of how reported is taken seriously and immediately reported to supervisory staff and local law enforcement. Staff clearly articulated separating, preserving and reporting all allegations to the Chief of Security or the Facility Administrator.</p> <p>(a) The Edinburg Transitional Center PAQ states when the agency or facility learns that a resident is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the resident. In the past 12 months, the number of times the agency or facility determined that a resident was subject to a substantial risk of imminent sexual abuse was zero. The PAQ states, ‘The Edinburg Transitional Center (ETC) has (0) reports of any resident reporting any risk of imminent sexual abuse in the past 3 years, however if such a case would be reported ETC would take immediate action to protect the resident.’”</p>

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 28, section 115.262 (a), states, "When an agency learns that a resident is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the resident."

Through such reviews the facility meets standard requirements.

**115.263 Reporting to other confinement facilities**

**Auditor Overall Determination:** Meets Standard

**Auditor Discussion**

Document Review:

1. Edinburg Transitional Center PAQ
2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023

Interviews:

1. Facility Administrator

The interview with the Facility Administrator 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 within 72 hours.

(a) The Edinburg Transitional Center 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. The PAQ states, "The Edinburg Transitional Center has (0) cases where abuse occurred while confined at another facility for fiscal years 2021, 2022, and 2023."

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 28, section 115.263 (a), states, "Upon receiving an allegation that a resident was sexually

abused while confined at another facility, the head of the facility that received the allegation shall notify the head of the facility or appropriate office of the agency where the alleged abuse occurred.”

(b) The Edinburg Transitional Center PAQ states agency policy requires the facility head to provide such notification as soon as possible, but no later than 72 hours after receiving the allegation.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 28, section 115.263 (b), states, “Such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation.”

(c) The Edinburg Transitional Center PAQ states the agency or facility documents that it has provided such notification within 72 hours of receiving the allegation.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 28, section 115.263 (c), states, “The agency shall document that it has provided such notification.”

(d) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 28, section 115.263 (d), states, “The facility head or agency office that receives such notification shall ensure that the allegation is investigated in accordance with these standards.”

Through such reviews, the facility meets the standard requirements.

<b>115.264</b>	<b>Staff first responder duties</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>

Document Review:

1. Edinburg Transitional Center PAQ
2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023

Interviews:

1. Monitors
2. Shift Supervisors

Interviews with Monitors and Shift Supervisors demonstrated each were aware of their first responder responsibilities and spoke to preserving evidence in the area where the allegation may have occurred, the separation of victims and aggressors, ensuring neither changed clothes, smoked, ate, drank, or cleaned up in any way.

(a) The Edinburg Transitional Center 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 was zero.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 28, section 115.264 (a), states, "Upon learning of an allegation that a resident was sexually abused, the first security staff member to respond to the report shall be required



	<p>to:</p> <ol style="list-style-type: none"> <li>1. Separate the alleged victim and abuser;</li> <li>2. Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence;</li> <li>3. If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and</li> <li>4. If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.”</li> </ol> <p>(b) The Edinburg Transitional Center PAQ states the facility’s’ policy requires that if the first staff responder is not a security staff member, that responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and notify security staff. Of the allegations that a resident was sexually abused made in the past 12 months, the number of times a non-security staff member was the first responder was zero.</p> <p>CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 28, section 115.264 (b), states, “If the first staff responder is not a security staff member, the responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and then notify security staff.”</p> <p>Through such reviews, the facility meets standard requirements.</p>
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<b>115.265</b>	<b>Coordinated response</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Document Review: <ol style="list-style-type: none"> <li>1. Edinburg Transitional Center PAQ</li> <li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li> </ol>

3. Edinburg Transition Center Sexual Harassment, Sexual Activity, & Sexual Abuse Emergency Action Plan, not dated

Interviews:

1. Facility Administrator

The interview with the Facility Administrator demonstrated the response to allegations of sexual assault is written in the policies and procedures and is to be followed in response to sexual abuse and sexual harassment incidents.

Site Observation:

During the tour laminated PREA Policies to include the coordinated response was observed in offices and the Monitor station.

(a) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 29, section 115.265 states, "The facility shall develop 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 facility provided an Edinburg Transition Center Sexual Harassment, Sexual Activity, & Sexual Abuse Emergency Action Plan. The action plan includes the following information.

- Order of Responsibility
- Command Post
- Lines of Authority During Emergencies
- Preparedness
- Sexual Activity, Sexual Harassment, Sexual Abuse
- Staff Responsibilities

	<ul style="list-style-type: none"> <li>· Responsibilities When Sexual Activity is Observed</li> <li>· Responsibilities When Sexual Abuse Is In Progress</li> <li>· Responsibilities for Evidence Protocol – Medical</li> <li>· Responsibilities for Involving Mental Health Professionals</li> <li>· Responsibilities When Allegation of Sexual Abuse Is Reported</li> <li>· Responsibilities for Confidentiality of Information</li> <li>· Required Reporting to Company and Customer Entities</li> <li>· Deactivation Phase</li> <li>· Posting</li> </ul> <p>Through such reviews, the facility meets standard requirements.</p>
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<b>115.266</b>	<b>Preservation of ability to protect residents from contact with abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Edinburg Transitional Center PAQ</li> <li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Facility Administrator</li> </ol> <p>The Facility Administrator stated the agency has not entered into collective bargaining agreements of any kind.</p> <p>(a) The Edinburg Transitional Center 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</p>

	<p>later.</p> <p>CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 29, section 115.266, states, “Neither the agency nor any other governmental entity responsible for collective bargaining on the agency’s behalf shall enter into or renew any collective bargaining agreement or other agreement that limits the agency’s ability to remove alleged staff sexual abusers from contact with residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted.”</p> <p>Through such reviews, the facility meets standard requirements.</p>
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<b>115.267</b>	<b>Agency protection against retaliation</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Edinburg Transitional Center PAQ</li> <li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Case Manager</li> </ol> <p>The interview with the Case Manager demonstrated that she would begin retaliation monitoring upon receipt of an allegation of sexual abuse which is when retaliation processes are introduced to victims. The Case Manager stated she would monitor dorm changes and disciplinary reports. The Case Manager stated she documents each check in, monthly, for up to 90 day and or as long as is needed.</p> <p>Site Observation:</p> <p>The facility has not experienced a sexual abuse allegation in the past 12 months therefore retaliation monitoring could not be reviewed.</p> <p>(a) The Edinburg Transitional Center PAQ states the agency has a policy to protect</p>

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 Administrator, Residential Services Manager and the Security Supervisor are the designated staff completing retaliation monitoring.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 29, section 115.2667 (a), states, "The agency shall establish 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 and shall designate which staff members or departments are charged with monitoring retaliation."

(b) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 29, section 115.2667 (b), states, "The agency shall 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."

(c) The Edinburg Transitional Center 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 residents or staff. The facility will monitor conduct or treatment until the resident is discharged. The facility acts promptly to remedy any such retaliation. In the past 12 months, the facility has had zero incidents of retaliation.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 29, section 115.2667 (c), states, "For at least 90 days following a report of sexual abuse, the agency shall monitor the conduct and treatment of residents or staff who reported the sexual abuse and of residents who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff, and shall act promptly to remedy any such retaliation. Items the agency should monitor include any resident disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. The agency shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need."

(d) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 29, section 115.2667 (d), states, "In the case of residents, such monitoring shall also include

	<p>periodic status checks.”</p> <p>(e) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 29, section 115.2667 (e), states, “If any other individual who cooperates with an investigation expresses a fear of retaliation, the agency 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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<b>115.271</b>	<b>Criminal and administrative agency investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Edinburg Transitional Center PAQ</li> <li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Chief of Security / Investigator</li> </ol> <p>The interview with the Investigator demonstrates the facility completes administrative investigations for all sexual harassment and sexual abuse allegations once the director determines if the allegation is PREA. The investigator explained that she brings in each person involved in the allegation one at a time, reviews statements, review policy infractions and review any evidence and prepare a report.</p> <p>The interview with the PREA Coordinator demonstrated the facility investigator stays in contact with the external criminal investigator, typically local law enforcement, who continually reports investigation information to the PREA Coordinator.</p> <p>Site Observation:</p> <p>The facility has not experienced a sexual harassment or sexual abuse allegation in the past 12 months.</p>

(a) The Edinburg Transitional Center PAQ states the agency/facility has a policy related to criminal and administrative agency investigations.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 30, section 115.271 (a), states, "When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, it shall do so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports."

(b) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 30, section 115.271 (b), states, "Where sexual abuse is alleged, the agency shall use investigators who have received special training in sexual abuse investigations pursuant to § 115.234."

(b) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 30, section 115.271 (c), states, "Investigators shall 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) This provision is not applicable as the facility does not conduct criminal investigations.

(e) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 30, section 115.271 (e), states, "The credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person's status as resident or staff. No agency shall require a resident 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."

(f) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 30, section (f), states, "Administrative investigations:

1. Shall include an effort to determine whether staff actions or failures to act contributed to the abuse; and

2. 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.

(g) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 30, section 115.271 (g), 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."

(h) The Edinburg Transitional Center PAQ states substantiated allegations of conduct that appear to be criminal are referred for prosecution. The number of substantiated allegations of conduct that appear to be criminal that were referred for prosecution since August 20, 2012, or since the last PREA audit, whichever is later was zero.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 30, section 115.271 (h), states, "Substantiated allegations of conduct that appears to be criminal shall be referred for prosecution."

(i) The Edinburg Transitional Center PAQ states the agency retains all written reports pertaining to the administrative or criminal investigation of alleged sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 30, section 115.271 (i), states, "The agency shall retain all written reports referenced in paragraphs (f) and (g) of this section for as long as the alleged abuser is incarcerated or employed by the agency, plus five years."

(j) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 30, section 115.271 (j), states, "The departure of the alleged abuser or victim from the employment or control of the facility or agency shall not provide a basis for terminating an investigation."

(k) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 30, section 115.271 (k), states, "Any State entity or Department of Justice component that conducts such investigations shall do so pursuant to the above requirements."



(I) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 30, section 115.271 (I), states, "When outside agencies investigate 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	<b>Evidentiary standard for administrative investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Edinburg Transitional Center PAQ</li> <li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Chief of Security / Investigator</li> </ol> <p>Interviews with the Investigator demonstrated she would apply a preponderance of evidence for all unsubstantiated or substantiated allegations of sexual abuse.</p> <p>Site Observation:</p> <p>The facility has not experienced a sexual harassment or sexual abuse allegation in the past 12 months.</p> <p>(a) The Edinburg Transitional Center 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. The PAQ states, "The Edinburg Transitional Center has no incidents to impose no standard higher than a preponderance of evidence in determining allegations of sexual abuse or sexual harassment are substantiated for fiscal years 2021, 2022, and 2023."</p>

	<p>CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 31, states, “The agency 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
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Edinburg Transitional Center PAQ</li> <li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li> <li>3. CSG PREA Investigational Summary Report – Uniform Evidence Protocol, dated 2.2017</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. PREA Coordinator</li> <li>2. Facility Administrator</li> </ol> <p>Interviews with the Facility Administrator demonstrated he or investigator would report the outcome of a sexual abuse investigation to victims as long as the client remained in the program.</p> <p>Site Observation:</p> <p>The facility has not had an allegation of sexual abuse in the past 12 months.</p> <p>(a) The Edinburg Transitional Center 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/</p>

facility in the past 12 months was zero. The PAQ states, "The Edinburg Transitional Center has (0) alleged sexual abuse complaints for fiscal years 2021, 2022, and 2023."

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 31, section 115.273 (a), states, "Following an investigation into a resident's allegation of sexual abuse suffered in an agency facility, the agency shall inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded."

The facility provided a CSG PREA Investigational Summary Report to demonstrate they follow a Uniform Evidence Protocol. The summary report documents the following information.

- Investigation Staff
- Report completed by
- Report Distribution
- Relevant PREA Standard
- Definitions
- Allegation Summary
- Summary of Investigation
- Conclusion
- Conclusion definitions
- Notations - further information
- Resident access to confidential outside support services
- Offering mental health care for sexual abuse victims
- Informing residents victims of sexual abuse of the investigation findings
- Sexual Abuse Incident Review
- Attached Supporting Documentation

(b) The Edinburg Transitional Center 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. The PAQ states, "No sexual abuse investigations conducted by outside agency for fiscal years 2021, 2022, and 2023."

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 31, section 115.273 (b), states, "If the agency did not conduct the investigation, it shall request the relevant information from the investigative agency in order to inform the resident."

(c) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 31, section 115.273 (c), states, "Following a resident's allegation that a staff member has committed sexual abuse against the resident, the agency shall subsequently inform the resident (unless the agency has determined that the allegation is unfounded) whenever:

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

(d) The Edinburg Transitional Center 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

	<p>convicted on a charge related to sexual abuse within the facility.</p> <p>CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 31, section 115.273 (d), states, “Following a resident’s allegation that he or she has been sexually abused by another resident, the agency shall subsequently inform the alleged victim whenever:</p> <ol style="list-style-type: none"> <li>1. The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or</li> <li>2. The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.”</li> </ol> <p>(e) The Edinburg Transitional Center 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 standard.</p> <p>CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 31, section 115.273 (e), states, “All such notifications or attempted notifications shall be documented.”</p> <p>Through such reviews, the facility meets standard requirements.</p>
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<b>115.276</b>	<b>Disciplinary sanctions for staff</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Edinburg Transitional Center PAQ</li> <li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Facility Administrator</li> </ol>

Interviews with the Facility Administrator 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. If a staff member was involved in a sexual harassment or sexual abuse investigation the staff would be terminated from employment at the facility and reported to applicable licensing agencies.

(a) The Edinburg Transitional Center PAQ states staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. The PAQ states, "The Edinburg Transitional Center has (0) cases of termination, resignation, or other sanctions against staff for violating agency sexual abuse or sexual harassment policies for the past 3 years."

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 31, section 115.276 (a), states, "Staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies."

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

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 31, section 115.276 (b), states, "Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse."

(c) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 32, section 115.276 (c), states, "Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than engaging in sexual abuse) shall

be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.”

(d) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 32, section 115.276 (d), 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, 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.

<b>115.277</b>	<b>Corrective action for contractors and volunteers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"><li>1. Edinburg Transitional Center PAQ</li><li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li></ol> <p>Interviews:</p> <ol style="list-style-type: none"><li>1. Facility Administrator</li></ol> <p>The Facility Administrator 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. If a volunteer or contractor was involved in a sexual harassment or sexual abuse investigation, they would be prohibited from returning to the facility and reported to applicable licensing agencies.</p>

(a) The Edinburg Transitional Center 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. The PAQ states, "The Edinburg Transitional Center has (0) cases of sexual abuse of residents by contractors or volunteers for the past 3 years."

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 32, section 115.277 (a), states, "Any Edinburg Transition Center or volunteer who engages in sexual abuse shall be prohibited from contact with residents and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies."

(b) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 32, section 115.277 (b), 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 Edinburg Transition Center or volunteer."

Through such reviews, the facility meets standard requirements.

<b>115.278</b>	<b>Disciplinary sanctions for residents</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Document Review:



1. Edinburg Transitional Center PAQ
2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023

Interviews:

1. Facility Administrator

The interview with the Facility Administrator demonstrated residents who falsely reported PREA allegations would typically be removed from the facility to a secure placement and be reported to law enforcement.

(a) The Edinburg Transitional Center PAQ states residents are subject 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 guilty of resident-on-resident sexual abuse that have occurred at the facility was zero. The PAQ states, "The Edinburg Transitional Center has (0) disciplinary actions dealing with resident for sexual conduct with staff."

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 32, section 115.278 (a), states, "Residents shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the resident engaged in resident-on-resident sexual abuse or following a criminal finding of guilt for resident-on-resident sexual abuse."

(b) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 32, section 115.278 (b), states, "Sanctions shall be commensurate with the nature and circumstances of the abuse committed, the resident's disciplinary history, and the sanctions imposed for comparable offenses by other residents with similar histories."

(c) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 32, section 115.278 (c), states, "The disciplinary process shall consider whether a resident's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed."

(d) The Edinburg Transitional Center PAQ states the facility does offer therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 32, section 115.278 (d), states, "If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, the facility shall consider whether to require the offending resident to participate in such interventions as a condition of access to programming or other benefits."

(d) The Edinburg Transitional Center PAQ states the agency disciplines residents for sexual conduct with staff only upon finding that the staff member did not consent to such contact.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 32, section 115.278 (e), states, "The agency may discipline a resident for sexual contact with staff only upon a finding that the staff member did not consent to such contact."

(e) Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 32, section 115.278 (f), 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 enough to substantiate the allegation."

(f) Edinburg Transitional Center PAQ states the agency prohibits all sexual activity between residents.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 32, section (g), states, "An agency may, in its discretion, prohibit all sexual activity between residents and may discipline residents for such activity. An agency may not, however, deem such activity to constitute sexual abuse if it determines that the activity is not coerced."

	Through such reviews, the facility meets standard requirements.
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<b>115.282</b>	<b>Access to emergency medical and mental health services</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Edinburg Transitional Center PAQ</li> <li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li> </ol> <p>Interviews:</p> <ol style="list-style-type: none"> <li>1. Facility Administrator</li> </ol> <p>The interview with the Facility Administrator demonstrated clients would be transported to the Edinburg Regional Hospital for emergency services for any sexual assault victims.</p> <p>(a) The Edinburg Transitional Center 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.</p> <p>CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 33, section 115.282 (a), states, "Resident 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."</p> <p>(b) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 33, section 115.282 (b), states, "If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders shall take preliminary steps to protect the victim pursuant to § 115.262 and shall</p>

	<p>immediately notify the appropriate medical and mental health practitioners.”</p> <p>(c) The Edinburg Transitional Center 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> <p>CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 33, section 115.282 (c), states, “Resident victims of sexual abuse while incarcerated shall be 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> <p>(d) The Edinburg Transitional Center 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>CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 33, section 115.282 (d), 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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<b>115.283</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Edinburg Transitional Center PAQ</li> <li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li> </ol>

Interviews:

1. Random Clients
2. Targeted Clients
3. Facility Administrator

Interviews with clients demonstrated none had reported sexual abuse.

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

(a) The Edinburg Transitional Center PAQ states the facility does 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 33, section 115.283 (a), states, "The facility shall 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."

(b) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 33, section 115.283 (b), states, "The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody."

(c) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 33, section 115.283 (c), states, "The facility shall provide such victims with medical and mental health services consistent with the community level of care."

(d) The Edinburg Transitional Center PAQ states female victims of sexually abusive vaginal penetration while incarcerated are offered pregnancy tests.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 33, section 115.283 (d), states, "Resident victims of sexually abusive vaginal penetration while incarcerated shall be offered pregnancy tests."

(c) The Edinburg Transitional Center PAQ states if pregnancy results from sexual abuse while incarcerated, victims receive timely and comprehensive information about, and timely access to, all lawful pregnancy-related medical services.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 33, section 115.283 (e), states, "If pregnancy results from conduct specified in paragraph (d) of this section, such victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy- related medical services."

(f) The Edinburg Transitional Center PAQ states resident victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 33, section 115.283 (f), states, "Resident victims of sexual abuse while incarcerated shall be offered tests for sexually transmitted infections as medically appropriate."

(g) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 33, states, 115.283 (g), 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."

(h) This Edinburg Transitional Center PAQ states the facility does 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 33, states, 115.283 (h), states, "The facility shall 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."

Through such reviews, the facility meets standard requirements.

<b>115.286</b>	<b>Sexual abuse incident reviews</b>
	<p data-bbox="280 188 983 221"><b>Auditor Overall Determination:</b> Meets Standard</p> <hr/> <p data-bbox="280 266 564 300"><b>Auditor Discussion</b></p> <p data-bbox="280 344 544 378">Document Review:</p> <ol data-bbox="280 412 1401 517" style="list-style-type: none"> <li data-bbox="280 412 820 445">1. Edinburg Transitional Center PAQ</li> <li data-bbox="280 479 1401 517">2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li> </ol> <p data-bbox="280 629 437 663">Interviews:</p> <ol data-bbox="280 696 655 730" style="list-style-type: none"> <li data-bbox="280 696 655 730">1. Facility Administrator</li> </ol> <p data-bbox="280 775 1453 976">The Facility Administrator articulated his review of all sexual abuse investigations stating each are completed with the Facility Administrator, Chief of Security, Bookkeeper, Case Manager, Parole Officer and Administrative personnel. The team will review all details of the investigation, camera footage, staff placement, completed rounds and group dynamics.</p> <p data-bbox="280 1088 1469 1368">(a) The Edinburg Transitional Center 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. The PAQ states, “The Edinburg Transitional Center has (0) zero incident reports of sexual abuse; therefore, no implementation of recommendations is on file.”</p> <p data-bbox="280 1480 1469 1671">CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 33-34, section 115.286 (a), states, “The facility 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.”</p> <p data-bbox="280 1783 1453 2029">(b) The Edinburg Transitional Center 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.</p>

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 34, section 115.286 (b), states, "Such review shall ordinarily occur within 30 days of the conclusion of the investigation."

(c) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 34, section 115.286 (c), states, "The review team shall include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners."

(d) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 34, section 115.286 (d), states, "The review team shall:

1. Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;
2. 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;
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; and
6. Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1) -(d)(5) of this section, and any recommendations for improvement, and submit such report to the facility head and



	<p>PREA compliance manager.</p> <p>(e) The Edinburg Transitional Center PAQ states, the facility implements the recommendations for improvement or documents its reasons for not doing so.</p> <p>CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 34, section 115.286 (e), states, “The facility shall implement the recommendations for improvement or shall document its reasons for not doing so.”</p> <p>Through such reviews the facility meets standard requirements.</p>
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<b>115.287</b>	<b>Data collection</b>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p> <p>Document Review:</p> <ol style="list-style-type: none"> <li>1. Edinburg Transitional Center PAQ</li> <li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li> <li>3. CSG PREA 2020, 2021 and 2022 Statistical and Annual Reports</li> </ol> <p>(a) The Edinburg Transitional Center 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>CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 34, section 115.287 (a), states, “The agency shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions.”</p> <ol style="list-style-type: none"> <li>1. The facility provided a CSG PREA 2022 Statistical Report. The report captures the following data. <ul style="list-style-type: none"> <li>· Identification of problem areas.</li> </ul> </li> </ol>

- Corrective action taken on an ongoing basis; and because of incident investigations.
- A comparison of the current year's data and corrective action with those from prior years.
- A comparison of the current year's data and corrective actions with those from prior years.
- Provide an assessment of the agency's progress in addressing sexual abuse.

2. PREA Annual Report - 2022 Incident Data - for each of the agency's four facilities.

- Sexual Harassment Resident on Resident
- Staff Sexual Harassment
- Sexual Abuse-Resident on Resident Nonconsensual Sexual Acts
- Sexual Abuse Resident on Resident Abuse Sexual Contact
- Staff Sexual Misconduct

The annual report is signed and dated by the Chief Operating Officer.

(b) The Edinburg Transitional Center PAQ states the agency aggregates the incident-based sexual abuse at least annually.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 34, section 115.287 (b), states, "The agency shall aggregate the incident-based sexual abuse data at least annually. "

(c) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 34, section 115.287 (c), 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."

(d) The Edinburg Transitional Center 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.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 34, section 115.287 (d), states, "The agency shall maintain, review, and collect data as needed from all available incident- based documents including reports, investigation files, and sexual abuse incident reviews."

(e) The Edinburg Transitional Center PAQ states the agency obtains incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 34, section 115.287 (e), states, "The agency also shall obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents."

(f) The Edinburg Transitional Center PAQ states the agency provided the Department of Justice (DOJ) with data from the previous calendar year upon request.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 34, section 115.287 (f), states, "Upon request, the agency shall provide all such data from the previous calendar year to the Department of Justice no later than June 30."

Through such reviews, the facility meets the standard requirements.

115.288	Data review for corrective action
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Document Review:

	<p>1. Edinburg Transitional Center PAQ</p> <p>(a) The Edinburg Transitional Center 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.</p> <p>(b) The Edinburg Transitional Center 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 from the years 2020, 2021 and 2022. The annual report provides progress in addressing sexual abuse.</p> <p>(c) The Edinburg Transitional Center PAQ states the agency makes its annual report readily available to the public, at least annually, through its website at <a href="https://www.correctionalsolutionsgroup.com/contact">https://www.correctionalsolutionsgroup.com/contact</a>. Annual reports are approved by the agency Chief Operating Officer.</p> <p>(d) The Edinburg Transitional Center PAQ states when the agency redacts material from an annual report for publication, the redactions are limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility.</p> <p>Through such reviews, the facility meets standard requirements.</p>
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<b>115.289</b>	<b>Data storage, publication, and destruction</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	Document Review:
	<ol style="list-style-type: none"> <li>1. Edinburg Transitional Center PAQ</li> <li>2. CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, dated 4.2023</li> </ol>

(a) The Edinburg Transitional Center PAQ states the agency ensures that incident-based and aggregate data are securely retained.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 35, section 115.289 (a) states, "The agency shall ensure that data collected pursuant to § 115.287 are securely retained."

(b) The Edinburg Transitional Center 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 at <https://www.correctionalsolutionsgroup.com/contact>

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 35, section 115.289 (b), states, "The agency shall make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means."

(c) The Edinburg Transitional Center PAQ states before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers. Compliance can be found in provision (b) of this standard.

CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 35, section 115.289 (c), states, "Before making aggregated sexual abuse data publicly available, the agency shall remove all personal identifiers."

(d) CSG Policy Number 6-B-1 Prison Rape Elimination Act Policy, page 35, section 115.287 (d), states, "The agency shall 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."

Through such reviews, the facility meets standard requirements.

	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>(a) During the prior three-year audit period, the agency ensured that each facility operated was audited, once.</p> <p>(b) This is the fourth audit cycle for Edinburg Transitional Center and the second year of the fourth audit cycle.</p> <p>(h) The Auditor was granted complete access to, and the ability to observe, all 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 are 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>

<p><b>115.403</b></p>	<p><b>Audit contents and findings</b></p>
	<p><b>Auditor Overall Determination:</b> Meets Standard</p>
	<p><b>Auditor Discussion</b></p>
	<p>(b) The agency has final audit reports published on its agency website.</p> <p>Through such reviews, the facility meets the standard requirements.</p>

<b>Appendix: Provision Findings</b>		
<b>115.211 (a)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
<b>115.211 (b)</b>	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its community confinement facilities?	yes
<b>115.212 (a)</b>	<b>Contracting with other entities for the confinement of residents</b>	
	If this agency is public and it contracts for the confinement of its residents with private agencies or other entities, including other government agencies, has the agency included the entity's obligation to adopt and comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents.)	na
<b>115.212 (b)</b>	<b>Contracting with other entities for the confinement of residents</b>	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents.)	na
<b>115.212 (c)</b>	<b>Contracting with other entities for the confinement of residents</b>	
	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
<b>115.213 (a)</b>	<b>Supervision and monitoring</b>	
	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
<b>115.213 (b)</b>	<b>Supervision and monitoring</b>	
	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
<b>115.213 (c)</b>	<b>Supervision and monitoring</b>	
	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
<b>115.215 (a)</b>	<b>Limits to cross-gender viewing and searches</b>	
	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
<b>115.215 (b)</b>	<b>Limits to cross-gender viewing and searches</b>	
	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
<b>115.215 (c)</b>	<b>Limits to cross-gender viewing and searches</b>	
	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
<b>115.215 (d)</b>	<b>Limits to cross-gender viewing and searches</b>	
	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
<b>115.215 (e)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility always refrain from searching or physically examining transgender or intersex residents for the sole purpose of determining the resident's genital status?	yes
	If 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
<b>115.215 (f)</b>	<b>Limits to cross-gender viewing and searches</b>	
	Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
	Does the facility/agency train security staff in how to conduct searches of transgender and intersex residents in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs?	yes
<b>115.216 (a)</b>	<b>Residents with disabilities and residents who are limited English proficient</b>	
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who are blind or have low vision?	yes

	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other (if "other," please explain in overall determination notes.)	yes
	Do such steps include, when necessary, ensuring effective communication with residents who are deaf or hard of hearing?	yes
	Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Have intellectual disabilities?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Who are blind or have low vision?	yes
<b>115.216 (b)</b>	<b>Residents with disabilities and residents who are limited English proficient</b>	

	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to residents who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
<b>115.216 (c)</b>	<b>Residents with disabilities and residents who are limited English proficient</b>	
	Does the agency always refrain from relying on resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-response duties under §115.264, or the investigation of the resident's allegations?	yes
<b>115.217 (a)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the 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
<b>115.217 (b)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone 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
<b>115.217 (c)</b>	<b>Hiring and promotion decisions</b>	
	Before hiring new employees who may have contact with residents, does the agency: Perform a criminal background records check?	yes
	Before hiring new employees who may have contact with residents, does the agency, consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
<b>115.217 (d)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with residents?	yes
<b>115.217 (e)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with residents or have in place a system for otherwise capturing such information for current employees?	yes
<b>115.217</b>	<b>Hiring and promotion decisions</b>	

<b>(f)</b>		
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
<b>115.217 (g)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
<b>115.217 (h)</b>	<b>Hiring and promotion decisions</b>	
	Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
<b>115.218 (a)</b>	<b>Upgrades to facilities and technology</b>	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect residents from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012 or since the last PREA audit, whichever is later.)	na
<b>115.218 (b)</b>	<b>Upgrades to facilities and technology</b>	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the	na

	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.)	
<b>115.221 (a)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal or administrative sexual abuse investigations.)	yes
<b>115.221 (b)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	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.)	no
	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.)	yes
<b>115.221 (c)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	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
<b>115.221 (d)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member?	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
<b>115.221 (e)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
<b>115.221 (f)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating 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
<b>115.221 (h)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.221(d) above).	na



<b>115.222 (a)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
<b>115.222 (b)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency have a policy in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
<b>115.222 (c)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	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
<b>115.231 (a)</b>	<b>Employee training</b>	
	Does the agency train all employees who may have contact with residents on: Its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with residents on: Residents' right to be free from sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with	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
<b>115.231 (b)</b>	<b>Employee training</b>	
	Is such training tailored to the gender of the residents at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male residents to a facility that houses only female residents, or vice versa?	yes
<b>115.231 (c)</b>	<b>Employee training</b>	
	Have all current employees who may have contact with residents received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training,	yes

	does the agency provide refresher information on current sexual abuse and sexual harassment policies?	
<b>115.231 (d)</b>	<b>Employee training</b>	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
<b>115.232 (a)</b>	<b>Volunteer and contractor training</b>	
	Has the agency ensured that all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
<b>115.232 (b)</b>	<b>Volunteer and contractor training</b>	
	Have all volunteers and contractors who have contact with residents been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with residents)?	yes
<b>115.232 (c)</b>	<b>Volunteer and contractor training</b>	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
<b>115.233 (a)</b>	<b>Resident education</b>	
	During intake, do residents receive information explaining: The agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do residents receive information explaining: How to report incidents or suspicions of sexual abuse or sexual harassment?	yes
	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
<b>115.233 (b)</b>	<b>Resident education</b>	
	Does the agency provide refresher information whenever a resident is transferred to a different facility?	yes
<b>115.233 (c)</b>	<b>Resident education</b>	
	Does the agency provide resident education in formats accessible to all residents, including those who: Are limited English proficient?	yes
	Does the agency provide resident education in formats accessible to all residents, including those who: Are deaf?	yes
	Does the agency provide resident education in formats accessible to all residents, including those who: Are visually impaired?	yes
	Does the agency provide resident education in formats accessible to all residents, including those who: Are otherwise disabled?	yes
	Does the agency provide resident education in formats accessible to all residents, including those who: Have limited reading skills?	yes
<b>115.233 (d)</b>	<b>Resident education</b>	
	Does the agency maintain documentation of resident participation in these education sessions?	yes
<b>115.233 (e)</b>	<b>Resident education</b>	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to residents through posters, resident handbooks, or other written formats?	yes
<b>115.234 (a)</b>	<b>Specialized training: Investigations</b>	
	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)).	
<b>115.234 (b)</b>	<b>Specialized training: Investigations</b>	
	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
<b>115.234 (c)</b>	<b>Specialized training: Investigations</b>	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of criminal or administrative sexual abuse investigations. See 115.221(a).)	yes
<b>115.235 (a)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes

	Does the agency ensure that all full- and part-time medical and 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.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How 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.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
<b>115.235 (b)</b>	<b>Specialized training: Medical and mental health care</b>	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency does not employ medical staff or the medical staff employed by the agency do not conduct forensic exams.)	yes
<b>115.235 (c)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
<b>115.235 (d)</b>	<b>Specialized training: Medical and mental health care</b>	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.231? (N/A for circumstances in which a particular status (employee or contractor/volunteer) does not apply.)	yes
	Do medical and mental health care practitioners contracted by	yes

	and volunteering for the agency also receive training mandated for contractors and volunteers by §115.232? (N/A for circumstances in which a particular status (employee or contractor/volunteer) does not apply.)	
<b>115.241 (a)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	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
<b>115.241 (b)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes
<b>115.241 (c)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes
<b>115.241 (d)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	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
<b>115.241 (e)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	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
<b>115.241 (f)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	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



<b>115.241 (g)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	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
<b>115.241 (h)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	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
<b>115.241 (i)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the resident's detriment by staff or other residents?	yes
<b>115.242 (a)</b>	<b>Use of screening information</b>	
	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
<b>115.242 (b)</b>	<b>Use of screening information</b>	
	Does the agency make individualized determinations about how to ensure the safety of each resident?	yes
<b>115.242 (c)</b>	<b>Use of screening information</b>	
	When deciding whether to assign a transgender or intersex resident to a facility for male or female residents, does the agency consider on a case-by-case basis whether a placement would ensure the resident's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns residents to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex residents, does the agency consider on a case-by-case basis whether a placement would ensure the resident's health and safety, and whether a placement would present management or security problems?	yes
<b>115.242 (d)</b>	<b>Use of screening information</b>	
	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
<b>115.242 (e)</b>	<b>Use of screening information</b>	
	Are transgender and intersex residents given the opportunity to shower separately from other residents?	yes
<b>115.242</b>	<b>Use of screening information</b>	

<b>(f)</b>		
	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
<b>115.251 (a)</b>	<b>Resident reporting</b>	
	Does the agency provide multiple internal ways for residents to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: Retaliation by other residents or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
<b>115.251 (b)</b>	<b>Resident reporting</b>	

	Does the agency also provide at least one way for residents to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the resident to remain anonymous upon request?	yes
<b>115.251 (c)</b>	<b>Resident reporting</b>	
	Do staff members accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Do staff members promptly document any verbal reports of sexual abuse and sexual harassment?	yes
<b>115.251 (d)</b>	<b>Resident reporting</b>	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of residents?	yes
<b>115.252 (a)</b>	<b>Exhaustion of administrative remedies</b>	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address resident grievances regarding sexual abuse. This does not mean the agency is exempt simply because a resident does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
<b>115.252 (b)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency permit residents to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring a resident to use any informal grievance process, or to otherwise attempt to resolve	yes

	with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	
<b>115.252 (c)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency ensure that: a resident who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
<b>115.252 (d)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by residents in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)	yes
	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.)	yes
	At any level of the administrative process, including the final level, if the resident does not receive a response within the time allotted for reply, including any properly noticed extension, may a resident consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
<b>115.252 (e)</b>	<b>Exhaustion of administrative remedies</b>	
	Are third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, permitted to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of residents? (If a third party files such a request on behalf	yes

	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.)	yes
<b>115.252 (f)</b>	<b>Exhaustion of administrative remedies</b>	
	Has the agency established procedures for the filing of an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging a resident is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the resident is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
<b>115.252 (g)</b>	<b>Exhaustion of administrative remedies</b>	
	If the agency disciplines a resident for filing a grievance related to	yes

	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.)	
<b>115.253 (a)</b>	<b>Resident access to outside confidential support services</b>	
	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
<b>115.253 (b)</b>	<b>Resident access to outside confidential support services</b>	
	Does the facility inform residents, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
<b>115.253 (c)</b>	<b>Resident access to outside confidential support services</b>	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide residents with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
<b>115.254 (a)</b>	<b>Third party reporting</b>	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of a resident?	yes
<b>115.261 (a)</b>	<b>Staff and agency reporting duties</b>	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or	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
<b>115.261 (b)</b>	<b>Staff and agency reporting duties</b>	
	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
<b>115.261 (c)</b>	<b>Staff and agency reporting duties</b>	
	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
<b>115.261 (d)</b>	<b>Staff and agency reporting duties</b>	
	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
<b>115.261 (e)</b>	<b>Staff and agency reporting duties</b>	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes



<b>115.262 (a)</b>	<b>Agency protection duties</b>	
	When the agency learns that a resident is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the resident?	yes
<b>115.263 (a)</b>	<b>Reporting to other confinement facilities</b>	
	Upon receiving an allegation that a resident was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
<b>115.263 (b)</b>	<b>Reporting to other confinement facilities</b>	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
<b>115.263 (c)</b>	<b>Reporting to other confinement facilities</b>	
	Does the agency document that it has provided such notification?	yes
<b>115.263 (d)</b>	<b>Reporting to other confinement facilities</b>	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
<b>115.264 (a)</b>	<b>Staff first responder duties</b>	
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate,	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
<b>115.264 (b)</b>	<b>Staff first responder duties</b>	
	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
<b>115.265 (a)</b>	<b>Coordinated response</b>	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes
<b>115.266 (a)</b>	<b>Preservation of ability to protect residents from contact with abusers</b>	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	no
<b>115.267 (a)</b>	<b>Agency protection against retaliation</b>	
	Has the agency established a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff?	yes

	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
<b>115.267 (b)</b>	<b>Agency protection against retaliation</b>	
	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
<b>115.267 (c)</b>	<b>Agency protection against retaliation</b>	
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any resident disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: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
<b>115.267 (d)</b>	<b>Agency protection against retaliation</b>	
	In the case of residents, does such monitoring also include periodic status checks?	yes
<b>115.267 (e)</b>	<b>Agency protection against retaliation</b>	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
<b>115.271 (a)</b>	<b>Criminal and administrative agency investigations</b>	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/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
<b>115.271 (b)</b>	<b>Criminal and administrative agency investigations</b>	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.234?	yes
<b>115.271 (c)</b>	<b>Criminal and administrative agency investigations</b>	
	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
<b>115.271 (d)</b>	<b>Criminal and administrative agency investigations</b>	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
<b>115.271 (e)</b>	<b>Criminal and administrative agency investigations</b>	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as resident or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring a resident who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
<b>115.271 (f)</b>	<b>Criminal and administrative agency investigations</b>	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
<b>115.271 (g)</b>	<b>Criminal and administrative agency investigations</b>	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
<b>115.271</b>	<b>Criminal and administrative agency investigations</b>	

<b>(h)</b>		
	Are all substantiated allegations of conduct that appears to be criminal referred for prosecution?	yes
<b>115.271 (i)</b>	<b>Criminal and administrative agency investigations</b>	
	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
<b>115.271 (j)</b>	<b>Criminal and administrative agency investigations</b>	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the facility or agency does not provide a basis for terminating an investigation?	yes
<b>115.271 (l)</b>	<b>Criminal and administrative agency investigations</b>	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.221(a).)	yes
<b>115.272 (a)</b>	<b>Evidentiary standard for administrative investigations</b>	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
<b>115.273 (a)</b>	<b>Reporting to residents</b>	
	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
<b>115.273 (b)</b>	<b>Reporting to residents</b>	
	If the agency did not conduct the investigation into a resident's allegation of sexual abuse in an agency facility, does the agency	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.)	
<b>115.273 (c)</b>	<b>Reporting to residents</b>	
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the resident's unit?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following a resident's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
<b>115.273 (d)</b>	<b>Reporting to residents</b>	
	Following a resident's allegation that he or she has been sexually abused by another resident, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following a resident's allegation that he or she has been sexually abused by another resident, does the agency subsequently inform	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?	
<b>115.273 (e)</b>	<b>Reporting to residents</b>	
	Does the agency document all such notifications or attempted notifications?	yes
<b>115.276 (a)</b>	<b>Disciplinary sanctions for staff</b>	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
<b>115.276 (b)</b>	<b>Disciplinary sanctions for staff</b>	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
<b>115.276 (c)</b>	<b>Disciplinary sanctions for staff</b>	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
<b>115.276 (d)</b>	<b>Disciplinary sanctions for staff</b>	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies, unless the activity was clearly not criminal?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
<b>115.277 (a)</b>	<b>Corrective action for contractors and volunteers</b>	



	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with residents?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
<b>115.277 (b)</b>	<b>Corrective action for contractors and volunteers</b>	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with residents?	yes
<b>115.278 (a)</b>	<b>Disciplinary sanctions for residents</b>	
	Following an administrative finding that a resident engaged in resident-on-resident sexual abuse, or following a criminal finding of guilt for resident-on-resident sexual abuse, are residents subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
<b>115.278 (b)</b>	<b>Disciplinary sanctions for residents</b>	
	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
<b>115.278 (c)</b>	<b>Disciplinary sanctions for residents</b>	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether a resident's mental disabilities or mental illness contributed to his or her behavior?	yes
<b>115.278 (d)</b>	<b>Disciplinary sanctions for residents</b>	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending resident to participate in such interventions as a	yes

	condition of access to programming and other benefits?	
<b>115.278 (e)</b>	<b>Disciplinary sanctions for residents</b>	
	Does the agency discipline a resident for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
<b>115.278 (f)</b>	<b>Disciplinary sanctions for residents</b>	
	For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
<b>115.278 (g)</b>	<b>Disciplinary sanctions for residents</b>	
	Does the agency always refrain from considering non-coercive sexual activity between residents to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between residents.)	yes
<b>115.282 (a)</b>	<b>Access to emergency medical and mental health services</b>	
	Do resident victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
<b>115.282 (b)</b>	<b>Access to emergency medical and mental health services</b>	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do 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
<b>115.282 (c)</b>	<b>Access to emergency medical and mental health services</b>	
	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?	
<b>115.282 (d)</b>	<b>Access to emergency medical and mental health services</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.283 (a)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
<b>115.283 (b)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
<b>115.283 (c)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
<b>115.283 (d)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are resident victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if “all-male” facility. 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
<b>115.283 (e)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	If pregnancy results from the conduct described in paragraph § 115.283(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.)	
<b>115.283 (f)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are resident victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
<b>115.283 (g)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
<b>115.283 (h)</b>	<b>Ongoing medical and mental health care for sexual abuse victims and abusers</b>	
	Does the facility attempt to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners?	yes
<b>115.286 (a)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
<b>115.286 (b)</b>	<b>Sexual abuse incident reviews</b>	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
<b>115.286 (c)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes

<b>115.286 (d)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.286(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
<b>115.286 (e)</b>	<b>Sexual abuse incident reviews</b>	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
<b>115.287 (a)</b>	<b>Data collection</b>	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
<b>115.287 (b)</b>	<b>Data collection</b>	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
<b>115.287</b>	<b>Data collection</b>	

<b>(c)</b>		
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
<b>115.287 (d)</b>	<b>Data collection</b>	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
<b>115.287 (e)</b>	<b>Data collection</b>	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents? (N/A if agency does not contract for the confinement of its residents.)	yes
<b>115.287 (f)</b>	<b>Data collection</b>	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
<b>115.288 (a)</b>	<b>Data review for corrective action</b>	
	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

<b>115.288 (b)</b>	<b>Data review for corrective action</b>	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
<b>115.288 (c)</b>	<b>Data review for corrective action</b>	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
<b>115.288 (d)</b>	<b>Data review for corrective action</b>	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
<b>115.289 (a)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency ensure that data collected pursuant to § 115.287 are securely retained?	yes
<b>115.289 (b)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
<b>115.289 (c)</b>	<b>Data storage, publication, and destruction</b>	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
<b>115.289 (d)</b>	<b>Data storage, publication, and destruction</b>	
	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

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



	same manner as if they were communicating with legal counsel?	
<b>115.403 (f)</b>	<b>Audit contents and findings</b>	
	The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)	yes