

**PREA AUDIT REPORT Interim Final
COMMUNITY CONFINEMENT FACILITIES**

Date of report: 8/27/2017

Auditor Information			
Auditor name: Kayleen Murray			
Address: P.O. Box 2400 Wintersville, Ohio 43953			
Email: kmurrap.prea@yahoo.com			
Telephone number: 7403176630			
Date of facility visit: June 27-28, 2017			
Facility Information			
Facility name: Special Housing Adjustment Residential Program (SHARP)			
Facility physical address: 55 Glenwood Avenue Akron, Ohio 44304			
Facility mailing address: <i>(if different from above)</i> Click here to enter text.			
Facility telephone number: 330-996-2222			
The facility is:	<input type="checkbox"/> Federal	<input type="checkbox"/> State	<input type="checkbox"/> County
	<input type="checkbox"/> Military	<input type="checkbox"/> Municipal	<input type="checkbox"/> Private for profit
	<input checked="" type="checkbox"/> Private not for profit		
Facility type:	<input type="checkbox"/> Community treatment center	<input type="checkbox"/> Community-based confinement facility	
	<input checked="" type="checkbox"/> Halfway house	<input type="checkbox"/> Mental health facility	
	<input type="checkbox"/> Alcohol or drug rehabilitation center	<input type="checkbox"/> Other	
Name of facility's Chief Executive Officer: Jamie Messenger			
Number of staff assigned to the facility in the last 12 months: 30			
Designed facility capacity: 124			
Current population of facility: 94			
Facility security levels/inmate custody levels: minimum/community control			
Age range of the population: 18 and up			
Name of PREA Compliance Manager: Hope Factorr		Title: Program Manager	
Email address: hopefactor@orianahouse.org		Telephone number: 330-535-8116	
Agency Information			
Name of agency: Oriana House, Inc.			
Governing authority or parent agency: <i>(if applicable)</i> Click here to enter text.			
Physical address: 885 East Butchel Avenue Akron, Ohio 44309			
Mailing address: <i>(if different from above)</i> P.O. Box 1501 Akron, Ohio 44309			
Telephone number: 330-535-8116			
Agency Chief Executive Officer			
Name: James Lawrence		Title: CEO	
Email address: JamesLawrence@orianahouse.org		Telephone number: 330-535-8116	
Agency-Wide PREA Coordinator			
Name: Mary Jones		Title: Vice President of Administration & Legal Council	
Email address: MaryJones@orianahouse.org		Telephone number: 330-535-8116	

AUDIT FINDINGS

NARRATIVE

The PREA audit for the Special Housing Adjustment Residential Program (SHARP) Halfway House was conducted on June 27-28, 2017 in Akron, Ohio.

SHARP is a facility that is under the Oriana House, Inc. umbrella. Oriana House was founded in 1981 and has been nationally recognized for community corrections and chemical dependency treatment. The facility uses Power DMS web based compliance system to supply the auditor with documentation relevant to showing compliance with each of the standards. The pre-audit questionnaire, a list of community partners and their phone numbers, floor plans, and MOU's were included in the documentation. The auditor is notified by email that the documentation is available online and is then supplied a unique access key supplied by Power DMS. The auditor received this information six weeks prior to the audit.

During the audit, the auditor toured the facility and conducted formal staff and client interviews. During the tour, it was noted that multiple PREA audit notices were posted in both resident and staff areas including the main entrance where visitors to the facility could also see the notices. The notices included the name and address (mailing and email) of the auditor and the date in which the notice was posted. The auditor received no contact from residents or staff prior to the audit. One resident made a requested to speak with the auditor during the audit. Also posted were notices as to how anyone could report a PREA allegation. The notices included the names, numbers, and addresses of internal and external agencies they can make an anonymous report, and that anyone can report a PREA allegation to any staff member at any time verbally or in writing.

Three offenders were randomly chosen for interviews (10% of the population). Clients were asked about their experience with PREA education, allegation reporting, communication with staff, safety, restrooms, knock and announcements, grievance procedures, pat downs, PREA brochures/postings, and the zero tolerance policy.

The auditor also interviewed specialized staff. This staff includes: Executive Vice President of Administrative Services and Business Relations, PREA Coordinator, PREA Compliance Specialist, PREA Manager, Investigators (2), Human Resource Director, and Emotional Support personnel. The auditor was able to speak with the liaison for both Akron General Hospital's SANE program and Medina/Summit Counties Rape Crisis Center. The auditor was able to verify services through each of the organizations' representative. The facility does not provide on-site mental health or medical services. Random staff were questioned about PREA training, how to report, to whom to report, filing reports, investigations, conducting interviews, follow-up and monitoring retaliation, first responder duties, and the facility's coordinated response plan.

After a brief opening with agency staff, the auditor toured the facility. The tour consisted of examining all housing units, dorms, bathrooms, group areas, operations posts, rec yard, air break patio, utility areas, kitchen, and maintenance areas. A review of employee files, training records, PREA acknowledgments, PREA forms, and data logs were also completed. The auditor gave a closeout and shared some the immediate findings.

DESCRIPTION OF FACILITY CHARACTERISTICS

The Special Housing Adjustment Residential Program (SHARP) is a halfway house located in Akron, Ohio that serves adult male felony offenders (state and federal offenders) that present with mental health issues or a developmental disability. The facility is a single story brick building that can house 19 offenders. In order to access the secure perimeter of the facility one must report to the main entrance and be buzzed into the main lobby by staff. Once inside the main lobby, all residents, staff, and/or visitors must be signed in. Residents will receive a pat down that is visible by video surveillance or residents may receive an enhanced pat down (residents receiving an enhanced pat down will be moved to a room where they will strip down to their underclothes) which is supervised by two staff of the same sex. Visitors will read and sign an acknowledgment of Oriana House's zero tolerance policy.

The facility is connected to the Terrence Mann Residential Center but is separated by a locked door and has its own outside entrance into the facility.

The facility has one dorm for clients in SHARP that houses 16 beds. Clients that have a developmental disability and are considered pre-trial clients will be housed in one of two rooms (one single occupancy and one double occupancy). Dorm rooms have security mirrors strategically located and a window in the door for easy visibility. Clients are required to change clothes in the bathrooms. The housing unit area has a restroom that is designed for maximum privacy while still providing a safe and secure environment (see standard 115.215 for a detailed description of both bathrooms). The day room area houses a manned housing desk, dining area, seating, and pay phones. There is access to a TV, recreation equipment, air break patio (enclosed by a 12ft wood fence and is staff supervised), quiet room, and treatment offices. All areas have either a security mirror or camera and some areas have both. The residents participate in recreation activities across the street while supervised and are required to be in visible areas. The laundry room is located within the restroom. The facility has identified beds within the dorm for residents who have been identified as highly abusive or highly vulnerable. A transgender or intersex client may be housed in one of the single or double bed rooms.

The facility has windows in all the doors (group rooms, quiet, and staff offices) for clear line of site views into all rooms. These areas also have security mirrors in strategic places to minimize blind spot areas. SHARP's electronic surveillance program includes cameras placed throughout the facility (interior and exterior) that have the capability to record and playback up to 30 days. The cameras located at the main post also record audio. Camera footage is viewed by Resident Supervisor staff assigned to the main control post. Supervisors review live and recorded footage at least one time per week. The Program Administrator, Lead Resident Supervisor, and Program Coordinator have access to the facility camera system on their office desk top computer. Resident supervisor staff also are required to conduct "whereabouts" 6x per shift and 9x per shift for residents who have been classified as highly abusive or highly susceptible until a review can be done by a supervisor team to remove the resident from the increased "whereabouts". During a "where about" staff must document physically seeing each resident. Along with "whereabouts", Resident Supervisor staff circulate throughout the whole facility once every 30 minutes. Identified blind spot areas have increased circulation. The facility has placed surveillance mirrors in most of the rooms in order to capture areas that are not immediately visible when looking through the window, and in the hallways to cover corners and other hidden areas.

The facility's goals are to alleviate jail and prison overcrowding; improving the community integration process for residents; addressing chemical dependency, employment, education, and other issues prior to release; and reducing recidivism by addressing certain behaviors, attitudes, and thought processes. SHARP accomplishes these goals by using programming that has demonstrated the ability to reduce crime.

SUMMARY OF AUDIT FINDINGS

Special Housing Adjustment Residential Program has had one (1) PREA allegations during the reporting period. This was a substantiated client on client sexual harassment allegation. The allegation was administratively investigated by an appropriately trained investigator and did not reach the level for referral to the legal authority for a criminal investigation.

The staff of SHARP indicated that they received formal PREA training during orientation training or as part of their annual training along with refresher training during a monthly staff meeting. Staff was able to specifically talk about their responsibilities as first responders, how they were to respond to any allegation reported to them or if they suspected incidents of sexual abuse/sexual harassment, how to communicate effectively with offenders who may be LGBTI, and impressed upon the auditor that their main duty was to keep everyone safe.

The offenders at SHARP expressed that they have no doubt that the staff would keep them safe and would respond appropriately should an incident of sexual harassment/sexual abuse take place. The offenders were able to clearly recite the education they received concerning their rights under the PREA standards, and knew the location of PREA related postings. All offenders affirmed being screened at intake for risk of vulnerability or abusiveness and again by their case manager at a later date.

All MOU's documented the partnership between the facility and the contracting agency concerning services to be provided should there be a need. The auditor was able to interview representatives from Akron General Hospital and Medina/Summit Counties Rape Crisis Center and confirm the services each would provide to offenders should there be an allegation of sexual assault or abuse.

Overall, the auditor was left with the impression that the leadership and staff of SHARP have made implementing the PREA standards a priority and that they have received the necessary training and authority to detect, protect, and respond to any incident of sexual abuse/sexual harassment. Oriana House as an agency has reviewed the corrective action plans from past audits and have implemented positive changes at all facilities. Opportunities to increase the ability to protect and detect sexual abuse and sexual harassment are proactive in nature. Agency leadership has developed policies and practices that shows a commitment to the safety of residents, and provides the necessary support to implement all aspects of the PREA standards.

This is the facility's second PREA audit and it confirms the agency's progression toward providing maximum safety and an environment where to enable positive change.

Number of standards exceeded: 6

Number of standards met: 30

Number of standards not met: 0

Number of standards not applicable: 3

Standard 115.211 Zero tolerance of sexual abuse and sexual harassment; PREA Coordinator

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

The facility has an agency wide written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment. The policy includes how the facility will implement its approach to preventing, detecting, and responding to sexual abuse and sexual harassment; definitions of prohibited behavior; sanctions for those found to have participated in sexual abuse or sexual harassment; and appropriate strategies to reduce and prevent sexual abuse and sexual harassment of clients.

The agency-wide PREA Coordinator is the agency's Vice President of Administration and Legal Counsel, and reports directly to the agency's Executive Vice President of Administrative Services and Business Relations. During staff interviews, the PREA coordinator indicated that she has enough time and authority to develop, implement, and oversee the facility's efforts to comply with the PREA standards. The Vice President of Administrative Services and Business Relations agreed that the PREA Coordinator has great latitude toward implementing policy and procedure where PREA is concerned.

The facility's PREA Manager is the agency's Program Manager. The PREA Manager reports directly to the PREA Coordinator on issues pertaining to complying with the PREA standards. She indicates that she has ample time to comply with the PREA standards.

- Review:
 - Policy and Procedure
 - Interview with PREA Coordinator
 - Interview with Vice President of Administrative Services and Business Relations
 - Interview with Program Manager

Standard 115.212 Contracting with other entities for the confinement of residents

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

N/A: The PREA Coordinator advises that the facility is not a public agency and does not contract with other facilities.

Standard 115.213 Supervision and monitoring

- Exceeds Standard (substantially exceeds requirement of standard)

- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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The facility has a staffing plan that provides for adequate levels of staffing, and where appropriate video monitoring to protect residents against sexual misconduct. The staffing plan takes into consideration the physical layout of the facility, types of residents housed at the facility, and the number of substantiated and unsubstantiated incidents. The facility management has considered all blind spot areas and developed an appropriate response to maintain the safety and security of the facility.

The staffing plan was developed with the agency PREA coordinator and the facility PREA manager along with other facility leadership. The team conducts an annual walk through of the facility and documents ways the facility can improve its methods of preventing and detecting any incidents of sexual abuse/sexual harassment. Staffing levels are continuously monitored and the facility has the ability to pull from other facilities if necessary to ensure appropriate coverage (the facility is connected to the agency’s Special Housing Adjustment Residential Program halfway house and is capable to getting immediate assistance whenever necessary).

There have been no deviations to the staffing plan during this audit cycle. The facility has created a form to document the dates of any deviations, listed what the deviation was, and a justification for the deviation.

The auditor has reviewed the agency's written policy concerning what information is to be contained in the staffing plan and the number of staff members required to operate each shift. A review of floor plans, camera placement, and identified blind spot areas was conducted by the auditor prior to the audit and during the walk through. During interviews with facility staff, the auditor was informed how staff placement, security mirrors, required "where about" checks and circulations, and video monitoring are used to ensure maximum safety and security. There is a policy requirement to have the staffing plan reviewed annually and updated if necessary.

This is the second PREA audit for this facility, and the auditor noted areas in which increased monitoring either by camera, security, mirror, or staffing was adjusted based on feedback from the last audit. The facility is continually updating security and staffing plans to eliminate any potential blind spot areas.

- Review:
- Policy and Procedure
 - Facility tour
 - Staffing plan
 - Deviation Report
 - Floor plans with camera placement/security mirrors
 - Interview with PREA Coordinator
 - Interview with PREA Compliance Specialist
 - Interview with Program Administrator
 - Interview with Program Manager

Standard 115.215 Limits to cross-gender viewing and searches

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The facility does not conduct cross-gender strip or cross-gender body cavity searches of residents. Residents receiving an "enhanced pat-down" (stripped down to underclothing) will have two members of the same sex perform this type only. All pat downs are recorded on the facility's video monitoring system. The facility does not allow for a total strip search or a body cavity search. Cross-gender pat-down searches are also not allowed. The facility does not house female residents.

The facility allows residents to shower, perform bodily functions, and dress in areas not viewable to staff. The facility has one restroom in the housing unit for residents to be able to shower and use the toilets. The bathroom consist of four staffs with half doors and five shower stalls. The showers have curtains with clear top and bottom. The main entrance to the bathroom is open and has a camera near the entrance for pat searches. The view from the camera cannot see into the restroom. The restrooms allow for privacy while in use however has increased circulations due to it not being easily viewable to staff. During resident interviews, all indicated that staff announce their presence before entering the restroom or dorm areas, and the auditor witnessed this while walking through the facility. The agency has a dress policy that requires residents to be fully dressed in common areas.

The bathrooms also house washers and dryers for resident use.

The facility does not currently have nor have they ever housed a transgender or intersex resident. The agency has implemented a policy addressing the proper housing, search, and showering of any transgender or intersex resident. Agency administration would assign the resident to the most appropriate facility and along with facility administration, develop a plan for specific bed placement and showering accommodations. SHARP has two rooms with two beds that could appropriate accommodate a transgender or intersex client. Clients who are identified as highly vulnerable or highly abusive would be housed and in beds that are easily viewable to staff. A transgender or intersex resident would be offered showering options such as showering at different times in order to protect privacy and offer safety. The policy does not allow staff to physically examine a transgender or intersex resident for the sole purpose of determining genital status. The auditor discussed the housing plan for any transgender or intersex client with facility administrators, leadership, and line staff. All staff report the agency has prepared them to appropriately manage, house, and keep safe any transgender client that may be placed at the facility.

Facility staff have received proper training for patting down a transgender or intersex resident. This training is completed during new staff orientation. A Shift Supervisor is required to periodically review pat downs, live or reviewing surveillance video, and provide training/guidance to staff if necessary. Reviews of this training is conducted annually.

Review:

Policy and procedure

Staffing plan

Facility tour

Training records

Interview with PREA Coordinator

Interview with Program Administrator

Interview with Program Manager

Interview with Crisis Intervention Counselor

Interview with random Resident Supervisor staff

Interview with residents

Standard 115.216 Residents with disabilities and residents who are limited English proficient

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

The facility has been able to partner with other agencies to provide a disabled resident equal opportunity to participate in all aspects of the facility's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. The facility identifies residents who may be limited English proficient and works with interpreters so that residents can benefit from all aspects of the facility's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Per policy, the facility will only rely on resident interpreters if a delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-responder duties, or the investigation of the resident's allegations.

As a part of the agency's PREA training program, all staff are trained on how to ensure that PREA is communicated with clients having a cognitive or physical disability and who to call to help clients who may have a language barrier. The facility will use a qualified employee to aid any resident in understanding agency rules, PREA, and other regulations. If a qualified staff member is unavailable, outside assistance by a qualified person will be used at no cost to the resident. At this time, the facility does not have a resident who is in need of these services.

The facility has an agreement with The International Institute for interpreter services and the Greenleaf Family Center for hearing impaired services.

Interviews with staff and a review of agency policy confirmed the process of how the facility would assist any resident with a disability or is limited English proficient.

Review:

Policy and Procedure

Oriana House, Inc. plan for assisting residents with disabilities

Training Curriculum

Interpreter service providers

Interview with Program Administrator

Interview with Program Manager

Interview with Resident Supervisor staff (conduct intake)

Standard 115.217 Hiring and promotion decisions

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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The agency has a policy that prohibits hiring or promoting anyone who may have contact with the residents and prohibits 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; has been convicted or engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied treats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or has been civilly or administratively adjudicated to have engaged in the activity described in the above section.

The agency conducts a background check for all prospective employees, including temporary employees, independent contractors, volunteers, and student interns or required the contractor, vendor, volunteer to provide a background check. Record checks are completed every five years. Every five years the Human Resource Department will run background checks on the entire facility regardless when a person was hired in order to guarantee all staff received the required updated check. All employees, independent contractors, volunteers, and interns are required by policy to immediately report to their supervisor any arrests, citations, and complaints to professional licensing boards. Employees document this continued affirmation during annual personnel evaluations.

All successful applicants are notified of the PREA background check requirement and that any omission regarding sexual misconduct is grounds for termination. Employees are required to document their adherence to this policy.

The Human Resource Department will review the personnel file, specifically any disciplinary action, of any employee who is up for a promotion. The agency has developed a form that indicates in red that the Human Resource Department must check for discipline records for anything related to PREA. This form is then placed in the employee's file. This information is reported to the hiring/promotion committee before a decision is made.

The Human Resource Department conducts referral checks for all new hires and specifically documents whether or not a potential employee has been found to have substantially sexually abused an offender or resigned during a pending investigation of an allegation of sexual abuse.

The auditor conducted a review of ten randomly chosen employee's files and confirmed the background checks (initial and five-year update), documentation of the continual affirmation to disclose any sexual misconduct, referral checks, and the promotion process. The auditor conducted a lengthy interview with the Director of Human Resources who took the auditor step by step through the hiring and promotion process.

Review:
Policy and procedure
Employee files
On boarding documentation
Interview with Director of Human Resources

Standard 115.218 Upgrades to facilities and technologies

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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The facility has not acquired a new building or made any substantial expansion or modification to the existing facility.

An interview with the Agency's Executive Vice President of Administrative Services and Business and the PREA Coordinator indicate that no electronic surveillance system or other monitoring technology improvements or changes have been made. The facility will address any needs to these areas as the budget allows.

Review:
Policy and procedure
Interview with Executive Vice President of Administrative Services and Business Relations
Interview with PREA Coordinator
Interview with PREA Investigator

Standard 115.221 Evidence protocol and forensic medical examinations

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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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.

The facility has two trained investigators to conduct administrative sexual abuse investigations. The Akron City Police Department is responsible for conducting criminal investigations, however the facility is located across the street from the Summit County Sherriff's Department who can and will assist the facility when necessary. The agency has an agreement with Akron City Police that acknowledges that the department is responsible for conducting criminal investigations for the facility.

The facility will use Akron General Hospital to provide a Sexual Assault Nurse Examiner for any resident who is a victim of sexual abuse. The auditor reviewed the hospital's website and confirmed with the hospital's Director of Sane Services, Carol Powell, that any resident taken to this hospital would be treated by a certified SANE nurse. The services provided by the hospital would be at no cost to the resident. The hospital also partners with the Summa Health Hospital to provide on call SANE services should a client be taken to Summa Health.

The facility has a MOU with the Medina/Summit Counties Rape Crisis Center to provide a victim advocate to any victim of sexual abuse, and a trained staff member who can provide victim support services. The auditor spoke to Renee Jackson of the center who confirmed the services the agency would provide to clients of SHARP and that all services were free of charge.

The facility also has a crisis counselor that can provide emotional supportive services or make a recommendation for outside services if necessary. These services will be provided to the resident at no cost.

Review:

Policy and Procedure

Emails to local legal authority

MOU with Medina/Summit Counties Rape Crisis Center

Interview with Administrative Investigators

Interview with PREA Coordinator

Phone interview with SANE services director

Phone interview with Medina/Summit Counties Rape Crisis Center Advocate

Interview with Crisis Counselor

Standard 115.222 Policies to ensure referrals of allegations for investigations

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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The agency has a policy that requires an administrative investigation of all allegations of sexual abuse and sexual harassment, and that any allegation that is criminal in nature is referred to the Akron City Police Department. The facility has not had an allegation that need to be referred from criminal investigation during this audit cycle. The auditor interviewed both administrative investigators and reviewed their process for investigating allegations and what would prompt a referral to the legal criminal investigative authority.

Investigation #1: SHARP client reported to staff that another client was making sexualized comments towards him. He repeatedly asked that other client to stop speaking to him that way but the client would stop for a few days and then start up again. There was a witness to the sexualized comments and the alleged abuser admitted to the comments. The allegation was determined to be substantiated and the abuser was terminated from the program. The allegation did not warrant a criminal investigation.

The PREA Coordinator will review the allegation with the investigators and make a determination of the allegation.

The Oriana House website post the investigative policy of the agency and the responsibilities of both the agency and the investigating entity.

The auditor reviewed the agency's website and confirmed that the appropriate policy was posted.

Review:

Policy and procedure
Oriana House website
Interview with PREA Coordinator
Interview with Administrative Investigators
Investigation report

Standard 115.231 Employee training

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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The agency has trained all (1-10 of section 115.231) staff on the PREA required topics. The agency holds monthly trainings which included role plays, games, and quizzes to ensure all staff knew the proper way to prevent, detect, report, and respond to any allegations of sexual abuse or sexual harassment that is specific to each facility. Staff practice being a first responder and deploying the facility coordinated response.

During staff interviews, all staff were able to discuss the various PREA related training they received either at orientation or during one of the monthly training sessions. Staff was well versed on the PREA policies and protocols.

The agency cross-trains its staff because staff can be transferred to work in any facility. All staff received gender specific training, and the agency continues to hold staff gender specific training on PREA related topics. The agency used video conferencing as a training tool so that all employees in any facility would receive the same zero tolerance message, but also allows for facility specific training that is tailored to the specific needs of that facility. The facility uses a video produced by the Ohio Department of Rehabilitation and Correction to train on transgender and intersex pat downs and searches.

PREA training is provided to all staff at the beginning of employment and all staff will receive PREA training throughout the year by signing up through the facility's Go Sign Me Up electronic class registration program. Additional training topics include: transgender clients, client reporting, PREA assessment interview, coordinated response plan, effective use of communication with LGBTI residents, response to allegations, avoiding inappropriate relationships, and PREA definitions. Because of the specialized clientele housed at this facility, the crisis counselor also provides a nine hour mental health first aid training.

Facility managers are provided with a list of required PREA training topics and will include one topic a month throughout the year to review with staff.

All staff sign an acknowledgment of the training they received.

The training department runs a quarterly report to ensure that the required training is complete each year.

Review:

Policy and procedure
Training curriculum
ODRC transgender/intersex pad-down search video
Training records
Interview with PREA Coordinator
Interview with Human Resource Director
Interview with Program Manager

Interview with Program Administrator
Interview with Crisis Counselor
Interview with random staff

Standard 115.232 Volunteer and contractor training

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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The agency has developed a level system for the type of training any contractor, volunteer, or vendor would receive. A person identified at level 1 would receive a 3-hour training on the agency's policy on how to prevent, detect, respond, and report sexual abuse and sexual harassment. A level 2 contractor, volunteer, or vendor will receive a 30-minute PREA training. Each provider will watch a 15-minute video and receive instruction from a trained facilitator. A level three vendor will be asked to read and sign the PREA acknowledgement form. The form explains the agency's zero tolerance policy and the signer's acknowledgement to abide by these rules. Anyone assigned a level 4 status must be 100% escorted by staff while in the facility.

Documentation of received training is forwarded to the Compliance Accreditation Manager. Any contractor or volunteer who has completed the necessary training will receive a special name badge which identifies to the Resident Supervisory staff that this person has received PREA training and does not need to sign the PREA acknowledgement form. If the person forgets the badge, they will have to read and sign the acknowledgement form.

Oriana House contracts with food service provider Aramark. These contract employees receive the same type of training that Oriana House employees receive.

Every visitor who enters an Oriana House facility must read and sign an acknowledgment of understanding on the agency's zero tolerance policy each time they enter the facility. The auditor signed this notification upon entrance to the facility each day of the onsite visit.

The auditor reviewed the training material and documentation of completed training from various contractors/volunteers.

Review:
Policy and procedure
Contract/vendor training
Visitor zero tolerance notification
Interview with PREA Coordinator

Standard 115.233 Resident education

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

All residents receive information at the time of intake about the facility's zero tolerance policy, 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. This information is read and reviewed with all residents to ensure each resident understands their rights under the PREA guidelines. If a resident does not understand English or has other disabilities that prevent normal communication, the facility contracts services with other agencies so that each resident can benefit from the facilities efforts to prevent, detect, report, and respond to sexual abuse and sexual harassment (See standard 115.216). Residents sign acknowledgment of receiving this information.

All residents watch a PREA education video every Monday during structured time activity. A resident supervisor staff member reviews all relevant reporting information, medical and emotional supportive services, and disciplinary sanctions related to the PREA standards. This information is also on posters located throughout the facility. During this group, the facility manager or facility administrator ensures that residents understand the services available to them at no cost and the limits to confidentiality.

During resident interviews, all offenders reported receiving the PREA education and information at intake and during orientation group. Residents also indicated that their case managers reviewed ways to keep themselves safe, how to report including anonymously, and the toll free numbers posted near the phones. Postings with PREA related information were located in conspicuous areas throughout the facility.

Review:

Policy and procedure

Resident training curriculum

PREA postings

Facility tour

Interview with residents

Interview with Program Manager

Interview with Program Administrator

Standard 115.234 Specialized training: Investigations

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

The facility has a standardized process for administratively investigating any allegations. The agency has two former police officers with experience in dealing with sexual abuse/assault investigations as their administratively trained investigators. The agency's PREA Compliance Specialist has also been trained. The training included techniques for interviewing sexual abuse victims, proper use of Miranda and Garity warnings, evidence collection in a confinement setting, and required evidence to substantiate a case for administrative action or criminal referral. The training was provided by the Moss Group.

The facility has conducted one administrative investigation during this audit cycle.

Investigation #1: SHARP client reported to staff that another client was making sexualized comments towards him. He repeatedly asked that other client to stop speaking to him that way but the client would stop for a few days and then start up again. There was a witness to the sexualized comments and the alleged abuser admitted to the comments. The allegation was determined to be substantiated and the abuser was terminated from the program.

Review:

Policy and procedure

PREA Audit Report

Administrative Investigator training curriculum
Administrative Investigator training certificate
Interview with Administrative Investigators
Investigation report

Standard 115.235 Specialized training: Medical and mental health care

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

The facility has a qualified clinician who knows how to respond effectively and professionally to victims of sexual abuse and sexual harassment. The clinician also received training on how to prevent, detect, report, and respond to sexual abuse and sexual harassment.

The facility does not have any in-house medical staff. All medical services including any required sexual assault examinations are provided by outside entities.

Interviews of the clinician indicate he understands his obligations on how and whom to report allegations of sexual abuse and sexual harassment.

Review:
Policy and procedure
Interview with Crisis Counselor
Interview with PREA Coordinator

Standard 115.241 Screening for risk of victimization and abusiveness

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

All residents are screened for risk of vulnerability or abusiveness at intake. The screening tool used includes all required criteria to accurately assess the resident's risk. The PREA screening form is stored electronically and only approved staff have access to the information. Resident Supervisory staff will complete the initial assessment with the resident during intake. A resident's case manager will complete a re-screen anytime any additional, relevant information is received, a referral, request, or incident of sexual abuse occurs or if the client was assessed as highly abusive or highly vulnerable at intake. The policy does not allow a resident to be disciplined for refusing to answer or for not disclosing complete information in response to questions on the resident's mental health, sexuality, or previous victimization.

All staff are training on how to complete the screening tool appropriately. An interview with Resident Supervisors confirmed his training on completing the form appropriately and the steps to take should a resident be classified as highly abusive, abusive, highly susceptible, or susceptible.

The Program Coordinator reviews initial assessments and completes a quality assurance check to ensure residents are classified appropriately. Any necessary re-assessments are also reviewed for quality assurance purposes.

Review:

- Policy and procedure
- Initial PREA assessment screen
- PREA assessment rescreen
- Interview with Program Administrator
- Interview with Program Manager
- Interview with residents
- Interview with Program Coordinator
- Interview with case managers
- Interview with Resident Supervisors

Standard 115.242 Use of screening information

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

All residents receive a classification based upon their PREA screening information. Classifications include: none, vulnerable, highly vulnerable, abusive, or highly abusive. A resident's classification will be documented in the facilities data base but no staff member will be able to see the screening form or answers. Any resident who is classified as highly vulnerable or highly abusive will be housed in a designated dorm with a bed that is easily viewable by staff. These residents will also be placed on the "where about" check list 9 times per shift versus 6 times for those who do not have the highly vulnerable or highly abusive classification. The increased checks will continue until management team meets and deems it appropriate to have the increased checks reduced to 6 times per shift. The facility has a resident count sheet which identifies any resident that has a classification and the number of required checks.

All residents with a classification have it addressed on their individual program plan. These residents work with their case worker to work on the issues underlining their classification and residents can also be referred to outside counseling if necessary.

The facility has never housed a transgender or intersex resident but does have an appropriate plan to house such residents safely which include opportunities to shower separately and make housing and program assignments with a transgender or intersex resident's own views taken into consideration. The agency has developed a team that includes the PREA coordinator, PREA manager, Admission's personnel, Mental Health personnel, and the offender that will address placement issues for any transgender resident housed with agency.

The auditor and facility management discussed the facility's plan to house residents that are highly vulnerable, highly abusive, or transgender/intersex. The facility was able to describe specific bed placement, group separation, ability to shower separately, and the new protocol on safely housing transgender/intersex residents as ways to ensure the safety of each resident.

Staff report the training Oriana House provides has prepared them to appropriately manage and interact with transgender or intersex clients.

Review:

- Policy and procedure
- Facility tour
- Initial PREA assessment screening

PREA re-screen assessment
Individual case plan
Staffing plan
Interview with Case Managers
Interview with Resident Supervisors
Interview with PREA Coordinator

Standard 115.251 Resident reporting

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

Residents at SHARP have multiple ways of reporting sexual abuse. Posters throughout the facility indicate how residents can report as well as how to report to an outside agency. Interviews with the residents indicate that they are aware of all means of reporting and that they could report anonymously. They received the information at intake, every Monday during structured time, and in case manager meetings.

The facility has public pay phones with the reporting numbers unblocked to allow free calls to the reporting entities. Clients also have access to person cell phones which they can use to make an anonymous report.

All residents received information at intake and in their handbooks regarding PREA reporting. Staff received information on how to privately report during staff training.

The one allegation investigated during this audit cycle was a client report.

Review:
Policy and procedure
PREA postings
PREA brochure
Facility tour
Interview with Program Administrator
Interview with Program Manager
Interview with residents
Investigation report

Standard 115.252 Exhaustion of administrative remedies

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

N/A: The PREA Coordinator states that the agency does not use its grievance system to investigate PREA allegations. Any resident who uses a grievance form to report an allegation will have the form removed from the grievance process and it will be handled like any other reporting method.

Standard 115.253 Resident access to outside confidential support services

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

The facility has a MOU with Medina/Summit Counties Rape Crisis Center to provide emotional support and advocate services to any resident who is a victim of sexual abuse. The facility provides the phone number and address of this agency to residents as well as train them during orientation of the limitations to confidentiality and mandatory reporting.

Interviewed residents verified that they received this information and that the information is available on posters located throughout the facility.

The auditor took note of the information on posters located throughout the facility and ensured that the posting contained all the accurate information. A review of the MOU was also completed.

The auditor reviewed Akron General Hospital's website and spoke with the director of SANE Services about the services available to any resident who may need emotional support after an incident of sexual assault/abuse. The services provided by the hospital and the crisis center included support while in the hospital, during any investigation/questioning, court appearances, and any on-going counseling needs. The interview confirmed that the services are free of charge.

The allegation investigated during this audit cycle was not sexual abuse and the client was not in need of these services.

Review:

Policy and procedure
MOU with Medina/Summit Counties Rape Crisis Center
Akron General Hospitals' website
Phone interview with SANE Services Director
Interview with Victim Advocate
Interview with PREA Coordinator
Interview with Clinician
Investigation report

Standard 115.254 Third-party reporting

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

The agency has posted on its website ways that anyone can report sexual abuse or sexual harassment on behalf of a resident. Residents are also educated that they can report to family members who can then make a third party report. This information is also on posters located in the facility where visitors may frequent.

The facility has not had a third party report.

Review:

Policy and procedure

Oriana House website

PREA postings

Facility tour

Interviews with random residents

Standard 115.261 Staff and agency reporting duties

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

Oriana House, Inc. policy requires all employees to immediately report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment including third party and anonymous reports. Apart from the employee's supervisor, no one shall reveal any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions. All allegations of sexual abuse or sexual harassment are reported to the facility's investigators.

The auditor interviewed all required specialized staff and several random staff members. All staff members indicated that they were given and understand the agency's policy on reporting PREA incidents and were trained on the appropriate way to document a report and to whom they should report an allegation. Staff indicated they understood that they are required to report their own suspicions, or information regarding sexual abuse, sexual harassment, or retaliation.

All staff members with a duty to report based on local law and medical and mental health practitioners are required to inform residents of their status and the limitation of confidentiality at the initiation of services. Interviews with staff members who have a duty to report indicated that they understood their duty to inform residents before providing services.

The facility does not admit residents under the age of 18. The State of Ohio does not require institutions or facilities licensed by the state or facilities in which a person resides as a result of voluntary, civil, or criminal commitment to report to adult protective services (Chapter 5101:2-20 and 5101:2-20-01).

Review:

Policy and procedure

Ohio revised code

Interview with random staff

Interview with Program Administrator

Interview with Program Manager

Standard 115.262 Agency protection duties

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

SHARP has several dormitories within the facility. This allows the facility to move either the alleged victim or the alleged abuser to another dorm during or after an investigation. During the interview process, it was very clear that the safety and security of all residents is their primary concern.

An interview with the PREA Coordinator and Agency Investigators describe the process on how they determine if an alleged victim or abuse should be moved to another facility in order to protect the victim from imminent abuse. The practice is to place a staff member on administrative leave or place in another facility (if possible) if they are accused of sexual harassment or sexual abuse during the investigation. The staff member is to have no contact with the facility or other staff member until a determination has been made. If another resident is the alleged abuser, the abuser and victim will be separated either by dorm or facility until a determination has been made. The facility also has the ability to place an offender on electronic monitoring if needed.

The facility has not had to move a resident or staff member to another facility; place a staff member on leave; or move a resident to a different location due to an allegation of sexual abuse or sexual harassment during this audit cycle. The facility did place a victim on increased "where abouts" during the lone administrative investigation this audit cycle.

Review:

Policy and procedure

Interview with Administrative Investigators

Interview with PREA Coordinator

Interview with Program Administrator

Interview with Program Manager

Investigation report

Standard 115.263 Reporting to other confinement facilities

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

Upon receiving an allegation that a client was sexually abused while confined at another corrections facility, the Program Manager/Administrator shall notify in writing the head of the facility or appropriate central office of the agency where the alleged abuse occurred and notify the facility's Vice President of Administration and Legal Counsel. The policy requires notification within 72 hours.

Interviews with the Agency's PREA Coordinator and the facility's PREA Manager confirmed this practice.

The facility has not received any allegation that they had to make a report to another agency. The facility did receive a report that a former client made an allegation that while at SHARP he was sexually harassed. The Administrative Investigator made several trips to other facilities in order interview the client and when interviewed, the client admitted that he made the whole incident up. The allegation was classified as unfounded.

Review:
Policy and procedure
Interview with Program Administrator
Interview with Program Manager
Interview with PREA Coordinator

Standard 115.264 Staff first responder duties

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

Oriana House has a policy outlining first responder duties for any allegation of sexual abuse. The policy contains instructions for how to separate the abuser and victim, protect and preserve evidence until it can be collected by appropriate authorities, does not allow the abuse to destroy evidence, request that the victim does not destroy any evidence, and enacting the PREA coordinated response plan. All staff are trained on first responder duties (security and non-security staff) including role playing potential situations.

Interviews of security and program staff indicate that staff know the appropriate steps to take to preserve and protect evidence and support the victim. All staff seemed comfortable with the first responder duties and confident that they would respond appropriately based upon their training.

Each security post has a posting of the first responder duties and coordinated response plan.

The facility has not had to use first responder training for any allegation of sexual abuse.

Review:
Policy and procedure
Coordinated response plan/first responder duties posting
Training records
Interviews with random staff
Investigation report

Standard 115.265 Coordinated response

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

Oriana House has an appropriate written coordinated response plan to respond to any incident of sexual abuse. The plan includes the steps to take for first responders, medical and mental health practitioners, investigators, and facility leadership. All staff is trained on the plan and this was confirmed through interviews with security and program staff.

While on the tour, the auditor noted that the written coordinated plan is posted at the security post in the facility. The posting is within a flip chart which is highly visible and clearly marked.

During staff interviews, staff knew and could articulate the coordinated response plan. All staff knew the entire plan and did not differentiate between security and non-security tasks. Staff was able to disclose the location of the plan and discussed how they practice using the plan in various scenarios during training.

Review:
Policy and procedure
Coordinated response plan/first responder duties posting
Interview with random staff

Standard 115.266 Preservation of ability to protect residents from contact with abusers

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

N/A: The PREA Coordinator indicates that the facility is not under any collective bargaining agreements – a non-union agency.

Standard 115.267 Agency protection against retaliation

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

The agency has a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation. The facility has assigned the Program Manager and Program Administrator or supervisory designee as the staff responsible for monitoring against retaliation for at least 90 days. The client would be placed on special surveillance and would have increased “where about” checks by security staff. In the case of resident victims, a status check is completed by the

facility's emotional support person or if necessary the agency's crisis counselor.

The facility has the ability to move victim, offender, or employees in order to protect against retaliation. The facility has not had to move an abuser, victim, or employee during this audit cycle in order to protect from retaliation.

Interviews with the agency's PREA Coordinator, the Program Manager, and the Program Administrator confirmed the monitoring process. The auditor reviewed the form that is to be completed for status checks and the team would review the status reviews to determine if an extension in monitoring is necessary.

Staff verified during interviews that their PREA training includes how to detect and protect others from retaliation, and that they have a right to be free from retaliation when reporting or cooperating in an investigation. Residents also verified that they have received information on their right to be free from retaliation.

Review:

Policy and procedure

Training records

Interview with Program Manager

Interview with Program Administrator

Interview with PREA Coordinator

Interview with Human Resource Director

Interview with random staff

Interview with random residents

Standard 115.271 Criminal and administrative agency investigations

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

All allegations of sexual abuse or sexual harassment including third party and anonymous reports are administratively investigated by 2 trained investigators and any report that appears criminal in nature are referred to the Akron City Police Department who has the legal authority to conduct a criminal investigation.

Both the agency investigators were interviewed and walked through their process of investigating any PREA related complaint and how this information is used determine whether an allegation is substantiated, unsubstantiated, or unfounded. The investigators collect all relevant information (interviews with staff, victim, witness, and the abuser; review any surveillance information, and make note of any facility issue that could have aided in the allegation) and pass this information along with a recommendation to the PREA Coordinator. The PREA Coordinator determines the outcome of the investigation. Both investigators are former police officers and one has extensive knowledge in monitoring technology.

The investigators written report includes whether staff actions or failures to act contribute to the abuse and a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.

Both investigators have a relationship with and work well with the local police department and remain informed about the progress of any referred allegation.

The investigators maintain all records from all allegations for as long as the abuser is incarcerated or employed by the agency, plus five years.

The facility had one administrative investigation during this audit cycle.

Investigation #1: SHARP client reported to staff that another client was making sexualized comments towards him. He repeatedly asked that other client to stop speaking to him that way but the client would stop for a few days and then start up again. There was a witness to the sexualized comments and the alleged abuser admitted to the comments. The allegation was determined to be substantiated and the abuser was terminated from the program.

Review:
Policy and Procedure
Interview with Administrative Investigators

Standard 115.272 Evidentiary standard for administrative investigations

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

By agency policy and confirmed by investigators and PREA Coordinator interviews, the agency imposes a standard of preponderance of evidence or 51% to substantiate an allegation of sexual abuse or sexual harassment.

During the one administrative investigation, the witness corroborated the victim's statement as to the facts of the incident and the abuser admitted to the sexualized comments.

Review:
Policy and Procedure
Interview with Administrative Investigators
Interview with PREA Coordinator
Investigation report

Standard 115.273 Reporting to residents

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

The Program Manager or Program Administrator is responsible for informing a resident who alleges sexual abuse the outcome of the investigation. The facility request information from the legal authority if the investigation is criminal in nature to inform the alleged victim of the outcome of an investigation.

The notice includes whether the abuser, if a staff member, is no longer posted in the client's unit; no longer employed at the facility; has

been indicted on a charge related to the sexual abuse within the facility; or has been convicted on a charge related to sexual abuse within the facility. The notice includes whether the abuser, if another resident, has been indicted on a charge related to sexual abuse within the facility or has been convicted on a charge related to sexual abuse within the facility.

There were no allegations of sexual abuse during this audit cycle. The auditor reviewed a sample notification report.

Review:
Policy and procedure
Sample notice
Interview with PREA Coordinator

Standard 115.276 Disciplinary sanctions for staff

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

Oriana House outlines its progressive disciplinary plan in its employee handbook. A review of the handbook states that any staff member found to have engaged in sexual abuse will be terminated. Termination or resignations by staff will not void an investigation and any criminal activity will be reported to the legal authority and to any relevant licensing agency. Policy also indicates that the agency will notify law enforcement or any relevant licensing boards of any terminations or resignations based upon violations of the agency's client sexual abuse and sexual harassment prevention policy when such behavior is criminal in nature.

All staff interviewed understood that anyone engaging in sexual harassment will be disciplined according to agency policy and that they would be terminated for participating in sexual abuse. Staff indicated that they are required to report any suspicion to their immediate supervisor and that they would not have any issue reporting a coworker for violation of the zero tolerance policy.

The auditor reviewed agency policy, the employee handbook, and interviewed the Agency Administrator, PREA Coordinator, and Human Resource Director to confirm the disciplinary process for employees found to have substantially engaged in sexual harassment or sexual abuse against residents. All agency leadership stated that any employee found to have engaged in sexual abuse will be immediately terminated from the facility and law enforcement would be notified.

The resident who found to have sexually harassed another resident was terminated from the program.

Review:
Policy and procedure
Employee handbook
Code of ethics
Interview with Human Resource Director
Interview with Administrative Investigators
Interview with random staff members
Interview with PREA Coordinator
Investigation report

Standard 115.277 Corrective action for contractors and volunteers

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the

relevant review period)

- Does Not Meet Standard (requires corrective action)

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.

All contractors and volunteers are made aware of the agency's zero tolerance policy toward sexual abuse and sexual harassment. Each must participate in PREA training where they will be taught how to prevent, detect, respond, and report sexual harassment and sexual abuse. They will also learn the consequences of participating in any type of sexual misconduct. Contractors and volunteers sign an agreement that they could be removed from the facility for any acts of sexual abuse or sexual harassment.

The auditor has reviewed the contractor/volunteer training and documentation of compliance with training.

Any person (contractor, vendor, volunteer, or visitor) must read and sign an acknowledgment form stating that they have read and understand the agency's Zero Tolerance Policy and agree to abide by the rules set forth by the agency before entering the facility. The auditor was also required to sign the acknowledgment form each time she entered the building.

The agency contracts with AraMark for its food services. These employees receive the same PREA training an Oriana House new employee would receive at orientation due to the amount of time these contractors spend in the building and interact with the residents.

The facility has not removed any contractor or volunteer for a PREA issue.

Review:

Policy and procedure

Contractor/vendor acknowledgement form

Contractor/vendor training curriculum

Interview with PREA Coordinator

Standard 115.278 Disciplinary sanctions for residents

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

A review of the client handbook shows how it outlines resident conduct and prohibits all sexual activity between residents and disciplines residents for such activity. Residents are given a handbook at intake and the contents are reviewed with the resident.

During resident interviews, all residents affirmed that they received a handbook at intake and the rules and discipline policies regarding sexual abuse and sexual harassment were reviewed with them. All residents interviewed understood fully the seriousness of the agency's Zero Tolerance Policy and the consequences of participating in sexual misconduct.

The resident who was found to have sexually harass another client was removed from the program.

Review:

Policy and procedure

Resident handbook

PREA Audit Report

Investigation report
Interviews with residents
Interview with Program Manager
Interview with Program Administrator

Standard 115.282 Access to emergency medical and mental health services

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

Policy indicates the types of service offered free of charge to an alleged victim of sexual assault. It is documented which types of services were rendered and or declined by the alleged victim on the investigation form. Residents are offered timely information about and timely access to sexually transmitted infection prophylaxis. There are no females housed at this facility.

If services are necessary, the Counselor will provide appropriate referrals to community resources and notify the case manager assigned to the resident. The scope of services provided will be determined by the licensed practitioner.

Staff have been notified of the Agency's PREA Medical Response Plan. The plan outlines how staff is to offer unimpeded access to both emergency and ongoing medical and mental health care. Ongoing medical or mental health care will be at the discretion of the medical provider and is again at no cost to the resident.

The Medical Response Plan is reviewed annually to ensure that all service provider information is current and that the range of services is still available.

Resident are informed of their right to free services during PREA education at orientation.

The facility has not had a sexual abuse/sexual assault allegation that resulted in the use of these services.

Review:
Policy and procedure
Medical Response Plan
Interview with PREA Coordinator
Interview with Crisis Counselor

Standard 115.283 Ongoing medical and mental health care for sexual abuse victims and abusers

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

This facility offers community medical and counseling services for residents who have been sexually abused in jail, lockup, or juvenile facility. This treatment includes testing for sexually transmitted disease. Treatment is offered to all known residents on resident abusers within in 60 days of learning such history. All treatment offered is free of charge.

Staff have been notified of the Agency's PREA Medical Response Plan. The plan outlines how staff is to offer unimpeded access to both emergency and ongoing medical and mental health care. Ongoing medical or mental health care will be at the discretion of the medical provider and is again at no cost to the resident.

The Medical Response Plan is reviewed annually to ensure that all service provider information is current and that the range of services is still available.

The facility has not had a report of any known resident on resident abuser.

A review of the investigation form shows how staff indicates whether services were offered and accepted or declined. The PREA initial screening form indicates whether a resident has abused others while in a correctional setting. If a resident indicates that he has in fact abused another resident while in a corrections setting, the agency's Crisis Counselor will meet with the resident to make a determination if additional treatment or referrals for community treatment is necessary.

The facility had not a report of a resident being sexually abused while in a jail, lockup, or juvenile facility.

The PREA Coordinator has confirmed the process and practice of how staff will provide unimpeded access to necessary emergency and/or ongoing medical and mental health services. The Agency's PREA Compliance Specialist reviews the information annually.

Review:

Policy and procedure

Medical Response Plan

PREA initial assessments

Interview with Crisis Counselor

Interview with PREA Coordinator

Standard 115.286 Sexual abuse incident reviews

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

Oriana House has an agency policy on a review of all substantiated or unsubstantiated allegations of sexual abuse within 30 days of the conclusion of the investigation. The review team includes the assigned regional Vice President, an upper management designee, Admissions Manager, input from a designated Resident Supervisor and/or Caseworker, Internal Investigator, and any other employee deemed appropriate.

The team, per policy, considers whether a change in policy or practice will better prevent, detect, or respond to sexual abuse; if the incident or allegation was motivated by race, ethnicity, gender identity, gang affiliation, or any other group dynamic; if any physical barriers in the area enabled the abuse; adequacy of staffing levels; and whether monitoring technology should be deployed or augmented to supplement supervision by staff.

At the conclusion of an investigation, the Client Sexual Abuse/Harassment Review Team would provide executive management with any relevant recommendations that would increase the ability to protect, detect, or report allegations of sexual harassment or sexual abuse. The

executive team would deem which recommendations are appropriate to implement and provide documentation to the recommendations that were not implemented.

Review:

Policy and procedure

Review of Client Sexual Abuse/Harassment Review Team form

Interview with PREA Coordinator

Standard 115.287 Data collection

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

Oriana House has an agency policy for data collection and statistical reporting of all necessary information in the most recent version of the Survey of Sexual Violence. The auditor reviewed the most recent information collected by the agency and has confirmed that the agency collects the appropriate data on all allegations of sexual abuse and aggregates this information annually.

The facility's PREA Manager collects the data and send the data to the agency's PREA Coordinator. The information for each facility is used by the PREA Coordinator to complete the Survey of Sexual Victimization for all Oriana House facilities.

The agency has not received a request to supply the Department of Justice with this information.

Review:

Policy and procedure

PREA data collection and statistical reporting information

Interview with PREA Manager

Interview with PREA Coordinator

Standard 115.288 Data review for corrective action

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

Agency uses information collected in 115.287 to make improvements in how the agency prevents, detects, and responds to incidents of sexual abuse and sexual harassment. The report compares the current year's data with those of previous years, and includes the updates made from previous year's reports. The information contained in the report is based on a calendar year and the report with this information can be found on the agency's website.

The information in the report has been reviewed and approved by the President and CEO of Oriana House, Inc.

The information in the report does not contain any identifying information that would need to be redacted in order to protect the safety of an individual or the facility.

Auditor verified that the reported was posted on the agency's website (www.orianahouse.org) and that the report contained all required information.

Review:

Policy and procedure

PREA annual report

Oriana House website

Interview with Executive Vice President of Administrative Services and Business Relations

Interview with PREA Coordinator

Standard 115.289 Data storage, publication, and destruction

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

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.

All data collected in sexual abuse cases are securely maintained by the PREA Coordinator for a minimum of 10 years. The PREA Coordinator confirmed the retention schedule.

The aggregated information from each of Oriana House facilities was posted on its website.

There is no information in the report that would identify any individual or jeopardize the safety or security of the facility.

Review:

Policy and procedure

PREA annual report

Oriana House website

Interview with PREA Coordinator

AUDITOR CERTIFICATION

I certify that:

- The contents of this report are accurate to the best of my knowledge.
- No conflict of interest exists with respect to my ability to conduct an audit of the agency under review, and
- I have not included in the final report any personally identifiable information (PII) about any inmate or staff member, except where the names of administrative personnel are specifically requested in the report template.

Kayleen Murray

Auditor Signature

August 27, 2017

Date