

# PREA AUDIT: AUDITOR'S SUMMARY REPORT JUVENILE FACILITIES

INTERIM  FINAL



AUDITOR INFORMATION			
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Dates of on-site audit:	August 11-12, 2015		
FACILITY INFORMATION			
Name of Facility:	Youth Forestry Camp #3		
Physical Address:	4534 Tarkiln Rd. James Creek, PA 16657		
Facility Mailing Address:	Same		
Telephone number:	(814) 658-3492		
This Facility is:	<input type="checkbox"/> Federal	<input checked="" type="checkbox"/> State	<input type="checkbox"/> County
	<input type="checkbox"/> Military	<input type="checkbox"/> Municipal	<input type="checkbox"/> Private for Profit
	<input type="checkbox"/> Private not for Profit		
Facility Type:	<input checked="" type="checkbox"/> Correctional	<input type="checkbox"/> Detention	<input type="checkbox"/> Other:
Name of Facility's Chief Executive Officer: David Fouse			
Number of staff assigned to the Facility in the past 12 months: 73			
Designed Facility Capacity: 50			
Current Population of Facility: 24			
Age Range of the Population: 14 - 20			
Name of PREA Compliance Manager: Wilson Smith		Title: YDC Manager	
Email Address: wilssmith@pa.gov		Telephone: (814) 658-3492	
AGENCY INFORMATION			
Name of Agency:	Pennsylvania Bureau of Juvenile Justice Services		
Governing Authority or Parent Agency:	Pennsylvania Bureau of Juvenile Justice Services		
Address:	607 South Street, Harrisburg, PA 17120		
Telephone Number:	(717) 787-9532		
AGENCY CHIEF EXECUTIVE OFFICER			
Name:	Michael Pennington	Title: Director	
Email Address:	mpenningto@pa.gov		Telephone: (717) 705-2451
AGENCY WIDE PREA COORDINATOR			
Name:	Michael Both	Title: Human Services Program Specialist Supervisor	
Email Address:	mboth@pa.gov		Telephone: (717) 230-3384

**NARRATIVE:** The Youth Forestry Camp #3 is a staff-secure 50 bed facility for male adolescents operated by the Pennsylvania Bureau of Juvenile Justice Services (BJJS). The on-site portion of the PREA Audit took place August 11-12, 2015 and covered the audit period of August 11, 2014 to August 11, 2015. On the morning of August 11, 2015 this auditor entered the facility for purposes of conducting an on sight tour of the facility and interviewing youth, staff, volunteers and contractors. The facility provided a list of all staff by shift and employee job categories and a list of all youth by housing unit. Prior to arrival this auditor reviewed pertinent agency policies, procedures, and related documentation used to demonstrate compliance with the Juvenile Facility PREA Standards. The pre-audit review of documents contained in the Pre-Audit Questionnaire submitted by the BJJS PREA Coordinator prompted no questions. The pre-audit questionnaires submitted by the BJJS PREA Coordinator are the best this auditor has ever seen. This auditor interviewed 11 of the current 24 youth. The youth interviewed were a representative sample from each of the housing units. Length of stay for those interviewed ranged from three weeks to eight months. There was one youth who identified as lesbian, bisexual, gay, transgender or intersex and no youth who needed translation services. There were no youth currently in the program who made an allegation of sexual abuse or sexual harassment at the program. The one LGBTI youth was interviewed by this auditor. No youth had specifically requested to speak with this auditor nor had this auditor received any written correspondence from youth or staff.

During the tour, additional questions were answered by executive and upper-level management staff. Staff and youth interviews followed and were conducted privately in a room with a large observation window. There are no SANE or SAFE staff employed at the facility. These services are available by contract with the J. C. Blair Memorial Hospital. This auditor reviewed the string of emails documenting efforts to provide SANE and SAFE services, and crisis counseling. This auditor interviewed members of the incident review team and the staff member charged with monitoring retaliation. Administrative investigations are conducted by the Huntingdon County Office of Children and Youth. Criminal investigations are conducted exclusively by the Pennsylvania State Police. There was one contractor interviewed during the audit.

**DESCRIPTION OF FACILITY CHARACTERISTICS:** Youth Forestry Camp 3 (YFC3), located in Huntingdon County, supports positive change through a multi-program approach in a safe and open environment. Two distinct living and treatment units are available; the B-Dorm Residential program and the First Step program. Both living units are 25-bed dormitory housing. Bathrooms are designed for multiple users.

Cognitive Behavioral Therapy (CBT) is at the core of YFC3 programming. CBT has proven useful with a wide range of issues. It does not focus on the resident's past; rather, it focuses on looking for ways to improve his situations now. With CBT we help the resident see the connections between the way he thinks, and the way he feels and acts.

YFC3 utilizes multiple normed and validated assessment instruments, including the Youth Level of Service/Case Management Inventory (YLS/CMI), to determine strengths/weaknesses, to develop individual learning plans, and to assess resident development. The Master Case Planning System (MCPS) is utilized for case management. Our two programs promote similar expectations, competency development opportunities, behavioral modification techniques, evidence-based treatment workshops and esteem-building activities. The Balanced and Restorative Justice (BARJ) philosophy is embedded throughout the programming. Treatment fidelity is maintained through our commitment to the Standardized Program Evaluation Protocol (SPEP) process and through

independent quality improvement reviews.

The Youth Forestry Camp #3 maintains 24 hour supervisory coverage as well as an On-Call Administrator.

**SUMMARY OF AUDIT FINDINGS:** Auditor arrived at the facility the morning of August 11, 2015. An entrance meeting was held with Facility Director, PREA Compliance Manager, two Counselor Supervisors, Program Manager, Psychological Services Associate, Human Services Program Representative and the BJS PREA Coordinator.

A complete tour of the facility took approximately two hours. All areas were extremely well maintained. The facility has a video surveillance system which provides coverage for 95% of the facility. There are 183 cameras and work stations for supervisory staff to review stored video. The system has a retention of 60 days for recorded images (this length of time is outstanding). The system provides coverage of all housing units, hallways, stairwells, recreation areas and education areas. There are cameras in the dormitories. There is a camera view of all doors in areas where youth are permitted. Facility standard operating procedures specify specific outdoor routes of travel when escorting youth in order to maintain video surveillance. Observed staffing (5 : 1), while this auditor was on site exceeds the standards requirement of 8: 1. All housing units have multi-stall showers and toilets which are appropriately partitioned for privacy and properly supervised when more than one youth is in the room. Youth are permitted to shower and use the bathroom alone if requested. This was confirmed by all staff and youth interviewed. The housing units are dormitories and are appropriately staffed.

Youth were observed during recreation, work details, during movement, and at meals. Observations of staff supervision practices were consistent with the agencies policies. Interactions between staff and youth were professional, respectful and boundary appropriate.

The PREA education program for youth and screening for risk are conducted by the State Court Liaison on the date of admission, and documented. All youth interviewed acknowledged being screened on the date of admission as well as being seen by medical staff within 24 hours of admission.

Administrative investigations regarding allegations of sexual abuse and sexual harassment are conducted by are conducted by the Huntingdon County Office of Children and Youth. Criminal investigations of sexual abuse and assault are conducted by the Pennsylvania State Police. Forensic examinations and evidence collection are performed at the J.C. Blair Memorial Hospital. A state-wide MOU is in place to provide victims' services.

This auditor interviewed the following staff titles (number in parentheses indicates more than one staff in that title was interviewed):

- Facility Director
- Psychological Services Associate
- Program Manager
- Youth Advocate
- BJS PREA Coordinator
- Registered Nurse

- Youth Development Aide (4)
- Youth Development Aide Supervisor (2)
- Youth Development Counselor (2)
- Youth Development Counselor Supervisor (2)
- Facility PREA Compliance Manager

Random direct-care staff were selected for interviews to include staff from all housing units and all areas of program. Experience levels ranged from ten months to over 28 years. All presented as very knowledgeable about their jobs and highly dedicated to keeping youth safe. The agency's commitment to implementing the PREA standards was very evident during interviews. Staff members were not only aware of their agency's policies and procedures relative to the standards, but were able to discuss PREA and how it related to the overall mission of the program and the agency's mission as a whole.

All staff members knew their obligations as mandated reporters and first responders. All felt well supported by facility management, and had no fear regarding retaliation for reporting abuse. All staff have received PREA specific training as first responders and all knew what to do if they were a first responder. Staff also carry a card on their ID holder with the first responder duties printed on one side and suicide protocols on the other. All felt empowered to proactively address issues related to sexual violence and were able to describe actions they would take to prevent and/or deter potential and/or imminent threats of sexual violence.

A total of 11 youth at the facility were interviewed, and included youth from all housing units. Ages ranged from 15 to 20 years. There were no youth currently at the facility that had made an allegation of abuse that occurred at the facility. There were no youth currently at the facility who had reported an allegation of sexual harassment that occurred at the facility. There was one youth at the program who identified as LGBTI or had been identified as gender non-conforming in appearance (this youth was interviewed). All youth acknowledged being asked about sexual orientation, history of abuse and their own sense of vulnerability for victimization upon admission. All youth interviewed had extensive knowledge of the right to be free from sexual abuse, assault or harassment. All youth were aware of multiple methods for reporting abuse. All youth acknowledged being screened upon admission (screening actually occurs on date of admission, which exceeds the standard) and receiving information upon admission on their right to be free from abuse in any form. No youth reported ever having fear for their safety while at the facility or at any time during commitment with BJJS. All said they currently felt safe at the facility.

The quality and organization of the documentation provided to this auditor was outstanding. The pre-audit questionnaires completed by the BJJS State-Wide PREA Coordinator are the best one I have ever received. Clicking on the referenced document in the questionnaire automatically opens the document to the correct page and highlighted reference.

The manner in which the interviews were organized and facilitated by the PREA Compliance Manager and the BJJS State-Wide PREA Coordinator was outstanding. There was no wasted time between interviews and youth from different housing units never crossed paths during the interview process.

The Youth Forestry Camp #3 is an outstanding juvenile facility. The scope of this audit (PREA compliance) does not afford the opportunity to go into all the positive aspects of the program.

**STANDARDS DETERMINATION TOTALS:**

**Exceeds Standard – 2 (Two) Standards or approximately 4% of total standards.**

**Meets Standard - 40 (Forty) Standards or approximately 96% of total standards.**

**Does Not Meet Standard – 0 (Zero) Standards or 0% of total standards**

**Standard 115.311 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 Pennsylvania Bureau of Juvenile Justice Services Policy and Procedure 1.14, page 2, clearly articulates the agency’s zero tolerance policy. Agency and facility organization charts clearly depict the roles of State-wide PREA Coordinator and Facility PREA Compliance Manager. Interviews with the PREA Coordinator and Compliance Manager proved their knowledge of the PREA standards and their commitment to the implementation of the PREA standards. Notice of the PREA compliance audit was posted on all living units and other prominent locations throughout the facility.

**Standard 115.312 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)

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This auditor was provided with copies of contracts the Commonwealth of Pennsylvania has for the confinement of juvenile justice youth. The contracts clearly require full compliance with the PREA standards as a condition of the contract. The Youth Forestry Camp #3 does not enter into such contracts.

**Standard 115.313 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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Pennsylvania Bureau of Juvenile Justice Services Policy and Procedure 1.14, page 6, was reviewed by this auditor. Policy requires Youth Forestry Camp #3 to have a staffing plan in compliance with the PREA standards and that the plan is reviewed annually. The facility has a video surveillance and staffing plan which was provided to this auditor (the plan meets all the requirements of the standard). Documentation of annual review of the plan was also provided. Pennsylvania Bureau of Juvenile Justice Services Policy and Procedure 1.14, page 7, requires unannounced rounds. This auditor was provided documentation of these rounds and interviews with supervisory staff confirmed that they occur. There is a video surveillance system which provides video coverage of all housing units, program areas and hallways. The system has a video retention period of 60 days. Unannounced rounds are supplemented with random video reviews by supervisors. Observed staffing ratios of 5 : 1 during the on-site audit exceeded the standards during program hours. Over-night staffing in compliance with the standards was documented on staffing schedules, housing unit logs as well as interviews with staff and youth. There were no instances of deviations from the staffing plan due to training, vacations, Family Medical Leave and other types of leave. Overtime is paid to maintain staffing ratios.

**Standard 115.315 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)

**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.**

Per Pennsylvania Bureau of Juvenile Justice Services Policy and Procedure 1.14 and 7.10A state that youth may only be searched by staff of the same gender. All searches must be conducted with a witness. All random staff interviewed confirmed that cross-gender searches do not occur. All youth interviewed denied ever having been searched by an opposite gender staff. Pennsylvania Bureau of Juvenile Justice Services Policy and Procedure 7.10A prohibits searching youth for the purpose of determining if the youth is transgender or intersex. All of the youth interviewed denied ever being searched for this purpose. There are no cameras in bathrooms, showers, youth rooms or anywhere youth are permitted to change clothes. Pennsylvania Bureau of Juvenile Justice Services Policy and Procedure 1.14 provides for all youth to shower privately. All youth interviewed acknowledged that they have privacy when showering, toileting and changing clothes. All showers and bathrooms are for multiple users and are appropriately partitioned and supervised.

**Standard 115.316 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.**

Pennsylvania Bureau of Juvenile Justice Services Policy and Procedure 1.14, page 8 requires compliance with this standard. Pennsylvania Bureau of Juvenile Justice Services Policy and Procedure 1.12 states on page 4 that only qualified interpreters may be used. Other incarcerated youth do not meet the policy’s definition of “qualified interpreter”. This auditor received copies of intake materials in Spanish. The facility has multiple Spanish speaking staff. Special education teachers are available for youth with learning disabilities. A language interpretation service is available for other languages should the need arise. This auditor was provided with a copy of the current contract. There were no youth currently at the facility that required the services of an interpreter. There were no youth currently at the facility that had disabilities that would require them to receive special services to understand their rights under PREA. All of the above was confirmed via interviews with staff and youth.

**Standard 115.317 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)

**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.**

Pennsylvania Bureau of Juvenile Justice Services Policy and Procedure 1.14, page 8-10 requires background checks and re-checks in accordance with the standards. These checks include clearance through the Commonwealth’s child abuse registry. Material omissions of sexual abuse or harassment incidents or the provision of materially false information are grounds for termination. Documentation of background checks and clearances for this audit period were provided to this auditor. Interviews with the Facility Director and the BJJS State-Wide PREA Coordinator confirmed the practice.

### **Standard 115.318 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's video surveillance system was designed in October 2014. The facility and agency conduct annual vulnerability assessments (documentation provided) As a result of the facility's 2015 annual vulnerability assessment the facility added cameras its video surveillance system (outdoor courts at B dorm, conference room in annex and mail room in administration building). The facility's Video Surveillance and Staffing Plan clearly address the use of technology to improve the safety of youth.

### **Standard 115.321 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)

**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.**

Pennsylvania Bureau of Juvenile Justice Services Policy and Procedure 1.14 and the Memorandum of Understanding with the Pennsylvania Coalition Against Rape and YMCA Violence Prevention Program were reviewed by this auditor. The policy addresses all aspects of this standard. The MOU provides from crisis counseling and victim advocacy services. There were no instances of sexual abuse or assault during this audit period, and therefore there was no documentation to review. Physical evidence collection of criminal acts and forensic examinations are not conducted by facility staff. All staff are trained to preserve incident scenes and measures to prevent evidence from being destroyed. This was confirmed via interviews with staff. Criminal investigations are conducted by the Pennsylvania State Police. Forensic examinations would be conducted at the J.C. Blair Memorial Hospital. There were no instances of sexual abuse or assault that would have necessitated a forensic examination during this audit period. Documentation of BJJ's efforts to have the outside entities that conduct PREA investigations to comply with the standards was provided to this auditor.

**Standard 115.322 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)

**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.**

Pennsylvania Bureau of Juvenile Justice Services Policy and Procedure 1.14, 1.06, 1.09B and 1.17 were reviewed by this auditor. These policies are available on the agency's web site. These policies meet all the requirements of this standard. It requires that all allegations of sexual harassment and sexual abuse be investigated. It requires that allegations that may be criminal in nature be referred to law enforcement and provides clear guidance for when BJJJS may conduct an administrative investigation once a referral to law enforcement has been made. All BJJJS staff are mandated reporters of abuse and all staff interviewed were aware of their obligations to report abuse under Pennsylvania law. The facility reported two allegations of sexual abuse and/or harassment during this audit period. Administrative investigations were conducted and both incidents were referred to the Pennsylvania State Police. Neither of these allegations actually rose to the level of repeated as stated in the standards. Youth Forestry Camp #3, and BJJJS as a whole, is intentionally reporting and investigating single occurrences of sexual harassment (standard states "repeated" in the definition) in order to improve the conditions of confinement at the facility as they relate to PREA compliance, and they should be applauded for their efforts. This practice clearly exceeds the requirements of this standard.

**Standard 115.331 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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BJJS Policy and Procedure 1.14, pages 11-25 meet all aspects of this standard and are incorporated into the BJJS power-point trainings received by all staff (PREA training curricula and Professionalism and Ethics curricula were reviewed by this auditor as well). All staff interviewed acknowledged that they had received the initial training and refresher training. Documentation was provided to this auditor confirming staff completes a post training supervisory conference and signs a form to confirm understanding of the material presented. All staff interviewed were aware of their obligations related to the agency’s PREA policy, their obligations as mandated reporters of abuse, their duties as a first responder and agency protocols related to evidence collection.

The training curriculum utilized by the facility meets all aspects of this standard as follows:

<input checked="" type="checkbox"/> (1) Agency’s zero tolerance policy for sexual abuse and sexual harassment.	Slide 4
<input checked="" type="checkbox"/> (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures.	Slide 6, 15 and 16
<input checked="" type="checkbox"/> (3) Residents’ right to be free from sexual abuse and sexual harassment.	Slide 18 - 23
<input checked="" type="checkbox"/> (4) The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment.	Slide 24
<input checked="" type="checkbox"/> (5) The dynamics of sexual abuse and sexual harassment in juvenile facilities.	Slide 7
<input checked="" type="checkbox"/> (6) The common reactions of sexual abuse and sexual harassment juvenile victims.	Slide 7
<input checked="" type="checkbox"/> (7) How to detect and respond to signs of threatened and actual sexual abuse.	Slide 7
<input checked="" type="checkbox"/> (8) How to avoid inappropriate relationships with residents.	Slide 7
<input checked="" type="checkbox"/> (9) How to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming residents.	Slide 8
<input checked="" type="checkbox"/> (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.	Slide 12
<input checked="" type="checkbox"/> (11) Relevant laws regarding the applicable age of consent.	Slide 19

**Standard 115.332 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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Per BJJIS Policy and Procedure 1.14, page 12, all volunteers and contractors must receive PREA training. The PREA training is a detailed review of the BJJIS pamphlet, "Zero Tolerance of Sexual Abuse and/or Harassment for Contracted Employees and Volunteers". Volunteers and contractors must sign an acknowledgement that they have received and understood the training. Documentation of signed acknowledgement forms was provided to this auditor

**Standard 115.333 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)

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BJJIS's resident education program is provided to youth by the assigned Court Liaison Program Specialist on the date of admission as part of the intake process (BJJIS Policy and Procedure 1.26, page 7). Youth receive written materials about PREA and their rights to be free from abuse upon admission. This document is available in English and Spanish. Each youth signs an acknowledgement that they understood the material presented. All youth interviewed were aware of the right to be free from abuse and multiple means of reporting allegations of abuse. All youth entering any BJJIS facility, either as a new admission or a transfer, go through the same intake process. Posters, in both English and Spanish were clearly visible on all living units and throughout the facility.

### **Standard 115.334 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 Bureau of Juvenile Justice Services does not conduct investigations of sexual abuse. Such investigations are conducted by the Pennsylvania State Police and the Perry County Office of Children and Youth. Documentation was provided to this auditor of BJJS' request to the Pennsylvania State Police and Perry County to comply with the PREA standards when conducting such investigations. Documentation of training for BJJS Investigators was provided to this auditor. BJJS investigators have completed the NIC PREA Investigators training.

### **Standard 115.335 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.**

BJJS Policy and Procedure 1.14, page 13 mandates specialized training for medical and mental health staff as per the PREA standards. Documentation of this training, including training for contract providers was provided to this auditor. One medical staff member was interviewed. Youth Forestry Camp #3 medical staff does not conduct forensic examinations or collect evidence. The agency's protocol is to preserve/avoid destruction of evidence and then transport to the designated medical facility (J.C. Blair Memorial Hospital).

**Standard 115.341 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.**

BJJS Policy and Procedure 1.14, pages 14-25 and BJJS Policy and Procedure 1.26, page 7-12 address the standards related to screening youth for risk of victimization and abusiveness. BJJS uses a standardized, objective instrument to perform this screening (Vulnerability Assessment Instrument: Risk of Victimization and/or Sexually Aggressive Behavior). The screening instrument addresses all required elements of the standard. Screening occurs on date of admission. Periodic reassessment occurs as a part of the Multi-Discipline Team treatment process and after any PREA related incident. All of the youth interviewed acknowledged being screened and that screening occurred shortly after admission.

**Standard 115.342 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)

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BJJS Policy and Procedure 1.14, pages 14-15 addresses how the information obtained during screening is utilized to inform programming and housing decisions. Policy 1,14 also meets the requirements of this standard as it relates to the use of isolation. Isolation, as it relates to this standard, was not used during this audit period. Interviews with all staff and youth confirmed compliance with this standard. BJJS Policy and Procedure 1.14, page 15 prohibits youth from being assigned to a housing unit based on gender identity and prohibits gender identity from being used as a risk factor for abusiveness.

### **Standard 115.351 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)

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BJJS Policy and Procedure 1.14, page 15-16, appropriately addresses this standard. All youth interviewed knew multiple means (tell staff, Blue Phone, tell parent, call lawyer, file grievance) to report abuse of any kind. All knew where to find the Blue Phone to anonymously report abuse outside the agency. One of the youth interviewed made an allegation of sexual abuse against another youth during this audit period. The youth's description of the facility's response to his allegation demonstrated compliance with this standard. Youth receive a handout at admission regarding how to report abuse and there are posters throughout the facility and on all housing units (in English and Spanish) with the information. All staff are mandated reporters of abuse per BJJS Policy and Procedure 1.06A and the laws of the Commonwealth of Pennsylvania. All staff interviewed were aware of their obligations as mandated reporters.

### **Standard 115.352 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.**

BJJS Policy and Procedure 3.03A, complies in full with this standard. Although the policy complies with the standard, a grievance filed that alleges that sexual abuse occurred or alleges an imminent threat would immediately trigger the agency's PREA response procedures. All youth interviewed were aware of the grievance procedures. All staff interviewed were able to describe steps they would take to protect a youth from threatened abuse.

**Standard 115.353 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.**

A state-wide Memorandum of Understanding exists for the provision of these services. BJJS Policy and Procedure 1.06A addresses access to these services. Interviews with medical and clinical staff confirmed that youth would be advised about confidentiality prior to accessing the services. Information is provided to youth via the Youth Handbook posters that are on display in all living units and common areas throughout the Facility. The Blue Phone located in medical is a direct line to these services and does not require the youth to remember any telephone number. All youth interviewed knew how to use the Blue Phone, acknowledged ready access to contact with their families (free telephone calls) and the ability to contact their lawyer if they so desired.

**Standard 115.354 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.**

BJJS’s public website lists the Childline number to call if sexual abuse or harassment is suspected. All youth interviewed acknowledged that they knew they could report abuse via a third party. All staff interviewed acknowledged that they would accept a third party report of abuse and respond in the same manner as if they had witnessed the abuse themselves.

**Standard 115.361 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.**

BJJS Policy and Procedure 1.14 address the requirements of this standard. All staff and volunteers are mandated reporters of child abuse. All staff and volunteers receive training as to how to fulfill their obligations as mandated reporters (what to report and how to report it). All staff interviewed were aware of the obligations as mandated reporters. There were two allegations of sexual misconduct by staff during this audit period. Documentation of compliance with BJJS policies regarding reporting was provided to this auditor. Both instances were called into Child Line and reported to the state police.

**Standard 115.362 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.**

BJJS Policy and Procedure 1.14, pages 17 and Policy 1.06A addresses the requirements of this standard. There was one instance of a youth being determined to be in substantial risk of imminent sexual abuse. Documentation of the safety plan being put into place shortly after the imminent risk was discovered was provided to this auditor. The youth/victim involved in this incident was interviewed by this auditor and confirmed that the safety plan was put in place in a timely manner. All staff interviewed were able to articulate means that they would use to protect youth should this occur.

**Standard 115.363 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.**

BJJS Policy and Procedure 1.14, page 18 complies with this standard. Youth Forestry Camp #3 did not receive any reports of youth being sexually abused at another confinement facility during this audit period and therefore had no documentation to show this auditor regarding such actions.

**Standard 115.364 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.**

All staff receive training regarding first responder duties. Documentation of training was provided to this auditor. Staff carry a card with their first responder duties printed on them. BJJS Policy and Procedure 1,06A complies with this standard. Youth Forestry Camp #3 has an institutional plan that meets the requirements of this standard. There were no instances of sexual assault during this audit period, therefore there is no documentation of staff performing these duties. All staff interviewed were able to articulate their first responder duties.

**Standard 115.365 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.**

BJJS Policy and Procedure 1.14, page 18 requires each facility to have an institutional plan for a coordinated response. A copy of the facility's institutional plan was provided to this auditor. The plans provide clear and concise direction for response to any alleged PREA violation. There were two allegations of staff on youth sexual misconduct during this audit period. Documentation of the plan being utilized was provided to this auditor. All staff interviewed were aware of their program's institutional plan and where to locate the document.

**Standard 115.366 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.**

There have been no new collective bargaining agreements entered into by Youth Forestry Camp #3 or BJJS on behalf of the Camp that would violate this standard. BJJS Policy and Procedure 1.14, page 19 specifically authorizes BJJS to protect youth from contact with alleged abusers up to and including suspending staff without pay.

**Standard 115.367 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.**

BJJS Policy and Procedure 1.27, Appendix A and B describes how protection against retaliation is monitored and documented. The Multi-Disciplinary Team has been named as the persons responsible for monitoring for retaliation against staff or youth. The facility reports that there have been no instances of retaliation during this auditing period. There were no youth currently at the facility who had made an allegation of sexual harassment or sexual abuse, therefore there were no youth interviews to confirm the practice.

**Standard 115.368 Post-allegation protective custody**

- 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.**

Youth Forestry Camp #3 reports that it did not use post-allegation protective custody during this audit period.

**Standard 115.371 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.**

BJJS and Youth Forestry Camp #3 do not conduct investigations of allegations that rise to the level of criminal behavior. These are conducted by the Pennsylvania State Police. BJJS Policy and Procedure 1.06A and 1.09B comply with this standard relative to administrative investigations. BJJS investigators completed PREA investigations training through the NIC and follow the protocols there in when conducting investigations related to allegations of sexual harassment. A review of prior sexual harassment investigation reports confirmed the investigators’ understanding of this policy and their training. BJJS has made documented efforts to advise the Pennsylvania State Police of the requirements of this standard.

**Standard 115.372 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.**

Per BJJS Policy and Procedure 1.14, page 20, a preponderance of evidence is the standard. A review of sample administrative investigation reports for alleged sexual harassment confirmed the evidentiary standard is being followed.

**Standard 115.373 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.**

There were two instances of sexual abuse alleged to have occurred during this audit period. BJJIS Policy and Procedure 1.14, page 20 and Policy 1.06A meets the requirements of this standard. The youth/victim of this incident was interviewed by this auditor and confirmed that he was notified of the outcome of the investigation.

**Standard 115.376 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.**

BJJIS Policy and Procedure 1.14, page 20 addresses the requirements of this standard. There were no substantiated instances of sexual abuse, assault or harassment by Youth Forestry Camp #3 staff occurring during this audit period. Therefore there was no documentation of staff discipline to review.

**Standard 115.377 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.**

BJJS Policy and Procedure 1.14, page 21 addresses the requirements of this standard. There were no instances of sexual abuse, assault or harassment by Youth Forestry Camp #3 contractors or volunteers occurring during this audit period, and therefore there was no documentation to review for compliance.

**Standard 115.378 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.**

Youth Forestry Camp #3 has a youth handbook that outlines the behavioral treatment program response for such violations. Based upon the therapeutic nature of these programs the general tenor of responses are therapeutic in nature. In other words, behavioral change is the goal versus punitive actions. Based upon the fact that Youth Forestry Camp #3's primary goal related to disciplinary sanctions in response to rule violations is treatment oriented this auditor finds this standard to be in compliance.

**Standard 115.381 Medical and mental health screenings; history of sexual abuse**

- 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.**

BJJS Policy and Procedure 4.05 pages 4-5 addresses the requirements of this standard. Youth admitted to Youth Forestry Camp #3 are seen by medical staff within 24 hours of arrival. Staff performing the youth’s intake utilize a standardized screening tool to determine if a youth has any immediate and/or emergency medical or mental health needs. All youth interviewed confirmed that they were seen by medical staff shortly after arrival at the facility. Interview with medical staff confirmed that screening includes history of sexual abuse. Per medical staff interview, youth have access to all the same medical services available to youth in the community. When a disclosure of prior abuse occurs, and services are offered by Medical and Mental Health staff, this is documented in Automated Intake and Incident Reporting System. Access to this information is restricted (need-to-know).

**Standard 115.382 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.**

BJJS Policy and Procedure 1.14 and 4.05 require that the youth’s medical and mental health needs are met. The state-wide MOU for victim services clearly states that services will be provided to the youth free of charge. There were no substantiated incidents of sexual abuse or sexual assault occurring at Youth Forestry Camp #3 during this audit period that involved physical contact, and therefore there was no documentation to be reviewed. Documentation of the two youth who made unfounded allegations being referred for psychological assessment was provided to this auditor.

**Standard 115.383 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.**

There were no incidents of sexual abuse or sexual assault, as defined in the PREA standards, occurring at Youth Forestry Camp #3 during this audit period and therefore there was no documentation to review. In the event that an incident was to occur the victim would receive services from a community provider as outlined in the state-wide MOU. As previously noted, services from these providers are at no cost to the victim. All ongoing medical care beyond the scope of facility medical staff would be provided by community providers. The youth would have the option of facility clinical staff or community providers for ongoing mental health services.

**Standard 115.386 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.**

There were no incidents of sexual abuse or sexual assault occurring at Youth Forestry Camp #3 during this audit period. BJJIS Policy and Procedure 1.14, page 22 complies with this standard. Due to the lack of sexual abuse incidents there was no documentation for this auditor to review. It should be noted that YFC #3 conducts incident reviews of all alleged PREA violations, even ones that do not rise to the standards definition of sexual abuse. This practice clearly exceeds the standard.

**Standard 115.387 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.**

BJJS Policy and Procedure 1.14, page 23 complies with this standard. BJJS also maintains detailed electronic records for all incident reviews conducted. These records allow BJJS to access data sufficient to complete the annual survey of sexual violence. The agency's public website was reviewed by this auditor. Aggregate data for all contract and BJJS operated facilities is posted.

**Standard 115.388 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.**

The agency's public website was reviewed by this auditor. The most recent, available annual PREA report was posted. The annual report addresses all elements of this standard. BJJS Policy and Procedure 1.14 addresses the retention requirements of this standard.

**Standard 115.389 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.**

The BJJS Policy and Procedure 1.14 addresses the data storage requirements of this standard. A review of the data available on the BJJS website supports full compliance for this standard. There is no individual identifying information contained in the aggregate data or the reports related to the data posted.

**AUDITOR CERTIFICATION**

This auditor certifies that no conflict of interest exists with respect to his ability to conduct an audit of the Pennsylvania Bureau of Juvenile Justice Services or the Youth Forestry Camp #3.

*Kurt Pfisterer/s/*  
Kurt Pfisterer, Dual Certified PREA Auditor

September 3, 2015  
Date