

PREA Facility Audit Report: Final

Name of Facility: Montgomery County Youth Facility

Facility Type: Juvenile

Date Interim Report Submitted: 07/04/2025

Date Final Report Submitted: 01/25/2026

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input type="checkbox"/>
Auditor Full Name as Signed: Robert Burns Latham	Date of Signature: 01/25/2026

AUDITOR INFORMATION	
Auditor name:	Latham, Robert
Email:	robertblatham@icloud.com
Start Date of On-Site Audit:	05/07/2025
End Date of On-Site Audit:	05/08/2025

FACILITY INFORMATION	
Facility name:	Montgomery County Youth Facility
Facility physical address:	1111 Airbase Boulevard, Montgomery, Alabama - 36108
Facility mailing address:	PO Box 9219, Montgomery, Alabama - 36108

Primary Contact

Name:	Scott Holmes
Email Address:	scottholmes@mc-ala.org
Telephone Number:	334-240-2119

Superintendent/Director/Administrator	
Name:	Scott Holmes
Email Address:	scottholmes@mc-ala.org
Telephone Number:	334-240-2119

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

Facility Characteristics	
Designed facility capacity:	52
Current population of facility:	50
Average daily population for the past 12 months:	44
Has the facility been over capacity at any point in the past 12 months?	Yes
What is the facility's population designation?	Both women/girls and men/boys
Age range of population:	10-19
Facility security levels/resident custody levels:	Medium
Number of staff currently employed at the	36

facility who may have contact with residents:	
Number of individual contractors who have contact with residents, currently authorized to enter the facility:	1
Number of volunteers who have contact with residents, currently authorized to enter the facility:	8

AGENCY INFORMATION	
Name of agency:	Montgomery County Commission
Governing authority or parent agency (if applicable):	
Physical Address:	101 South Lawrence Street, Montgomery, Alabama - 36104
Mailing Address:	
Telephone number:	

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

Agency-Wide PREA Coordinator Information			
Name:	Patricia Boyd	Email Address:	patriciaboyd@mc-ala.org

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

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

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

Number of standards exceeded:

0

Number of standards met:

43

Number of standards not met:

0

POST-AUDIT REPORTING INFORMATION

Please note: Question numbers may not appear sequentially as some questions are omitted from the report and used solely for internal reporting purposes.

GENERAL AUDIT INFORMATION

On-site Audit Dates

1. Start date of the onsite portion of the audit:	2025-05-07
2. End date of the onsite portion of the audit:	2025-05-08

Outreach

10. Did you attempt to communicate with community-based organization(s) or victim advocates who provide services to this facility and/or who may have insight into relevant conditions in the facility?	<input checked="" type="radio"/> Yes <input type="radio"/> No
a. Identify the community-based organization(s) or victim advocates with whom you communicated:	<ul style="list-style-type: none">• Alabama Department of Youth Services• Just Detention International• Child Protect Children's Advocacy Center

AUDITED FACILITY INFORMATION

14. Designated facility capacity:	52
15. Average daily population for the past 12 months:	44
16. Number of inmate/resident/detainee housing units:	3

<p>17. Does the facility ever hold youthful inmates or youthful/juvenile detainees?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> Not Applicable for the facility type audited (i.e., Community Confinement Facility or Juvenile Facility)</p>
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Audited Facility Population Characteristics on Day One of the Onsite Portion of the Audit

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

<p>23. Enter the total number of inmates/residents/detainees in the facility as of the first day of onsite portion of the audit:</p>	<p>45</p>
<p>25. Enter the total number of inmates/residents/detainees with a physical disability in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>26. Enter the total number of inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>27. Enter the total number of inmates/residents/detainees who are Blind or have low vision (visually impaired) in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>
<p>28. Enter the total number of inmates/residents/detainees who are Deaf or hard-of-hearing in the facility as of the first day of the onsite portion of the audit:</p>	<p>0</p>

29. Enter the total number of inmates/residents/detainees who are Limited English Proficient (LEP) in the facility as of the first day of the onsite portion of the audit:	0
30. Enter the total number of inmates/residents/detainees who identify as lesbian, gay, or bisexual in the facility as of the first day of the onsite portion of the audit:	1
31. Enter the total number of inmates/residents/detainees who identify as transgender or intersex in the facility as of the first day of the onsite portion of the audit:	0
32. Enter the total number of inmates/residents/detainees who reported sexual abuse in the facility as of the first day of the onsite portion of the audit:	0
33. Enter the total number of inmates/residents/detainees who disclosed prior sexual victimization during risk screening in the facility as of the first day of the onsite portion of the audit:	0
34. Enter the total number of inmates/residents/detainees who were ever placed in segregated housing/isolation for risk of sexual victimization in the facility as of the first day of the onsite portion of the audit:	0
35. Provide any additional comments regarding the population characteristics of inmates/residents/detainees in the facility as of the first day of the onsite portion of the audit (e.g., groups not tracked, issues with identifying certain populations):	No text provided.

Staff, Volunteers, and Contractors Population Characteristics on Day One of the Onsite Portion of the Audit	
36. Enter the total number of STAFF, including both full- and part-time staff, employed by the facility as of the first day of the onsite portion of the audit:	36
37. Enter the total number of VOLUNTEERS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	8
38. Enter the total number of CONTRACTORS assigned to the facility as of the first day of the onsite portion of the audit who have contact with inmates/residents/detainees:	6
39. Provide any additional comments regarding the population characteristics of staff, volunteers, and contractors who were in the facility as of the first day of the onsite portion of the audit:	No text provided.
INTERVIEWS	
Inmate/Resident/Detainee Interviews	
Random Inmate/Resident/Detainee Interviews	
40. Enter the total number of RANDOM INMATES/RESIDENTS/DETAINEES who were interviewed:	9

<p>41. Select which characteristics you considered when you selected RANDOM INMATE/RESIDENT/DETAINEE interviewees: (select all that apply)</p>	<p><input type="checkbox"/> Age</p> <p><input type="checkbox"/> Race</p> <p><input type="checkbox"/> Ethnicity (e.g., Hispanic, Non-Hispanic)</p> <p><input type="checkbox"/> Length of time in the facility</p> <p><input type="checkbox"/> Housing assignment</p> <p><input type="checkbox"/> Gender</p> <p><input type="checkbox"/> Other</p> <p><input type="checkbox"/> None</p>
<p>42. How did you ensure your sample of RANDOM INMATE/RESIDENT/DETAINEE interviewees was geographically diverse?</p>	<p>Residents were interviewed from each of the housing units.</p>
<p>43. Were you able to conduct the minimum number of random inmate/resident/detainee interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>44. Provide any additional comments regarding selecting or interviewing random inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>The auditor was provided with a roster of residents confined on the first day of the onsite audit. The auditor selected residents from each housing unit with consideration given to age, race, ethnicity, gender, and length of time in the facility. Additionally, the auditor was provided with lists of residents for selecting targeted interviews.</p>
<p>Targeted Inmate/Resident/Detainee Interviews</p>	
<p>45. Enter the total number of TARGETED INMATES/RESIDENTS/DETAINEES who were interviewed:</p>	<p>1</p>

As stated in the PREA Auditor Handbook, the breakdown of targeted interviews is intended to guide auditors in interviewing the appropriate cross-section of inmates/residents/detainees who are the most vulnerable to sexual abuse and sexual harassment. When completing questions regarding targeted inmate/resident/detainee interviews below, remember that an interview with one inmate/resident/detainee may satisfy multiple targeted interview requirements. These questions are asking about the number of interviews conducted using the targeted inmate/resident/detainee protocols. For example, if an auditor interviews an inmate who has a physical disability, is being held in segregated housing due to risk of sexual victimization, and disclosed prior sexual victimization, that interview would be included in the totals for each of those questions. Therefore, in most cases, the sum of all the following responses to the targeted inmate/resident/detainee interview categories will exceed the total number of targeted inmates/residents/detainees who were interviewed. If a particular targeted population is not applicable in the audited facility, enter "0".

<p>47. Enter the total number of interviews conducted with inmates/residents/detainees with a physical disability using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Corroboration strategies included interviewing staff and residents.</p>
<p>48. Enter the total number of interviews conducted with inmates/residents/detainees with a cognitive or functional disability (including intellectual disability, psychiatric disability, or speech disability) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Corroboration strategies included interviewing staff and residents.</p>
<p>49. Enter the total number of interviews conducted with inmates/residents/detainees who are Blind or have low vision (i.e., visually impaired) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Corroboration strategies included interviewing staff and residents.</p>
<p>50. Enter the total number of interviews conducted with inmates/residents/detainees who are Deaf or hard-of-hearing using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>

<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Corroboration strategies included interviewing staff and residents.</p>
<p>51. Enter the total number of interviews conducted with inmates/residents/detainees who are Limited English Proficient (LEP) using the "Disabled and Limited English Proficient Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Corroboration strategies included interviewing staff and residents.</p>
<p>52. Enter the total number of interviews conducted with inmates/residents/detainees who identify as lesbian, gay, or bisexual using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>1</p>

<p>53. Enter the total number of interviews conducted with inmates/residents/detainees who identify as transgender or intersex using the "Transgender and Intersex Inmates; Gay, Lesbian, and Bisexual Inmates" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Corroboration strategies included interviewing staff and residents.</p>
<p>54. Enter the total number of interviews conducted with inmates/residents/detainees who reported sexual abuse in this facility using the "Inmates who Reported a Sexual Abuse" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Corroboration strategies included interviewing staff and residents.</p>

<p>55. Enter the total number of interviews conducted with inmates/residents/detainees who disclosed prior sexual victimization during risk screening using the "Inmates who Disclosed Sexual Victimization during Risk Screening" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>
<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Corroboration strategies included interviewing staff and residents.</p>
<p>56. Enter the total number of interviews conducted with inmates/residents/detainees who are or were ever placed in segregated housing/isolation for risk of sexual victimization using the "Inmates Placed in Segregated Housing (for Risk of Sexual Victimization/Who Allege to have Suffered Sexual Abuse)" protocol:</p>	<p>0</p>
<p>a. Select why you were unable to conduct at least the minimum required number of targeted inmates/residents/detainees in this category:</p>	<p><input checked="" type="checkbox"/> Facility said there were "none here" during the onsite portion of the audit and/or the facility was unable to provide a list of these inmates/residents/detainees.</p> <p><input type="checkbox"/> The inmates/residents/detainees in this targeted category declined to be interviewed.</p>

<p>b. Discuss your corroboration strategies to determine if this population exists in the audited facility (e.g., based on information obtained from the PAQ; documentation reviewed onsite; and discussions with staff and other inmates/residents/detainees).</p>	<p>Corroboration strategies included interviewing staff and residents.</p>
<p>57. Provide any additional comments regarding selecting or interviewing targeted inmates/residents/detainees (e.g., any populations you oversampled, barriers to completing interviews):</p>	<p>The facility identified one gay resident who met the targeted interview criteria. Interviewing staff, medical and mental health practitioners, and educational staff did not indicate any additional residents who met the targeted interview criteria.</p>
<p>Staff, Volunteer, and Contractor Interviews</p>	
<p>Random Staff Interviews</p>	
<p>58. Enter the total number of RANDOM STAFF who were interviewed:</p>	<p>12</p>
<p>59. Select which characteristics you considered when you selected RANDOM STAFF interviewees: (select all that apply)</p>	<p><input checked="" type="checkbox"/> Length of tenure in the facility</p> <p><input checked="" type="checkbox"/> Shift assignment</p> <p><input checked="" type="checkbox"/> Work assignment</p> <p><input checked="" type="checkbox"/> Rank (or equivalent)</p> <p><input checked="" type="checkbox"/> Other (e.g., gender, race, ethnicity, languages spoken)</p> <p><input type="checkbox"/> None</p>
<p>If "Other," describe:</p>	<p>Gender, race, ethnicity, and languages spoken were considered.</p>
<p>60. Were you able to conduct the minimum number of RANDOM STAFF interviews?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>

<p>61. Provide any additional comments regarding selecting or interviewing random staff (e.g., any populations you oversampled, barriers to completing interviews, barriers to ensuring representation):</p>	<p>The auditor was provided a roster on the first day of the onsite audit. Staff were selected all housing units and from each shift. To enable a cross section of staff interviewed, the auditor considered, length of tenure in the facility, rank, work assignments, gender, race, ethnicity, and languages spoken.</p>
<p>Specialized Staff, Volunteers, and Contractor Interviews</p>	
<p>Staff in some facilities may be responsible for more than one of the specialized staff duties. Therefore, more than one interview protocol may apply to an interview with a single staff member and that information would satisfy multiple specialized staff interview requirements.</p>	
<p>62. Enter the total number of staff in a SPECIALIZED STAFF role who were interviewed (excluding volunteers and contractors):</p>	<p>10</p>
<p>63. Were you able to interview the Agency Head?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>64. Were you able to interview the Warden/Facility Director/Superintendent or their designee?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>65. Were you able to interview the PREA Coordinator?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>66. Were you able to interview the PREA Compliance Manager?</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> NA (NA if the agency is a single facility agency or is otherwise not required to have a PREA Compliance Manager per the Standards)</p>

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

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

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

SITE REVIEW AND DOCUMENTATION SAMPLING

Site Review

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

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

Yes

No

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

72. Observations of all facility practices in accordance with the site review component of the audit instrument (e.g., signage, supervision practices, cross-gender viewing and searches)?

Yes

No

73. Tests of all critical functions in the facility in accordance with the site review component of the audit instrument (e.g., risk screening process, access to outside emotional support services, interpretation services)?

Yes

No

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

Yes

No

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

Yes

No

<p>76. Provide any additional comments regarding the site review (e.g., access to areas in the facility, observations, tests of critical functions, or informal conversations).</p>	<p>The auditor had access to all areas of the facility. During the site review the auditor had informal, conversations with residents and staff. The auditor tested the following critical functions:</p> <ul style="list-style-type: none"> • The facility’s process for securing interpretation services on-demand (on-call interpreter) • Internal reporting methods for confined persons (grievance) • External reporting methods for confined persons (Alabama Department of Youth Services Sexual Assault Hotline) • Access to outside emotional support services (Child Protect Children’s Advocacy Center) • Third-Party Reporting
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Documentation Sampling

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

<p>77. In addition to the proof documentation selected by the agency or facility and provided to you, did you also conduct an auditor-selected sampling of documentation?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p>
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<p>78. Provide any additional comments regarding selecting additional documentation (e.g., any documentation you oversampled, barriers to selecting additional documentation, etc.).</p>	<p>The auditor selected documents for the staff interviewed, along with additional documents provided through corrective action. Documents reviewed included personnel files and training records. The auditor also reviewed records for the residents interviewed, as well as additional historical documents covering the 12-month audit period and the corrective action period. These documents included intake records, initial risk assessments, risk reassessments and the use of screening information, grievances related to sexual abuse and sexual harassment, and offense reports.</p>
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SEXUAL ABUSE AND SEXUAL HARASSMENT ALLEGATIONS AND INVESTIGATIONS IN THIS FACILITY

Sexual Abuse and Sexual Harassment Allegations and Investigations Overview

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

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

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

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

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

Sexual Abuse and Sexual Harassment Investigation Outcomes

Sexual Abuse Investigation Outcomes

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

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

	Ongoing	Referred for Prosecution	Indicted/ Court Case Filed	Convicted/ Adjudicated	Acquitted
Inmate-on-inmate sexual abuse	0	0	0	0	0
Staff-on-inmate sexual abuse	2	2	0	0	0
Total	2	2	0	0	0

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

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

Sexual Harassment Investigation Outcomes

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

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

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

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

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

Sexual Abuse and Sexual Harassment Investigation Files Selected for Review

Sexual Abuse Investigation Files Selected for Review

85. Enter the total number of SEXUAL ABUSE investigation files reviewed/ sampled:

2

<p>86. Did your selection of SEXUAL ABUSE investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any sexual abuse investigation files)</p>
<p>Inmate-on-inmate sexual abuse investigation files</p>	
<p>87. Enter the total number of INMATE-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>0</p>
<p>88. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>89. Did your sample of INMATE-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual abuse investigation files)</p>
<p>Staff-on-inmate sexual abuse investigation files</p>	
<p>90. Enter the total number of STAFF-ON-INMATE SEXUAL ABUSE investigation files reviewed/sampled:</p>	<p>2</p>
<p>91. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include criminal investigations?</p>	<p><input checked="" type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>

<p>92. Did your sample of STAFF-ON-INMATE SEXUAL ABUSE investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input checked="" type="radio"/> No</p> <p><input type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual abuse investigation files)</p>
<p>Sexual Harassment Investigation Files Selected for Review</p>	
<p>93. Enter the total number of SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>a. Explain why you were unable to review any sexual harassment investigation files:</p>	<p>The agency reported no allegations of sexual harassment.</p>
<p>94. Did your selection of SEXUAL HARASSMENT investigation files include a cross-section of criminal and/or administrative investigations by findings/outcomes?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any sexual harassment investigation files)</p>
<p>Inmate-on-inmate sexual harassment investigation files</p>	
<p>95. Enter the total number of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>96. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>

<p>97. Did your sample of INMATE-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any inmate-on-inmate sexual harassment investigation files)</p>
<p>Staff-on-inmate sexual harassment investigation files</p>	
<p>98. Enter the total number of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files reviewed/sampled:</p>	<p>0</p>
<p>99. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include criminal investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p>100. Did your sample of STAFF-ON-INMATE SEXUAL HARASSMENT investigation files include administrative investigations?</p>	<p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input checked="" type="radio"/> NA (NA if you were unable to review any staff-on-inmate sexual harassment investigation files)</p>
<p>101. Provide any additional comments regarding selecting and reviewing sexual abuse and sexual harassment investigation files.</p>	<p>The auditor reviewed two offense reports for allegations of staff-on-resident sexual abuse. The Sheriff provided a statement indicating that both investigative reports were forwarded to the district attorney's office and are pending prosecution.</p>

SUPPORT STAFF INFORMATION

DOJ-certified PREA Auditors Support Staff

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

Yes

No

Non-certified Support Staff

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

Yes

No

AUDITING ARRANGEMENTS AND COMPENSATION

108. Who paid you to conduct this audit?

The audited facility or its parent agency

My state/territory or county government employer (if you audit as part of a consortium or circular auditing arrangement, select this option)

A third-party auditing entity (e.g., accreditation body, consulting firm)

Other

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

115.311	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 • Montgomery County Youth Detention Organizational Chart • Interview with PREA coordinator • Interview with PREA compliance manager <p>Reasoning and analysis (by provision): 15.311 (a) What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment in facilities it operates directly or under contract. The facility has a policy outlining how it will implement the agency’s approach to preventing, detecting, and responding to sexual abuse and sexual harassment. The</p>

policy includes definitions of prohibited behaviors regarding sexual abuse and sexual harassment. The policy includes sanctions for those found to have participated in prohibited behaviors. The policy includes a description of agency strategies and responses to reduce and prevent sexual abuse and sexual harassment of residents.

Montgomery County Youth Detention Policy 12.7.1 (page 1): The Prison Rape Elimination Act of 2003 establishes a zero tolerance standard for the incidence of inmate sexual assault and rape; makes prevention of inmate sexual assault and sexual harassment a top priority in each corrections facility; develops/implements national standards for the detection, prevention, and punishment of prison rape; increases available data and information of the incidence of incarcerated juvenile sexual assault and sexual harassment; standardizes the definitions used for data collection; increases accountability of corrections or detention officials who fail to detect, prevent, reduce and punish prison rape; and protects the Eighth Amendment rights of incarcerated juveniles.

The policy outlines the facility's approach to preventing, detecting, and responding to such conduct. The policy includes definitions of prohibited behaviors regarding sexual misconduct, sexual abuse and sexual harassment and includes sanctions for those found to have participated in prohibited behaviors. The policy addresses prevention of sexual abuse and sexual harassment through the designations of a PREA coordinator and PREA compliance manager, supervision and monitoring, criminal background checks, staff training, resident education, PREA posters and educational materials. The policies address detection of sexual abuse and sexual harassment through resident education, staff training, and intake screening for risk of sexual victimization and abusiveness. The policies address responding to sexual abuse and sexual harassment through the various ways of reporting, investigations, disciplinary sanctions for residents and staff, victim advocacy, access to emergency medical treatment and crisis intervention services, sexual abuse incident reviews, data collection, and data review for corrective action.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.311 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency employs or designates an upper-level, agency-wide PREA coordinator. The PREA coordinator has sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards at the facility. The position of the PREA coordinator is in the agency's organizational structure is assistant juvenile detention director.

Montgomery County Youth Detention Policy 12.7.1 (page 1):

MCYD shall designate an agency wide PREA coordinator with enough time and

	<p>authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all its facilities.</p> <p>What was heard, as part of a systematic review of evidence: Interview with the PREA coordinator: The PREA coordinator stated they have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards. There is one PREA compliance manager.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p> <p>Reasoning and analysis (by provision): 115.311 (c) What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The facility has designated a PREA compliance manager. The PREA compliance manager has sufficient time and authority to coordinate the facility’s efforts to comply with the PREA standards. The position of the PREA compliance manager in the agency’s organizational structure as juvenile detention compliance officer.</p> <p>Montgomery County Youth Detention Policy 12.7.1 (page 1): Each facility shall designate a PREA compliance manager with sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards.</p> <p>What was heard, as part of a systematic review of evidence: Interview with the PREA compliance manager: The PREA compliance manager stated they are provided with sufficient time and authority to coordinate Prairie Vista's efforts to comply with the PREA standards.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>
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115.312	Contracting with other entities for the confinement of residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) <p>Reasoning and analysis (by provision): 115.312 (a)</p>

	<p>What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency has not entered into or renewed a contract for the confinement of residents since the last PREA audit. All of the above contracts require contractors to adopt and comply with PREA Standards. Since the last PREA audit:</p> <ul style="list-style-type: none"> • The number of contracts for the confinement of residents that the agency entered into or renewed with private entities or other government agencies: 0 • The number of above contracts that DID NOT require contractors to adopt and comply with PREA standards: N/A <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p> <p>Reasoning and analysis (by provision): 115.312 (b)</p> <p>What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Since the last PREA audit the number of the contracts referenced in 115.312 (a) that DO NOT require the agency to monitor contractor’s compliance with PREA Standards: N/A</p> <p>Montgomery County Youth Detention does not contract for the confinement of its residents.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>
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115.313	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy: Resident Supervision revised 01/01/2024 • Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 • Montgomery County Youth Facility Shift Assignment Duties revised 04/05/2024 • Montgomery County Detention Schedule 2024 • Montgomery County Youth Detention 12 Hour Shift Schedule • Memorandum: Standard Prison Rape Elimination Act of 2003 (PREA) 115.313 Patterns dated 04/18/2024 • Memorandum: Standard Prison Rape Elimination Act of 2003 (PREA) 115.313

Patterns dated 04/19/2024

- Memorandum: Standard Prison Rape Elimination Act of 2003 (PREA) 115.313

Patterns dated 04/22/2024

- Memorandum: Shift Assignment Duties dated 04/18/2024
- Montgomery County Youth Detention 2023 Staffing Plan review dated 01/15/2023
- Montgomery County Youth Detention 2024 Staffing Plan review dated 02/12/2024
- Supervisor Monitoring Logs (unannounced rounds)
- Interview with superintendent (juvenile detention director)
- Interview with PREA coordinator
- Interview with PREA compliance manager
- Interview with intermediate or higher-level facility staff (Youth Services Specialist III)

Evidence (Corrective action):

- Staffing Plan (07/17/2025)
- Unannounced rounds (09/10/2025)

Reasoning and analysis (by provision):

115.313 (a)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency requires each facility it operates to develop, document, and make its best efforts to comply on a regular basis with a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect residents against abuse.

Since August 20, 2012, or last PREA audit, whichever is later, the average daily number of residents: 47

Since August 20, 2012, or last PREA audit, whichever is later, the average daily number of residents on which the staffing plan was predicated: 52

Montgomery County Youth Detention Policy 12.7.1 (page 21):

MCYD shall develop, implement, and document a staffing plan that provides adequate levels of staffing, and where feasible, video monitoring to protect juveniles against sexual assault.

Review of staffing plan:

A staffing plan that includes the 11 topics required by the standard provision was not provided for review.

The facility provided the following documents: Montgomery County Detention Schedule 2024; Montgomery County Youth Detention 12 Hour Shift Schedule; Memorandum: Shift Assignment Duties dated 04/18/2024; and Memoranda: Standard Prison Rape Elimination Act of 2003 (PREA) 115.313 Patterns dated 04/18/2024, 04/19/2024, and 04/22/2024. The documents included a discussion of staffing ratios, monitoring blind spots, supervision, and other facility issues and directives.

What was heard, as part of a systematic review of evidence:

Interviews with superintendent (juvenile detention director) and PREA compliance manager:

The juvenile detention director stated the staffing plan was in development and the PREA compliance manager stated the facility regularly develops a staffing plan, maintains adequate staffing levels to protect residents against sexual abuse, considers video monitoring as part of the plan, and documents the plan. When assessing staffing levels and the need for video monitoring, the staffing plan considers: generally accepted juvenile detention and correctional/secure residential practices; any judicial findings of inadequacy; any findings of inadequacy from Federal investigative agencies; any findings of inadequacy from internal or external oversight bodies; all components of the facility's physical plant (including "blind spots" or areas where staff or residents may be isolated); the composition of the resident population; the number and placement of supervisory staff; institution programs occurring on a particular shift; any applicable State or local laws, regulations, or standards; the prevalence of substantiated and unsubstantiated incidents of sexual abuse; and any other relevant factors.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The agency developed a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring, to protect residents against sexual abuse (07/17/2025).

Reasoning and analysis (by provision):

115.313 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Each time the staffing plan is not complied with, the facility documents and justifies all deviations from the staffing plan.

Documentation of deviations from staffing plan:

There were no deviations reported.

What was heard, as part of a systematic review of evidence:

Interviews with superintendent (juvenile detention director):

The juvenile detention director stated there have been no circumstances where the facility has been unable to meet the requirements of the staffing plan. If deviations were to occur, documentation would include explanations for non-compliance.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.313 (c)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The facility is obligated by law, regulation, or judicial consent decree to maintain staffing ratios of a minimum of 1:8 during resident waking hours and 1:16 during resident sleeping hours. The facility maintains staff ratios of a minimum of 1:8 during resident waking hours. The facility maintains staff ratios of a minimum of 1:16 during resident sleeping hours.

In the past 12 months the facility did not deviate from the staffing ratios of 1:8 security staff during resident waking hours from the staffing ratios of 1:16 security staff during resident sleeping hours.

Montgomery County Youth Detention Policy 12.7.1 (page 2):

MCYD shall maintain a staffing ratio of a minimum of 1:8 during juvenile waking hours and 1:16 during juvenile sleeping hours, except during limited and discrete exigent circumstances which shall be fully documented.

Montgomery County Youth Detention Policy 12.7.1 (pages 21-22):

Staff /juvenile ratios of a minimum of 1:8 during juvenile waking hours and 1:16 during juvenile sleeping hours shall be maintained, except during limited and discrete exigent circumstances, which shall be fully documented. Only direct care staff shall be included in these ratios. Male and female staff ratios must be correctly maintained. Male staff will supervise male detainees on each wing and female staff will supervise female detainees on the wing.

Montgomery County Youth Detention Policy: Resident Supervision (page 1):

To comply with the Prison Rape Elimination Act of 2003 (PREA) Montgomery County Youth

Detention staffing ratio is one staff member per eight detainees during waking hours and one staff member per sixteen detainees during sleeping hours. A Juvenile Detention Supervisor is assigned to each shift.

What was heard, as part of a systematic review of evidence:

Interviews with superintendent (juvenile detention director):

The juvenile detention director stated the ratios are 1:8 during waking hours and 1:16 during sleeping hours.

What was observed as part of a systematic review of evidence:

Site review:

During the site review of the facility the auditor observed all areas where residents were present were compliant with required staffing ratios.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.313 (d)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

At least once every year the agency or facility, in collaboration with the PREA

Coordinator, reviews the staffing plan to see whether adjustments are needed to:

- The staffing plan;
- Prevailing staffing patterns;
- The deployment of monitoring technology; or
- The allocation of agency or facility resources to commit to the staffing plan to ensure compliance with the staffing plan.

Review of annual staffing plan reviews:

The auditor reviewed the 2023 and 2024 staffing plan reviews. The auditor observed the 2023 review included the following considerations: staffing personnel, ratios, scheduling considerations, unplanned absence, deviations from the staffing plan, excessive absence, key personnel/vacancies, and analysis, review and revision. The 2024 review included the following considerations: current staffing plan, prevailing staffing patterns, video monitoring systems, and additional resources available to ensure compliance with the staffing plan.

What was heard, as part of a systematic review of evidence:

Interviews with PREA coordinator:

The PREA coordinator stated they are included in any assessments of, or adjustments to, the staffing plan. They confirmed the assessment occurs annually and is documented through the Staffing Plan review. The auditor observed the PREA coordinator signed the staffing plan reviews.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.313 (e)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The facility requires that intermediate-level or higher-level staff conduct unannounced rounds to identify and deter staff sexual abuse and sexual harassment. The facility documents unannounced rounds. The unannounced rounds cover all shifts. The facility prohibits staff from alerting other staff of the conduct of such rounds.

Montgomery County Youth Detention Policy 12.7.1 (page 21):

MCYD shall implement a practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment. Such practice shall be for all shifts. The inspections will occur in a random and irregular manner, and the Juvenile Detention Director must insure that all shifts and work days are visited by supervisors several times a month. Documentation of the inspections shall be maintained using the log books on each wing. MCYF shall have a procedure to prohibit staff from alerting other staff members that these supervisory rounds are occurring, unless such announcements are related to the legitimate operational functions of the facility. Unannounced security checks shall be conducted randomly and documented at

	<p>least three times per week on the day shift and three times per week on the evening shift. Each month, at least two of the unannounced security checks shall be conducted on a weekend day.</p> <p>Review of documented unannounced rounds: The auditor reviewed limited documentation showing that unannounced rounds (Supervisory Monitoring Logs) are occurring for night shifts as well as day shifts, with a majority of the documented unannounced rounds occurring on day shifts. The following unannounced rounds for the audit period were reviewed: 03/09/2024 - 1st shift 03/13/2024 - 1st shift 04/09/2024 - 1st shift 04/26/2024 - 2nd shift 06/10/2024 - 1st shift 07/26/2024 - 1st shift 04/09/2025 - 1st shift</p> <p>What was heard, as part of a systematic review of evidence: Interviews with intermediate or higher-level facility staff (juvenile detention compliance officer): The juvenile detention compliance officer stated they conduct unannounced rounds, the rounds are documented, and they stated they do not inform staff the rounds are occurring.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.</p> <p>To demonstrate unannounced rounds are regularly occurring on both shifts, the provided additional documented unannounced rounds for July 2025 through August 2025 (09/10/2025). The auditor reviewed the unannounced rounds and observed they are conducted on both shifts.</p>
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115.315	<p>Limits to cross-gender viewing and searches</p> <p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy: Limits to Cross-Gender Viewing and Searches revised 01/01/2024 • Training PowerPoints and curricula: cross-gender pat-down searches and searches of transgender and intersex residents • Montgomery County Youth Facility Training Hours forms for January - June 2024
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- Interviews with random sample of staff
- Interviews with random sample of residents
- Interviews with transgender or intersex residents

Reasoning and analysis (by provision):

115.315 (a)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:
The facility does not conduct cross-gender strip or cross-gender visual body cavity searches of residents.

In the past 12 months there were no cross-gender strip or cross-gender visual body cavity searches of residents:

Montgomery County Youth Detention Policy: Limits to Cross-Gender Viewing and Searches (page 1):

The facility's search plans will include not conducting cross-gender strip searches or cross-gender visual body searches except in exigent circumstances or when performed by medical staff

What was observed as part of a systematic review of evidence:

The auditor observed the search area is not under video surveillance and doesn't allow for cross-gender viewing. Staff explained the searches process and confirmed that searches are completed by staff of the same gender as the resident being searched. Two staff are always present.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.315 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:
The facility does not permit cross-gender pat-down searches of residents, absent exigent circumstances.

In the past 12 months there were no cross-gender pat-down searches of residents. The PAQ indicates there were six searches of transgender residents.

Montgomery County Youth Detention Policy: Limits to Cross-Gender Viewing and Searches (page 1):

The facility's search plans will include the following: Pat searches are performed by staff members of the same sex as the detainee except in exigent circumstances

Review of logs of cross-gender pat down searches of residents to identify documentation of exigent circumstances:

The auditor observed no documented cross-gender searches. Documentation of same gender searches was observed.

What was heard, as part of a systematic review of evidence:

Interviews with 10 random residents:

All 10 residents interviewed stated no staff of the opposite gender have performed a pat-down search of their body.

Interviews with 12 random staff:

All 12 staff interviewed stated they are restricted from conducting cross-gender pat-down searches. No staff interviewed provided an example of a circumstance that would warrant such a search other than an emergency.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.315 (c)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

Facility policy requires that all cross-gender strip searches, cross-gender visual body cavity searches, and cross-gender pat-down searches be documented and justified.

Review of documentation, including justification, of cross-gender strip searches, cross-gender visual body cavity searches, and all cross-gender pat-down searches of residents:

The auditor observed no documented cross-gender searches. Documentation of same gender searches was observed.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.315 (d)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The facility has implemented policies and procedures that enable residents to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks (this includes viewing via video camera). Policies and procedures require staff of the opposite gender to announce their presence when entering a resident housing unit or area where residents are likely to be showering, performing bodily functions, or changing clothing.

Montgomery County Youth Detention Policy: Limits to Cross-Gender Viewing and Searches (page 1):

All detainees shower, perform bodily functions, and change clothing without nonmedical staff of the opposite sex viewing their breast, buttocks, and genitalia. All detainees shower one at a time.

	<p>What was heard, as part of a systematic review of evidence:</p> <p>Interviews with 10 random residents:</p> <ul style="list-style-type: none"> • Three residents interviewed stated staff of the opposite gender announce their presence when entering a housing unit that houses residents of the opposite gender. • Six residents interviewed stated staff of the opposite gender do not enter their housing unit. • One resident stated they have not heard these announcements. • All ten residents interviewed stated they are able to dress, shower and performing bodily functions without being viewed by staff of the opposite gender. <p>Interviews with 12 random staff:</p> <ul style="list-style-type: none"> • All 12 staff interviewed stated they or other officers announce their presence when entering a housing unit that houses residents of the opposite gender (from themselves). • All 12 staff interviewed stated residents able to dress, shower, and use the toilet without being viewed by staff of the opposite gender. <p>What was observed as part of a systematic review of evidence:</p> <p>Site review:</p> <p>The auditor observed residents shower and change clothing one at a time in a shower stall with swinging doors for privacy. The facility reported shower curtains are being installed as well. The cells have toilets for performing bodily functions. The auditor observed cross-gender announcements.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p> <p>Reasoning and analysis (by provision): 115.315 (e) N/A</p> <p>Reasoning and analysis (by provision): 115.315 (f) N/A</p>
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115.316	Residents with disabilities and residents who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy: Accommodating Residents with Special Needs revised 01/01/2024

- Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024
- Brochure: “What You Should Know About Sexual Abuse and Assault” (English and Spanish)
- Poster: “Speak up! Speak out! Say no to sexual assault/abuse!” (English and Spanish)
- Statement regarding residents with disabilities and residents who are limited English proficient
- Memorandum: Administrative Office of the Courts interpreter access
- Alabama Foreign Language Interpreter Registry
- Systems Test: Access to Interpreter (on-call interpreter)
- Interview with agency head designee (juvenile detention director)
- Interviews with random sample of staff
- Interviews with residents (with disabilities or who are limited English proficient)

Evidence (corrective action):

- “No Means No” Poster (English and Spanish) (06/16/2025)
- Statement regarding implementing comprehensive education video (05/29/2025)
- PREA Comprehensive Education Video (English, Spanish, ASL, Closed Captioning) (05/29/2025)

Reasoning and analysis (by provision):

115.316 (a)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The agency has established procedures to provide disabled residents equal opportunity to participate in or benefit from all aspects of the agency’s efforts to prevent, detect, and respond to sexual abuse and sexual harassment.

Montgomery County Youth Detention Policy: Accommodating Residents with Special Needs (page 1):

Each detainee upon placement in Montgomery County Youth Detention, will be provided information, both orally and in writing, concerning sexual abuse/assault. This information will be communicated to the detainee by the juvenile Detention Officer during the intake process. The information will be simple and, in a language, that the detainee can easily understand.

Montgomery County Youth Detention Policy 12.7.1 (page 7):

Each facility shall take appropriate steps to ensure that residents with disabilities have a equal opportunity to participate in or benefit from all aspects of MCYD's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. Such steps shall include, when necessary to ensure effective communication with residents who are deaf or hard of hearing, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. In addition, facilities shall ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities, including residents who have intellectual disabilities, limited reading skills, or who are blind or have low vision.

What was observed as part of a systematic review of evidence:

Site review discussions and observations: The facility has procedures to provide disabled residents equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. The procedures include providing services to residents who: are deaf or hard of hearing; are blind or have low vision; have intellectual disabilities; have psychiatric disabilities; have sensory disabilities; or have physical disabilities.

Statement regarding residents with disabilities and residents who are limited English proficient:

The PREA compliance manager provided a statement regarding residents with disabilities and residents who are limited English proficient. All detainees in custody are afforded the same opportunity as any other detainee in detention. When detainees enter detention with a variety of special accommodation needed and/or disabilities there are court therapists on call through the courts if needed for detainees with psychiatric/intellectual needs. Also, the facility is equipped with a device that assists with detainees that have disabilities such as: hearing, vision, speech, etc. Education services are available to the detainees and at which time detainees with a learning disability are afforded services with the special education staff. Contracted interpreters assist with detainees who are either non-English speaking or dealing with a deficiency in communicating effectively.

Through corrective action the facility implemented the PREA Comprehensive Education Video (English, Spanish, ASL, Closed Captioning) (05/29/2025).

What was heard, as part of a systematic review of evidence:

Interview with agency head designee (juvenile detention director):

The juvenile detention director stated the agency has established procedures to provide disabled residents equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment.

Interviews with residents (with disabilities or who are limited English proficient):
No residents were identified as having a disability during the onsite phase of the audit.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The facility implemented the PREA Comprehensive Education Video (English, Spanish, ASL, Closed Captioning) (05/29/2025).

Reasoning and analysis (by provision):

115.316 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:
The agency has established procedures to provide residents with limited English proficiency equal opportunity to participate in or benefit from all aspects of the

agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment.

Montgomery County Youth Detention Policy: Accommodating Residents with Special Needs (page 1):

Accommodations will be made to ensure that detainees with limited English proficient (LEP), deaf, or disabled are able to report sexual abuse to staff directly, through interpretive technology, or through non-youth interpreters.

Montgomery County Youth Detention Policy 12.7.1 (page 7):

Facilities shall take reasonable steps to ensure meaningful access to all aspects of the MCYD efforts to prevent, detect, and respond to sexual abuse and sexual harassment to detainees who are limited English proficient, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary, and translations in the language they speak.

What was heard, as part of a systematic review of evidence:

Interviews with residents who are limited English proficient:

No residents were identified as limited English proficient during the onsite phase of the audit.

What was observed as part of a systematic review of evidence:

Systems test of interpreter services:

Montgomery County Youth Detention provides interpreter services through the Administrative Office of the Courts. The auditor successfully tested the facility's ability to provide an interpreter through the assistance of a juvenile detention officer. The officer called the on-call court interpreter.

Site review:

The auditor observed the facility also has access to additional interpreter services through the Alabama Foreign Language Interpreter Registry. The auditor also observed the "What You Should Know About Sexual Abuse and Assault" brochure (English and Spanish) and the "Speak up! Speak out! Say no to sexual assault/abuse!" poster (English and Spanish). Through corrective action the facility developed the "No Means No" poster (English and Spanish) (06/16/2025); and implemented the PREA Comprehensive Education Video (English, Spanish, ASL, Closed Captioning) (05/29/2025).

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The facility developed the "No Means No" poster (English and Spanish) (06/16/2025)

The facility implemented the PREA Comprehensive Education Video (English, Spanish, ASL, Closed Captioning) (05/29/2025).

Reasoning and analysis (by provision):

115.316 (c)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Agency policy prohibits use of resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-response duties under §115.364, or the investigation of the resident's allegations. The agency or facility documents the limited circumstances in individual cases where resident interpreters, readers, or other types of resident assistants are used.

In the past 12 months, the number of instances where resident interpreters, readers, or other types of resident assistants have been used and it was not the case that an extended delay in obtaining another interpreter could compromise the resident's safety, the performance of first-response duties under §115.364, or the investigation of the resident's allegations: 0

Montgomery County Youth Detention Policy 12.7.1 (pages 7-8):

MCYD shall not rely on resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first responder duties, or the investigation of the resident's allegations.

What was heard, as part of a systematic review of evidence:

Interviews with 12 random staff:

No staff interviewed had any knowledge of resident interpreters, resident readers, or any other types of resident assistants being used in relation to allegations of sexual abuse or sexual harassment.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

115.317	Hiring and promotion decisions
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Evidence relied upon in making the compliance determinations: <ul style="list-style-type: none">• Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities)• Montgomery County Youth Detention Policy: Criminal Record Check revised 02/11/2021

- Montgomery County Youth Detention Policy: Hiring and Promotion Decisions 01/01/2024
- Alabama Department of Human Resources Child Abuse and Neglect Central Registry Clearance examples
- Criminal Background Records Checks examples
- Montgomery County Youth Detention Policy 12.7.1 dated
- Interview with administrative (human resources) staff

Evidence (corrective action):

- PREA Employment/ Appraisal Questionnaire (adopted 05/29/2025)
- Documented evidence that the questions about prior misconduct were asked before hire for all staff and contracted staff interviewed (10/29/2025)
- Documented evidence that the agency considers of any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with residents (10/21/2025)
- Documented evidence that the agency contacts all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse (11/05/2025)
- Initial criminal background record checks for all staff interviewed (11/04/2025)
- Alabama Department of Human Resources Child Abuse and Neglect Central Registry Clearances for all staff interviewed (11/04/2025)
- Initial criminal background record checks for medical staff interviewed (10/22/2025)
- Alabama Department of Human Resources Child Abuse and Neglect Central Registry Clearances for all medical staff (11/12/2025)
- Five-year criminal background record checks for all current employees and contractors interviewed (11/04/2025)
- Documented evidence that the questions about prior misconduct were asked annually for staff interviewed (10/29/2025)
- Documented evidence that the questions about prior misconduct were asked for promotions (10/29/2025)

Reasoning and analysis (by provision):

115.317 (a)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Agency policy prohibits hiring or promoting anyone who may have contact with residents, and prohibits enlisting the services of any contractor who may have contact with residents, who:

- Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997);
- Has been convicted of engaging or attempting to engage in sexual activity in the

community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or

- Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a)(2) of this section.

Montgomery County Youth Detention Policy: Hiring and Promotion Decisions (page 2):

Montgomery County Youth Detention shall ask all applicants and employees who may have contact with detainees directly about previous conduct described in this standard in written applications or interviews for hiring or promotions and in any interview or self-evaluations conducted as parts of reviews for current employees. The Montgomery County Youth Detention shall impose upon employees a continuing affirmative duty to disclose any such conducts.

Review of files of persons hired or promoted in the past 12 months to determine whether questions regarding past conduct were asked and answered:

No documented evidence was initially provided to demonstrate that questions regarding prior misconduct were asked before hiring for staff and contracted staff interviewed. Through corrective action, the facility provided a statement on October 21, 2025, confirming that the PREA Employment/Appraisal Questionnaire would be implemented. The facility subsequently provided 24 completed examples demonstrating that the form has been implemented.

What was heard, as part of a systematic review of evidence:

Interview with administrative (human resources) staff:

The human resources staff designee stated the facility asks all applicants and employees about previous misconduct when hiring new employees.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

- **The PREA Employment/ Appraisal Questionnaire was adopted and confirmed through a statement provided by the agency (05/29/2025). The questionnaire includes the three questions about prior misconduct.**
- **The facility provided 24 completed examples of the PREA Employment/ Appraisal Questionnaire (10/24/2025) to demonstrate the form has been implemented.**

Reasoning and analysis (by provision):

115.317 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Agency policy requires the consideration of any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with residents.

Montgomery County Youth Detention Policy: Hiring and Promotion Decisions (page 2):

Montgomery County Youth Detention shall consider any incidents of sexual harassment in determining whether to hire or promote anyone or enlist the services of any contractor, who may have contacts with detainees.

What was heard, as part of a systematic review of evidence:

Interview with administrative (human resources) staff:

The human resources staff designee stated the facility considers prior incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with the residents.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The PREA Employment/ Appraisal Questionnaire was implemented October 21, 2025. The questionnaire includes consideration of sexual harassment.

Reasoning and analysis (by provision):

115.317 (c)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Agency policy requires that before it hires any new employees who may have contact with residents, it (a) conducts criminal background record checks, (b) consults any child abuse registry maintained by the State or locality in which the employee would work; and (c) consistent with Federal, State, and local law, makes its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse.

During the past 12 months three people hired, who may have contact with residents, had criminal background record checks.

Montgomery County Youth Detention Policy: Criminal Record Check (page 1):

A criminal record check is conducted on all new employees in accordance with state and federal statutes. The record will include comprehensive identifier information to be collected and run against law enforcement indices. If suspect information on matters with potential terrorism connections is returned on a desirable applicant, it is forwarded to the local Joint Terrorism Task Force (JTTF) or another similar agency.

Review of files of personnel hired in the past 12 months to determine that the agency has completed checks consistent with 115.317(c):

- No initial criminal background record checks were provided for review for personnel hired in the past 12 months.
- One criminal background record check was provided for the 14 staff interviewed.

- Seven examples of criminal background record checks, selected by the facility, were conducted in 2018 - 2020.
- One Alabama Department of Human Resources Child Abuse and Neglect Central Registry Clearance was provided for the 14 staff interviewed.
- Fifteen Alabama Department of Human Resources Child Abuse and Neglect Central Registry Clearances, selected by the facility, were provided for review.
- No documented evidence was initially provided that the agency contacts all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse.

Through corrective action, the facility completed criminal background record checks for the 14 staff interviewed and an additional 10 facility staff. The documentation was provided to the auditor on November 4, 2025, for review.

Additionally, the facility conducted Alabama Department of Human Resources Child Abuse and Neglect Central Registry Clearances for the 14 staff interviewed and an additional 10 facility staff. This documentation was provided to the auditor on November 12, 2025, for review.

Lastly, the agency provided a statement on November 5, 2025, confirming that the facility did not hire any employees who previously worked in a juvenile or adult correctional facility during the audit period. The statement also affirms that the facility will follow the requirements of the standard provision going forward.

What was heard, as part of a systematic review of evidence:

Interview with administrative (human resources) staff:

The human resources staff designee stated the agency performs criminal background record checks and considers pertinent civil or administrative adjudications for all newly hired employees who may have contact with the residents and all employees, who may have contact with residents who are being considered for promotions. They also confirmed the facility consults with the Alabama Department of Human Resources Child Abuse and Neglect Central Registry.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

- **Criminal background record checks were provided November 4, 2025.**
- **Alabama Department of Human Resources Child Abuse and Neglect Central Registry Clearances were provided November 12, 2025.**
- **The agency provided a statement on November 5, 2025, confirming that the facility did not hire any employees who previously worked in a juvenile or adult correctional facility during the audit period. The statement also affirms that the facility will follow the**

requirements of the standard provision going forward.

Reasoning and analysis (by provision):

115.317 (d)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Agency policy requires that a criminal background records check be completed, and applicable child abuse registries consulted before enlisting the services of any contractor who may have contact with residents.

The number of contracts for services where criminal background records checks were conducted on all staff covered in the contract who might have contact with residents during the past 12 months: 0

Records of background checks of contractors who might have contact with residents:

No records of criminal background checks for contractors who might have contact with residents were initially provided for review. Likewise, no Alabama Department of Human Resources Child Abuse and Neglect Central Registry Clearances for contractors with potential resident contact were initially provided.

Through corrective action, criminal background checks for the medical and mental health contractors interviewed were provided on October 22, 2025, and the Alabama Department of Human Resources Child Abuse and Neglect Central Registry Clearances were provided on November 12, 2025.

What was heard, as part of a systematic review of evidence:

Interview with administrative (human resources) staff:

The human resources staff designee stated the facility performs criminal background record checks and considers pertinent civil or administrative adjudications for all contractors who may have contact with the residents and all contractors, who may have contact with residents who are being considered for promotions. Additionally, the facility consults with the Alabama Department of Human Resources Child Abuse and Neglect Central Registry.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

- **Criminal background checks for the medical and mental health contractors interviewed were provided on October 22, 2025.**
- **The Alabama Department of Human Resources Child Abuse and Neglect Central Registry Clearances were provided on November 12, 2025.**

Reasoning and analysis (by provision):

115.317 (e)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Agency policy requires that either criminal background records checks be conducted at least every five years of current employees and contractors who may have contact with residents or that a system is in place for otherwise capturing such information for current employees.

Montgomery County Youth Detention Policy: Hiring and Promotion Decisions (page 2):

Montgomery County Youth Detention shall perform a criminal background check records at least every five years of current employees and contractors who may have contact with detainees or have in place a system for otherwise capturing such information for current employees.

Review of documentation of background records checks of current employees and contractors at five-year intervals when applicable:

No documented evidence was initially provided to demonstrate that background records checks for current employees and contractors had been completed at the required five-year intervals. Through corrective action, the facility completed criminal background record checks for the 14 staff interviewed and an additional 10 facility staff. This documentation was provided to the auditor on November 4, 2025, for review.

What was heard, as part of a systematic review of evidence:

Interview with administrative (human resources) staff:

The human resources staff stated the agency conducts criminal background records every five years for current employees and contractors who may have contact with residents.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The facility completed criminal background record checks for the 14 staff interviewed and an additional 10 facility staff. This documentation was provided to the auditor on November 4, 2025, for review.

Reasoning and analysis (by provision):

115.317 (f)

What was read, as part of a systematic review of evidence:

Montgomery County Youth Detention Policy: Hiring and Promotion Decisions (page 2):

See 115.317 (a).

What was heard, as part of a systematic review of evidence:

Interview with administrative (human resources) staff:

The human resources staff designee confirmed that the facility asks all applicants and employees who may have contact with residents about the types of prior misconduct described in section (a). These inquiries are included in written

applications for hiring or promotion, as well as in interviews or written self-evaluations conducted as part of performance reviews for current employees. The designee also affirmed that the facility imposes a continuing affirmative duty on all employees to disclose any such previous misconduct.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.317 (g)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Agency policy states that material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.

Montgomery County Youth Detention Policy: Hiring and Promotion Decisions (page 2):

Material omissions regarding such misconduct or the provision of materially false information shall be grounds for termination.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.317 (h)

What was read, as part of a systematic review of evidence:

Montgomery County Youth Detention Policy: Hiring and Promotion Decisions (page 2):

Unless prohibited by law, Montgomery County Youth Detention shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a formal employee upon receiving a request from an institutional employer for whom such employee has applied for work.

What was heard, as part of a systematic review of evidence:

Interview with administrative (human resources) staff:

The human resources staff designee stated the agency would provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

115.318	Upgrades to facilities and technologies
	<p data-bbox="280 188 983 221">Auditor Overall Determination: Meets Standard</p> <hr/> <p data-bbox="280 266 564 300">Auditor Discussion</p> <hr/> <p data-bbox="280 344 1299 378">Evidence relied upon in making the compliance determinations:</p> <ul data-bbox="280 383 1262 622" style="list-style-type: none"> • Montgomery County Youth Detention Pre-Audit Questionnaire (PAQ) • Facility Schematics • Video monitoring system updates • Interview with agency head designee (juvenile detention director) • Interview with superintendent (juvenile detention director) • Site Review <p data-bbox="280 667 900 701">Reasoning and analysis (by provision):</p> <p data-bbox="280 705 464 739">115.318 (a)</p> <p data-bbox="280 743 1225 777">What was read, as part of a systematic review of evidence:</p> <p data-bbox="280 786 1484 904">The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency or facility has acquired a new facility or made a substantial expansion or modification to existing facilities since the last PREA audit.</p> <p data-bbox="280 943 1246 976">What was heard, as part of a systematic review of evidence:</p> <p data-bbox="280 983 1442 1059">Interviews with the agency head designee and superintendent (juvenile detention director):</p> <p data-bbox="280 1068 1469 1270">The juvenile detention director stated the facility would consider the ability to protect residents from sexual abuse when designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities. Also, the agency would consider the effect of the design, acquisition, expansion, or modification upon the agency’s ability to protect residents from sexual abuse.</p> <p data-bbox="280 1308 413 1341">Finding:</p> <p data-bbox="280 1348 1398 1424">Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p> <p data-bbox="280 1462 900 1496">Reasoning and analysis (by provision):</p> <p data-bbox="280 1503 464 1536">115.318 (b)</p> <p data-bbox="280 1543 1225 1576">What was read, as part of a systematic review of evidence:</p> <p data-bbox="280 1585 1469 1704">Montgomery County Youth Detention Pre-Audit Questionnaire response: The agency or facility has installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since the last PREA audit.</p> <p data-bbox="280 1742 1246 1776">What was heard, as part of a systematic review of evidence:</p> <p data-bbox="280 1785 1442 1861">Interviews with the agency head designee and superintendent (juvenile detention director):</p> <p data-bbox="280 1870 1477 2029">The juvenile detention director stated when installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, the agency shall consider how such technology may enhance the agency’s ability to protect residents from sexual abuse.</p>

	<p>Review of updates to monitoring technology: The auditor reviewed work orders and email communication detailing updates to the video monitoring system.</p> <p>What was observed as part of a systematic review of evidence: Site review: The auditor observed the video monitoring system.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>
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115.321	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy: Evidence Protocol and Forensic Medical Examinations revised 01/01/2024 • Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 • Memorandum regarding the Montgomery County Sheriff’s Office Criminal Investigations • Division is responsible for criminal investigating allegations of sexual abuse dated 04/24/2024 • Memorandum of understanding between Montgomery County Youth Detention and Child Protect Children’s Advocacy Center dated 01/31/2025 • Agreement between One Place Family Justice Center and Standing Together Against Rape (STAR) Program and Montgomery County Commission (MCC) • Interview with PREA compliance manager • Interviews with a random sample of staff • Interviews with residents who reported a sexual abuse <p>Evidence (corrective action):</p> <ul style="list-style-type: none"> • Uniform evidence protocol (11/04/2025) <p>Reasoning and analysis (by provision): 115.321 (a) What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency/facility is responsible for conducting administrative or criminal sexual</p>

abuse investigations (including resident-on-resident sexual abuse or staff sexual misconduct).

When conducting a sexual abuse investigation, the investigators follow a uniform evidence protocol.

Review of memorandum dated 04/24/2024 :

The memorandum states, the Montgomery County Sheriff's Department investigators are responsible for investigating all criminal activities within county facilities. All sexual abuse investigations will be handled according to uniform evidence protocol.

Review of uniform evidence protocol:

The evidence protocol was provided through corrective action November 4, 2025. The auditor reviewed the uniform evidence protocol and observed that there is sufficient technical detail to aid responders in obtaining usable physical evidence.

What was heard, as part of a systematic review of evidence:

Interviews with 12 random staff:

Staff interviewed stated they are knowledgeable of the agency's protocol for obtaining usable physical evidence if a resident alleges sexual abuse. They also stated that the Montgomery County Sheriff Office is responsible for conducting sexual abuse investigations.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The evidence protocol was provided November 4, 2025.

Reasoning and analysis (by provision):

115.321 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency/facility is responsible for conducting criminal sexual abuse investigations (including resident-on-resident sexual abuse or staff sexual misconduct).

Review of uniform evidence protocol:

The evidence protocol was provided through corrective action November 4, 2025. The auditor reviewed the uniform evidence protocol and observed that the protocol is developmentally appropriate for youth.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

See 115.321 (a).

Reasoning and analysis (by provision):

115.321 (c)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:
The facility offers all residents who experience sexual abuse access to forensic medical examinations. Forensic medical examinations are offered without financial cost to the victim. Where possible, examinations are conducted by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs). When SANEs or SAFEs are not available, a qualified medical practitioner performs forensic medical examinations.

The number of forensic medical exams conducted during the past 12 months: 1
The number of exams performed by SANEs/SAFEs during the past 12 months: 0
The number of exams performed by a qualified medical practitioner during the past 12 months: 1

Montgomery County Youth Detention Policy 12.7.1 (page 18):
The facility shall offer all juveniles who experience sexual abuse access to forensic medical examinations without financial cost. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot be made available, the examination can be performed by other qualified medical practitioners. The facility shall document its efforts to provide SAFEs or SANEs.

Review of agreement between One Place Family Justice Center and Standing Together Against Rape (STAR) Program and Montgomery County Commission (MCC):
The auditor reviewed the agreement between One Place Family Justice Center and Standing Together Against Rape (STAR) Program and Montgomery County Commission (MCC) and observed residents who experience sexual abuse are provided access to forensic medical examinations.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.321 (d)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:
The facility makes a victim advocate from a rape crisis center available to the victim, in person or by other means. These efforts are documented. If and when a rape crisis center is not available to provide victim advocate services, the facility provides a qualified staff member from a community-based organization or a qualified agency staff member.

Montgomery County Youth Detention Policy 12.7.1 (page 18):
The facility shall attempt to make available to the victim a victim advocate from a rape crisis center. If a rape crisis center is not available to provide victim advocate services, the agency shall make available to provide these services through a qualified staff member from a community-based organization or a qualified agency staff member that has received Victim Advocacy training. Such training shall be

documented on MCYD Fonn 115.321 Confirmation of Receipt of Specialized Training for Victim Advocates.

Review of memorandum of understanding between Montgomery County Youth Detention and Child Protect Children's Advocacy Center:

The auditor reviewed the memorandum of understanding between Montgomery County Youth Detention and Child Protect Children's Advocacy Center dated 01/31/2025 and observed the agreement makes victim advocates available to a victim of sexual abuse.

What was heard, as part of a systematic review of evidence:

Interview with PREA compliance manager:

The PREA compliance manager stated the facility makes a qualified victim advocate available from Child Protect Children's Advocacy Center.

Interviews with residents who reported a sexual abuse:

There were no residents present during the onsite phase of the audit who reported a sexual abuse.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.321 (e)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

If requested by the victim, a victim advocate, or qualified agency staff member, or qualified community-based organization staff member accompanies and supports the victim through the forensic medical examination process and investigatory interviews and provides emotional support, crisis intervention, information, and referrals.

Montgomery County Youth Detention Policy 12.7.1 (page 18):

Qualified agency staff trained as Victim Advocates shall provide crisis intervention services to victims of sexual abuse/assault and shall complete before providing services MCYD Form 115.321.1 PREA Confidentiality and the Victim Advocate.

What was heard, as part of a systematic review of evidence:

Interview with PREA compliance manager:

The PREA compliance manager stated if requested by the victim, a victim advocate from Child Protect Children's Advocacy Center will accompany a victim and provide emotional support, crisis intervention, information, and referrals during the forensic medical examination process and investigatory interviews.

Interviews with residents who reported a sexual abuse:

See 115.321 (d).

Finding:

	<p>Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p> <p>Reasoning and analysis (by provision): 115.321 (f) N/A</p> <p>What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: If the agency is responsible for administrative or criminal investigating allegations of sexual abuse and does not rely on another agency to conduct these investigations.</p> <p>The Montgomery County Youth Detention’s parent agency is the Montgomery Sheriff’s Department. The Montgomery County Sheriff’s Office Criminal Investigations Division is responsible for criminal investigating allegations of sexual abuse</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>
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115.322	Policies to ensure referrals of allegations for investigations
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy: Policies to Ensure Referrals for Allegations for Investigations revised 01/01/2024 • Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 • Memorandum regarding the Montgomery County Sheriff’s Office Criminal Investigations • Division is responsible for criminal investigating allegations of sexual abuse dated 04/24/2024 • State of Alabama Department of Human Resources Written Report of Suspected Child Abuse/Neglect • Grievances • Montgomery County Youth Detention Pre-Audit Questionnaire (PAQ) • Interview with agency head designee (juvenile detention director) <p>Evidence (corrective action):</p> <ul style="list-style-type: none"> • Offence reports for allegations of sexual abuse or sexual harassment (01/17/2025)

- Statement regarding investigation reports being submitted to the district attorney's office (01/17/2025)

Reasoning and analysis (by provision):

115.322 (a)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

In the past 12 months:

- The number of allegations of sexual abuse and sexual harassment that were received: 6
- The number of allegations resulting in an administrative investigation: 6
- The number of allegations referred for criminal investigation: 2

Review of memorandum dated 04/24/2024:

The memorandum states that the Montgomery County Sheriff's Department investigators are responsible for investigating all criminal activities within county facilities. All sexual abuse investigations will be handled according to uniform evidence protocol.

Review of documentation of reports of sexual abuse and harassment and documentation of investigations, including full investigative reports with findings: Through corrective action, two offense reports were provided for review, along with a statement indicating that the full investigative reports had been forwarded to the district attorney's office.

What was heard, as part of a systematic review of evidence:

Interview with agency head designee (juvenile detention director):

The juvenile detention director stated the agency ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse or sexual harassment.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

- **Offense reports were provided January 17, 2026.**
- **Statement indicating that the full investigative reports had been forwarded to the district attorney's office was provided January 17, 2026.**

Reasoning and analysis (by provision):

115.322 (b)

What was read, as part of a systematic review of evidence:

	<p>The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency has a policy that requires that allegations of sexual abuse or sexual harassment be referred for investigation to an agency with the legal authority to conduct criminal investigations, including the agency if it conducts its own investigations, unless the allegation does not involve potentially criminal behavior.</p> <p>What was observed as part of a systematic review of evidence: Montgomery County Youth Detention has the investigation policy published on the agency website at https://www.mc-ala.org/departments/youth-facility. The publication states any allegation of sexual abuse that potentially involves criminal behavior shall be turned over to the Montgomery County Sheriff Department for investigation, especially in all cases that may have happened within a time frame that allows for collection of physical evidence or if the allegation involves another staff member.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p> <p>Reasoning and analysis (by provision): 115.322 (c) N/A</p> <p>What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention’s parent agency is the Montgomery Sheriff’s Office. The Montgomery County Sheriff’s Office Criminal Investigations Division is responsible for criminal investigating allegations of sexual abuse.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>
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115.331	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy: Employee Training revised 01/01/2024 • Juvenile Detention First Responder Duties PREA Refresher • Staff/Contracted Counties/Volunteers/Interns PREA Acknowledgement Statements • Staff Confirmation of Receipt of PREA forms • Montgomery County Youth Facility Employee Training Forms • Montgomery County Youth Facility Training Hours forms for January - June 2024 • Interviews with random sample of staff

Evidence (corrective action):

- Training Curriculum inclusive of the 11 training topics required by the standard (07/29/2025)

Reasoning and analysis (by provision):

115.331 (a)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency trains all employees who may have contact with residents on the required topics.

Montgomery County Youth Detention Policy: Employee Training (page 1-2): All staff at Montgomery County Youth Detention to include: Detention, Food Service, Intake, Probation, Maintenance, Clerks, Mental Health, Medical, and Judges will be trained on the Prison Rape Elimination Act of 2003 standards and Montgomery County Youth Detention "ZERO TOLERANCE POLICY."

The training will be ongoing and annually and will include the following topics:

- Montgomery County Youth Detention "ZERO TOLERANCE POLICY" for sexual abuse and sexual harassment
- How to fulfill their responsibilities under facility sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures
- Detainees right to be free from sexual abuse and sexual harassment
- The right of detainees and employees to be free from retaliation from reporting sexual abuse and sexual harassment
- The dynamics of sexual abuse and sexual harassment in juvenile facilities
- The common reactions of juvenile victims of sexual abuse and sexual harassments
- How to detect and respond to signs of threatened and actual sexual abuse and how to distinguish between consensual sexual contact and sexual abuse between detainees
- How to avoid inappropriate relationships with detainees
- How to communicate effectively and professionally with detainees, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming detainees
- How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities; and
- Relevant laws regarding the applicable age of consent.

Review of training curriculum:

The documentation initially provided did not allow for a determination of compliance. Policies and related documents were uploaded to the OAS; however, they did not constitute a complete training curriculum. Through corrective action, the facility developed a fully inclusive training curriculum and provided it for review on July 29, 2025.

Review of staff training records:

The auditor reviewed 26 Montgomery County Youth Facility Training Hours forms for January - June 2024 and observed the training occurred in 2024. The auditor reviewed 13 Montgomery County Youth Facility Employee Training forms for staff

interviewed and observed the training occurred in 2025. Additionally, the auditor reviewed eight Staff/Contracted Counties/Volunteers/Interns PREA Acknowledgement Statements selected by the agency and observed the training occurred in 2025. Lastly, the auditor reviewed 23 Staff Confirmation of Receipt of PREA forms selected by the agency and observed the training occurred in 2025.

What was heard, as part of a systematic review of evidence:

Interviews with 12 random staff:

All 12 staff interviewed stated they receive training annually.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The auditor requested that the facility provide the training curriculum and identify the page/section for each of the training topics, as is required by the pre-audit questionnaire instructions. This information was provided to the auditor 07/29/2025.

Reasoning and analysis (by provision):

115.331 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

Training is tailored to the unique needs and attributes and gender of the residents at the facility. Employees who are reassigned from facilities housing the opposite gender are given additional training.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.331 (c)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

Between trainings the agency provides employees who may have contact with residents with refresher information about current policies regarding sexual abuse and harassment. The frequency with which employees who may have contact with residents receive refresher training on PREA requirements: Annually

Montgomery County Youth Detention Policy: Employee Training (page 2):

All staff full and part-time will be required to complete refresher training annually. Staff will be trained on current updates as they become available.

Review of staff training records:

See 115.331 (a).

Finding:

Based on this analysis, the facility is substantially compliant with this

	<p>provision and corrective action is not required.</p> <p>Reasoning and analysis (by provision): 115.331 (d) What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency documents that employees who may have contact with residents understand the training they have received through employee signature or electronic verification.</p> <p>Review of staff training records: See 115.331 (a). The auditor observed training is documented with staff signature.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>
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115.332	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy: Volunteer and Contractor Training revised 01/01/2024 • Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 • Montgomery County Youth Detention Teachers Orientation Training • Montgomery County Youth Detention Volunteer Orientation handbook revised 01/04/2024 • Staff/Contracted Counties/Volunteers/Interns PREA Acknowledgement Statements • Montgomery County Youth Detention Code of Ethics forms • Interviews with volunteers or contractors who have contact with residents <p>Evidence relied upon in making the compliance determinations: 115.332 (a) What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: All volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency’s policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response.</p> <p>The number of volunteers and contractors, who have contact with residents, who have been trained in agency’s policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response: 8</p>

Montgomery County Youth Detention Policy: Volunteer and Contractor Training (page 1):

Prior to assignment, each volunteer/intern and contractor will receive formal documented orientation appropriate to his/her assignment and additional training as needed. They should receive information regarding rules and procedures important to the performance of their duties. Each volunteer/intern and contractor is expected to comply with facility rules and policies regarding confidentiality and shall sign a statement agreeing to comply with those rules and policies. Montgomery County Youth Detention "Zero Tolerance Policy" towards all forms of sexual harassment, sexual assault/abuse will be included in this training. All orientation and training documentation will be maintained in the files set up for volunteers/interns, and contractors. Refresher training will be completed on an annual basis.

Review of training records of volunteers and contractors:

The auditor reviewed the Montgomery County Youth Detention Volunteer Orientation handbook and found it to be inclusive of the standard provision training requirements. The auditor reviewed eight Staff/Contracted Counties/Volunteers/Interns PREA Acknowledgement statements and observed the training was received.

What was heard, as part of a systematic review of evidence:

Interviews with volunteers or contractors who have contact with residents:

The auditor interviewed one contracted staff. The contracted staff stated they have been trained on their responsibilities under the agency's policies and procedures regarding sexual abuse and sexual harassment prevention, detection, and response.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.332 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with residents, but all volunteers and contractors who have contact with residents shall be notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

Review of training records of volunteers and contractors:

See 115.332 (a).

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.332 (c)

	<p>What was read, as part of a systematic review of evidence:</p> <p>The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency maintains documentation confirming that volunteers and contractors understand the training they have received.</p> <p>Montgomery County Youth Detention Policy: Volunteer and Contractor Training (page 1): See 115.332 (a).</p> <p>Review of training records of volunteers and contractors: See 115.332 (a).</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>
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115.333	Resident education
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy: Resident Education revised 01/01/2024 • Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 • Montgomery County Youth Detention Detainee Handbook/ Sexual Assault Guide • Montgomery County Youth Detention PREA Orientation for Detainees • Juvenile Confirmation of Receipt of Prison Rape Elimination Act (PREA) • Brochure: “What You Should Know About Sexual Abuse and Assault” (English and Spanish) • Poster: “Speak up! Speak out! Say no to sexual assault/abuse!” (English and Spanish) • Statement regarding residents with disabilities and residents who are limited English proficient • Memorandum: Administrative Office of the Courts interpreter access • Alabama Foreign Language Interpreter Registry • Systems Test: access to interpreter (on-call interpreter) • Interview with agency head designee (juvenile detention director) • Interviews with random sample of staff • Interviews with residents (with disabilities or who are limited English proficient) <p>Evidence (Corrective Action):</p> <ul style="list-style-type: none"> • “No Means No” Poster (English and Spanish) (final version 06/16/2025) • Statement regarding implementing comprehensive education video (05/29/

2025)

- PREA Comprehensive Education Video (English, Spanish, ASL, Closed Captioning) (05/29/2025)
- PREA Education Video Sign in Sheets (12/10/2025)

Reasoning and analysis (by provision):

115.333 (a)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Residents receive information at time of intake about the zero-tolerance policy and how to report incidents or suspicions of sexual abuse or sexual harassment. This information is provided in an age-appropriate fashion.

Of residents admitted during the past 12 months, the number who were given this information at intake: 276

Montgomery County Youth Detention Policy 12.7.1 (page 6):

During the intake process, juveniles shall receive information explaining, in an age appropriate fashion, the MCYF zero tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment. Juveniles shall be given at intake a copy of MCYD Pamphlet 115.333 "What You Should Know about Sexual Abuse and Assault". This pamphlet shall be read by staff to all juveniles in groups or individually.

Montgomery County Youth Detention Policy: Resident Education (page 1):

All detainees admitted to Montgomery County Youth Detention will be provided orientation by the Juvenile Detention Officer during admission that includes basic directions for reporting abuse, sexual abuse/exploitation, neglect, youth on youth sexual acts, youth on youth sexual contact, staff/contractor/volunteer/intern sexual penetration, and staff/contractor/volunteer/intern sexual contact of youth and assurance that the detainee will be protected against retaliation for reporting. Each detainee upon placement in Montgomery County Youth Detention will be provided information both orally and in writing, concerning sexual abuse/assault to include the facility 's "Zero Tolerance Policy" toward all forms of sexual abuse/assaults.

Review of intake records of residents:

The auditor reviewed 10 Juvenile Confirmation of Receipt of Prison Rape Elimination Act (PREA)

forms for residents interviewed. The forms indicate all 10 residents received the information at intake.

What was observed as part of a systematic review of evidence:

Process Observation:

The PREA coordinator demonstrated the intake process. Residents sign the Juvenile Confirmation of Receipt of Prison Rape Elimination Act (PREA) form to document they received intake information. Residents are given copies of the "What You Should Know About Sexual Abuse and Assault" brochure and the Montgomery County Youth Detention Detainee Handbook/ Sexual Assault Guide during the intake process. The brochure includes information about the agency's zero tolerance policy

regarding sexual abuse and sexual harassment, victim advocate support services, definitions for sexual abuse and sexual harassment, and how to report incidents or suspicions of sexual abuse or sexual harassment both internally and externally to the Alabama Department of Youth Services hotline. The handbook includes additional information including protections against retaliation and what actions to take if sexual assault were to occur. The residents are also instructed about outside support service for victims of sexual abuse provided by Child Protect Children's Advocacy Center through the "No Means No" poster, developed through corrective action (final version 06/16/2025).

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The facility developed the "No Means No" poster (final version 06/16/2025).

Reasoning and analysis (by provision):

115.333 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:
Of residents admitted during the past 12 months, the number who received such education within 10 days of intake: 276

Montgomery County Youth Detention Policy: Resident Education (page 2):
Within 10 days of intake, Montgomery County Youth Detention shall provide comprehensive age appropriate education to detainees regarding their rights to be free from sexual harassment and free from retaliation for reporting such incidents and regarding Montgomery County Youth Detention policy and procedures for responding to such incidents.

Review of education materials:

Comprehensive education was implemented through corrective action. The facility provided a statement that the PREA Comprehensive Education Video (English, Spanish, ASL, Closed Captioning) was implemented (05/29/2025). The video will be shown weekly to ensure all residents receive comprehensive education within 10 days of intake. Receipt of comprehensive education will be documented with radio frequency identification (RFID) scanners when the video is shown to each group of residents, along with each resident signing a group sign in sheet.

What was heard, as part of a systematic review of evidence:

Interviews with 10 random residents:

All 10 residents interviewed stated they were told about their right not to be sexually abused and sexually harassed, how to report sexual abuse or sexual harassment, and their right not to be punished for reporting sexual abuse or sexual harassment. They stated they received PREA education upon admission to the facility, during intake.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The facility implemented the PREA Comprehensive Education Video (English, Spanish, ASL, Closed Captioning) (05/29/2025).

The auditor requested documented evidence that the comprehensive education video had been fully implemented, specifically sign-in sheets for July 2025 - August 2025. PREA Education Video Sign-In Sheets were provided on December 10, 2025, documenting that comprehensive education is being provided on the same day as intake.

Reasoning and analysis (by provision):

115.333 (c)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: All residents were educated within 10 days of intake.

Montgomery County Youth Detention Policy: Resident Education (page 2):
See 115.333 (b).

What was heard, as part of a systematic review of evidence:

Interview with intake staff:

The PREA compliance manager stated the residents will receive education through newly implemented comprehensive education video.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.333 (d)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency shall provide resident education in formats accessible to all residents, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to residents who have limited reading skills.

Montgomery County Youth Detention Policy 12.7.1 (page 7):

Facilities shall provide juvenile orientation in formats accessible to all juveniles, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to juveniles who have limited reading skills.

Montgomery County Youth Detention Policy: Resident Education (page 2):

This information will be communicated to the detainee by a Juvenile Detention Officer during the intake process. The information will be simple and, in a language, that the detainee can easily understand, including detainees who are limited English Proficient, deaf, visually impaired, or otherwise disabled, as well as detainees who have limited reading skills.

What was observed as part of a systematic review of evidence:

Site review:

The facility has procedures to provide disabled residents equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. The procedures include providing services to residents who: are deaf or hard of hearing; are blind or have low vision; have intellectual disabilities; have psychiatric disabilities; have sensory disabilities; or have physical disabilities.

Statement regarding residents with disabilities and residents who are limited English proficient:

The PREA compliance manager provided a statement regarding residents with disabilities and residents who are limited English proficient. All detainees in custody are afforded the same opportunity as any other detainee in detention. When detainees enter detention with a variety of special accommodation needed and/or disabilities there are court therapists on call through the courts if needed for detainees with psychiatric/intellectual needs. Also, the facility is equipped with a device that assists with detainees that have disabilities such as: hearing, vision, speech, etc. Education services are available to the detainees and at which time detainees with a learning disability are afforded services with the special education staff. Contracted interpreters assist with detainees who are either non-English speaking or dealing with a deficiency in communicating effectively.

The auditor observed the facility has access to interpreter services through the Administrative Office of the Courts and the Alabama Foreign Language Interpreter Registry. The auditor also observed the "What You Should Know About Sexual Abuse and Assault" brochure (English and Spanish) and the "Speak up! Speak out! Say no to sexual assault/abuse!" poster (English and Spanish). Through corrective action, the facility developed the "No Means No" poster (English and Spanish) (final version 06/16/2025); and implemented the PREA Comprehensive Education Video (English, Spanish, ASL, Closed Captioning) (05/29/2025).

Systems test of interpreter services:

Montgomery County Youth Detention provides interpreter services through the Administrative Office of the Courts. The auditor successfully tested the facility's ability to provide an interpreter through the assistance of a juvenile detention officer. The officer called the on-call court interpreter.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

- **The facility developed the "No Means No" poster (English and Spanish) (06/16/2025).**
- **The facility implemented the PREA Comprehensive Education Video (English, Spanish, ASL, Closed Captioning) (05/29/2025).**

Reasoning and analysis (by provision):

115.333 (e)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:
The agency maintains documentation of resident participation in PREA education sessions.

Montgomery County Youth Detention Policy: Resident Education (page 2):
The detainee will sign an acknowledgement form indicating that he/she has received and understand the information.

Montgomery County Youth Detention Policy 12.7.1 (page 8):
MCYD shall maintain documentation of juvenile participation in these orientation sessions using MCYD Form 115.333.1 Juvenile Confirmation of Receipt of PREA.

Review of documentation of resident participation in education sessions:
The auditor reviewed resident participation in intake education is documented with the Juvenile Confirmation of Receipt of Prison Rape Elimination Act (PREA) form. Through corrective action, participation in comprehensive education sessions will be documented with (radio frequency identification (RFID) scanners when the video is shown to each group of residents, along with each resident signing a group sign in sheet.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.333 (f)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:
The agency ensures that key information about the agency's PREA policies is continuously and readily available or visible through posters, resident handbooks, or other written formats.

Montgomery County Youth Detention Policy 12.7.1 (page 8):

In addition to providing such education, facility PREA Compliance Manager shall ensure that key information is continuously and readily available or visible to residents through posters, detainee handbooks, or other written formats.

What was observed as part of a systematic review of evidence:

Site review:

The residents are given the "What You Should Know About Sexual Abuse and Assault" brochure (English and Spanish) and the Montgomery County Youth Detention Detainee Handbook/ Sexual Assault Guide. The brochure includes information about the agency's zero tolerance policy regarding sexual abuse and sexual harassment, victim advocate support services, definitions for sexual abuse and sexual harassment, and how to report incidents or suspicions of sexual abuse or sexual harassment both internally and externally to the Alabama Department of Youth Services Sexual Assault Hotline. The handbook includes additional information including protections against retaliation and what actions to take if

sexual assault were to occur. The residents are also instructed about outside support service for victims of sexual abuse provided by Child Protect Children’s Advocacy Center through the “No Means No” poster, developed through corrective action (final version 06/16/2025). The auditor observed the “No Means No” posters (English and Spanish) are readable and accessible, consistent, and posted throughout the facility. In addition to providing information about outside support service for victims of sexual abuse, the posters also include the zero-tolerance policy and how to report sexual abuse and sexual harassment, including anonymous reports to the Alabama Department of Youth Services Sexual Assault Hotline.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

115.334 Specialized training: Investigations

Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence relied upon in making the compliance determinations:

- Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities)
- Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024
- Interview with investigative staff (criminal investigations)

Evidence (corrective action):

- Documented proof of receipt of general training provided to all employees pursuant to § 115.331 for administrative investigators (03/11/2025)
- Documented proof of receipt of general training provided to all employees pursuant to § 115.331 for criminal investigators (01/22/2026)
- Documented proof of receipt of specialized training topics required by § 115.334 (b) for administrative investigators (11/18/2025)

Reasoning and analysis (by provision):

115.334 (a)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Agency policy requires that investigators are trained in conducting sexual abuse investigations in confinement settings.

Review of training records/logs for investigative staff:

Through corrective action, training records for investigative staff were provided for review. The administrative investigators completed the training required by

Standard 115.331 on March 11, 2025, and completed the specialized investigative topics on November 18, 2025. Acknowledgment forms were provided to document completion of the specialized topics, and Employee Training Forms were provided to document receipt of the Standard 115.331 training.

The criminal investigators completed the specialized investigative topics through a variety of trainings, including Investigating Sexual Assault Investigations, Sex Offender Investigator Program, Human Trafficking, Child Sex Trafficking Investigations, among others. Employee Training Forms were provided to document receipt of the Standard 115.331 training. These forms were dated January 22, 2026.

What was heard, as part of a systematic review of evidence:

Interview with investigative staff (Montgomery County Sheriff's Office Criminal Investigations Division):

The investigator did not state they have received the specialized training topics required by § 115.334 for conducting sexual abuse investigations in confinement settings or the training required by §115.331.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

- Criminal investigators completed Standard 115.331 training topics January 22, 2026.
- Administrative investigators completed Standard 115.331 training topics March 11, 2025.
- Administrative investigators completed the specialized investigative topics on November 18, 2025.

Reasoning and analysis (by provision):

115.334 (b)

What was read, as part of a systematic review of evidence:

Review of training records/logs of investigative staff:

See 115.334 (a).

What was heard, as part of a systematic review of evidence:

Interview with investigative staff (Montgomery County Sheriff's Office Criminal Investigations Division):

See 115.334 (a).

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

See 115.334 (a).

Reasoning and analysis (by provision):

115.334 (c)

What was read, as part of a systematic review of evidence:

	<p>The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency maintains documentation showing that investigators have completed the required training. The number of investigators currently employed who have completed the required training: 0 (Initially, zero investigators had completed the required training; eight completed the required training through corrective action.)</p> <p>Review of training records/logs of investigative staff: See 115.334 (a).</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.</p> <p>See 115.334 (a).</p>
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115.335	Specialized training: Medical and mental health care
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy: Specialized Training: Medical and Mental Health Care revised 01/01/2024 • Health Services Agreement • Staff Confirmation of Receipt of PREA forms • Staff/Contracted Counties/Volunteers/Interns PREA Acknowledgement Statements • Montgomery County Youth Facility Training Hours forms for January - June 2024 • Interviews with medical staff and mental health staff <p>Evidence (corrective action):</p> <ul style="list-style-type: none"> • Documented evidence of receipt of specialized training topics required by § 115.335 (a) for the nurse and court therapist supervisor interviewed (11/20/2025) • Documented evidence of receipt of training topics required by § 115.331 for the nurse interviewed (03/04/2025) <p>Reasoning and analysis (by provision): 115.335 (a)</p> <p>What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency has a policy related to the training of medical and mental health practitioners who work regularly in its facilities.</p>

1. The number of all medical and mental health care practitioners who work regularly at this facility who received the training: 7
2. The percent of all medical and mental health care practitioners who work regularly at this facility who received the training required by agency policy: 0%

Montgomery County Youth Detention Policy: Specialized Training: Medical and Mental Health Care (page 1):

Montgomery County Youth Detention will provide training to all full-time and part-time medical and mental health care practitioners who work regularly in the facility. Medical and mental health practitioners will receive annual training on the following topics:

- How to detect and assess signs of sexual abuse and sexual harassment.
- How to preserve physical evidence of sexual abuse;
- How to respond effectively and professionally to juvenile victims of sexual abuse and sexual harassment;
- How to and to whom to report allegations or suspicions of sexual abuse and sexual harassment;

Review of training records:

No documented evidence has been provided that the medical and mental health staff have been trained in:

- (1) How to detect and assess signs of sexual abuse and sexual harassment;
- (2) How to preserve physical evidence of sexual abuse;
- (3) How to respond effectively and professionally to juvenile victims of sexual abuse and sexual harassment; and
- (4) How and to whom to report allegations or suspicions of sexual abuse and sexual harassment.

What was heard, as part of a systematic review of evidence:

Interviews with medical staff and mental health staff:

The nurse and court therapist supervisor did not state they have received the specialized training topics regarding sexual abuse and sexual harassment.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

Through corrective action, training records for medical staff and mental health staff were provided for review. The medical staff and mental health staff interviewed completed the training required by Standard 115.331 on March 4, 2025, and completed the specialized topics on November 20, 2025. Acknowledgment forms were provided to document completion of the specialized topics, and Employee Training Forms were provided to document receipt of the Standard 115.331 training.

Reasoning and analysis (by provision):

115.335 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

Agency medical staff at the facility do not conduct forensic exams.

What was heard, as part of a systematic review of evidence:

Interviews with medical staff and mental health staff:

The medical staff and mental health staff stated forensic medical examinations would be conducted offsite.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.335 (c)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The agency maintains documentation showing that medical and mental health practitioners have completed the required training.

Montgomery County Youth Detention Policy: Specialized Training: Medical and Mental Health Care (page 1):

Montgomery County Youth Detention shall maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere.

Document review:

See 115.335 (a).

Finding:

Based on this analysis, the facility is not substantially compliant with this provision and corrective action is completed.

See 115.335 (a).

Reasoning and analysis (by provision):

115.335 (d)

What was read, as part of a systematic review of evidence:

Document review:

- The auditor reviewed four Staff Confirmation of Receipt of PREA forms for training in 2025, six Staff/Contracted Counties/Volunteers/Interns PREA Acknowledgement Statements for training in 2025 and five Montgomery County Youth Facility Training Hours forms for January - June 2024 for training in 2024.
- The auditor observed the court therapist supervisor received the training required by § 115.331 in 2024 and 2025.
- Training records were provided for the nurse interviewed through corrective action.

Finding:

Based on this analysis, the facility is not substantially compliant with this provision and corrective action is completed.

	See 115.335 (a).
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115.341	Obtaining information from residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy: Policies to Ensure Referrals for Allegations for Investigations revised 01/01/2024 • Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 • Montgomery County Youth Detention Screening Instrument forms • Interview with PREA coordinator • Interview with PREA compliance manager • Interview with staff responsible for risk screening • Interviews with random sample of residents • Site review <p>Evidence (corrective action):</p> <ul style="list-style-type: none"> • Statement regarding implementing fully compliant risk assessment and six month reassessments (05/29/2025) • Alabama Department of Youth Services Screening Assessment for Risk of Sexual Victimization and Abusiveness (implemented 06/12/2025) • Alabama Department of Youth Services Screening Assessment for Risk of Sexual Victimization and Abusiveness forms - six month reassessment forms for existing residents (06/12/2025) • Alabama Department of Youth Services Screening Assessment for Risk of Sexual Victimization and Abusiveness forms from June - November 2025 (11/17/2025) <p>Reasoning and analysis (by provision): 115.341 (a) What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency has a policy that requires screening (upon admission to a facility or transfer to another facility) for risk of sexual abuse victimization or sexual abusiveness toward other residents.</p> <p>The policy requires that residents be screened for risk of sexual victimization or risk of sexually abusing other residents within 72 hours of their intake.</p> <p>In the past 12 months:</p>

- The number of residents entering the facility (either through intake or transfer) whose length of stay in the facility was for 72 hours or more who were screened for risk of sexual victimization or risk of sexually abusing other residents within 72 hours of their entry into the facility: 276

- The percent of residents entering the facility (either through intake or transfer) whose length of stay in the facility was for 72 hours or more who were screened for risk of sexual victimization or risk of sexually abusing other residents within 72 hours of their entry into the facility: 100%

Updated policy requires that a resident’s risk level be reassessed at six month intervals.

Montgomery County Youth Detention Policy 12.7.1 (page 8):

All juveniles shall be screened within 24 hours of arrival at the facility utilizing MCYD Form 115.341 Intake Screening for Assaultive Behavior, Sexually Aggressive Behavior and Risk for Sexual Victimization, to identify potential vulnerabilities or tendencies of acting out with sexually aggressive behavior.

Review of records for residents admitted to the facility:

The auditor reviewed ten completed Montgomery County Youth Detention Screening Instrument forms for the residents interviewed. All assessments reviewed (100%) were completed on the day of admission. Initially, no risk reassessments were provided for review; however, this issue was addressed through corrective action.

What was observed as part of a systematic review of evidence:

Site review:

The PREA Coordinator demonstrated the screening process. They confirmed residents screen are screened upon admission to the facility or transfer from another facility for risk of sexual abuse victimization or sexual abusiveness toward other residents. They stated residents are screened for risk of sexual victimization or risk of sexually abusing other residents within 72 hours of their intake. The information is ascertained through conversations with residents during intake and reviewing any available information. They confirmed resident’s risk levels will be reassessed every six months.

What was heard, as part of a systematic review of evidence:

Interviews with 10 random residents:

All 10 residents stated they were asked questions like the following examples at intake:

- Have you have ever been sexually abused?
- Do you identify with being gay, bisexual, or transgender?
- Do you have any disabilities?
- Do you think you might be in danger of sexual abuse at the facility?

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

- **The auditor reviewed eight Alabama Department of Youth Services Screening Assessment for Risk of Sexual Victimization and Abusiveness - six month reassessments for existing residents (06/12/2025) and observed the reassessments have been implemented.**
- **The auditor requested all Alabama Department of Youth Services Screening Assessment for Risk of Sexual Victimization and Abusiveness forms from June 12, 2025, to August 1, 2025, to determine whether assessments are conducted in compliance with the standard provisions. Twenty-three risk assessments were provided, and all 23 were completed within 72 hours.**

Reasoning and analysis (by provision):

115.341 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Risk assessment is conducted using an objective screening instrument.

Review of Montgomery County Youth Detention Screening Instrument:
The auditor reviewed the Montgomery County Youth Detention Screening Instrument and observed it was not objective. The instrument did not include a scoring system or a determination of risk level.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The auditor observed the Alabama Department of Youth Services Screening Assessment for Risk of Sexual Victimization and Abusiveness (implemented 06/12/2025) and observed the risk assessment is an objective screening instrument. There is a set format of objective yes and no questions and a subjective observation of gender nonconforming appearance, and the scoring system leads to a determination of risk level. The tool includes the following risk levels:

- **Risk of Sexual Victimization: Low (0-7), Moderate (8-18), or High (19-31)**
- **Risk of Sexual Perpetration: Low (0-5), Moderate (6-10), or High (11-15)**

Reasoning and analysis (by provision):

115.341 (c)

What was read, as part of a systematic review of evidence:

Montgomery County Youth Detention Policy 12.7.1 (pages 8-9):

At a minimum, MCYD shall attempt to ascertain information about:

- a) Prior sexual victimization or abusiveness;
- b) Any gender nonconforming appearance or mannerisms, or self-identification as lesbian, gay, bisexual, transgender, or intersex, and whether the juvenile may, therefore, be vulnerable to sexual abuse;
- c) Current charges and offense history;

- d Age
- e) Level of emotional and cognitive development;
- t) Physical size and stature;
- g) Mental illness or mental disabilities;
- h) Intellectual or developmental disabilities;
- i) Physical disabilities;
- j) The juveniles own perception of vulnerability; and
- k) Any other specific information about individual juveniles that may indicate a heightened need for supervision, additional safety precautions, or separation from certain other juveniles.

Review of Montgomery County Youth Detention Screening Instrument:
 The auditor reviewed the Montgomery County Youth Detention Screening Instrument and observed the risk screening instrument did not contain the 10 criteria required by this provision for assessing risk of sexual victimization. The following topics were not included:

- Intellectual or developmental disabilities
- The resident’s own perception of vulnerability
- physical disability
- Offense history

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The auditor reviewed the Alabama Department of Youth Services Screening Assessment for Risk of Sexual Victimization and Abusiveness (implemented 06/12/2025) and observed the risk assessment tool includes all criteria required by the standard provision.

The presence of each required risk factor was assessed as such:

1. Prior sexual victimization or abusiveness - Asked in question 9. “Have you ever been the victim of sexual abuse?”
2. Current charges and offense history - Asked, “Current Charges and Offense History Documentation Reviewed?” Question 7., “Duration of confinement (lack of familiarity with confinement setting)?”
3. Age - Asked in question 1. “Age of juvenile?”
4. Level of emotional and cognitive development - Observed in section 5. “Behaviors that are likely to irritate and annoy others (immature, intentionally aggravating).”, and “Inappropriate verbal behavior (giggling, odd remarks)”.
5. Physical size and stature - Observed in section 5., “Small build”, “Looks younger than stated age”, and “Appears frail, weak”.
6. Mental illness or mental disabilities - Asked in question 6. “ Does the juvenile report or does the juvenile’s records indicate any history of diagnosed mental health disorders?”
7. Intellectual or developmental disabilities - Asked in question 8. and

observed in section 5. Question 8., “Are there indicators this juvenile has limitations due to intellectual impairment (low IQ), a learning disability, is a special education student, or has a developmental disability?” Section 5., “Speech impediment.”

8. Physical disabilities - Observed in section 5. “Physical disability”, “Pronounced disfigurement”, or “Vision/Hearing Impaired.”
9. The resident’s own perception of vulnerability - Asked in question 3, “Perception of own vulnerability (Ask Juvenile: Do you feel safe?)?”
10. Any other specific information about individual residents that may indicate heightened needs for supervision, additional safety precautions, or separation from certain other residents - Asked in questions 4 and 7 and observed in section 5 questions 4 and 7. Question 4., “Have you ever been attacked, bullied, or abused in any setting (school, community, facility, etc.)? Example: have you received threats, insults, and harassment from other people?” Question 7., “Identifies as lesbian, gay, bisexual, transgender, or intersex (LGBTIQ).?” “Section 5., “Member of a gang that’s likely to be a target”, “Non-English speaking”, “Gender nonconforming appearance/behavior”, and “hunched/fearful posture (very shy or fearful)”.

Reasoning and analysis (by provision):

115.341 (d)

What was read, as part of a systematic review of evidence:

Montgomery County Youth Detention Policy 12.7.1 (page 9):

The information on MCYD Form 115.341 Intake Screening shall be ascertained through conversations with the juvenile during the intake process and medical and mental health screenings; during classification assessments; and by reviewing court records, case files, facility behavioral records, and other relevant documentation from the juvenile's files.

What was heard, as part of a systematic review of evidence:

Interview with staff responsible for risk screening:

The PREA compliance manager stated the information is ascertained through conversations with the residents and observations using the risk screening tool.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.341 (e)

What was read, as part of a systematic review of evidence:

Montgomery County Youth Detention Policy 12.7.1 (pages 10-11):

Any information related to sexual abuse victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security

	<p>and management decisions, including housing, bed, education, and program assignments. Refer to MCYD Form 115.341.2 Guidelines for PREA Shared Information.</p> <p>What was heard, as part of a systematic review of evidence:</p> <p>Interview with the PREA coordinator: The PREA coordinator stated the agency has outlined who can have access to a resident’s risk assessment within the facility, to protect sensitive information from exploitation. The information is available to officers assigned to the wings for safety and security decisions.</p> <p>Interview with the PREA compliance manager: The PREA compliance manager stated the agency has outlined who can have access to a resident’s risk assessment within the facility, to protect sensitive information from exploitation. The information is available to mental health clinicians, administration, and medical staff.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>
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115.342	Placement of residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy: Screening for Risk of Sexual Victimization and Abusiveness revised 01/01/2024 • Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 • Interview with superintendent (juvenile detention director) • Interview with PREA coordinator • Interview with PREA compliance manager • Interview with staff responsible for risk screening • Interview with staff who supervise residents in isolation • Interview with medical staff • Interview with mental health staff • Interviews with residents in isolation (for risk of sexual victimization/who allege to have suffered sexual abuse) • Site review <p>Evidence (corrective action):</p>

• Alabama Department of Youth Services Screening Assessment for Risk of Sexual Victimization and Abusiveness (implemented 06/12/2025)

Reasoning and analysis (by provision):

115.342 (a)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The agency/facility uses information from the risk screening required by §115.341 to inform housing, bed, work, education, and program assignments with the goal of keeping all residents safe and free from sexual abuse.

Montgomery County Youth Detention Policy 12.7.1 (page 11):

Facilities shall use all information obtained from MCYD Form 115.341 Intake Screening, and subsequently, to make housing, bed, program, education, and work assignments for juveniles with the goal of keeping all juveniles safe and free from sexual abuse.

Montgomery County Youth Detention Policy: Screening for Risk of Sexual Victimization and Abusiveness (page 1):

All detainees will be screened utilizing Montgomery County Youth Detention Screening Instrument within 24 hours of arrival at the Youth facility for potential vulnerabilities or tendencies of acting out with sexually aggressive behavior.

Housing assignments shall be made accordingly. The Juvenile Detention Officers will conduct this interview at intake.

Review of housing, bed, work, education, and program assignments decisions:

Through corrective action, the facility implemented the Alabama Department of Youth Services Screening Assessment for Risk of Sexual Victimization and Abusiveness form (06/12/2025). The reviewed the form and observed page three documents special housing assignments, special bed assignments, special programming assignments, special education assignments, and special work assignments.

Review of risk-based housing decisions:

The auditor reviewed eight completed Alabama Department of Youth Services Screening Assessment for Risk of Sexual Victimization and Abusiveness forms completed for six month reassessments for residents and observed none of the resident's risk screening required housing, bed, work, education, and program assignments based on their risk level.

What was heard, as part of a systematic review of evidence:

Interview with PREA compliance manager:

The PREA compliance manager discussed how the facility uses information from risk screening during intake to keep residents safe and free from sexual abuse. Special housing, staff alerts for programming and no contact status are implemented. The Alabama Department of Youth Services Screening Assessment for Risk of Sexual Victimization and Abusiveness form is being implemented to document fully these decisions.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The facility implemented the Alabama Department of Youth Services Screening Assessment for Risk of Sexual Victimization and Abusiveness form (06/12/2025). The form documents housing, bed, program, education, and work assignments for juveniles with the goal of keeping all juveniles safe and free from sexual abuse.

Reasoning and analysis (by provision):

115.342 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The facility has a policy that residents at risk of sexual victimization may only be placed in isolation as a last resort if less restrictive measures are inadequate to keep them and other residents safe, and only until an alternative means of keeping all residents safe can be arranged. The facility policy requires that residents at risk of sexual victimization who are placed in isolation have access to legally required educational programming, special education services, and daily large-muscle exercise.

In the past 12 months:

- The number of residents at risk of sexual victimization who were placed in isolation: 0
- The number of residents at risk of sexual victimization who were placed in isolation who have been denied daily access to large muscle exercise, and/or legally required education, or special education services: 0
- The average period of time residents at risk of sexual victimization who were held in isolation to protect them from sexual victimization: N/A

Montgomery County Youth Detention Policy 12.7.1 (page 11):

Juveniles alleging sexual assault may be isolated from others only as a last resort when less restrictive measures are inadequate to keep them and other juveniles safe, and then only until an alternative means of keeping all juveniles safe can be arranged. During any period of isolation, facilities shall not deny juveniles daily large-muscle exercise and any legally required educational programming or special education services. Residents in isolation shall receive daily visits from a medical or mental health care clinician. Juveniles shall also have access to other programs and work

opportunities to the extent possible. Documentation of programming shall be maintained utilizing MCYFD Individual Record of Confinement/Suicide Watch/Observation.

Montgomery County Youth Detention Policy: Screening for Risk of Sexual Victimization and Abusiveness (page 2):

Detainees may be isolated from others only as a last resort when less restrictive measures are inadequate to keep them and others detainees safe, and then only

until an alternative means of keeping all detainees safe can be arranged. During any period of isolation, Montgomery County Youth Detention shall not deny detainees large-muscle exercise and any legally required educational programming or special education services. Detainees in isolation shall receive daily visits from a medical or mental health care clinician. Detainees shall also have access to other programs and work opportunities to the extent possible.

What was heard, as part of a systematic review of evidence:

Interview with superintendent (juvenile detention director):

The juvenile detention director stated Montgomery County Youth Detention has not used isolation for residents at risk of sexual victimization. Residents are only isolated from others as a last resort when less restrictive measures are inadequate to keep them and other residents safe, and then only until an alternative means of keeping all residents safe can be arranged. The maximum amount of time residents can be placed in isolation is 72 hours.

Interview with mental health staff:

The court therapist supervisor stated residents placed in isolation receive daily visits from medical or mental health care clinicians.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.342 (c) N/A

Reasoning and analysis (by provision):

115.342 (d) N/A

Reasoning and analysis (by provision):

115.342 (e) N/A

Reasoning and analysis (by provision):

115.342 (f) N/A

Reasoning and analysis (by provision):

115.342 (g) N/A

Reasoning and analysis (by provision):

115.342 (h)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

From a review of case files of residents at risk of sexual victimization who were held in isolation in the past 12 months, the number of case files that include BOTH:

- A statement of the basis for facility's concern for the resident's safety, and
- The reason or reasons why alternative means of separation cannot be arranged:

N/A

No residents at risk of sexual victimization were held in isolation in the past 12

	<p>months.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p> <p>Reasoning and analysis (by provision): 115.342 (i) What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: If a resident at risk of sexual victimization is held in isolation, the facility affords each such resident a review every 30 days to determine whether there is a continuing need for separation from the general population.</p> <p>No residents at risk of sexual victimization were held in isolation in the past 12 months. Montgomery County Youth Detention has not used isolation for residents at risk of sexual victimization.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>
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115.351	Resident reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy: Resident Reporting revised 01/01/2021 • Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 • Poster: “Break the Silence of Abuse” • Montgomery County Youth Detention Detainee Handbook/ Sexual Assault Guide • Interview with PREA compliance manager • Interviews with random sample of staff • Interviews with random sample of residents • Interviews with residents who reported a sexual abuse • Systems tests • Site review <p>Evidence (Corrective Action):</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention Detainee Handbook/ Sexual Assault Guide (05/31/2025) • Brochure: “What You Should Know About Sexual Abuse and Assault” (final version

05/01/2025)

- Poster: "No Means No" (final version 06/16/2025)
- Grievance systems test response (11/17/2025)

Reasoning and analysis (by provision):

115.351 (a)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency has established procedures allowing for multiple internal ways for residents to report privately to agency officials about: Sexual abuse or sexual harassment; Retaliation by other residents or staff for reporting sexual abuse and sexual harassment; AND Staff neglect or violation of responsibilities that may have contributed to such incidents.

Montgomery County Youth Detention Policy 12.7.1 (page 12):

Juveniles who are victims of sexual abuse/assault/harassment have the option to report the incident to any staff member in addition to immediate point-of-contact line staff member.

Montgomery County Youth Detention Policy 12.7.1 (page 13):

Juveniles may use the MCYD Detainee Grievance Form, available on each wing to report sexual abuse/harassment, or they may make a verbal report to the MCYF Advocacy Representative.

Montgomery County Youth Detention Policy: Resident Reporting (page 1):

Montgomery County Youth Detention Detainee Handbook will be provided to all detainees upon admission to the facility. The handbook contains information about procedures on how to report incidents such as sexual abuse/assault. If a detainee decides not to report information of sexual abuse victimization to the Juvenile Detention Officer, they have the option of reporting the same to a Juvenile Detention Supervisor, the Juvenile Detention Director, the PREA Coordinator or PREA Compliance Manager or a member of the Montgomery County Youth Detention Sexual Assault Response Team (SART).

Montgomery County Youth Detention reporting methods include written reports, verbal reports, anonymous reports, and third-party reports.

Montgomery County Youth Detention shall provide and maintain multiple internal ways for detainees to anonymously report physical abuse, sexual abuse, sexual harassment, retaliation by other detainees or staff for reporting sexual abuse or sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents including, but not limited to: reporting to staff members, reporting to clerical staff, reporting through the sexual abuse hotline (1-888-403-2935), reporting to the Juvenile Detention Director, reporting via confidential suggestion box which shall be checked daily or through the DYS PREA hotline at 1-855-332-1594.

Document review:

The facility developed the "No Means No" Poster (English and Spanish) (final version

06/16/2025). The poster includes the following internal reporting methods:

- Report to any staff, volunteer, contractor, or medical or mental health staff
- Submit grievance
- Report to the PREA coordinator or PREA compliance manager
- Tell a family member, friend, legal counsel, or anyone else outside the facility.

They can report on your behalf by calling PREA coordinator at (334)-240-2160 or the Alabama Department of Youth Services

- You also can submit a report on someone's behalf, or someone at the facility can report for you using the ways listed here.

The facility updated the Montgomery County Youth Detention Detainee Handbook/ Sexual Assault Guide (05/31/2025).

The handbook includes the following internal reporting methods:

- Report to the juvenile detention officer, juvenile detention supervisor, a teacher or other education staff, parents, attorney, probation officer, court therapist, volunteers, clergy, or anyone trusted
- Submit grievance

The facility updated "What You Should Know About Sexual Abuse and Assault" brochure (final version 05/01/2024).

The brochure includes the following internal reporting methods:

- Report to staff, juvenile detention supervisor, assistant juvenile detention director, juvenile detention director, PREA coordinator, PREA compliance manager, or a member of the Sexual Assault Response (SART) Team
- Third party reports to clerical staff, probation staff, attorney, and family members
- Submit grievance

What was heard, as part of a systematic review of evidence:

Interviews with 12 random staff:

Staff stated residents can privately report sexual abuse or sexual harassment, retaliation by other residents or staff for reporting sexual abuse and sexual harassment, or staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment by calling the Alabama Department of Youth Services Sexual Assault Hotline, a private office meeting, or writing a note.

Interviews with 10 random residents:

Residents stated they would report sexual abuse or sexual harassment that happened to them or someone else by telling a teacher, telling a trusted adult, calling the Alabama Department of Youth Services Sexual Assault Hotline, or writing a grievance.

What was observed as part of a systematic review of evidence:

Site review:

The auditor observed signage is readable and accessible, consistent, and placed throughout the facility. The signage is provided in English and Spanish. Signage includes the following:

- Poster: "No Means No" (final version 06/16/2025)

- Brochure: “What You Should Know About Sexual Abuse and Assault” (final version 05/01/2024)
- Montgomery County Youth Detention Detainee Handbook/ Sexual Assault Guide (05/31/2025)

Systems test:

The auditor tested internal reporting by submitting a test grievance in a locked grievance box located in a classroom. The auditor received a response to the test grievance through corrective action on November 17, 2025.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

- The facility developed the “No Means No” Poster (final version 06/16/2025)
- The facility updated the Montgomery County Youth Detention Detainee Handbook/ Sexual Assault Guide (05/31/2025).
- The facility updated “What You Should Know About Sexual Abuse and Assault” brochure (final version 05/01/2024).
- The facility responded to the test grievance and provided detailed procedures for responding to an allegation of sexual abuse (11/17/2025).

Reasoning and analysis (by provision):

115.351 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The agency provides at least one way for residents to report abuse or harassment to a public or private entity or office that is not part of the agency. The agency does not detain youth solely for civil immigration purposes.

Montgomery County Youth Detention Policy 12.7.1 (page13):

Juveniles may also report sexual abuse/assault/harassment to a public or private entity, such as Child Protect Children's Advocacy Program, that is not a part of MCYD and they can immediately forward the Juvenile's report to the MCYD PREA Coordinator.

Juveniles or others may report allegations via a Sexual Assault Hotline 1-800-656-4673 or the Alabama PREA Hotline at 1-855-332-1594. Both hotlines may be accessed 24 hours a day.”

Montgomery County Youth Detention Policy: Resident Reporting (page 2):

Montgomery County Youth Detention shall provide and maintain at least one way for detainees to report physical abuse, sexual abuse, sexual harassment, retaliation by other detainees or staff for reporting sexual abuse or sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents to a public or private entity or office that is not a part of Montgomery County Youth Detention and that is able to immediately forward detainee's reports of sexual abuse and sexual harassment to Montgomery County Youth Detention officials

allowing the detainee to remain anonymous upon request including the following, which may include, but not limited to: reporting to teachers, reporting to mental health staff, reporting to medical staff, reporting to probation officers, reporting to attorneys, reporting to National Abuse Hotline (1 -800-656-4673), reporting to law enforcement, reporting to a Sexual Assault Response Team (SART) member or the DYS PREA Hotline at 1-855-332-1594.

Document review:

The facility developed the “No Means No” Poster (English and Spanish) (final version 06/16/2025). The poster includes the following external reporting method:

- Call the Alabama Department of Youth Services (DYS) at 1-334-215-6040 for external reporting.

The poster includes procedures for making an anonymous report.

- Anonymous reports can be made by mailing the Alabama Department of Youth Services at PO Box 66, Mt. Meigs, AL 36057.
- Addressed envelopes for anonymous reporting to DYS are located by the grievance box.
- All outgoing mail is confidential and will not be read.

The facility updated the Montgomery County Youth Detention Detainee Handbook/ Sexual Assault Guide (05/31/2025).

The handbook includes the following internal reporting method:

- Call the Alabama Department of Youth Services Sexual Assault Hotline at 1-855-992-1594.

What was heard, as part of a systematic review of evidence:

Interview with PREA coordinator:

The PREA coordinator confirmed Montgomery County Youth Detention does not accept residents detained solely for civil immigration purposes.

Interview with PREA compliance manager:

The PREA compliance manager identified the Alabama Department of Youth Services Sexual Assault Hotline as a way residents can report sexual abuse or sexual harassment to a public or private entity that is not part of the agency.

Interviews with 10 random residents:

See 115.351 (a).

What was observed as part of a systematic review of evidence:

Site review:

See 115.351 (a).

The auditor observed signage is readable and accessible, consistent, and placed throughout the facility. The signage is provided in English and Spanish. Signage includes the following:

- Poster: “No Means No” (final version 06/16/2025)
- Montgomery County Youth Detention Detainee Handbook/ Sexual Assault Guide (05/31/2025)

Systems test:

The auditor successfully tested external reporting by calling the Alabama Department of Youth Services Sexual Assault Hotline. The Alabama Department of Youth Services PREA coordinator forwarded the report to the director the same day.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

- **The facility implemented an anonymous reporting procedure (06/16/2025).**
- **The facility developed the “No Means No” Poster (final version 06/16/2025).**
- **The facility updated the Montgomery County Youth Detention Detainee Handbook/ Sexual Assault Guide to remove Standing Together Against Rape (STAR) as a reporting method (05/31/2025).**

Reasoning and analysis (by provision):

115.351 (c)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency has a policy mandating that staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties. Staff are required to document verbal reports. The time frame that staff are required to document verbal reports: immediately

Montgomery County Youth Detention Policy: Resident Reporting (page 1):

Montgomery County Youth Detention reporting methods include written reports, verbal reports,

anonymous reports, and third-party reports. All verbal reports will be immediately documented by the staff member receiving the report.

What was heard, as part of a systematic review of evidence:

Interviews with 12 random staff:

Eleven of the 12 staff stated verbal reports would be documented immediately.

Interviews with 10 random residents:

All 10 residents interviewed stated they could make reports of sexual abuse or sexual harassment either in person or in writing and someone could make the report for them so that they would not have to give their name.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.351 (d)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The facility provides residents with access to tools to make written reports of sexual abuse or sexual harassment, retaliation by other residents or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.

Montgomery County Youth Detention Policy: Resident Reporting (page 1):
Detainees will be provided access to the tools necessary to make a written report if requested, including, but not limited to writing utensils, paper, and an envelope.

What was heard, as part of a systematic review of evidence:

Interview with PREA compliance manager:

The PREA compliance manager stated the facility provides residents with grievance forms and writing utensils for making written reports of sexual abuse or sexual harassment, retaliation by other residents or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. There is a grievance box located in a classroom.

What was observed as part of a systematic review of evidence:

Site review:

The auditor observed a grievance box in the classroom.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.351 (e)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:
The agency has established procedures for staff to privately report sexual abuse and sexual harassment of residents. Staff are informed of these procedures in the following ways: posters

Montgomery County Youth Detention Policy: Resident Reporting (page 2):

The facility shall provide a method for staff to privately report sexual abuse and sexual harassment of detainees utilizing the Written Report of Suspected Child Abuse/Neglect Form or an Incident and Disciplinary Report which is to be sealed in an envelope and forwarded to the Juvenile Detention Director or a member of Montgomery County Youth Detention Sexual Assault Response Team (SART).

What was heard, as part of a systematic review of evidence:

Interviews with 12 random staff:

See 115.351 (a).

What was observed as part of a systematic review of evidence:

Site review:

The facility developed the "No Means No" Poster (English and Spanish) (final version 06/16/2025). The poster provides reporting methods for staff, including reporting privately to the Alabama Department of Youth Services, or reporting to the PREA

	<p>coordinator or PREA compliance manager.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.</p> <p>The facility developed the “No Means No” Poster (English and Spanish) (final version 06/16/2025).</p>
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115.352	Exhaustion of administrative remedies
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy: Exhaustion of Administrative Remedies revised 01/01/2024 • Montgomery County Youth Detention Policy: Grievance Procedures revised 01/01/2024 • Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 • Montgomery County Youth Detention Detainee Handbook/ Sexual Assault Guide • Grievances • Interviews with residents who reported a sexual abuse <p>Reasoning and analysis (by provision): 115.352 (a)</p> <p>What was read, as part of a systematic review of evidence:</p> <p>The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency has an administrative procedure for dealing with resident grievances regarding sexual abuse.</p> <p>Montgomery County Youth Detention Policy: Exhaustion of Administrative Remedies (page 1): There is a written grievance procedure that is made available to all juveniles and that includes at least one level of appeal.</p> <p>Montgomery County Youth Detention Policy: Exhaustion of Administrative Remedies (page 2): Any allegations regarding sexual abuse would not be treated as a grievance by the Facility. Rather, it would be reported to the appropriate oversight agency (Department of Youth Services) and law enforcement.</p> <p>Montgomery County Youth Detention Policy: Grievance Procedures (page 1): There is a written juvenile grievance procedure that is made available to all</p>

juveniles and that includes at least one level of appeal.

Montgomery County Youth Detention Policy 12.7.1 (page 13):

Juveniles may use the MCYD Detainee Grievance Form, available on each wing to report sexual abuse/harassment, or they may make a verbal report to the MCYF Advocacy Representative.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.352 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

Agency policy or procedure allows a resident to submit a grievance regarding an allegation of sexual abuse at any time regardless of when the incident is alleged to have occurred. Agency policy does not require a resident to use an informal grievance process, or otherwise to attempt to resolve with staff, an alleged incident of sexual abuse.

Montgomery County Youth Detention Policy: Exhaustion of Administrative Remedies (page 1):

For detainee's grievance involving sexual abuse, Montgomery County Youth Detention will abide by the following:

- Do not impose time limit on submission.
- Do not require detainee to use informal grievance process or to attempt to resolve issue with staff.

Review of Montgomery County Youth Detention Detainee Handbook/ Sexual Assault Guide:

The auditor reviewed the handbook and observed relevant information is provided.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.352 (c)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The agency's policy and procedure allow a resident to submit a grievance alleging sexual abuse without submitting it to the staff member who is the subject of the complaint.

Montgomery County Youth Detention Policy: Exhaustion of Administrative Remedies (page 1):

For detainee's grievance involving sexual abuse, Montgomery County Youth

Detention will abide by the following:

- Ensure that detainee can submit a grievance without giving it to a staff member who is subject of the complaint.
- Ensure that a grievance is not referred to a staff member who is the subject of the complaint.

Review of Montgomery County Youth Detention Detainee Handbook/ Sexual Assault Guide:

See 115.352 (b).

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.352 (d)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The agency has policy and procedures that require that a decision on the merits of any grievance or portion of a grievance alleging sexual abuse be made within 90 days of the filing of the grievance. The total time between the discovery of the grievance and the disposition cannot exceed 25 days.

In the past 12 months, the number of grievances that were filed that alleged sexual abuse: 6

In the past 12 months, the number of grievances alleging sexual abuse that reached final decision within 90 days after being filed: 6

In the past 12 months, the number of grievances alleging sexual abuse that involved extensions because final decision was not reached within 90 days: 0

Montgomery County Youth Detention Policy: Exhaustion of Administrative Remedies (pages 1-2):

Montgomery County Youth Detention will issue a final decision on the merits of grievance involving sexual abuse within 90 days of filing.

- Time does not include consumed by detainees preparing administrative appeals.
- Montgomery County Youth Detention may claim up to 70-day extension if original timeframe is insufficient to render a decision but must notify detainee in writing of extension and anticipated decision date.
- If detainee does not receive a response within time frame, detainee can consider it as a denial.

Review of grievances that alleged sexual abuse and final decisions:

The auditor reviewed nine grievance alleging staff-on-juvenile sexual abuse and sexual harassment. The facility response to the residents states the grievances were reported to the Alabama Department of Human Services and referred for investigation.

What was heard, as part of a systematic review of evidence:

Interviews with residents who reported a sexual abuse:

There were no residents, present during the onsite phase of the audit, who reported a sexual abuse allegation.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.352 (e)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The number of the grievances alleging sexual abuse filed by residents in the past 12 months in which the resident declined third-party assistance, containing documentation of the resident's decision to decline: 0

If an abuse allegation is discovered, multiple policies require documentation of the allegation and of the response to that allegation, including the youth's participation in the investigation.

Montgomery County Youth Detention Policy: Exhaustion of Administrative Remedies (page 2):

Montgomery County Youth Detention will permit third parties, including other youth, staff, family members, attorneys, and outside advocates to file requests for administrative remedies related to allegations of sexual abuse, including on behalf or detainees.

- If a third party other than a parent or guardian files a report on behalf of a youth, the facility may require that the alleged victim agree with the request and that the victim pursue administrative remedies.
- If the detainee declines to have the request processed, the facility must document the refusal.
- Detainee may not refuse processing of grievances filed by parents or legal guardians.

Review of third-party reports and declination of third-party assistance:

There were no third-party reports.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.352 (f)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The agency has a policy and established procedures for filing an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse. Agency policy and procedures for emergency grievances alleging substantial risk of imminent sexual abuse require an initial response within 48 hours. The number of emergency grievances alleging substantial risk of imminent sexual abuse

	<p>that were filed in the past 12 months: 0</p> <p>Montgomery County Youth Detention Policy: Exhaustion of Administrative Remedies (page 2): Montgomery County Youth Detention will establish emergency grievance procedures for detainees subject to substantial risk of imminent abuse. The procedures will include the following:</p> <ul style="list-style-type: none"> • Ensure that emergency procedures if forwarded to someone who can take immediate action. • Provide an initial response within 48 hours. • Provide a final decision within 5 calendar days, documenting determination of whether detainee is at substantial risk of imminent sexual abuse and the action taken in response. <p>Review of emergency grievances filed: There were no emergency grievances filed.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p> <p>Reasoning and analysis (by provision): 115.352 (g) What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency has a written policy that limits its ability to discipline a resident for filing a grievance alleging sexual abuse to occasions where the agency demonstrates that the resident filed the grievance in bad faith.</p> <p>In the past 12 months there were no resident grievances alleging sexual abuse that resulted in disciplinary action by the agency against the resident for having filed the grievance in bad faith.</p> <p>Montgomery County Youth Detention Policy: Exhaustion of Administrative Remedies (page 2): The facility may only discipline detainees for filing a grievance related to sexual abuse when it demonstrates that the detainee filed it in bad faith.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>
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115.353	Resident access to outside confidential support services and legal representation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Evidence relied upon in making the compliance determinations:

- Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities)
- Montgomery County Youth Detention Policy: Resident Access to Outside Support Services and Legal Representation revised 01/01/2024
- Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024
- Brochure: “What You Should Know About Sexual Abuse and Assault”
- Memorandum of understanding between Montgomery County Youth Detention and Child Protect Children’s Advocacy Center dated 01/31/2025
- Interview with superintendent (juvenile detention director)
- Interview with PREA compliance manager
- Interviews with random sample of residents
- Interviews with residents who reported a sexual abuse

Evidence (Corrective Action):

- Brochure: “What You Should Know About Sexual Abuse and Assault” (final version 05/01/2024)
- Poster: “No Means No” (final version 06/16/2025)

Findings (By Provision):

115.353 (a)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The facility provides residents access to outside victim advocates for emotional support services related to sexual abuse by:

- Giving residents (by providing, posting, or otherwise making accessible) mailing addresses and telephone numbers (including toll-free hotline numbers where available) of local, State, or national victim advocacy or rape crisis organizations.
- Enabling reasonable communication between residents and these organizations, in as confidential a manner as possible.

Montgomery County Youth Detention Policy: Resident Access to Outside Support Services and Legal Representation (page 1):

Montgomery County Youth Detention shall provide detainees with access to outside victim advocates (Child Protect Child Advocacy Group) for emotional support services related to sexual abuse, by providing, posting, and otherwise making accessible mailing addresses and telephone numbers, including toll free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organization. For persons detained solely for civil immigration purposes, immigrant services agencies. Youth Detention shall enable reasonable communication between detainees and these organizations and agencies in as confidential a manner as possible.

Document review:

Through corrective action, the “What You Should Know About Sexual Abuse and Assault” brochure was updated (05/01/2024) and the “No Means No” poster was developed (final version 06/16/2025).

The “What You Should Know About Sexual Abuse and Assault” brochure was updated to include a telephone number and mailing address for the Child Protect Children’s Advocacy Center.

The “No Means No” poster also includes a telephone number and mailing address for the Child Protect Children’s Advocacy Center.

What was heard, as part of a systematic review of evidence:

Interview with PREA coordinator:

The PREA coordinator stated the facility does not accept residents detained solely for civil immigration purposes.

Interviews with 10 random residents:

None of the residents interviewed (0%) stated they were knowledgeable of services available outside of the facility for dealing with sexual abuse if they ever need it.

Interviews with residents who reported a sexual abuse:

There were no residents, present during the onsite phase of the audit, who reported a sexual abuse allegation.

What was observed as part of a systematic review of evidence:

Site review:

The auditor observed information for Child Protect Children’s Advocacy Center in included in the “What You Should Know About Sexual Abuse and Assault” brochure (updated 05/01/2024) and the “No Means No” poster was developed (final version 06/16/2025). The posters are located in each living units, halls, intake, and medical, among other areas in the facility. The “What You Should Know About Sexual Abuse and Assault” brochure is provided at intake.

Systems test:

The auditor called Child Protect Children’s Advocacy Center from a facility telephone and confirmed calls could be made, and victim advocates would be available by telephone or mail.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The “What You Should Know About Sexual Abuse and Assault” brochure was updated to include a telephone number and mailing address for the Child Protect Children’s Advocacy Center.

The “No Means No” poster also includes a telephone number and mailing address for the Child Protect Children’s Advocacy Center.

Reasoning and analysis (by provision):

115.353 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The facility informs residents, prior to giving them access to outside support

services, the extent to which such communications will be monitored. The facility informs residents, prior to giving them access to outside support services, of the mandatory reporting rules governing privacy, confidentiality, and/or privilege that apply to disclosures of sexual abuse made to outside victim advocates, including any limits to confidentiality under relevant Federal, State, or local law.

Montgomery County Youth Detention Policy: Resident Access to Outside Support Services and Legal Representation (page 1):

Montgomery County Youth Detention shall inform detainees, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws.

Document review:

Through corrective action, the “No Means No” poster was developed (final version 06/16/2025).

What was heard, as part of a systematic review of evidence:

Interviews with 10 random residents:

See 115.353 (a).

Interviews with residents who reported a sexual abuse:

See 115.353 (a).

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The “No Means No” poster states Child Protect Children’s Advocacy Center are mandatory reporters and facility staff will not monitor calls.

Reasoning and analysis (by provision):

115.353 (c)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The agency or facility maintains memoranda of understanding (MOUs) or other agreements with community service providers that are able to provide residents with emotional support services related to sexual abuse. The agency or facility maintains copies of those agreements.

Montgomery County Youth Detention Policy: Resident Access to Outside Support Services and Legal Representation (page 1):

Montgomery County Youth Detention shall maintain or attempt to enter into memoranda of understanding or other agreements with community services providers that provide detainees with confidential emotional support services related to sexual abuse (One Place Family Justice Center), (Child Protect Child Advocacy Group). Youth Detention shall maintain copies of agreements or documentation showing attempts to enter into such agreements.

Document review:

The auditor reviewed the memorandum of understanding between Montgomery County Youth Detention and Child Protect Children’s Advocacy Center dated 01/31/2025 and observed the agreement provides residents with emotional support services related to sexual abuse.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.353 (d)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The facility provides residents with reasonable and confidential access to their attorneys or other legal representation. The facility provides residents with reasonable access to parents or legal guardians.

Montgomery County Youth Detention Policy: Resident Access to Outside Support Services and Legal Representation (page 1):

Montgomery County Youth Detention shall also provide detainees with reasonable and confidential access to their attorneys or other legal representation and reasonable access to parents or legal guardians.

What was heard, as part of a systematic review of evidence:

Interview with superintendent (juvenile detention director):

The juvenile detention director stated the facility provides residents with reasonable and confidential access to their attorneys or other legal representation through telephone calls and in-person visits. The facility provides residents with reasonable access to parents or legal guardians through telephone calls, mail, virtual visitation, in-person visitation, and passes.

Interview with PREA compliance manager:

The PREA compliance manager stated the facility provides residents with reasonable and confidential access to their attorneys or other legal representation through telephone calls, mail, and in-person visits. The facility provides residents with reasonable access to parents or legal guardians through visits, mail, and telephone.

Interviews with 10 random residents:

- All 10 of the residents interviewed (100%) stated the facility allows them to see or talk with a lawyer and the facility will allow them to talk with that person privately.
- All 10 of the residents interviewed (100%) stated the facility allows them to see or talk with their parents or someone else.

Interviews with residents who reported a sexual abuse:

See 115.353 (a).

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

115.354	Third-party reporting
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 • Montgomery County Youth Detention third party reporting form • Site review <p>Evidence (corrective action):</p> <ul style="list-style-type: none"> • Agency’s website was updated with corrected third party reporting information (06/02/2025) • Montgomery County Youth Detention third party reporting form (06/02/2025) • “No Means No” poster (final version 06/16/2025) <p>Reasoning and analysis (by provision): 115.354 (a)</p> <p>What was read, as part of a systematic review of evidence:</p> <p>The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency or facility provides a method to receive third-party reports of resident sexual abuse or sexual harassment.</p> <p>Montgomery County Youth Detention Policy 12.7.1 (page 13): Third party reporting can also be done on behalf of the juvenile by a family member, Juvenile Probation Officer, members of the education staff, other juveniles, attorneys, etc.</p> <p>What was observed as part of a systematic review of evidence:</p> <p>Site Review: The auditor reviewed the website at https://www.mc-ala.org/departments/youth-facility and observed the information was out of date with regards to staff contact information.</p> <p>Through corrective action, the website was updated with correct information (06/02/2025).</p> <p>The website publication informs reporters if they suspect sexual abuse or harassment has happened at Montgomery County Youth Detention, they have several options for reporting. These options provided include:</p> <ul style="list-style-type: none"> • Telephone number and email address for the juvenile detention assistant director • Telephone number and email address for facility the PREA coordinator • Telephone number for the Montgomery County Sheriff’s Office • Telephone number for the Alabama Department of Youth Services PREA coordinator • Telephone number for the Alabama Department of Youth Services Sexual Assault Hotline

	<ul style="list-style-type: none"> • Montgomery County Youth Detention Dorm 115.354 Third Party Reporting <p>Additionally, the facility developed the No Means No” poster (final version 06/16/2025). The poster is located throughout the facility and informs staff and visitors of the third-party reporting methods.</p> <p>Systems test: After the website corrections were made the auditor submitted a test third-party report using the third-party reporting form (06/29/2025). The auditor followed the form instructions and emailed the test report to the facility PREA compliance manager. The test report was responded to the following day.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.</p> <ul style="list-style-type: none"> • The agency’s website was updated with corrected third party reporting information (06/02/2025). • The No Means No” poster (final version 06/16/2025) informs staff and visitors of the third-party reporting methods.
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115.361	Staff and agency reporting duties
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <hr/> <p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 • Interview with superintendent (juvenile detention director) • Interview with PREA compliance manager • Interviews with a random sample of staff • Interviews with medical and mental health staff <p>Reasoning and analysis (by provision): 115.361 (a) What was read, as part of a systematic review of evidence: Montgomery County Youth Detention Pre-Audit Questionnaire response: The agency requires all staff to report immediately and according to agency policy:</p> <ul style="list-style-type: none"> • Any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency. • Any retaliation against residents or staff who reported such an incident. • Any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. <p>Montgomery County Youth Detention Policy 12.7.1 (page 13):</p>

Any employee shall immediately report to their supervisor, any knowledge, suspicion, or information they receive regarding an incident of sexual assault/harassment that is alleged to have occurred. The supervisor shall immediately notify the Juvenile Detention Director who shall then initiate a critical incident report using the Critical Incident Report as outlined in MCYD ACA/DYS Policy 3-JDF-3B-14.

What was heard, as part of a systematic review of evidence:

Interviews with 12 random staff:

All 12 staff stated they are required to report any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency; retaliation against residents or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.361 (b)

What was read, as part of a systematic review of evidence:

Montgomery County Youth Detention Pre-Audit Questionnaire response:

The agency requires all staff to comply with any applicable mandatory child abuse reporting laws.

What was heard, as part of a systematic review of evidence:

Interviews with 12 random staff:

All 12 staff stated they are aware of Alabama laws related to mandatory reporting of sexual abuse.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.361 (c)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

Apart from reporting to designated supervisors or officials and designated State or local service agencies, agency policy prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions.

Montgomery County Youth Detention Policy 12.7.1 (page 14):

Apart from reporting to designated supervisors, investigators, law enforcement and the Alabama Department of Human Resources, staff are prohibited from revealing any information related to a sexual assault report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation,

and other security and management decisions.

What was heard, as part of a systematic review of evidence:

Interviews with 12 random staff:

Staff interviewed stated policy prohibits them from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.361 (d)

What was read, as part of a systematic review of evidence:

Montgomery County Youth Detention Policy 12.7.1 (page 14):

Medical and mental health practitioners shall be required to report sexual abuse up their chain of command, as well as where required by mandatory reporting laws.

What was heard, as part of a systematic review of evidence:

Interview with medical staff:

The nurse stated mental health staff disclose the limitations of confidentiality and their duty to report, at the initiation of services to a resident before the resident is seen by medical staff. They stated they are required to immediately report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment to the PREA coordinator and their supervisor. They stated they have not become aware of such incidents.

Interview with mental health staff:

The court therapist supervisor stated they disclose the limitations of confidentiality and their duty to report, at the initiation of services to a resident. They stated they are required to immediately report any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment to the Alabama Department of Human Resources and the chief. They stated they have not become aware of such incidents.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.361 (e)

What was read, as part of a systematic review of evidence:

Montgomery County Youth Detention Policy 12.7.1 (page 15):

Allegations of sexual abuse shall be investigated pursuant to MCYD Policy and Procedure ACA/DYS Policy 3-JDF-3D-06-4. Notification of allegations to the juvenile's parents/guardian attorney, or other legal representative shall be given pursuant to the instructions of the MCYD investigators. The Investigation Unit shall first make a finding regarding the minimal level of credibility of the allegation. If the IU

determines the allegation is minimally credible, notification to the parents/guardian, attorney or legal representative shall be made by the Juvenile Detention Director, and Assistant Juvenile Detention Director or his/her designee. A parent or legal guardian.

What was heard, as part of a systematic review of evidence:

Interview with superintendent (juvenile detention director):

The juvenile detention director stated when the facility receives an allegation of sexual abuse, the allegation is reported to the Montgomery County Sheriff Department. If the victim is under guardianship of the child welfare system, the allegation would be reported to the victim's case manager instead of the parents or legal guardians the same day. Lastly, they also stated if a juvenile court retains jurisdiction over the victim, they also report the allegation to the juvenile's attorney or other legal representative of record the same day.

Interview with PREA compliance manager:

The PREA compliance manager stated that when the facility receives an allegation of sexual abuse, the allegation is immediately reported to the Montgomery County Sheriff Department for investigation. If the victim is under the guardianship of the child welfare system, they stated the allegation would be immediately reported to the victim's case worker instead of the parents or legal guardians. Lastly, they also stated if a juvenile court retains jurisdiction over the victim, they also immediately report the allegation to the juvenile's probation officer.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.361 (f)

What was read, as part of a systematic review of evidence:

Montgomery County Youth Detention Policy 12.7.1 (page 15):

The facility shall report all allegations of sexual assault/harassment, including third party and anonymous reports, to the facility's designated investigators, to the MCYD PREA Coordinator.

What was heard, as part of a systematic review of evidence:

Interview with superintendent (juvenile detention director):

The juvenile detention director stated all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, are reported directly to designated facility investigators.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence relied upon in making the compliance determinations:

- Montgomery County Youth Detention Policy: Agency Reporting Duties revised 01/01/2024
- Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities)
- Interview with superintendent (juvenile detention director)
- Interview with random sample of staff

Reasoning and analysis (by provision):

115.362 (a)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: When the agency or facility learns that a resident is subject to a substantial risk of imminent sexual abuse, it takes immediate action to protect the resident (i.e., it takes some action to assess and implement appropriate protective measures without unreasonable delay).

In the past 12 months there were no incidents where the agency or facility determined that a resident was subject to substantial risk of imminent sexual abuse.

Montgomery County Youth Detention Policy: Agency Reporting Duties (page 1): When Montgomery County Youth Detention learns that a resident is subject to a substantial risk of imminent sexual abuse, it shall take immediate action to protect the resident.

Detainees at risk of sexual victimization will receive special management in accordance with 3-JDF-3E-0-I. Special Management plans will be used when there is credible evidence that a detainee is at risk of attack, retaliation, or other dangers in general population.

The facility will take appropriate steps to protect all detainees and staff that report sexual abuse or cooperate with sexual abuse investigations from retaliation by other detainees or staff. The facility will employ multiple measures including housing changes, Special Management Plans, and "No Contact Status".

What was heard, as part of a systematic review of evidence:

Interview with superintendent (juvenile detention director):

The juvenile detention director stated immediate actions will be taken to protect a resident who is subject to a substantial risk of imminent sexual abuse. Actions they would take to protect a resident would include conferring with staff, providing close observation, and room change to front of pod for increased supervision.

Interviews with 12 random staff:

All 12 staff stated if a resident is subject to a substantial risk of imminent sexual abuse, the facility would take immediate protective actions. Actions they would take

to protect a resident would include keeping a resident separated from potential harm, reporting, providing one-on-one supervision, no contact status, and placing a resident in a safe area.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

115.363 Reporting to other confinement facilities

Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence relied upon in making the compliance determinations:

- Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities)
- Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024
- Interview with agency head designee (juvenile detention director)
- Interview with superintendent (juvenile detention director)

Reasoning and analysis (by provision):

115.363 (a)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The agency has a policy requiring that, upon receiving an allegation that a resident was sexually abused while confined at another facility, the head of the facility must notify the head of the facility or appropriate office of the agency or facility where sexual abuse is alleged to have occurred. The agency's policy also requires that the head of the facility notify the appropriate investigative agency.

In the past 12 months, the facility received one allegation that a resident was abused while confined at another facility. The PAQ incorrectly stated there were three allegations received.

Montgomery County Youth Detention Policy 12.7.1 (pages 15-16):

Upon receiving an allegation that a juvenile was sexually abused while confined at another facility, the head of the facility that received the allegation shall notify the head of the facility or appropriate office of the facility where the alleged abuse occurred and shall also notify the appropriate investigative agency, using MCYF Form 115.363 Reporting to Other Confinement Facilities.

Documentation of allegations that a resident was abused while confined at another facility:

There were no allegations that a resident was abused while confined at another facility.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.363 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

Agency policy requires that the facility head provides such notification as soon as possible, but no later than 72 hours after receiving the allegation.

Montgomery County Youth Detention Policy 12.7.1 (page 16):

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

Documentation of allegations that a resident was abused while confined at another facility:

See 115.341 (a).

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.363 (c)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The agency or facility documents that it has provided such notification within 72 hours of receiving the allegation.

Montgomery County Youth Detention Policy 12.7.1 (page 16):

See 115.363 (b).

Documentation of allegations that a resident was abused while confined at another facility:

See 115.341 (a).

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.363 (d)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

Agency/facility policy requires that allegations received from other facilities/agencies are investigated in accordance with the PREA standards. The facility head or agency office that receives such notification shall ensure that the allegation is investigated in accordance with these standards.

	<p>In the past 12 months, no allegations of sexual abuse were received from other facilities.</p> <p>Montgomery County Youth Detention Policy 12.7.1 (page 16): The facility administrator that receives such notification shall ensure that the allegation is investigated in accordance with PREA standards.</p> <p>Documentation of allegations that a resident was abused while confined at another facility: See 115.363 (a).</p> <p>What was heard, as part of a systematic review of evidence: Interviews with agency head designee and superintendent (juvenile detention director): The juvenile detention director stated the facility director where the alleged incident occurs is contacted and the allegation is referred for investigation. There were no reported allegations of sexual abuse received from other facilities.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>
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115.364	Staff first responder duties
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 • First Responder Guidelines for Sexual Assault at Montgomery County Youth Detention • First Responder Checklist for Sexual Assault Allegations • PREA Refresher: Juvenile Detention First Responder Duties • PREA acknowledgement statements • Interviews with security staff and non-security staff first responders • Interviews with a random sample of staff • Interviews with residents who reported a sexual abuse <p>Reasoning and analysis (by provision): 115.364 (a)</p> <p>What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency has a first responder policy for allegations of sexual abuse. The policy requires that, upon learning of an allegation that a resident was sexually abused,</p>

the first security staff member to respond to the report separate the alleged victim and abuser. The policy requires that, upon learning of an allegation that a resident was sexually abused, the first security staff member to respond to the report preserve and protect any crime scene until appropriate steps can be taken to collect any evidence. The policy requires that, if the abuse occurred within a time period that still allows for the collection of physical evidence, the first security staff member to respond to the report request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating. The policy requires that, if the abuse occurred within a time period that still allows for the collection of physical evidence, the first security staff member to respond to the report ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.

In the past 12 months, the number of allegations that a resident was sexually abused: 1

Of these allegations:

- The number of times the first security staff member to respond to the report separated the alleged victim and abuser: 0
- The number of allegations where staff were notified within a time period that still allowed for the collection of physical evidence: 0

Montgomery County Youth Detention Policy 12.7.1 (page 16):

Upon learning of an allegation that a juvenile was sexually abused, the first staff member to respond to the report shall be required to:

- a. Separate the alleged victim and abuser;
- b. Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence.
- c. If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged victim and the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.
- d. The staff first responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify supervisor. Refer to MCYD Form 115.364 First Responder Checklist and MCYF Form 115.364. I First Responder Guidelines for Sexual Assault.

Review of response to allegations:

There was one allegation of sexual abuse that was reported after the resident left the facility.

What was heard, as part of a systematic review of evidence:

Interviews with security staff and non-security staff first responders:

Staff stated they are knowledgeable of their first responder duties if they are the first person to be alerted that a resident has allegedly been the victim of sexual abuse.

	<p>Interviews with residents who reported a sexual abuse: There were no residents, present during the onsite phase of the audit, who reported a sexual abuse allegation.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p> <p>Reasoning and analysis (by provision): 115.364 (b) What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency policy requires that if the first staff responder is not a security staff member, that responder shall be required to:</p> <ul style="list-style-type: none"> • Request that the alleged victim not take any actions that could destroy physical evidence. • Notify security staff. <p>Of the allegations that a resident was sexually abused made in the past 12 months, the number of times a non-security staff member was the first responder: 0</p> <p>Review of response to allegations: See 115.364 (a).</p> <p>What was heard, as part of a systematic review of evidence: Interviews with 12 random staff and security staff and non-security staff first responders: Staff stated they are knowledgeable of their first responder duties if they are the first person to be alerted that a resident has allegedly been the victim of sexual abuse. All staff are mandated reporters and would therefore follow the same policy requirements as security staff if they are a first responder.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>
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115.365	Coordinated response
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention PREA Written Institutional Plan • Interview with superintendent (juvenile detention director)

	<p>Evidence (corrective action):</p> <ul style="list-style-type: none"> • Written institutional plan to coordinate actions taken in response to an incident of sexual abuse (08/04/2025) <p>Reasoning and analysis (by provision): 115.365 (a)</p> <p>What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The facility has developed a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership.</p> <p>Coordinated Response Plan for Sexual Abuse Allegations: The auditor reviewed the Montgomery County Youth Detention PREA Written Institutional Plan and observed the plan is a summary of the PREA standards and Montgomery County Youth Detention policy and procedures. The auditor observed the plan does not coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership.</p> <p>What was heard, as part of a systematic review of evidence: Interview with superintendent (juvenile detention director): The juvenile detention director stated the facility is in the process of developing a plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership in response to an incident of sexual abuse.</p> <p>Finding: Based on this analysis, the facility is not substantially compliant with this provision and corrective action is required.</p> <p>The facility developed a written institutional plan to coordinate actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership (08/04/2025).</p>
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115.366	Preservation of ability to protect residents from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention Pre-Audit Questionnaire (Juvenile Facilities) • Interview with agency head designee (juvenile detention director)

	<p>Reasoning and analysis (by provision): 115.366 (a)</p> <p>What was read, as part of a systematic review of evidence: Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency, facility, or any other governmental entity responsible for collective bargaining on the agency’s behalf has not entered into a collective bargaining agreement since the last PREA audit.</p> <p>What was heard, as part of a systematic review of evidence: Interview with agency head designee (juvenile detention director): The juvenile detention director stated the agency has not entered into or renewed any collective bargaining agreements.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>
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115.367	Agency protection against retaliation
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy: Agency Protection Against Retaliation revised 01/01/2024 • Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 • Interview with agency head designee (juvenile detention director) • Interview with superintendent (juvenile detention director) • Interview with designated staff member charged with monitoring retaliation (juvenile detention compliance officer) • Interviews with residents who reported a sexual abuse <p>Evidence (corrective action):</p> <ul style="list-style-type: none"> • Alabama Department of Youth Services Protections Against Retaliation form (05/29/2025) • Statement regarding implementing retaliation monitoring form (05/29/2025) <p>Reasoning and analysis (by provision): 115.367 (a)</p> <p>What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency has a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff.</p>

The agency designates the assistant juvenile detention director and juvenile detention compliance officer with monitoring for possible retaliation.

Montgomery County Youth Detention Policy: Agency Protection Against Retaliation (page 1):

The Juvenile Detention Director, Assistant Detention Director, Juvenile Detention Compliance Officer, and Juvenile Detention Supervisors will take immediate steps to protect all detainees and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other detainees or staff and shall designate which staff members or departments are charged with monitoring retaliation.

Montgomery County Youth Detention Policy 12.7.1 (page 2):

Any employee or juvenile of the Montgomery County Youth Detention is prohibited from retaliating against other employees or juveniles for reporting allegations of sexual assault/harassment. Employees and/or juveniles who are found to have violated this prohibition shall be subject to disciplinary action.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.367 (b)

What was read, as part of a systematic review of evidence:

Documentation of any protective measures taken:

No documented evidence was provided for review.

Montgomery County Youth Detention Policy: Agency Protection Against Retaliation (page 1):

Montgomery County Youth Detention shall employ multiple protection measures, such as housing changes or transfers for detainees (victims or abusers) removal of alleged staff or detainee abusers from contact with victims, and emotional support services for detainees or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.

What was heard, as part of a systematic review of evidence:

Interviews with agency head designee and superintendent (juvenile detention director):

The juvenile detention director stated they would protect residents and staff from retaliation for sexual abuse or sexual harassment allegations through establishing report with the residents, making housing changes or transfers, and providing emotional support services.

Interview with designated staff member charged with monitoring retaliation (juvenile detention compliance officer):

The juvenile detention compliance officer stated the role they play in preventing retaliation against residents and staff who report sexual abuse or sexual

harassment, or against those who cooperate with sexual abuse or sexual harassment investigations includes making housing changes or transfers, removing alleged abusers, providing emotional support services. The different measures they would take to protect residents and staff from retaliation include separation or removal from facility. They stated they initiate contact with residents who have reported sexual abuse as soon as possible after being advised of the reported abuse.

Interviews with residents who reported a sexual abuse:

There were no residents, present during the onsite phase of the audit, who reported a sexual abuse allegation.

Documentation of any protective measures taken:

No documented evidence of protective measures taken was provided for review.

What was observed as part of a systematic review of evidence:

Site review:

There were no residents in isolation (for risk of sexual victimization/who allege to have suffered sexual abuse) or residents who reported a sexual abuse.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The facility provided a statement that the Alabama Department of Youth Services Protections Against Retaliation form would be implemented (05/29/2025). The form includes an area to document protective measures taken.

Reasoning and analysis (by provision):

115.367 (c)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The agency and/or facility monitors the conduct or treatment of residents or staff who reported sexual abuse and of residents who were reported to have suffered sexual abuse to see if there are any changes that may suggest possible retaliation by residents or staff.

- The length of time that the agency and/or facility monitors the conduct or treatment: 90 days
- The agency/facility acts promptly to remedy any such retaliation.
- The agency/facility continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need.
- The number of times an incident of retaliation occurred in the past 12 months: 0

Montgomery County Youth Detention Policy: Agency Protection Against Retaliation (page 2):

For at least 90 days following a report of sexual abuse, Montgomery County Youth Detention shall monitor the conduct or treatment of detainees or staff who reported the sexual abuse and of detainees who were reported to have suffered sexual abuse

to see if there are changes that may suggest possible retaliation by the detainee or staff, and shall act promptly to remedy any such retaliation. Items to be monitored by the facility will include any detainee incident and disciplinary reports, housing changes, negative performance reviews or reassignment of staff. Youth Detention shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need.

Documentation of monitoring efforts:

No documented evidence of monitoring efforts was provided for review.

What was heard, as part of a systematic review of evidence:

Interview with superintendent (juvenile detention director):

The juvenile detention director stated the measures they would take when they suspect retaliation would be to provide separation and interact with the residents and staff.

Interview with designated staff member charged with monitoring retaliation (juvenile detention compliance officer):

The juvenile detention compliance officer stated things they look for to detect possible retaliation includes standoffish behavior, changes in behavior, and residents not participating in activities. Monitoring the conduct and treatment of residents and staff who report the sexual abuse of a resident or were reported to have suffered sexual abuse would be conducted for a minimum of 90 days or until no retaliation is expressed or the resident is released from the facility.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The facility provided a statement that the Alabama Department of Youth Services Protections Against Retaliation form would be implemented (05/29/2025). The form includes documented weekly monitoring for 90 days or longer.

Reasoning and analysis (by provision):

115.367 (d)

What was read, as part of a systematic review of evidence:

Montgomery County Youth Detention Policy: Agency Protection Against Retaliation (page 2):

In the case of detainees, such monitoring shall also include periodic status checks.

Documentation of monitoring in case of residents:

See 115.367 (c).

What was heard, as part of a systematic review of evidence:

Interview with designated staff member charged with monitoring retaliation (juvenile detention compliance officer):

See 115.367 (c).

Finding:
Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

See 115.367 (c).

Reasoning and analysis (by provision):
115.367 (e)
What was read, as part of a systematic review of evidence:
 Montgomery County Youth Detention Policy: Agency Protection Against Retaliation (page 2):
 If any other individual who cooperates with an investigation expresses a fear of retaliation, the Youth Facility shall take appropriate measures to protect that individual against retaliation.

Documentation of protective measures taken:
 See 115.367 (b).

What was heard, as part of a systematic review of evidence:
 Interviews with agency head designee and superintendent (juvenile detention director):
 The juvenile detention director stated if an individual who cooperates with an investigation expresses fear of retaliation, measures the agency takes to protect that individual against retaliation includes moving to another wing or safe area. Measures taken when retaliation is suspected would be to provide separation and interact with the residents and staff.

Finding:
Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

See 115.367 (b).

Reasoning and analysis (by provision):
115.367 (f)
What was read, as part of a systematic review of evidence:
 Montgomery County Youth Detention Policy: Agency Protection Against Retaliation (page 2):
 The Youth Facility's obligation to monitor shall terminate if the facility determines that the allegation is unfounded.

Finding:
Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

115.368	Post-allegation protective custody
	Auditor Overall Determination: Meets Standard

	<p>Auditor Discussion</p> <p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy: Post-allegation Protective Custody revised 01/01/2024 • Interview with superintendent (juvenile detention director) • Interviews with residents in isolation (for risk of sexual victimization) <p>Reasoning and analysis (by provision):</p> <p>115.368 (a):</p> <p>What was read, as part of a systematic review of evidence:</p> <p>The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The facility has a policy that residents who allege to have suffered sexual abuse may only be placed in isolation as a last resort if less restrictive measures are inadequate to keep them and other residents safe, and only until an alternative means of keeping all residents safe can be arranged.</p> <p>No residents who alleged to have suffered sexual abuse who were placed in isolation in the past 12 months.</p> <p>Montgomery County Youth Detention Policy: Post-allegation Protective Custody (page 1):</p> <p>During any period of isolation, Montgomery County Youth Detention will provide detainees with large muscle exercise, required educational programming or special education services, daily visits from medical or mental health staff, and access to programs to the extent possible.</p> <p>What was heard, as part of a systematic review of evidence:</p> <p>Interview with superintendent (juvenile detention director):</p> <p>The juvenile detention director stated the facility has not used segregated housing in this manner.</p> <p>Interviews with residents in isolation (for risk of sexual victimization):</p> <p>There were no residents in isolation during the onsite phase of the audit.</p> <p>Finding:</p> <p>Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>
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115.371	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion

Evidence relied upon in making the compliance determinations:

- Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities)
- Montgomery County Youth Detention Policy: Criminal and Administrative Agency Investigations revised 01/01/2024
- Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024
- Memorandum regarding criminal investigations dated 04/30/2024
- Montgomery County Youth Detention PREA Refresher: Juvenile Detention Investigations
- National PREA Resource Center Training Module 7: Interviewing Juvenile Sexual Abuse Victims by the Moss Group
- Interview with superintendent (juvenile detention director)
- Interview with PREA coordinator
- Interview with PREA compliance manager
- Interview with investigative staff (criminal investigations)
- Interviews with residents who reported a sexual abuse (N/A)

Evidence (corrective action):

- Documented proof of receipt of specialized training topics required by § 115.334 (b) for administrative investigators and criminal investigators (01/22/2026)
- Offence reports for allegations of sexual abuse or sexual harassment (01/17/2026)
- Statement regarding investigation reports being submitted to the district attorney's office (01/17/2026)

Findings (by provision):

115.371 (a)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency/facility has a policy related to criminal and administrative agency investigations.

Montgomery County Youth Detention Policy: Criminal and Administrative Agency Investigations (page 1):

Written policy, procedure, and practice require that an investigation is conducted and documented whenever a sexual assault is alleged, threatened, or occurs.

What was heard, as part of a systematic review of evidence:

Interview with investigative staff (Montgomery County Sheriff's Office Criminal Investigations Division):

The investigator stated an investigation following an allegation of sexual abuse or sexual harassment is initiated immediately. Anonymous or third-party reports of sexual abuse and sexual harassment are investigated in the same manner as all investigations.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.371 (b)

What was read, as part of a systematic review of evidence:

Where sexual abuse is alleged, the agency shall use investigators who have received special training in sexual abuse investigations involving juvenile victims pursuant to § 115.334.

Montgomery County Youth Detention Policy: Criminal and Administrative Agency Investigations (page 1):

Montgomery County Youth Detention will use investigators who have specialized training in sexual abuse investigations involving youth that are employed by the Montgomery County Sheriff Department.

Review of training records/logs of investigative staff:

Through corrective action, training records for investigative staff were provided for review. The administrative investigators completed the training required by Standard 115.331 on March 11, 2025, and completed the specialized investigative topics on November 18, 2025. Acknowledgment forms were provided to document completion of the specialized topics, and Employee Training Forms were provided to document receipt of the Standard 115.331 training.

The criminal investigators completed the specialized investigative topics through a variety of trainings, including Investigating Sexual Assault Investigations, Sex Offender Investigator Program, Human Trafficking, Child Sex Trafficking Investigations, among others. Employee Training Forms were provided to document receipt of the Standard 115.331 training. These forms were dated January 22, 2026.

What was heard, as part of a systematic review of evidence:

Interview with investigative staff (Montgomery County Sheriff's Office Criminal Investigations Division):

The investigator did not state they have received the specialized training topics required by § 115.334 for conducting sexual abuse investigations in confinement settings.

Finding:

Based on this analysis, the facility is not substantially compliant with this provision and corrective action is completed.

- Criminal investigators completed Standard 115.331 training topics January 22, 2026.
- Administrative investigators completed Standard 115.331 training topics March 11, 2025.
- Administrative investigators completed the specialized investigative topics on November 18, 2025.

Reasoning and analysis (by provision):

115.371 (c)

What was read, as part of a systematic review of evidence:

Montgomery County Youth Detention Policy: Criminal and Administrative Agency Investigations (page 1):

Montgomery County Youth Detention will ensure that investigators gather and preserve direct and circumstantial evidence, interview relevant parties, and review prior complaints against alleged abuser.

Investigation reports:

Through corrective action, two offense reports were provided for review, along with a statement indicating that the full investigative reports have been forwarded to the district attorney's office.

What was heard, as part of a systematic review of evidence:

Interview with investigative staff (Montgomery County Sheriff's Office Criminal Investigations Division):

The investigator described the investigation process and stated the first steps in initiating an investigation would depend on how complaint is made. Interviews would be conducted by Child Protect Children's Advocacy Center. A standard criminal investigation would include gathering evidence. The investigation process would involve evidence collection and interviews based on the time frame of when alleged abuse occurred. Direct and circumstantial evidence would include interviews and statements with witnesses. A rape kit is conducted by a pediatric SANE with One Place Family Justice.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

- **Offense reports were provided January 17, 2026.**
- **Statement indicating that the full investigative reports have been forwarded to the district attorney's office was provided January 17, 2026.**

Reasoning and analysis (by provision):

115.371 (d)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The agency does not terminate an investigation solely because the source of the allegation recants the allegation.

Montgomery County Youth Detention Policy: Criminal and Administrative Agency Investigations (page 2):

Montgomery County Youth Detention will not terminate investigations solely because report is withdrawn or because alleged abuser or victim is no longer employed.

What was heard, as part of a systematic review of evidence:

Interview with investigative staff (Montgomery County Sheriff's Office Criminal Investigations Division):

The investigator stated an investigation does not terminate if the source of the allegation recants the allegation.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.371 (e)

What was read, as part of a systematic review of evidence:

Montgomery County Youth Detention Policy: Criminal and Administrative Agency Investigations (page 2):

Montgomery County Youth Detention will not conduct compelled interviews if there is a likelihood of criminal prosecution without consulting prosecutors.

Investigation reports:

See 115.371 (c).

What was heard, as part of a systematic review of evidence:

Interview with investigative staff (Montgomery County Sheriff's Office Criminal Investigations Division):

The investigator stated when they discover evidence that a prosecutable crime may have taken place, Child Protect Children's Advocacy Center would interviews and they would consult with the DA when needed.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

See 115.371 (c).

Reasoning and analysis (by provision):

115.371 (f)

What was read, as part of a systematic review of evidence:

Montgomery County Youth Detention Policy: Criminal and Administrative Agency Investigations (page 2):

Montgomery County Youth Detention will assess credibility of alleged victim, suspect, or witness on an individual basis, not based on person's status as detainee or staff.

What was heard, as part of a systematic review of evidence:

Interview with investigative staff (Montgomery County Sheriff's Office Criminal Investigations Division):

The investigator stated they judge the credibility of an alleged victim, suspect, or witness based on the evidence. They confirmed that a resident who alleges sexual

abuse is not required to submit to a polygraph examination or truth telling device as a condition for proceeding with an investigation. They stated it is not protocol and has not occurred.

Interviews with residents who reported a sexual abuse:

There were no residents, present during the onsite phase of the audit, who reported a sexual abuse allegation.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.371 (g)

What was read, as part of a systematic review of evidence:

Montgomery County Youth Detention Policy: Criminal and Administrative Agency Investigations (page 1):

Montgomery County Youth Detention will investigate all allegations of sexual misconduct promptly, thoroughly, and objectively. Montgomery County Youth Detention's documentation will address the following:

- Include effort to determine whether staff actions or failure to act contributed to abuse.
- Document investigations in written reports that include description of the evidence, reasoning behind credibility assessments, and facts and findings.

What was heard, as part of a systematic review of evidence:

Interview with investigative staff (Montgomery County Youth Detention administrator investigator):

The administrative investigator will be interviewed after completion of required training.

Investigation reports:

See 115.371 (c).

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

See 115.371 (c).

Reasoning and analysis (by provision):

115.371 (h)

What was read, as part of a systematic review of evidence:

Criminal investigation reports:

See 115.371 (c).

What was heard, as part of a systematic review of evidence:

Interview with investigative staff (Montgomery County Sheriff's Office Criminal Investigations Division):

The investigator stated criminal investigations are documented and contain rape kits, physical evidence, statements, video evidence, etc.

Finding:

Based on this analysis, the facility is not substantially compliant with this provision and corrective action is completed.

See 115.371 (c).

Reasoning and analysis (by provision):

115.371 (i)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Substantiated allegations of conduct that appear to be criminal are referred for prosecution.

Two substantiated allegations of conduct that appear to be criminal were referred for prosecution since the last PREA audit.

Montgomery County Youth Detention Policy: Criminal and Administrative Agency Investigations (page 2):

Montgomery County Youth Detention will refer substantiated allegations that appear to be criminal for prosecution.

Review of cases referred for prosecution:

See 115.371 (c).

What was heard, as part of a systematic review of evidence:

Interview with investigative staff (Montgomery County Sheriff's Office Criminal Investigations Division):

The investigator stated when an allegation is substantiated and appears to be criminal the case file is submitted to the DA's office for prosecution.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

See 115.371 (c).

Reasoning and analysis (by provision):

115.371 (j)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency retains all written reports pertaining to the administrative or criminal investigation of alleged sexual abuse or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years.

Montgomery County Youth Detention Policy: Criminal and Administrative Agency Investigations (page 1):

Montgomery County Youth Detention will investigate all allegations of sexual

misconduct promptly, thoroughly, and objectively. Montgomery County Youth Detention's documentation will retain all reports for as long as alleged abuser is detained or employed, plus five years, unless detainee commits abuse and applicable law requires shorter retention period.

Investigation reports:
See 115.371 (c).

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

See 115.371 (c).

Reasoning and analysis (by provision):

115.371 (k)

What was read, as part of a systematic review of evidence:

Montgomery County Youth Detention Policy: Criminal and Administrative Agency Investigations (page 2):

See 115.371 (d).

What was heard, as part of a systematic review of evidence:

Interview with investigative staff (Montgomery County Sheriff's Office Criminal Investigations Division):

The investigator stated an investigation would proceed when a staff member alleged to have committed sexual abuse or sexual harassment terminates employment prior to a completed investigation into his/her conduct. They also stated when a victim alleging sexual abuse or sexual harassment leaves the facility prior to a completed investigation into the allegation they would continue with the investigation.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.371 (m)

What was read, as part of a systematic review of evidence:

Montgomery County Youth Detention Policy: Criminal and Administrative Agency Investigations (page 2):

Montgomery County Youth Detention will cooperate with Montgomery County Sheriff Department Investigators and stay informed about process.

What was heard, as part of a systematic review of evidence:

Interview with Superintendent (juvenile detention director):

The juvenile detention director stated they would stay informed of the progress of a sexual abuse investigation through contact with the investigative agency to ensure findings are shared.

	<p>Interview with PREA coordinator: The PREA coordinator stated outside agencies do not investigate sexual abuse investigations. Investigations are completed by the Montgomery County Sheriff's Office.</p> <p>Interview with PREA compliance manager: The PREA compliance manager stated if an outside agency investigates allegations of sexual abuse they would maintain contact and provide documentation.</p> <p>Interview with investigative staff (Montgomery County Sheriff's Office Criminal Investigations Division): The investigator stated if an outside agency investigates allegations of sexual abuse, they would provide information as requested.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>
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115.372	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Interview with investigative staff (criminal investigations) <p>Reasoning and analysis (by provision): 115.372 (a): What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency imposes a standard of a preponderance of the evidence or a lower standard of proof when determining whether allegations of sexual abuse or sexual harassment are substantiated.</p> <p>What was heard, as part of a systematic review of evidence: Interview with investigative staff (Montgomery County Sheriff's Office Criminal Investigations Division): The investigator stated allegations of sexual abuse or sexual harassment are substantiated when there is probable cause and beyond reasonable doubt.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>

115.373	Reporting to residents
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy: Reporting to Residents revised 01/01/2024 • Interview with superintendent (juvenile detention director) • Interview with investigative staff (internal administrative investigations) • Interviews with residents who reported a sexual abuse <p>Evidence (corrective action):</p> <ul style="list-style-type: none"> • Alabama Department of Youth Services Juvenile Notification of Investigative Outcome form (05/29/2025) • Statement regarding informing residents of outcome of investigations (05/29/2025) <p>Reasoning and analysis (by provision): 115.373 (a) What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency has a policy requiring that any resident who makes an allegation that he or he suffered sexual abuse in an agency facility is informed, verbally or in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation by the agency.</p> <p>In the past 12 months:</p> <ol style="list-style-type: none"> 1. The number of criminal and/or administrative investigations of alleged resident sexual abuse that were completed by the agency/facility: 2 2. Of the investigations that were completed of alleged sexual abuse, the number of residents who were notified, verbally or in writing, of the results of the investigation: 1 <p>Montgomery County Youth Detention Policy: Reporting to Residents (page 1): Upon completion of an investigation into a detainee's allegations of sexual abuse suffered at the Montgomery County, the facility will inform the detainee in writing as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfound.</p> <p>Review of resident outcome notifications: No documented evidence of notifications to residents for the 12 month audit period were provided for review. One memorandum regarding a verbal notification made March 2, 2023, was provided.</p> <p>What was heard, as part of a systematic review of evidence:</p>

Interview with superintendent (juvenile detention director):

The juvenile detention director stated the facility notifies a resident who makes an allegation of sexual abuse, that the allegation has been determined to be substantiated, unsubstantiated, or unfounded.

Interview with investigative staff (Montgomery County Sheriff's Office Criminal Investigations Division):

The investigator stated they are aware that when a resident makes an allegation of sexual abuse, the resident must be informed as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The facility provided a statement that the Alabama Department of Youth Services Juvenile Notification of Investigative Outcome form was implemented (05/29/2025). The form documents that a resident was been informed that an allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation.

Reasoning and analysis (by provision):

115.373 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: If an outside entity conducts such investigations, the agency requests the relevant information from the investigative entity in order to inform the resident of the outcome of the investigation.

In the past 12 months:

1. The number of investigations of alleged resident sexual abuse in the facility that were completed by an outside agency: 0
2. Of the outside agency investigations of alleged sexual abuse that were completed, the number of residents alleging sexual abuse in the facility who were notified verbally or in writing of the results of the investigation: N/A

Montgomery County Youth Detention Policy: Reporting to Residents (page 1):

If Montgomery County Youth Detention did not conduct the investigation, the facility will request the relevant information from the Montgomery County Department of Human Resources, or Montgomery Sheriff's Department in order to inform the detainee of the outcome of the investigation.

Review of resident outcome notifications:

See 115.373 (a).

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.373 (c)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

Following a resident's allegation that a staff member has committed sexual abuse against the resident, the agency/facility subsequently informs the resident (unless the agency/facility has determined that the allegation is unfounded) whenever:

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

There have been no substantiated or unsubstantiated complaints (i.e., not unfounded) of sexual abuse committed by a staff member against a resident in the past 12 months.

Montgomery County Youth Detention Policy: Reporting to Residents (pages 1-2):

Following a detainee's allegation that staff a member has committed sexual abuse against the

detainee, Montgomery County Youth Detention shall subsequently inform the detainees (unless the facility has determined the allegation is unfounded whenever):

- The staff member is no longer assigned to the detainee's wing;
- The staff member is no longer employed at Youth Detention;
- Youth Detention learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or
- Youth Detention learns that the staff member has been convicted on a charge related to sexual abuse within the facility.

Review of resident outcome notifications:

See 115.373 (a).

What was heard, as part of a systematic review of evidence:

Interviews with residents who reported a sexual abuse:

There were no residents present during the onsite phase of the audit who reported a sexual abuse.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The Alabama Department of Youth Services Juvenile Notification of Investigative Outcome form was implemented (05/29/2025). The auditor reviewed the form and observed the form includes the standard provision requirements.

Reasoning and analysis (by provision):

115.373 (d)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Following a resident's allegation that he or she has been sexually abused by another resident in an agency facility, the agency subsequently informs the alleged victim whenever:

- The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or
- The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.

Montgomery County Youth Detention Policy: Reporting to Residents (page 2):

Following a detainee's allegation that he or she has been sexually abused by another detainee, the Youth Facility shall inform the alleged victim whenever:

- Youth Detention learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or
- Youth Detention learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.

Review of resident outcome notifications:

See 115.373 (a).

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The Alabama Department of Youth Services Juvenile Notification of Investigative Outcome form was implemented (05/29/2025). The auditor reviewed the form and observed the form includes the standard provision requirements.

Reasoning and analysis (by provision):

115.373 (e)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency has a policy that all notifications to residents described under this standard are documented.

In the past 12 months:

- The number of notifications to residents that were made pursuant to this standard: 0
- The number of those notifications that were documented: N/A

Montgomery County Youth Detention Policy: Reporting to Residents (page 2):

All such notifications or attempted notifications will be documented by Montgomery County Youth Detention.

Review of resident outcome notifications:

See 115.373 (a).

	<p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.</p> <p>See 115.373 (a).</p> <p>Reasoning and analysis (by provision): 115.373 (f)</p> <p>What was read, as part of a systematic review of evidence: Montgomery County Youth Detention Policy: Reporting to Residents (page 2): Youth Detention's obligation to report under this standard shall be terminated if the detainee is released from Youth Detention's custody.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>
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115.376	Disciplinary sanctions for staff
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy: Disciplinary Sanctions for Staff revised 01/01/2024 • Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 <p>Evidence (corrective action):</p> <ul style="list-style-type: none"> • Recommendation for Personnel Actions forms (records of the two terminations for violation of sexual abuse or harassment policies) (07/29/2025) • Montgomery County Sheriff's Office Arrest Report (two reports to law enforcement for violations of agency sexual abuse policies) (07/29/2025) <p>Reasoning and analysis (by provision): 115.376 (a)</p> <p>What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Staff is subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.</p> <p>Montgomery County Youth Detention Policy: Disciplinary Sanctions for Staff (page 1): Staff of Montgomery County Youth Detention shall be subject to disciplinary sanctions up to and including termination for violating the facility 's sexual abuse or</p>

sexual harassment policies.

Montgomery County Youth Detention Policy 12.7.1 (page 1):

It is the policy of the Montgomery County Youth Detention to ensure that sexual activity between staff and juveniles, volunteers or contract personnel and juveniles, regardless of consensual status, is prohibited and subject to administrative and criminal disciplinary sanctions. All employees, volunteers and independent contractors are expected to have a clear understanding that the facility strictly prohibits any type of sexual relationship with an individual under department supervision. Such conduct is considered to be a serious breach of the standards of conduct and these relationships will not be tolerated.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.376 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

In the past 12 months:

- The number of staff from the facility that have violated agency sexual abuse or sexual harassment policies: 2
- The number of those staff from the facility that have been terminated (or resigned prior to termination) for violating agency sexual abuse or sexual harassment policies: 2

Montgomery County Youth Detention Policy: Disciplinary Sanctions for Staff (page 2):

Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.

Montgomery County Youth Detention Policy 12.7.1 (page 1):

Engaging in a personal and/or sexual relationship may result in employment termination and/or termination of the contractual or volunteer status.

Review of records of terminations, resignations or other sanctions for violation of sexual abuse or harassment policies:

No records of the two terminations for violation of sexual abuse or harassment policies have been provided for review.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

Records of the two terminations for violation of sexual abuse policies were required for review and a compliance determination. Recommendation for Personnel Actions forms were provided 07/9/2025 indicating one officer was dismissed and the other officer resigned.

Reasoning and analysis (by provision):

115.376 (c)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.

In the past 12 months, the number of staff from the facility that have been disciplined, short of termination, for violation of agency sexual abuse or sexual harassment policies: 0

Montgomery County Youth Detention Policy: Disciplinary Sanctions for Staff (page 2):

Disciplinary sanctions for violations of Youth Detention policies relating to sexual or sexual harassment (other than engaging in sexual abuse) shall be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff members with similar histories.

Review of records of disciplinary sanctions taken against staff for violations of the agency sexual abuse or sexual harassment policies in the past 12 months:

There were no disciplinary sanctions taken against staff for violations of the agency sexual abuse or sexual harassment policies in the past 12 months.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.376 (d)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.

In the past 12 months, the number of staff from the facility that have been reported to law enforcement or licensing boards following their termination (or resignation prior to termination) for violating agency sexual abuse or sexual harassment policies: 2

Montgomery County Youth Detention Policy: Disciplinary Sanctions for Staff (page 2):

All terminations for violations of Montgomery County Youth Detention sexual abuse/sexual harassment policies, or resignations by staff who would have been

	<p>terminated if not for their resignation, shall be reported to law enforcement agencies, unless the activity was not criminal, and to any relevant licensing bodies.</p> <p>Review of records of reports to law enforcement for violations of agency sexual abuse or sexual harassment policies: No records of reports to law enforcement for violations of agency sexual abuse or sexual harassment policies have been provided for review.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.</p> <p>The two reports to law enforcement for violations of agency sexual abuse policies were requested for review and a compliance determination. The facility provided the Montgomery County Sheriff's Office Arrest Report for the 4th quarter of 2024 indicating the two staff were arrested.</p>
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115.377	Corrective action for contractors and volunteers
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy: Corrective Action for Contractors and Volunteers dated 01/12/2021 • Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 • Montgomery County Youth Detention Volunteer Orientation manual • Interview with superintendent (juvenile detention director) <p>Reasoning and analysis (by provision): 115.377 (a) What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Agency policy requires that any contractor or volunteer who engages in sexual abuse be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies. Agency policy requires that any contractor or volunteer who engages in sexual abuse be prohibited from contact with residents.</p> <p>In the past 12 months, no contractors or volunteers have been reported to law enforcement agencies and relevant licensing bodies for engaging in sexual abuse of</p>

residents.

Montgomery County Youth Detention Policy: Corrective Action for Contractors and Volunteers (page 1):

Any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with detainees and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to the relevant licensing body.

Montgomery County Youth Detention Policy 12.7.1 (page 1):

It is the policy of the Montgomery County Youth Detention to ensure that sexual activity between staff and juveniles, volunteers or contract personnel and juveniles, regardless of consensual status, is prohibited and subject to administrative and criminal disciplinary sanctions. All employees, volunteers and independent contractors are expected to have a clear understanding that the facility strictly prohibits any type of sexual relationship with an individual under department supervision. Such conduct is considered to be a serious breach of the standards of conduct and these relationships will not be tolerated.

Montgomery County Youth Detention Volunteer Orientation manual (page 9):

The manual informs volunteers that any violation of this policy will result in termination of services and possible criminal charges being filed.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.377 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The facility takes appropriate remedial measures and considers whether to prohibit further contact with residents in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.

Montgomery County Youth Detention Policy: Corrective Action for Contractors and Volunteers (pages 1-2):

The facility shall take appropriate remedial measures, and shall consider whether to prohibit further contact with detainees, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.

Montgomery County Youth Detention Policy 12.7.1 (page 1):

Engaging in a personal and/or sexual relationship may result in employment termination and/or termination of the contractual or volunteer status.

What was heard, as part of a systematic review of evidence:

Interview with superintendent (juvenile detention director):

The juvenile detention director stated actions the facility would take in the case of any violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer. The contractor or volunteer would be denied access to the facility. There

	<p>are no examples of contractors or volunteers violating the agency’s sexual abuse or sexual harassment policies.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>
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115.378	Interventions and disciplinary sanctions for residents
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	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy: Intervention and Disciplinary Sanctions for Residents revised 01/01/2024 • Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 • Montgomery County Youth Detention Detainee Handbook/ Sexual Assault Guide • Interview with superintendent (juvenile detention director) <p>Reasoning and analysis (by provision): 115.378 (a)</p> <p>What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Residents are subject to disciplinary sanctions only pursuant to a formal disciplinary process following an administrative finding that the resident engaged in resident-on-resident sexual abuse. Residents are subject to disciplinary sanctions only pursuant to a formal disciplinary process following a criminal finding of guilt for resident-on-resident sexual abuse.</p> <p>In the past 12 months:</p> <ul style="list-style-type: none"> • The number of administrative findings of resident-on-resident sexual abuse that have occurred at the facility: 0 • The number of criminal findings of guilt for resident-on-resident sexual abuse that have occurred at the facility: 0 <p>Montgomery County Youth Detention Policy 12.7.1 (page 24): A juvenile may be subject to disciplinary sanctions by the Disciplinary Committee only pursuant to a formal disciplinary process following an administrative finding that the juvenile engaged in juvenile-on-juvenile sexual abuse or following a criminal finding of guilt for juvenile-on-juvenile sexual abuse.</p> <p>Montgomery County Youth Detention Policy: Intervention and Disciplinary Sanctions for Residents (page 1): Montgomery County Youth Detention strictly prohibits any form of sexual activities</p>

between detainee and detainee, such conduct is subject to administrative disciplinary sanctions and may result in criminal prosecution.

Detainees will receive appropriate interventions if they engage in detainee on detainee sexual abuse. Decisions regarding which types of interventions to use in particular cases, including treatment referrals, counseling, education programs, or disciplinary sanctions are made with the goal of promoting improved behavior by the detainee and ensuring the safety of other detainees and staff.

To the extent Montgomery County Youth Detention itself is not responsible for investigating allegations of sexual abuse, the Youth Facility informs the Montgomery County Sheriff Department of the allegations. The Montgomery County Sheriff's Department refers detainees for criminal prosecution when appropriate.

Montgomery County Youth Detention disciplinary report and hearing process requires that the facility shall utilize a consistent, responsive, and fair disciplinary process. Discipline shall not be applied as a retaliatory measure and no form of corporal or degrading punishment, cruel or unusual punishment, punishment that interferes with eating or sleeping, or punishment that endangers a detainee physically or psychologically shall be imposed.

Montgomery County Youth Detention Detainee Handbook/ Sexual Assault Guide (pages 9-11):

The auditor reviewed the handbook and observed residents are informed about the disciplinary process, prohibited behaviors, and sanctions for those found to have participated in prohibited behaviors.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.378 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

In the event a disciplinary sanction for resident-on resident sexual abuse results in the isolation of a resident, the facility policy requires that residents in isolation have daily access to large muscle exercise, legally required educational programming, and special education services. In the event a disciplinary sanction for resident-on resident sexual abuse results in the isolation of a resident, residents in isolation receive daily visits from a medical or mental health care clinician. In the event a disciplinary sanction for resident-on resident sexual abuse results in the isolation of a resident, residents in isolation have access to other programs and work opportunities to the extent possible.

In the past 12 months:

- The number of residents placed in isolation as a disciplinary sanction for resident-on resident sexual abuse: 0
- The number of residents placed in isolation as a disciplinary sanction for resident-

on resident sexual abuse, who were denied daily access to large muscle exercise, and/or legally required educational programming, or special education services: N/A

- The number of residents placed in isolation as a disciplinary sanction for resident-on resident sexual abuse, who were denied access to other programs and work opportunities: N/A

Montgomery County Youth Detention Policy 12.7.1 (page 24):

Any disciplinary sanctions shall be commensurate with the nature and circumstances of the abuse committed, the juvenile's disciplinary history, and the sanctions imposed for comparable offenses by other juveniles with similar histories. In the event a disciplinary sanction results in the isolation of a juvenile, facilities shall not deny the juvenile daily large-muscle exercise or access to any legally required educational programming or special education services. Juveniles in isolation shall receive daily visits from a medical or mental health care clinician. Juveniles shall also have access to other programs and work opportunities to the extent possible. Documentation will be made using MCYD Record of Room Confinement/Observation/Suicide Watch Form and the wing logbooks.

Montgomery County Youth Detention Policy: Intervention and Disciplinary Sanctions for Residents (pages 1-2):

Seventy-two hours room confinement will be used in the following circumstances: detainee on detainee sexual contact; detainee on detainee sexual assault, detainee on staff assault, and detainee on detainee assault.

Detainee placed in room confinement shall have a room, food, clothing, and other services comparable to those available to detainees in the general population. A Court Therapist will conduct daily rounds to evaluate all detainees who are confined. (If a detainee enters confinement after daily rounds have been conducted, the detainee may be evaluated during the next rounds, but no later than 24 hours after the start of confinement).

The Court Therapist will document daily rounds on each confined detainee on the individual record of confinement sheet and sign in on the wing where the detainee is being housed.

What was heard, as part of a systematic review of evidence:

Interview with superintendent (juvenile detention director):

The juvenile detention director stated residents are subjected to disciplinary sanctions and are provided mental health services following an administrative or criminal finding the resident engaged in resident-on-resident sexual abuse. The sanctions would be proportionate to the nature and circumstances of the abuses committed, the residents' disciplinary histories, and the sanctions imposed for similar offenses by other residents with similar histories. Isolation is used for safety.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.378 (c)

What was read, as part of a systematic review of evidence:

Montgomery County Youth Detention Policy 12.7.1 (page 24):

The Disciplinary Committee shall consider whether a juvenile's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed. The Disciplinary Committee may want to consult with the juvenile's Probation Officer or Court Therapists for additional information on the juvenile's mental status before imposing a sanction.

What was heard, as part of a systematic review of evidence:

Interview with superintendent (juvenile detention director):

The juvenile detention director stated mental disability or mental illness is considered when determining sanctions.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.378 (d)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The facility offers therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse. If the facility offers therapy, counseling, or other interventions designed to address and correct the underlying reasons or motivations for abuse, the facility considers whether to require the offending resident to participate in such interventions as a condition of access to any rewards-based behavior management system or other behavior-based incentives. Access to general programming or education is not conditional on participation in such interventions.

Montgomery County Youth Detention Policy 12.7.1 (pages 24-25):

If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, the facility shall consider whether to offer the offending juvenile participation in such interventions. The facility may require participation in such interventions as a condition of access to any rewards-based behavior management system or other behavior-based incentives, but not as a condition to access to general programming or education.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.378 (e)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The agency disciplines residents for sexual contact with staff only upon finding that

the staff member did not consent to such contact.

Montgomery County Youth Detention Policy 12.7.1 (page 25):

Facilities may discipline a juvenile for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.378 (f)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The agency prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation.

Montgomery County Youth Detention Policy 12.7.1 (page 25):

For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.378 (g)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The agency prohibits all sexual activity between residents. The agency deems such activity to constitute sexual abuse only if it determines that the activity is coerced.

Montgomery County Youth Detention Policy: Intervention and Disciplinary Sanctions for Residents (page 1):

Montgomery County Youth Detention strictly prohibits any form of sexual activities between detainee and detainee, such conduct is subject to administrative disciplinary sanctions and may result in criminal prosecution.

Montgomery County Youth Detention Policy 12.7.1 (page 2):

Juvenile on juvenile sexual activity, sexual assault, sexual harassment, sexual conduct and sexual contact as defined in this policy and within the Alabama Revised Code are prohibited.

Montgomery County Youth Detention Policy 12.7.1 (page 25):

MCYD prohibits all sexual activity between juveniles and may discipline juveniles for such activity. MCYD, however, does deem such activity to constitute sexual abuse if

it determines that the activity is not coerced.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

115.381 Medical and mental health screenings; history of sexual abuse

Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence relied upon in making the compliance determinations:

- Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities)
- Montgomery County Youth Detention Policy: Medical and Mental Health Screenings; History of Sexual Abuse revised 01/01/2024
- Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024
- Request for Court Therapist Assessment forms
- Interview with staff responsible for risk screening
- Interviews with medical and mental health staff
- Interviews with residents who disclose sexual victimization at risk screening

Reasoning and analysis (by provision):

115.381 (a)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: All residents at this facility who have disclosed any prior sexual victimization during a screening pursuant to §115.341 are offered a follow-up meeting with a medical or mental health practitioner. The follow-up meeting was offered within 14 days of the intake screening. Medical and mental health staff maintain secondary materials (e.g., form, log) documenting compliance with the above required services. In the past 12 months, the percent of residents who disclosed prior victimization during screening who were offered a follow up meeting with a medical or mental health practitioner: 100%

Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 (page 10): In consultation with the Juvenile Detention Officers, the Court Therapist shall incorporate appropriate treatment referrals to address any identified issues. If the screening indicates that a resident has experienced prior sexual victimization or has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, staff shall ensure that the juvenile is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening.

Document review: The auditor reviewed Request for Court Therapist Assessment forms for two residents who disclosed prior victimization and observed the follow-up

meetings occurred within 14 days of the intake screening.

What was heard, as part of a systematic review of evidence:

Interview with staff responsible for risk screening:

The staff responsible for risk screening stated if a screening indicates that a resident has experienced prior sexual victimization, whether in an institutional setting or in the community, they are offered a follow-up meeting with a medical/and or mental health practitioner within 14 days.

Interviews with PREA coordinator:

The PREA coordinator stated all residents are referred to the court therapist.

Interviews with residents who disclose sexual victimization at risk screening:

No residents were identified who disclosed sexual victimization at risk screening.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.381 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

All residents who have previously perpetrated sexual abuse, as indicated during the screening pursuant to § 115.341, are offered a follow-up meeting with a mental health practitioner. The follow-up meeting was offered within 14 days of the intake screening. Mental health staff maintain secondary materials (e.g., form, log) documenting compliance with the above required services.

In the past 12 months, the percent of residents of residents who previously perpetrated sexual abuse, as indicated during screening, who were offered a follow up meeting with a mental health practitioner: 100%

Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 (page 10):
See 115.381 (a).

Document review: The auditor reviewed Request for Court Therapist Assessment forms for four residents who previously perpetrated sexual abuse and observed the follow-up meetings all occurred within 14 days of the intake screening.

What was heard, as part of a systematic review of evidence:

Interview with staff responsible for risk screening:

The staff responsible for risk screening stated if a screening indicates that a resident has previously perpetrated sexual abuse, whether in an institutional setting, or in the community, they are offered a follow-up meeting with a medical/and or mental health practitioner within 14 days.

Interviews with PREA coordinator:

The PREA coordinator stated all residents are referred to the court therapist.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.381 (c)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health practitioners.

Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 (pages 10-11): Any information related to sexual abuse victimization or abusiveness that occurred in an institutional setting shall be strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, education, and program assignments. Refer to MCYD Form 115.341.2 Guidelines for PREA Shared Information.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.381 (d)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Medical and mental health practitioners obtain informed consent from residents before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the resident is under the age of 18.

Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 (page 11): Medical and mental health practitioners shall obtain informed consent from juveniles before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the detainee is under the age of 18, using MCYD Form 115.381 informed Consent for documentation.

What was heard, as part of a systematic review of evidence:

Interview with medical staff:

The nurse stated mental health staff obtain informed consent from residents before reporting about prior sexual victimization that did not occur in an institutional setting.

Interview with mental health staff:

The court therapist supervisor stated they obtain informed consent from residents before reporting about prior sexual victimization that did not occur in an institutional setting. All residents over the age of 14 sign a consent form.

Finding:

Based on this analysis, the facility is substantially compliant with this

provision and corrective action is not required.

115.382 Access to emergency medical and mental health services

Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence relied upon in making the compliance determinations:

- Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities)
- Montgomery County Youth Detention Policy: Access to Emergency Medical and Mental Health Care Services revised 01/01/2024
- Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024
- Memorandum of understanding between Montgomery County Youth Detention and Child Protect Children’s Advocacy Center dated 01/31/2025
- Agreement between One Place Family Justice Center and Standing Together Against Rape (STAR) Program and Montgomery County Commission (MCC) (unsigned and not dated)
- Interviews with medical and mental health staff
- Interviews with residents who reported a sexual abuse (N/A)
- Interviews with security staff and non-security staff first responders
- Site Review Observations

Reasoning and analysis (by provision):

115.382 (a)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Resident victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services. The nature and scope of such services are determined by medical and mental health practitioners according to their professional judgment. Medical and mental health staff maintain secondary materials (e.g., form, log) documenting the timeliness of emergency medical treatment and crisis intervention services that were provided; the appropriate response by non-health staff in the event health staff are not present at the time the incident is reported; and the provision of appropriate and timely information and services concerning contraception and sexually transmitted infection prophylaxis.

Montgomery County Youth Detention Policy: Access to Emergency Medical and Mental Health Care (page 1):

Victims of sexual abuse will have timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by the medical and mental health practitioners according to their professional judgment.

Any detainee reported or believed to have been sexually assaulted shall be

immediately referred to the Designated Health Authority or his designee for appropriate first aid and emergency care/ The detainee will be sent to One Place Family Justice Center or the emergency room for further examination, treatment, and collection of forensic evidence. The first responders will take preliminary steps to protect the victim.

Montgomery County Youth Detention will seek agreements with local hospitals to provide inpatient and emergency services. These agreements shall be reviewed and updated based on the agreement terms as required by ACA/DYS standard 3-JDF-4C-15.

Montgomery County Youth Detention Policy 12.7.1 (page 19):

Facility medical staff shall request the local rape crisis center/hospital to take a history that includes an examination to document the extent of physical injury and to determine if referral to another medical facility and/or services is indicated. The rape crisis center/hospital shall include:

- i. Collection of evidence from the victim, using a kit approved by the appropriate authority;
- ii. Giving the evidence collected by the rape crisis center/hospital directly to local law enforcement;
- iii. Tests for sexually transmitted diseases (for example, HIV, Gonorrhea, Hepatitis, and other diseases) and provision of counseling, as appropriate; and
- iv. Prophylactic treatment and follow-up for sexually transmitted diseases.

Document review: The auditor reviewed the memorandum of understanding between Montgomery County Youth Detention and Child Protect Children's Advocacy Center dated 01/31/2025. Child Protect Children's Advocacy Center would provide crisis intervention services. The auditor reviewed the agreement between One Place Family Justice Center Standing Together Against Rape (STAR) Program and Montgomery County Commission (MCC). STAR would provide emergency medical treatment.

What was heard, as part of a systematic review of evidence:

Interviews with medical and mental health staff:

The nurse and court therapist supervisor both stated the nature and scope of these services provided at the facility would be determined according to their professional judgment.

Interviews with residents who reported a sexual abuse:

There were no residents present during the onsite phase of the audit who reported a sexual abuse.

Community outreach:

The auditor contacted Child Protect Children's Advocacy Center and confirmed victim advocates would be available to provide emotional support services to a victim of sexual abuse.

Finding:

Based on this analysis, the facility is substantially compliant with this

provision and corrective action is not required.

Reasoning and analysis (by provision):

115.382 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:
If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, staff first responders shall take preliminary steps to protect the victim pursuant to § 115.362 and shall immediately notify the appropriate medical and mental health practitioners.

Montgomery County Youth Detention Policy: Access to Emergency Medical and Mental Health Care Services (page 2):

When a detainee informs a staff member that he/she has been sexually assaulted, or there is a suspicion or a report of sexual assault from anyone, the staff member receiving the information will immediately inform the supervisor on duty and refer the detainee to the contract medical services staff for an initial evaluation and determination of the need for an outside referral for further testing and evaluation. If possible, the preselected hospital's emergency room or Standing Together Against Rape (STAR) should have received training in the collection of forensic evidence.

What was heard, as part of a systematic review of evidence:

Interviews with security staff and non-security staff first responders:
Staff first responders stated they would protect the victim and notify the appropriate medical and mental health practitioners.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.382 (c)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:
Resident victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate. Medical and mental health staff maintain secondary materials documenting the timeliness of emergency medical treatment and crisis intervention services that were provided; the appropriate response by non-health staff in the event health staff are not present at the time the incident is reported; and the provision of appropriate and timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.

Montgomery County Youth Detention Policy 12.7.1 (pages 19-20):

When the juvenile returns to the facility the on-site nursing staff shall ensure that the juvenile victim received testing to include, but not be limited to: Trichomonas

	<p>(females), Gonorrhea, Chlamydia, Syphilis, Hepatitis B, and HIV. If testing did not occur at the rape crisis center/hospital, these tests shall be performed at the facility. Medical follow-up shall reflect retesting five to six months after the initial test as indicated by the facility contract physician.</p> <p>The on-site nursing staff shall ensure that the aggressor, if a juvenile, shall receive testing to include but not be limited to: Trichomonas (females), Gonorrhea, Chlamydia, Syphilis, Hepatitis B, and HIV. Medical follow-up shall reflect retesting five to six months after the initial test as indicated by the facility contract physician.</p> <p>What was heard, as part of a systematic review of evidence: Interviews with medical and mental health staff: The nurse stated victims of sexual abuse would be offered timely information about access to emergency contraception and sexually transmitted infection prophylaxis offsite.</p> <p>Interviews with residents who reported a sexual abuse: See 115.382 (a).</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p> <p>Reasoning and analysis (by provision): 115.382 (d) What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>
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115.383	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy: Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers revised 01/01/2024

- Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024
- Interviews with medical and mental health staff
- Interviews with residents who reported a sexual abuse (N/A)

Reasoning and analysis (by provision):

115.383 (a)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The facility offers medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.

Montgomery County Youth Detention Policy: Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers (page 1):

Youth Detention will offer ongoing medical and mental health evaluations and treatment referrals to all detainees who have been victimized by sexual abuse.

What was observed as part of a systematic review of evidence:

Site review:

The auditor observed medical facilities during the site review. Services would be available at the facility and offsite at One Place Family Justice Center.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.383 (b)

What was read, as part of a systematic review of evidence:

Montgomery County Youth Detention Policy: Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers (page 1):

The evaluation and treatments referrals for sexual abuse victims will include appropriate follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to or placement in other facilities, or their release from custody.

Review of medical records:

There were no medical records or secondary documentation.

What was heard, as part of a systematic review of evidence:

Interviews with medical and mental health staff:

The nurse and court therapist supervisor both stated evaluation and treatment of residents who have been victimized would include follow-up medical and mental health services and referrals when needed. The court therapist supervisor stated they would provide counseling to address immediate needs and referrals for ongoing care. The nurse stated they would provide follow-up medical treatment and address any injuries.

Interviews with residents who reported a sexual abuse:

There were no residents present during the onsite phase of the audit who reported a sexual abuse.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.383 (c)

What was read, as part of a systematic review of evidence:

Review of medical records:

See 115.383 (b).

Montgomery County Youth Detention Policy: Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers (page 1):

Youth Detention will provide victims of sexual abuse medical and mental health services consistent with the community level of care.

What was heard, as part of a systematic review of evidence:

Interviews with medical and mental health staff:

The nurse and court therapist supervisor both stated medical and mental health services are consistent with the community level of care.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.383 (d)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

Female victims of sexual abusive vaginal penetration while incarcerated are offered pregnancy tests.

Montgomery County Youth Detention Policy: Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers (page 1):

Youth victims of sexually abusive vaginal penetration while in custody will be offered pregnancy tests.

What was heard, as part of a systematic review of evidence:

Interviews with female residents who reported a sexual abuse:

There were no female residents who reported a sexual abuse during the past 12 months.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.383 (e)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:
If pregnancy results from sexual abuse while incarcerated, victims receive timely and comprehensive information about, and timely access to, all lawful pregnancy-related medical services.

Montgomery County Youth Detention Policy: Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers (page 1):

If pregnancy results from conduct specified, such victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services.

What was heard, as part of a systematic review of evidence:

Interviews with medical and mental health staff:

The nurse stated if pregnancy results from sexual abuse while incarcerated, victims are given timely information and access to all lawful pregnancy-related services.

Interviews with female residents who reported a sexual abuse:

See 115.383 (d).

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.383 (f)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:
Resident victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate.

Montgomery County Youth Detention Policy: Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers (page 1):

Youth victims of sexual abuse while detained will be offered tests for sexually transmitted infections as medically appropriate.

Review of medical records:

See 115.383 (b).

What was heard, as part of a systematic review of evidence:

Interviews with medical and mental health staff:

The medical staff stated victims of sexual abuse shall be offered tests for sexually transmitted infections as medically appropriate.

Interviews with residents who reported a sexual abuse:

See 115.383 (b).

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.383 (g)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: Treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

Montgomery County Youth Detention Policy: Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers (pages 1-2):

Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident. Youth Detention will pay for medical expenses incurred on behalf of the detainee.

What was heard, as part of a systematic review of evidence:

Interviews with residents who reported a sexual abuse:
See 115.383 (b).

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.383 (h)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The facility attempts to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offers treatment when deemed appropriate by mental health practitioners.

Review of mental health records:

There were no applicable mental health records to review.

What was heard, as part of a systematic review of evidence:

Interview with mental health staff:

The court therapist supervisor staff stated if requested by the court, a mental health evaluation of all known resident-on-resident abusers would be conducted, and they would be offered treatment if appropriate. The evaluation would occur immediately upon receiving the order.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

115.386	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard

Auditor Discussion

Evidence relied upon in making the compliance determinations:

- Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities)
- Montgomery County Youth Detention Policy: Sexual Abuse Incident Review revised 01/01/2024
- Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024
- Sexual assault response team meeting minutes
- Interview with superintendent (juvenile detention director)
- Interview with PREA compliance manager
- Interview with incident review team

Evidence (corrective action):

- Statement regarding implementing sexual abuse review team meetings (05/29/2025)
- Alabama Department of Youth Services Sexual Abuse Critical Incident Review form (05/31/2025)

Reasoning and analysis (by provision):

115.386 (a)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The facility conducts a sexual abuse incident review at the conclusion of every sexual abuse criminal or administrative investigation unless the allegation has been determined to be unfounded.

In the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility, excluding only “unfounded” incidents: 2

Montgomery County Youth Detention Policy 12.7.1 (page 25):

The facility PREA Monitor shall conduct a sexual abuse incident review using MCYD Form 115.386 Sexual Abuse Critical Incident Review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded.

Review of completed criminal or administrative investigations of sexual abuse:
No documented evidence of sexual abuse incident reviews was provided for review.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The facility provided a statement (05/29/2025) that the Alabama Department of Youth Services Sexual Abuse Critical Incident Review form was implemented (05/31/2025) and will be used to document sexual abuse incident reviews.

Reasoning and analysis (by provision):

115.386 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:
The facility ordinarily conducts a sexual abuse incident review within 30 days of the conclusion of the criminal or administrative sexual abuse investigation.

In the past 12 months, the number of criminal and/or administrative investigations of alleged sexual abuse completed at the facility that were followed by a sexual abuse incident review within 30 days, excluding only “unfounded” incidents: 2

Montgomery County Youth Detention Policy 12.7.1 (page 26):
Such review shall ordinarily occur within 30 days of the conclusion of the investigation.

Review of completed criminal or administrative investigations of sexual abuse:
See 115.386 (a).

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

See 115.386 (a).

Reasoning and analysis (by provision):

115.386 (c)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:
The sexual abuse incident review team includes upper-level management officials and allows for input from line supervisors, investigators, and medical or mental health practitioners.

Montgomery County Youth Detention Policy 12.7.1 (page 26):
The review team shall include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners.

Documentation of review team minutes or reports:
See 115.386 (a).

The facility provided quarterly sexual assault response team meeting minutes that do not demonstrate compliance with the standard provision requirements.

What was heard, as part of a systematic review of evidence:

Interview with superintendent (juvenile detention director):
The juvenile detention director stated the facility has a sexual abuse incident review team; the team includes upper-level management officials and allows for input from line supervisors, investigators, and medical or mental health practitioners.

Finding:

Based on this analysis, the facility is substantially compliant with this

provision and corrective action is completed.

- **See 115.386 (a).**
- **The Alabama Department of Youth Services Sexual Abuse Critical Incident Review form includes signature lines for upper-level management officials and allows for input from line supervisors, investigators, and medical or mental health practitioners.**

Reasoning and analysis (by provision):

115.386 (d)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The facility prepares a report of its findings from sexual abuse incident reviews, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1)-(d)(5) of this section, and any recommendations for improvement and submits such report to the facility head and PREA compliance manager.

Montgomery County Youth Detention Policy 12.7.1 (page 26):

The review team shall:

- a. Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse;
- b. Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or, gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility;
- c. Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse;
- d. Assess the adequacy of staffing levels in that area during different shifts;
- e. Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and
- f. Prepare a report of its findings, including but not necessarily limited to determinations made and any recommendations for improvement and submit such report to the facility head and MCYF PREA Coordinator.

Documentation of review team minutes or reports:

See 115.386 (a).

What was heard, as part of a systematic review of evidence:

Interview with superintendent (juvenile detention director):

The juvenile detention director stated being a part of the sexual abuse incident review team. They stated the team considers whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or was motivated or otherwise caused by other group dynamics at the facility. The area in the facility where the incident allegedly occurred is examined to assess whether physical barriers in the area may enable abuse. Adequacy of staffing levels in the area is assessed for different shifts. They confirmed the team assesses whether monitoring technology should be deployed or augmented to supplement supervision by staff.

	<p>Interview with PREA compliance manager (juvenile detention compliance officer): The juvenile detention compliance officer stated the facility conducts a sexual abuse incident review. The facility prepares a report of its findings from the review, including any determinations per standard 115.386 (d)-1 through (d)- 5 and any recommendations for improvement. They stated they are part of the review. They stated they have noticed no trends.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.</p> <p>See 115.386 (a). The Alabama Department of Youth Services Sexual Abuse Critical Incident Review form includes the standard provision requirements.</p> <p>Reasoning and analysis (by provision): 115.386 (e) What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The facility implements the recommendations for improvement or documents its reasons for not doing so.</p> <p>Montgomery County Youth Detention Policy 12.7.1 (page 26): The facility shall implement the recommendations for improvement or shall document its reasons for not doing so.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.</p> <ul style="list-style-type: none"> • See 115.386 (a). • The Alabama Department of Youth Services Sexual Abuse Critical Incident Review form includes the standard provision requirements.
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115.387	Data collection
	<p>Auditor Overall Determination: Meets Standard</p> <hr/> <p>Auditor Discussion</p> <p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy: Data Collection revised 01/01/2024 • Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 • Survey of Sexual Victimization Substantiated Incident Form (Juvenile) • Survey of Sexual Victimization, 2021 State Juvenile Systems Summary Form

- Survey of Sexual Victimization, 2022 State Juvenile Systems Summary Form
- Survey of Sexual Victimization, 2023 State Juvenile Systems Summary Form

Reasoning and analysis (by provision):

115.387 (a)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The agency collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions. The standardized instrument includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Victimization conducted by the Department of Justice.

Montgomery County Youth Detention Policy: Data Collection (page 1):

Montgomery County Youth Detention will collect accurate data for every allegation of sexual abuse at the facility using the Written Report of Suspected Child Abuse/neglect Form, Critical Incident Debriefing Reports, and Special Management Plans.

Montgomery County Youth Detention Policy 12.7.1 (page 27):

MCYD shall collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using the DOJ Form SSV-IJ Survey of Sexual Violence Incident Report, standardized instrument and definitions.

Review of incident-based data collection:

The auditor reviewed the Survey of Sexual Victimization Substantiated Incident Form (Juvenile) for verification the agency uses a standardized instrument and set of definitions.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.387 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The agency aggregates the incident-based sexual abuse data at least annually.

Montgomery County Youth Detention Policy: Data Collection (page 1):

Montgomery County Youth Detention will aggregate the incident-based sexual abuse at least annually.

Montgomery County Youth Detention Policy 12.7.1 (page 27):

MCYD shall aggregate the incident-based sexual abuse data at least annually using MCYD Form 115.387 PREA Data Report.

Review of incident-based data collection:

The auditor reviewed the aggregated data from 2021-2023. The facility completed Survey of Sexual Victimization, State Juvenile Systems Summary Forms.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.387 (c)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The standardized instrument includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Victimization (SSV) conducted by the Department of Justice.

Montgomery County Youth Detention Policy: Data Collection (page 1):

The incident-based collected will include at a minimum, the data necessary to answer all questions required by the Department of Justice.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.387 (d)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.

Montgomery County Youth Detention Policy 12.7.1 (page 27):

MCYD shall maintain, review, and collect data as needed from all available incident based documents, including reports, investigation files, and sexual abuse incident reviews.

Montgomery County Youth Detention Policy: Data Collection (page 1):

Montgomery County Youth Detention will maintain, review, and collect data as needed from all available incident-based documents, including all reports, investigation files, and sexual abuse incident reviews.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.387 (e)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency obtains incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents. The data from private facilities complies with SSV reporting regarding content.

	<p>Montgomery County Youth Detention does not contract for the confinement of its residents. The detention center contracts for the confinement of residents from other counties.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p> <p>Reasoning and analysis (by provision): 115.387 (f) What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency provided the Department of Justice (DOJ) with data from the previous calendar year upon request. The agency reported to the U.S. Department of Justice Bureau of Justice Statistics in 2021 using the Survey of Sexual Victimization, State Juvenile Systems Summary Form.</p> <p>Montgomery County Youth Detention Policy 12.7.1 (page 28): Upon request, MCYF shall provide all such data from the previous calendar year to the Department of Justice no later than June 30 of each year on the U.S. Justice Department's Survey of Sexual Violence, Form SSV-5.</p> <p>Montgomery County Youth Detention Policy: Data Collection (page 2): Upon request from Department Justice, Montgomery County Youth Detention will provide all such data from the previous year to the Department of Justice no later than June 30.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>
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115.388	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 • Interview with agency head designee (juvenile detention director) • Interview with PREA coordinator • Interview with PREA compliance manager <p>Evidence (corrective action):</p> <ul style="list-style-type: none"> • 2024 Annual report (06/02/2025)

Reasoning and analysis (by provision):

115.388 (a)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The agency reviews data collected and aggregated pursuant to §115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, and training, including:

- Identifying problem areas;
- Taking corrective action on an ongoing basis; and
- Preparing an annual report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole.

Montgomery County Youth Detention Policy 12.7.1 (page 28):

The MCYD PREA Coordinator shall annually review data collected and aggregated in order to assess and improve the effectiveness of the MCYF sexual abuse prevention, detection, and response policies and practices, and training including:

- a. Identifying problem areas;
- b. Taking corrective action on an ongoing basis; and
- c. Preparing an annual report of findings and corrective actions for each facility, as well as the agency as a whole.

Review of documentation of corrective action plans:

No annual reports were provided for review.

What was heard, as part of a systematic review of evidence:

Interviews with agency head designee (juvenile detention director), PREA coordinator, and PREA compliance manager:

The juvenile detention director, PREA coordinator, and PREA compliance manager all stated the agency reviews data collected and aggregated pursuant to § 115.387 in order to assess, and improve the effectiveness, of its sexual abuse and prevention, detection, and response policies, and training.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The facility developed an annual report for 2024 and published it to the agency's website (06/02/2025). The auditor reviewed the annual report and observed it includes corrective actions taken for two allegations of staff-on juvenile sexual abuse.

Reasoning and analysis (by provision):

115.388 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

The annual report includes a comparison of the current year's data and corrective actions with those from prior years. The annual report provides an assessment of the agency's progress in addressing sexual abuse.

Montgomery County Youth Detention Policy 12.7.1 (page 28):
The MCYD Annual PREA Report shall include a comparison of the current year's data and corrective actions with those from prior years and shall provide an assessment of DYS's progress in addressing sexual abuse.

Review of annual reports:
No annual reports were provided for review.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The facility developed an annual report for 2024 and published it to the agency's website (06/02/2025). The report includes a comparison of data from 2022, 2023, and 2024. Additionally, the report includes corrective actions taken for two allegations of staff-on juvenile sexual abuse in 2024 and no corrective actions were indicated for 2022 and 2023. Lastly, the annual report provides an assessment of the agency's progress in addressing sexual abuse.

Reasoning and analysis (by provision):

115.388 (c)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:
The agency makes its annual report readily available to the public at least annually through its website. The annual reports are approved by the agency head.

Montgomery County Youth Detention Policy 12.7.1 (page 28):
The MCYD Annual PREA Report shall be approved by the Juvenile Detention Director and made readily available to the public through an annual publication.

Agency website review:
The auditor reviewed the agency's website and observed no annual reports were published.

What was heard, as part of a systematic review of evidence:

Interviews with agency head designee (juvenile detention director):
The juvenile detention director stated they approve annual reports.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The facility published the 2024 annual report at <https://www.mc-ala.org/departments/youth-facility> (06/02/2025). The auditor observed the report is approved by the assistant juvenile detention director/ PREA coordinator.

Reasoning and analysis (by provision):

115.388 (d)

	<p>What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: When the agency redacts material from an annual report for publication the redactions are limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility. The agency indicates the nature of material redacted.</p> <p>Montgomery County Youth Detention Policy 12.7.1 (page 28): MCYD may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility but must indicate the nature of the material redacted.</p> <p>Review of published annual reports: See 115.388 (c).</p> <p>What was heard, as part of a systematic review of evidence: Interviews with PREA coordinator: The PREA coordinator stated the types of material are typically redacted from the annual report include personal identifying information.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.</p> <p>The facility published the 2024 annual report at https://www.mc-ala.org/departments/youth-facility (06/02/2025). The auditor reviewed the annual report and observed no identifying information.</p>
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115.389	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Montgomery County Youth Detention Policy 12.7.1 dated 01/01/2024 • Interview with PREA coordinator <p>Evidence (corrective action):</p> <ul style="list-style-type: none"> • 2024 Annual report (06/02/2025) <p>Reasoning and analysis (by provision): 115.389 (a)</p> <p>What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:</p>

The agency ensures that incident-based and aggregate data are securely retained.

What was heard, as part of a systematic review of evidence:

Interview with PREA coordinator:

The PREA coordinator stated the agency reviews data collected and aggregated in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, and training. The agency ensures that data collected is securely retained.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.389 (b)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

Agency policy requires that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public, at least annually, through its website.

Montgomery County Youth Detention Policy 12.7.1 (page 29):

MCYD shall make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website.

Website review:

The auditor reviewed the agency's website and observed no annual reports were published.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

The facility published the 2024 annual report at <https://www.mc-ala.org/departments/youth-facility> (06/02/2025).

Reasoning and analysis (by provision):

115.389 (c)

What was read, as part of a systematic review of evidence:

The Montgomery County Youth Detention Pre-Audit Questionnaire indicated:

Before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers.

Montgomery County Youth Detention Policy 12.7.1 (page 29):

Before making aggregated sexual abuse data publicly available, MCYF shall remove all personal identifiers.

Review of publicly available sexual abuse data:

See 115.389 (b).

	<p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.</p> <p>See 115.389 (b).</p> <p>The auditor reviewed the 2024 published annual report and observed personal identifiers were not included in the report.</p> <p>Reasoning and analysis (by provision): 115.389 (d) What was read, as part of a systematic review of evidence: The Montgomery County Youth Detention Pre-Audit Questionnaire indicated: The agency maintains sexual abuse data sexual abuse data collected pursuant to §115.387 for at least 10 years after the date of initial collection, unless Federal, State, or local law requires otherwise.</p> <p>Montgomery County Youth Detention Policy 12.7.1 (page 29): All case records associated with claims of sexual abuse, including incident reports, investigative reports, juvenile information, case disposition, medical and counseling evaluation findings, and recommendations for post-release treatment and/or counseling shall be retained in accordance with the MCYF record retention schedule.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>
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115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention Pre-Audit Questionnaire (PAQ) • Interviews • Research • Policy Review • Document Review • Observations during onsite review of facility <p>Reasoning and analysis (by provision): 115.401 (a) During the three-year period starting on August 20, 2013, and the current audit cycle, Montgomery County Youth Detention was audited for compliance with the Federal PREA Standards in 2018, 2021, and in 2025.</p>

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.401 (b)

Montgomery County Youth Detention is a single entity agency.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.401 (h)

The auditor was given access to, and the ability to observe, all areas of Montgomery County Youth Detention.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.401 (i)

The auditor was not initially permitted to request and receive copies of all relevant documents (including electronically stored information). Additional documents requested were provided through corrective action.

Based on this analysis, the facility is substantially compliant with this provision and corrective action is completed.

Documents were requested and provided for the following Standards: 15.317, 115.322, 115.371, and 115.376.

Reasoning and analysis (by provision):

115.401 (m)

The auditor was permitted to conduct private interviews with residents at the facility.

Finding:

Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.

Reasoning and analysis (by provision):

115.401 (n):

The auditor sent an audit notice to the facility six weeks prior to the on-site audit. The facility confirmed the audit notice was posted by emailing pictures of the posted audit notices. The audit notice contained contact information for the auditor. The residents were permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel. No confidential information or correspondence was received.

	<p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>
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115.403	Audit contents and findings
	<p>Auditor Overall Determination: Meets Standard</p>
	<p>Auditor Discussion</p>
	<p>Evidence relied upon in making the compliance determinations:</p> <ul style="list-style-type: none"> • Montgomery County Youth Detention PREA Audit: Pre-Audit Questionnaire (Juvenile Facilities) • Website Review • Document Review <p>Reasoning and analysis (by provision): 115.403 (f): What was observed as part of a systematic review of evidence: The auditor reviewed the Montgomery County Youth Detention publications and reports. Final PREA Audit Reports are published on the agency’s website at https://www.mc-ala.org/departments/youth-facility.</p> <p>Finding: Based on this analysis, the facility is substantially compliant with this provision and corrective action is not required.</p>

Appendix: Provision Findings		
115.311 (a)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment?	yes
	Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment?	yes
115.311 (b)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes
115.311 (c)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.)	yes
	Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.)	yes
115.312 (a)	Contracting with other entities for the confinement of residents	
	If this agency is public and it contracts for the confinement of its residents with private agencies or other entities including other government agencies, has the agency included the entity's obligation to adopt and comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents.)	na
115.312 (b)	Contracting with other entities for the confinement of residents	

	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents OR the response to 115.312(a)-1 is "NO".)	na
115.313 (a)	Supervision and monitoring	
	Does the agency ensure that each facility has developed a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect residents against sexual abuse?	yes
	Does the agency ensure that each facility has implemented a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect residents against sexual abuse?	yes
	Does the agency ensure that each facility has documented a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect residents against sexual abuse?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The prevalence of substantiated and unsubstantiated incidents of sexual abuse?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Generally accepted juvenile detention and correctional/secure residential practices?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any judicial findings of inadequacy?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any findings of inadequacy from Federal investigative agencies?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate	yes

	staffing levels and determining the need for video monitoring: Any findings of inadequacy from internal or external oversight bodies?	
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: All components of the facility's physical plant (including "blind-spots" or areas where staff or residents may be isolated)?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The composition of the resident population?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: The number and placement of supervisory staff?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Institution programs occurring on a particular shift?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any applicable State or local laws, regulations, or standards?	yes
	Does the agency ensure that each facility's staffing plan takes into consideration the 11 criteria below in calculating adequate staffing levels and determining the need for video monitoring: Any other relevant factors?	yes
115.313 (b)	Supervision and monitoring	
	Does the agency comply with the staffing plan except during limited and discrete exigent circumstances?	yes
	In circumstances where the staffing plan is not complied with, does the facility fully document all deviations from the plan? (N/A if no deviations from staffing plan.)	na
115.313 (c)	Supervision and monitoring	
	Does the facility maintain staff ratios of a minimum of 1:8 during resident waking hours, except during limited and discrete exigent circumstances? (N/A only until October 1, 2017.)	yes

	Does the facility maintain staff ratios of a minimum of 1:16 during resident sleeping hours, except during limited and discrete exigent circumstances? (N/A only until October 1, 2017.)	yes
	Does the facility fully document any limited and discrete exigent circumstances during which the facility did not maintain staff ratios? (N/A only until October 1, 2017.)	yes
	Does the facility ensure only security staff are included when calculating these ratios? (N/A only until October 1, 2017.)	yes
	Is the facility obligated by law, regulation, or judicial consent decree to maintain the staffing ratios set forth in this paragraph?	yes
115.313 (d)	Supervision and monitoring	
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: Prevailing staffing patterns?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies?	yes
	In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan?	yes
115.313 (e)	Supervision and monitoring	
	Has the facility implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment? (N/A for non-secure facilities)	yes
	Is this policy and practice implemented for night shifts as well as day shifts? (N/A for non-secure facilities)	yes
	Does the facility have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational	yes

	functions of the facility? (N/A for non-secure facilities)	
115.315 (a)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners?	yes
115.315 (b)	Limits to cross-gender viewing and searches	
	Does the facility always refrain from conducting cross-gender pat-down searches in non-exigent circumstances?	yes
115.315 (c)	Limits to cross-gender viewing and searches	
	Does the facility document and justify all cross-gender strip searches and cross-gender visual body cavity searches?	yes
	Does the facility document all cross-gender pat-down searches?	yes
115.315 (d)	Limits to cross-gender viewing and searches	
	Does the facility implement policies and procedures that enable residents to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks?	yes
	Does the facility require staff of the opposite gender to announce their presence when entering a resident housing unit?	yes
	In facilities (such as group homes) that do not contain discrete housing units, does the facility require staff of the opposite gender to announce their presence when entering an area where residents are likely to be showering, performing bodily functions, or changing clothing? (N/A for facilities with discrete housing units)	na
115.315 (e)	Limits to cross-gender viewing and searches	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na

115.315 (f)	Limits to cross-gender viewing and searches	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.316 (a)	Residents with disabilities and residents who are limited English proficient	
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who are deaf or hard of hearing?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who are blind or have low vision?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have intellectual disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have psychiatric disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Residents who have speech disabilities?	yes
	Does the agency take appropriate steps to ensure that residents with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other? (if "other," please explain in overall determination notes.)	yes
	Do such steps include, when necessary, ensuring effective	yes

	communication with residents who are deaf or hard of hearing?	
	Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Have intellectual disabilities?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Have limited reading skills?	yes
	Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with residents with disabilities including residents who: Who are blind or have low vision?	yes
115.316 (b)	Residents with disabilities and residents who are limited English proficient	
	Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to residents who are limited English proficient?	yes
	Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?	yes
115.316 (c)	Residents with disabilities and residents who are limited English proficient	
	Does the agency always refrain from relying on resident interpreters, resident readers, or other types of resident assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the resident's safety, the performance of first-response duties under §115.364, or the investigation of the resident's allegations?	yes
115.317 (a)	Hiring and promotion decisions	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has engaged in sexual	yes

	abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the bullet immediately above?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes
115.317 (b)	Hiring and promotion decisions	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with residents?	yes
115.317 (c)	Hiring and promotion decisions	
	Before hiring new employees who may have contact with residents, does the agency: Perform a criminal background records check?	yes
	Before hiring new employees who may have contact with residents, does the agency: Consult any child abuse registry	yes

	maintained by the State or locality in which the employee would work?	
	Before hiring new employees who may have contact with residents, does the agency: Consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes
115.317 (d)	Hiring and promotion decisions	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with residents?	yes
	Does the agency consult applicable child abuse registries before enlisting the services of any contractor who may have contact with residents?	yes
115.317 (e)	Hiring and promotion decisions	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with residents or have in place a system for otherwise capturing such information for current employees?	yes
115.317 (f)	Hiring and promotion decisions	
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes
115.317 (g)	Hiring and promotion decisions	

	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes
115.317 (h)	Hiring and promotion decisions	
	Unless prohibited by law, does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes
115.318 (a)	Upgrades to facilities and technologies	
	If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect residents from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
115.318 (b)	Upgrades to facilities and technologies	
	If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect residents from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.)	yes
115.321 (a)	Evidence protocol and forensic medical examinations	
	If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.321	Evidence protocol and forensic medical examinations	

(b)		
	Is this protocol developmentally appropriate for youth? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
	Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice's Office on Violence Against Women publication, "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.)	yes
115.321 (c)	Evidence protocol and forensic medical examinations	
	Does the agency offer all residents who experience sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate?	yes
	Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible?	yes
	If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)?	yes
	Has the agency documented its efforts to provide SAFEs or SANEs?	yes
115.321 (d)	Evidence protocol and forensic medical examinations	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member?	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
115.321	Evidence protocol and forensic medical examinations	

(e)		
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
115.321 (f)	Evidence protocol and forensic medical examinations	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating entity follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency is responsible for investigating allegations of sexual abuse.)	na
115.321 (h)	Evidence protocol and forensic medical examinations	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (Check N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.321(d) above.)	na
115.322 (a)	Policies to ensure referrals of allegations for investigations	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
115.322 (b)	Policies to ensure referrals of allegations for investigations	
	Does the agency have a policy in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes

	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
115.322 (c)	Policies to ensure referrals of allegations for investigations	
	If a separate entity is responsible for conducting criminal investigations, does such publication describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.321(a))	na
115.331 (a)	Employee training	
	Does the agency train all employees who may have contact with residents on: Its zero-tolerance policy for sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
	Does the agency train all employees who may have contact with residents on: Residents' right to be free from sexual abuse and sexual harassment	yes
	Does the agency train all employees who may have contact with residents on: The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: The dynamics of sexual abuse and sexual harassment in juvenile facilities?	yes
	Does the agency train all employees who may have contact with residents on: The common reactions of juvenile victims of sexual abuse and sexual harassment?	yes
	Does the agency train all employees who may have contact with residents on: How to detect and respond to signs of threatened and actual sexual abuse and how to distinguish between consensual sexual contact and sexual abuse between residents?	yes
	Does the agency train all employees who may have contact with residents on: How to avoid inappropriate relationships with residents?	yes

	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the agency train all employees who may have contact with residents on: How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes
	Does the agency train all employees who may have contact with residents on: Relevant laws regarding the applicable age of consent?	yes
115.331 (b)	Employee training	
	Is such training tailored to the unique needs and attributes of residents of juvenile facilities?	yes
	Is such training tailored to the gender of the residents at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male residents to a facility that houses only female residents, or vice versa?	yes
115.331 (c)	Employee training	
	Have all current employees who may have contact with residents received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
115.331 (d)	Employee training	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
115.332 (a)	Volunteer and contractor training	
	Has the agency ensured that all volunteers and contractors who	yes

	have contact with residents have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	
115.332 (b)	Volunteer and contractor training	
	Have all volunteers and contractors who have contact with residents been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with residents)?	yes
115.332 (c)	Volunteer and contractor training	
	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
115.333 (a)	Resident education	
	During intake, do residents receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
	During intake, do residents receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
	Is this information presented in an age-appropriate fashion?	yes
115.333 (b)	Resident education	
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
	Within 10 days of intake, does the agency provide age-appropriate comprehensive education to residents either in person or through	yes

	video regarding: Agency policies and procedures for responding to such incidents?	
115.333 (c)	Resident education	
	Have all residents received such education?	yes
	Do residents receive education upon transfer to a different facility to the extent that the policies and procedures of the resident's new facility differ from those of the previous facility?	yes
115.333 (d)	Resident education	
	Does the agency provide resident education in formats accessible to all residents including those who: Are limited English proficient?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are deaf?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are visually impaired?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Are otherwise disabled?	yes
	Does the agency provide resident education in formats accessible to all residents including those who: Have limited reading skills?	yes
115.333 (e)	Resident education	
	Does the agency maintain documentation of resident participation in these education sessions?	yes
115.333 (f)	Resident education	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to residents through posters, resident handbooks, or other written formats?	yes
115.334 (a)	Specialized training: Investigations	
	In addition to the general training provided to all employees pursuant to §115.331, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its	yes

	investigators have received training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	
115.334 (b)	Specialized training: Investigations	
	Does this specialized training include: Techniques for interviewing juvenile sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
	Does this specialized training include: Proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
	Does this specialized training include: Sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
	Does this specialized training include: The criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
115.334 (c)	Specialized training: Investigations	
	Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
115.335 (a)	Specialized training: Medical and mental health care	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to detect and assess signs of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and	yes

	mental health care practitioners who work regularly in its facilities have been trained in: How to preserve physical evidence of sexual abuse? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How to respond effectively and professionally to juvenile victims of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in: How and to whom to report allegations or suspicions of sexual abuse and sexual harassment? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.335 (b)	Specialized training: Medical and mental health care	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams or the agency does not employ medical staff.)	na
115.335 (c)	Specialized training: Medical and mental health care	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
115.335 (d)	Specialized training: Medical and mental health care	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.331? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners who work regularly in its facilities.)	yes
	Do medical and mental health care practitioners contracted by	yes

	and volunteering for the agency also receive training mandated for contractors and volunteers by §115.332? (N/A if the agency does not have any full- or part-time medical or mental health care practitioners contracted by or volunteering for the agency.)	
115.341 (a)	Obtaining information from residents	
	Within 72 hours of the resident's arrival at the facility, does the agency obtain and use information about each resident's personal history and behavior to reduce risk of sexual abuse by or upon a resident?	yes
	Does the agency also obtain this information periodically throughout a resident's confinement?	yes
115.341 (b)	Obtaining information from residents	
	Are all PREA screening assessments conducted using an objective screening instrument?	yes
115.341 (c)	Obtaining information from residents	
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Prior sexual victimization or abusiveness?	yes
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Current charges and offense history?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Age?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Level of emotional and cognitive development?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Physical size and stature?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Mental illness or mental disabilities?	yes

	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Intellectual or developmental disabilities?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Physical disabilities?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: The resident's own perception of vulnerability?	yes
	During these PREA screening assessments, at a minimum, does the agency attempt to ascertain information about: Any other specific information about individual residents that may indicate heightened needs for supervision, additional safety precautions, or separation from certain other residents?	yes
115.341 (d)	Obtaining information from residents	
	Is this information ascertained: Through conversations with the resident during the intake process and medical mental health screenings?	yes
	Is this information ascertained: During classification assessments?	yes
	Is this information ascertained: By reviewing court records, case files, facility behavioral records, and other relevant documentation from the resident's files?	yes
115.341 (e)	Obtaining information from residents	
	Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the resident's detriment by staff or other residents?	yes
115.342 (a)	Placement of residents	
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Housing Assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Bed assignments?	yes

	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Work Assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Education Assignments?	yes
	Does the agency use all of the information obtained pursuant to § 115.341 and subsequently, with the goal of keeping all residents safe and free from sexual abuse, to make: Program Assignments?	yes
115.342 (b)	Placement of residents	
	Are residents isolated from others only as a last resort when less restrictive measures are inadequate to keep them and other residents safe, and then only until an alternative means of keeping all residents safe can be arranged?	yes
	During any period of isolation, does the agency always refrain from denying residents daily large-muscle exercise?	yes
	During any period of isolation, does the agency always refrain from denying residents any legally required educational programming or special education services?	yes
	Do residents in isolation receive daily visits from a medical or mental health care clinician?	yes
	Do residents also have access to other programs and work opportunities to the extent possible?	yes
115.342 (c)	Placement of residents	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na

115.342 (d)	Placement of residents	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.342 (e)	Placement of residents	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.342 (f)	Placement of residents	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.342 (g)	Placement of residents	
	This provision is no longer applicable to your compliance finding, please select N/A.	na
115.342 (h)	Placement of residents	
	If a resident is isolated pursuant to paragraph (b) of this section, does the facility clearly document: The basis for the facility's concern for the resident's safety? (N/A for h and i if facility doesn't use isolation?)	na
	If a resident is isolated pursuant to paragraph (b) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged? (N/A for h and i if facility doesn't use isolation?)	na
115.342 (i)	Placement of residents	
	In the case of each resident who is isolated as a last resort when less restrictive measures are inadequate to keep them and other residents safe, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
115.351	Resident reporting	

(a)		
	Does the agency provide multiple internal ways for residents to privately report: Sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: 2. Retaliation by other residents or staff for reporting sexual abuse and sexual harassment?	yes
	Does the agency provide multiple internal ways for residents to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
115.351 (b)	Resident reporting	
	Does the agency also provide at least one way for residents to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
	Is that private entity or office able to receive and immediately forward resident reports of sexual abuse and sexual harassment to agency officials?	yes
	Does that private entity or office allow the resident to remain anonymous upon request?	yes
	Are residents detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security to report sexual abuse or harassment?	yes
115.351 (c)	Resident reporting	
	Do staff members accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Do staff members promptly document any verbal reports of sexual abuse and sexual harassment?	yes
115.351 (d)	Resident reporting	
	Does the facility provide residents with access to tools necessary to make a written report?	yes
115.351 (e)	Resident reporting	

	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of residents?	yes
115.352 (a)	Exhaustion of administrative remedies	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address resident grievances regarding sexual abuse. This does not mean the agency is exempt simply because a resident does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	yes
115.352 (b)	Exhaustion of administrative remedies	
	Does the agency permit residents to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an resident to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes
115.352 (c)	Exhaustion of administrative remedies	
	Does the agency ensure that: A resident who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
	Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)	yes
115.352 (d)	Exhaustion of administrative remedies	
	Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by residents in preparing any administrative appeal.) (N/A if agency is exempt from this	yes

	standard.)	
	If the agency determines that the 90 day timeframe is insufficient to make an appropriate decision and claims an extension of time (the maximum allowable extension of time to respond is 70 days per 115.352(d)(3)) , does the agency notify the resident in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)	yes
	At any level of the administrative process, including the final level, if the resident does not receive a response within the time allotted for reply, including any properly noticed extension, may a resident consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)	yes
115.352 (e)	Exhaustion of administrative remedies	
	Are third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, permitted to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Are those third parties also permitted to file such requests on behalf of residents? (If a third party, other than a parent or legal guardian, files such a request on behalf of a resident, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)	yes
	If the resident declines to have the request processed on his or her behalf, does the agency document the resident’s decision? (N/A if agency is exempt from this standard.)	yes
	Is a parent or legal guardian of a juvenile allowed to file a grievance regarding allegations of sexual abuse, including appeals, on behalf of such juvenile? (N/A if agency is exempt from this standard.)	yes
	If a parent or legal guardian of a juvenile files a grievance (or an appeal) on behalf of a juvenile regarding allegations of sexual abuse, is it the case that those grievances are not conditioned upon the juvenile agreeing to have the request filed on his or her behalf? (N/A if agency is exempt from this standard.)	yes
115.352	Exhaustion of administrative remedies	

(f)		
	Has the agency established procedures for the filing of an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance alleging a resident is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)	yes
	After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)	yes
	Does the initial response and final agency decision document the agency's determination whether the resident is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)	yes
	Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
	Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)	yes
115.352 (g)	Exhaustion of administrative remedies	
	If the agency disciplines a resident for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the resident filed the grievance in bad faith? (N/A if agency is exempt from this standard.)	yes
115.353 (a)	Resident access to outside confidential support services and legal representation	
	Does the facility provide residents with access to outside victim advocates for emotional support services related to sexual abuse by providing, posting, or otherwise making accessible mailing addresses and telephone numbers, including toll-free hotline	yes

	numbers where available, of local, State, or national victim advocacy or rape crisis organizations?	
	Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies?	yes
	Does the facility enable reasonable communication between residents and these organizations and agencies, in as confidential a manner as possible?	yes
115.353 (b)	Resident access to outside confidential support services and legal representation	
	Does the facility inform residents, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws?	yes
115.353 (c)	Resident access to outside confidential support services and legal representation	
	Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide residents with confidential emotional support services related to sexual abuse?	yes
	Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements?	yes
115.353 (d)	Resident access to outside confidential support services and legal representation	
	Does the facility provide residents with reasonable and confidential access to their attorneys or other legal representation?	yes
	Does the facility provide residents with reasonable access to parents or legal guardians?	yes
115.354 (a)	Third-party reporting	
	Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment?	yes
	Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of a resident?	yes

115.361 (a)	Staff and agency reporting duties	
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding retaliation against residents or staff who reported an incident of sexual abuse or sexual harassment?	yes
	Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation?	yes
115.361 (b)	Staff and agency reporting duties	
	Does the agency require all staff to comply with any applicable mandatory child abuse reporting laws?	yes
115.361 (c)	Staff and agency reporting duties	
	Apart from reporting to designated supervisors or officials and designated State or local services agencies, are staff prohibited from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions?	yes
115.361 (d)	Staff and agency reporting duties	
	Are medical and mental health practitioners required to report sexual abuse to designated supervisors and officials pursuant to paragraph (a) of this section as well as to the designated State or local services agency where required by mandatory reporting laws?	yes
	Are medical and mental health practitioners required to inform residents of their duty to report, and the limitations of confidentiality, at the initiation of services?	yes

115.361 (e)	Staff and agency reporting duties	
	Upon receiving any allegation of sexual abuse, does the facility head or his or her designee promptly report the allegation to the appropriate office?	yes
	Upon receiving any allegation of sexual abuse, does the facility head or his or her designee promptly report the allegation to the alleged victim's parents or legal guardians unless the facility has official documentation showing the parents or legal guardians should not be notified?	yes
	If the alleged victim is under the guardianship of the child welfare system, does the facility head or his or her designee promptly report the allegation to the alleged victim's caseworker instead of the parents or legal guardians? (N/A if the alleged victim is not under the guardianship of the child welfare system.)	yes
	If a juvenile court retains jurisdiction over the alleged victim, does the facility head or designee also report the allegation to the juvenile's attorney or other legal representative of record within 14 days of receiving the allegation?	yes
115.361 (f)	Staff and agency reporting duties	
	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
115.362 (a)	Agency protection duties	
	When the agency learns that a resident is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the resident?	yes
115.363 (a)	Reporting to other confinement facilities	
	Upon receiving an allegation that a resident was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
	Does the head of the facility that received the allegation also notify the appropriate investigative agency?	yes

115.363 (b)	Reporting to other confinement facilities	
	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
115.363 (c)	Reporting to other confinement facilities	
	Does the agency document that it has provided such notification?	yes
115.363 (d)	Reporting to other confinement facilities	
	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes
115.364 (a)	Staff first responder duties	
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
	Upon learning of an allegation that a resident was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence?	yes
115.364 (b)	Staff first responder duties	

	If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff?	yes
115.365 (a)	Coordinated response	
	Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse?	yes
115.366 (a)	Preservation of ability to protect residents from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes
115.367 (a)	Agency protection against retaliation	
	Has the agency established a policy to protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff?	yes
	Has the agency designated which staff members or departments are charged with monitoring retaliation?	yes
115.367 (b)	Agency protection against retaliation	
	Does the agency employ multiple protection measures for residents or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations, such as housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services?	yes
115.367 (c)	Agency protection against retaliation	

	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of residents who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by residents or staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Any resident disciplinary reports?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Resident housing changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Resident program changes?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Negative performance reviews of staff?	yes
	Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor: Reassignments of staff?	yes
	Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need?	yes
115.367 (d)	Agency protection against retaliation	

	In the case of residents, does such monitoring also include periodic status checks?	yes
115.367 (e)	Agency protection against retaliation	
	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
115.368 (a)	Post-allegation protective custody	
	Is any and all use of segregated housing to protect a resident who is alleged to have suffered sexual abuse subject to the requirements of § 115.342?	yes
115.371 (a)	Criminal and administrative agency investigations	
	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency does not conduct any form of administrative or criminal investigations of sexual abuse or harassment. See 115.321(a).)	yes
	Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency does not conduct any form of administrative or criminal investigations of sexual abuse or harassment. See 115.321(a).)	yes
115.371 (b)	Criminal and administrative agency investigations	
	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations involving juvenile victims as required by 115.334?	no
115.371 (c)	Criminal and administrative agency investigations	
	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
	Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
	Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes

115.371 (d)	Criminal and administrative agency investigations	
	Does the agency always refrain from terminating an investigation solely because the source of the allegation recants the allegation?	yes
115.371 (e)	Criminal and administrative agency investigations	
	When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution?	yes
115.371 (f)	Criminal and administrative agency investigations	
	Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as resident or staff?	yes
	Does the agency investigate allegations of sexual abuse without requiring a resident who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding?	yes
115.371 (g)	Criminal and administrative agency investigations	
	Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse?	yes
	Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings?	yes
115.371 (h)	Criminal and administrative agency investigations	
	Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible?	yes
115.371 (i)	Criminal and administrative agency investigations	
	Are all substantiated allegations of conduct that appears to be	yes

	criminal referred for prosecution?	
115.371 (j)	Criminal and administrative agency investigations	
	Does the agency retain all written reports referenced in 115.371(g) and (h) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years unless the abuse was committed by a juvenile resident and applicable law requires a shorter period of retention?	yes
115.371 (k)	Criminal and administrative agency investigations	
	Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the facility or agency does not provide a basis for terminating an investigation?	yes
115.371 (m)	Criminal and administrative agency investigations	
	When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.321(a).)	yes
115.372 (a)	Evidentiary standard for administrative investigations	
	Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated?	yes
115.373 (a)	Reporting to residents	
	Following an investigation into a resident's allegation of sexual abuse suffered in the facility, does the agency inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded?	yes
115.373 (b)	Reporting to residents	
	If the agency did not conduct the investigation into a resident's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the resident? (N/A if the agency/facility is	yes

	responsible for conducting administrative and criminal investigations.)	
115.373 (c)	Reporting to residents	
	Following a resident’s allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the resident’s unit?	yes
	Following a resident’s allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility?	yes
	Following a resident’s allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility?	yes
	Following a resident’s allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility?	yes
115.373 (d)	Reporting to residents	
	Following a resident’s allegation that he or she has been sexually abused by another resident, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility?	yes
	Following a resident’s allegation that he or she has been sexually abused by another resident, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse	yes

	within the facility?	
115.373 (e)	Reporting to residents	
	Does the agency document all such notifications or attempted notifications?	yes
115.376 (a)	Disciplinary sanctions for staff	
	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
115.376 (b)	Disciplinary sanctions for staff	
	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
115.376 (c)	Disciplinary sanctions for staff	
	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
115.376 (d)	Disciplinary sanctions for staff	
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies, unless the activity was clearly not criminal?	yes
	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes
115.377 (a)	Corrective action for contractors and volunteers	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with residents?	yes

	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
115.377 (b)	Corrective action for contractors and volunteers	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with residents?	yes
115.378 (a)	Interventions and disciplinary sanctions for residents	
	Following an administrative finding that a resident engaged in resident-on-resident sexual abuse, or following a criminal finding of guilt for resident-on-resident sexual abuse, may residents be subject to disciplinary sanctions only pursuant to a formal disciplinary process?	yes
115.378 (b)	Interventions and disciplinary sanctions for residents	
	Are disciplinary sanctions commensurate with the nature and circumstances of the abuse committed, the resident's disciplinary history, and the sanctions imposed for comparable offenses by other residents with similar histories?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident is not denied daily large-muscle exercise?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident is not denied access to any legally required educational programming or special education services?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the agency ensure the resident receives daily visits from a medical or mental health care clinician?	yes
	In the event a disciplinary sanction results in the isolation of a resident, does the resident also have access to other programs and work opportunities to the extent possible?	yes
115.378	Interventions and disciplinary sanctions for residents	

(c)		
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether a resident's mental disabilities or mental illness contributed to his or her behavior?	yes
115.378 (d)	Interventions and disciplinary sanctions for residents	
	If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to offer the offending resident participation in such interventions?	yes
	If the agency requires participation in such interventions as a condition of access to any rewards-based behavior management system or other behavior-based incentives, does it always refrain from requiring such participation as a condition to accessing general programming or education?	yes
115.378 (e)	Interventions and disciplinary sanctions for residents	
	Does the agency discipline a resident for sexual contact with staff only upon a finding that the staff member did not consent to such contact?	yes
115.378 (f)	Interventions and disciplinary sanctions for residents	
	For the purpose of disciplinary action, does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation?	yes
115.378 (g)	Interventions and disciplinary sanctions for residents	
	Does the agency always refrain from considering non-coercive sexual activity between residents to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between residents.)	yes
115.381 (a)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.341 indicates that a resident has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that	yes

	the resident is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening?	
115.381 (b)	Medical and mental health screenings; history of sexual abuse	
	If the screening pursuant to § 115.341 indicates that a resident has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the resident is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening?	yes
115.381 (c)	Medical and mental health screenings; history of sexual abuse	
	Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?	yes
115.381 (d)	Medical and mental health screenings; history of sexual abuse	
	Do medical and mental health practitioners obtain informed consent from residents before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the resident is under the age of 18?	yes
115.382 (a)	Access to emergency medical and mental health services	
	Do resident victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?	yes
115.382 (b)	Access to emergency medical and mental health services	
	If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do staff first responders take preliminary steps to protect the victim pursuant to § 115.362?	yes
	Do staff first responders immediately notify the appropriate	yes

	medical and mental health practitioners?	
115.382 (c)	Access to emergency medical and mental health services	
	Are resident victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate?	yes
115.382 (d)	Access to emergency medical and mental health services	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.383 (a)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility?	yes
115.383 (b)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody?	yes
115.383 (c)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility provide such victims with medical and mental health services consistent with the community level of care?	yes
115.383 (d)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are resident victims of sexually abusive vaginal penetration while incarcerated offered pregnancy tests? (N/A if all-male facility.)	yes
115.383 (e)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	If pregnancy results from the conduct described in paragraph §	yes

	115.383(d), do such victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services? (N/A if all-male facility.)	
115.383 (f)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are resident victims of sexual abuse while incarcerated offered tests for sexually transmitted infections as medically appropriate?	yes
115.383 (g)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident?	yes
115.383 (h)	Ongoing medical and mental health care for sexual abuse victims and abusers	
	Does the facility attempt to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners?	yes
115.386 (a)	Sexual abuse incident reviews	
	Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?	yes
115.386 (b)	Sexual abuse incident reviews	
	Does such review ordinarily occur within 30 days of the conclusion of the investigation?	yes
115.386 (c)	Sexual abuse incident reviews	
	Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?	yes
115.386 (d)	Sexual abuse incident reviews	
	Does the review team: Consider whether the allegation or	yes

	investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	
	The subsection of this provision is no longer applicable to your compliance finding, please select N/A.	na
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.386(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
115.386 (e)	Sexual abuse incident reviews	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
115.387 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
115.387 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes
115.387 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes

115.387 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
115.387 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents? (N/A if agency does not contract for the confinement of its residents.)	na
115.387 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
115.388 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes
115.388 (b)	Data review for corrective action	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in	yes

	addressing sexual abuse?	
115.388 (c)	Data review for corrective action	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
115.388 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
115.389 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.387 are securely retained?	yes
115.389 (b)	Data storage, publication, and destruction	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
115.389 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes
115.389 (d)	Data storage, publication, and destruction	
	Does the agency maintain sexual abuse data collected pursuant to § 115.387 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes
115.401 (a)	Frequency and scope of audits	
	During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once?	yes

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

	<p>has otherwise made publicly available, all Final Audit Reports. The review period is for prior audits completed during the past three years PRECEDING THIS AUDIT. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or, in the case of single facility agencies, there has never been a Final Audit Report issued.)</p>	
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