

PREA Facility Audit Report: Final

Name of Facility: Phoenix RRC

Facility Type: Community Confinement

Date Interim Report Submitted: NA

Date Final Report Submitted: 12/18/2017

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
Auditor Full Name as Signed: Teri Brister	Date of Signature: 12/18/2017

AUDITOR INFORMATION	
Auditor name:	Brister, Teri
Address:	
Email:	audit_solutions@yahoo.com
Telephone number:	
Start Date of On-Site Audit:	11/08/17
End Date of On-Site Audit:	11/09/17

FACILITY INFORMATION	
Facility name:	Phoenix RRC
Facility physical address:	2846 Roosevelt Street, Phoenix, Arizona - 85008
Facility Phone	602-273-6293
Facility mailing address:	
The facility is:	<input type="radio"/> County <input type="radio"/> Federal <input type="radio"/> Municipal <input type="radio"/> State <input type="radio"/> Military <input checked="" type="radio"/> Private for profit <input type="radio"/> Private not for profit
Facility Type:	<input type="radio"/> Community Treatment Center <input type="radio"/> Halfway house <input type="radio"/> Restitution center <input type="radio"/> Alcohol or drug rehabilitation center <input type="radio"/> Mental health facility <input checked="" type="radio"/> Other community correctional facility

Primary Contact			
Name:	Daniele Koger	Title:	Program Director
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Facility Director			
Name:	Danielle Koger	Title:	Program Director
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Facility PREA Compliance Manager			
Name:	Danielle Koger	Email Address:	dkoger@behavioralsystemssouthwest.com

Facility Health Service Administrator			
Name:		Title:	
Email Address:		Telephone Number:	

Facility Characteristics			
Designed facility capacity:		70	
Current population of facility:		62	
Age Range	<i>Adults: 18-70</i>	<i>Juveniles:</i>	<i>Youthful Residents:</i>
Facility security level/resident custody levels:		low	
Number of staff currently employed at the facility who may have contact with residents:		0	

AGENCY INFORMATION	
Name of agency:	Behavioral Systems Southwest, Inc. -
Governing authority or parent agency (if applicable):	
Physical Address:	118 Avenida Victoria, San Clemente, California - 92672
Mailing Address:	California
Telephone number:	949-492-3574

Agency Chief Executive Officer Information:			
Name:	Christopher Lindholm	Title:	President/COO
Email Address:	cslindholm@behavioralsystemssouthwest.com	Telephone Number:	949-492-3574

Agency-Wide PREA Coordinator Information

Name:	Bari Caine-Lomberto	Email Address:	bcainelomberto@behavioralsystemssouthwest.com
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AUDIT FINDINGS

Narrative:

The auditor's description of the audit methodology should include a detailed description of the following processes during the pre-audit, on-site audit, and post-audit phases: documents and files reviewed, discussions and types of interviews conducted, number of days spent on-site, observations made during the site-review, and a detailed description of any follow-up work conducted during the post-audit phase. The narrative should describe the techniques the auditor used to sample documentation and select interviewees, and the auditor's process for the site review.

The PREA Audit of the Phoenix Residential Re-Entry Center (RRC) and the Roosevelt Residential Re-Entry Center (RRC) were conducted on November 8-9, 2017, by Department of Justice (DOJ) Certified PREA Auditors Teri Brister and Christina Kampczyk. Teri Brister was the Lead Auditor. The two sites are located within walking distance on the same street. The two sites share the same policies, procedures, programming, staff and management oversight; therefore, one audit was conducted for both sites. Notice of the audit along with auditor contact information was posted in various locations at each site six-weeks prior to the on-site visit. This was verified through photos that were e-mailed to the auditors by the PREA Coordinator during the Pre-Audit portion of the audit. The Pre-Audit Questionnaire (PAQ) was posted by the PREA Coordinator to the On-line Audit System (OAS), at least three weeks prior to the on-site visit. Facility specific PREA information was uploaded to the PAQ which includes; the PREA training curriculum and on-going PREA training for staff, staff training rosters and quizzes, PREA education materials and acknowledgement forms for residents, Memorandums of Understanding for third-party reporting agencies, PREA related policies and procedures, maps with camera locations, and staffing rosters. Some agency-wide policies and procedures were uploaded to the agency's Rubidoux RRC since that facility was audited just in September 2017. These policies and procedures were reviewed at that time and also referenced for this audit. There was on-going communication with the PREA Coordinator during the pre-audit phase. An agenda for the on-site audit was sent to the agency several days prior to the visit.

An entrance meeting was conducted on the first day of the Phoenix/Roosevelt RRCs on-site visit with Executive Vice President Bari Caine-Lombarto who is the agency-wide PREA Coordinator, Program Director Danielle Koger, who is also the facility's PREA Compliance Manager and Assistant Program Director Wes Mayhew. During this meeting, we discussed the agenda for the two-day visit and any changes to the facility, programs or services since the facility's last PREA audit in December 2014. At that time, the facility was found to be in compliance with all of the PREA standards. The auditors were provided with the current staff roster by position and shift pattern, the current resident roster by housing unit and a listing of residents with special designations. At the time of the audit, there were a total of 102 residents of which 24 were females, and a total of 44 staff. The auditors randomly selected twenty residents (eleven targeted) and fifteen staff of varying positions and shifts for interviews including the Program Director/PREA Compliance Manager, the two Assistant Program Directors, social service staff and graveyard staff. The lists of staff and residents selected for interviews were shared with the program director and assistant program directors so they could coordinate the interviews to ensure auditors were able to progress without a lag time in between the interviews. There were zero reports of sexual abuse or sexual harassment allegations during the previous twelve-month review period.

Following the entrance meeting, the Program Director led one of the auditors on a comprehensive facility tour of the Phoenix and Roosevelt sites, while the second auditor began interviews with the residents in a private location. All areas of both sites were toured, which consisted of the interior and exterior of the four two-story buildings, including the housing units, the staff office areas, the control/security areas. the

kitchen, the classroom/multipurpose room and the outside recreation areas. There were no areas that were off limits during the tour of both sites. During the tour, the auditor was able to observe security staff in the performance of their duties such as conducting head-counts/grounds checks, processing departing and returning residents from the community and processing new residents. The auditor was also able to speak with residents during the tour at both sites regarding their knowledge of the PREA audit and staff's compliance with the knock/announce notice when staff of the opposite gender enter their room. PREA-related postings and materials were observed throughout the tour at each site in areas accessible to the residents and visitors. Camera locations were observed in various locations of each site which includes the facility interior and exterior. There are no cameras in any of the housing units or restrooms.

Following the two site tours, the second auditor began interviews with the staff. Interviews with both staff and residents continued for the remainder of the first day of the on-site visit. Auditors returned the second day at 6:00 am in order to interview the two, graveyard staff before they completed their shift. The two assistant program directors and the program director were also interviewed. Following the completion of the resident and staff interviews, fifteen staff files and sixteen resident files were reviewed. Documents reviewed in the staff files included; the staff background clearance verification, the PREA initial and on-going training records, the signed PREA acknowledgment for the Zero Tolerance policy and the staff self-declaration document for previous sexual abusive behavior. The review of resident files included; PREA education and training records, the screening assessments for risk of victimization and abusiveness, the PREA-handout, the re-assessments completed within thirty days and the quizzes that were given to the residents to assess comprehension of the PREA education provided to them. Each file reviewed were noted to be well-organized and complete with documentation that clearly shows the agency is providing PREA training and education to the staff and residents.

Other documentation reviewed on the second day of the on-site visit included; the emergency procedures binder, serious incident reports and grievances submitted within the last twelve months, PREA education records provided during the new resident education classes, on-going PREA-training records for staff, grounds check/headcount logs, the facility rules and regulations for residents, the PREA Brochure, new resident intake checklists and the facility logbooks. The facility logbook is a comprehensive accounting of the day's activities consisting of; staff signing in and out for their shifts, new resident intakes, residents departing or returning to the facility, head counts and grounds checks conducted by staff, significant incidents involving the residents, maintenance issues and any special notes/reminders for staff. If a PREA-related incident were to occur, there would be a notation in the logbook. All staff are responsible for reviewing the logbook at the start of their shift. Each site maintains a separate logbook and visitors' sign-in log.

An exit meeting was conducted with the EVP/PREA Coordinator, the Program Director and the two Assistant Program Directors. The facility and staff were well prepared for the PREA audit, as this was the fifth of five PREA audits for Behavioral Systems Southwest, during an eight-week period of time. Additionally, just prior to this audit, the facility underwent a full audit by the BOP in September 2017 and a re-accreditation by the American Correction Association in early August 2017. The Phoenix RRC and Roosevelt RRC are required to be PREA compliant per their contract with the Bureau of Prisons (BOP). During interviews with staff, it was apparent they were well aware of what their responsibilities would be should an incident of sexual abuse or sexual harassment occur at the facility and were able to clearly describe the steps they would take to protect the victim. Overall, resident interviews indicate residents feel sexually safe in the program and are well-educated on the numerous ways in which to report and incident of sexual abuse or harassment inside and outside the facility. There was one confidential communication received from a female resident who had several concerns. However, the majority of the

resident's concerns were not PREA related. The resident emailed the auditors and stated she was unable to send formal complaints to the BOP without having to go through the facility because the information was not posted or accessible to the residents. According to the auditor's findings during the onsite physical plant review, the BOP's contact information was posted in the resident's dayroom which includes the RRM's name, phone number, and address. The resident agreed to withdraw her request for confidentiality in regard to this matter and stated she would like to speak to the PREA Coordinator. The PREA Coordinator was contacted and informed of the resident's concerns. The PREA Coordinator stated she would contact the resident and address her concerns. The resident was familiar with the PREA Coordinator's contact information as it too was posted in the resident's dayroom.

The auditors shared general observations noted during the two-day visit, discussed the timeline for the post-audit period and the follow-up that was needed regarding the one confidential communication. Finally, the auditors thanked the facility leadership for their time and preparation for the PREA audit, for accommodating the numerous requests for documentation and for ensuring a very smooth audit process during the two-day visit.

AUDIT FINDINGS

Facility Characteristics:

The auditor's description of the audited facility should include details about the facility type, demographics and size of the inmate or resident population, numbers and type of staff positions, configuration and layout of the facility, numbers of housing units, description of housing units including any special housing units, a description of programs and services, including food service and recreation. The auditor should describe how these details are relevant to PREA implementation and compliance.

The Phoenix and Roosevelt Residential Re-Entry Centers (RRC) are located in Phoenix, Arizona and are operated by Behavioral Systems Southwest (BSS), a private for-profit corporation headquartered in San Clemente, California. Both the Phoenix and Roosevelt RRCs operate under the same Federal contract with the Federal Bureau of Prisons (BOP) and operate as one program. Currently, BSS provides community correctional services to the BOP and residential parolee service centers for the California Department of Corrections and Rehabilitation (CDCR) with three facilities in California and two facilities in Arizona. The agency also operates a non-residential day reporting center, a non-residential drinking driver program, and several transitional housing programs both in California and Arizona.

At the time of the on-site audit, there was a population of 63 (24 females) residents residing at the Phoenix site. The total capacity for the Phoenix site is 70 beds. The Phoenix site provides services for male and female residents and also operates the Mother Infant Nurturing Together (MINT) program. This program promotes parenting skills and infant bonding for low-risk female residents who are pregnant or who have given birth. MINT residents receive classes on childbirth, parenting, coping skills, sexual abuse counseling, budgeting classes and vocational/educational programs. The Phoenix site consists of three U-shaped buildings interconnected by a second-story walkway.

There are 16 apartment-style living units each with private bathrooms. Six living unit are for females and ten living units were designated for males. Eleven living units are located on the second story with five living units located on the first floor. One of the downstairs living units was converted into a urinalysis testing room for probation and parole officer use. Each living unit has separate bedrooms and can accommodate four to seven residents with the exception of the MINT rooms. The MINT rooms are also equipped with kitchenettes. The staff offices, the security office, the kitchen the conference room, the dayroom, and case management offices are all located on the first floor. There is a fenced-in swimming pool adjacent to the buildings, a weight-lifting area and an outdoor recreational area with picnic tables for the residents' use. Three pay phones are located outside of the buildings in separate locations. The maintenance room and laundry room are located to the rear of the facility. Separate laundry room hours are allowed for male and female residents use. The parking lot and three separate locked storage buildings are also located to the rear of the facility.

The camera locations were observed and noted throughout the tour of the Phoenix site. The positioning of cameras assist staff in the supervision of the residents and capture potential blind spot areas. There were 24 cameras at the time of the on-site visit, with three cameras added since the PREA audit in 2014. The camera monitors are located in two locations; the security office and the program director's office. The placement of cameras excludes resident living quarters, restrooms and some staff office areas. Security staff monitor residents' activities continually throughout their shift via the camera monitoring system as well as during their regular facility rounds and by direct supervision. Staff reported that if there were problems with any of the cameras/monitors prohibiting them from observing a particular area of the facility, they would report it immediately to their superior, initiate a maintenance request and document it

in the logbook.

The Roosevelt site consists of 32-beds with 29 current residents at the time of the on-site audit. This site provides services for male sex-offenders, with four separate apartment-style living units, staff offices, a security office, a day room and laundry room all located in the one two-story building. Three living units are on the second story and one living unit is on the first floor. Each room has a private bathroom and houses up to eight residents. Two upstairs living units each have back doors with staircases leading to the rear of the site that are not to be utilized by residents and are for emergency purposes only. These doors are not equipped with alarms; however, four cameras are mounted in this area to capture any activity and to assist in staff supervision.

The exterior of the Roosevelt site consists of a parking lot, a picnic table area, pay phones, weight lifting equipment and a basketball court. There is no kitchen on site and thus food is prepared at the Phoenix site and delivered to the Roosevelt site at meal times. Residents of the Roosevelt site walk to the Phoenix site to participate in some services not provided at Roosevelt. Additionally, these residents are allowed to use the swimming pool at the Phoenix site, but not at the same time as female residents. There is a total of fifteen cameras located on the facility interior and the facility exterior with the exception of the living units and restrooms. The two video monitors are located in the security manager's office as well as the front security staff office. The cameras are positioned to capture blind spot areas and to assist in staff supervision of the residents. Cameras are monitored 24/7 by security staff.

During the tour of both sites, PREA-related information was observed in each of the living units and in various areas accessible to staff, residents and visitors. This PREA information includes; the notice of the PREA audit with auditor contact information, contact information for the PREA Coordinator and third-party reporting agencies, the zero-tolerance policy, and the knock/announce notice was posted in each living unit for staff of the opposite gender. PREA information in multiple languages was also included on the PREA bulletin board located in the day room. This PREA bulletin board contains comprehensive education materials, posters, resources, third party information for the residents all related to the agency's commitment to the PREA standards. Each site was noted to be in orderly and well-maintained condition throughout the tour of each site.

The purpose of the RRC is to transition inmates into their communities prior to their release from incarceration. These inmates remain in the federal custody of the BOP while residing in the structured environment of the Phoenix/Roosevelt RRC, and while completing the remainder of their sentence. They are able to participate in school and work outside of the facility and utilize resources within the community. BSS casework staff assist the residents seeking employment/education opportunities and with community-based resources as needed. The average stay at the RRC is about six months and includes a home detention component.

The agency's mission is to help problematic people change their lifestyle with emphasis placed on showing individuals how to lead a more productive, self-supporting, drug-free life, thus breaking the criminal cycle. According to their website; "the agency is dedicated to helping the ex-offender population break the criminal cycle and improve the quality of their lives through the use of cognitive behavioral change methodology. They accomplish this goal by providing comprehensive reintegration services to the ex-offender population in residential and non-residential settings. The services provided focus on individual skill building, accomplished through individual and/or group activities, all the while focusing on staff development and professional growth in order to provide effective services to those they serve. BSS seeks to empower individuals by providing them with the knowledge and training necessary to address

existing behavior issues, identify solutions to future problems, and live a productive, self-supporting, clean and sober, crime-free life."

AUDIT FINDINGS

Summary of Audit Findings:

The summary should include the number of standards exceeded, number of standards met, and number of standards not met, along with a list of each of the standards in each category. If relevant, provide a summarized description of the corrective action plan, including deficiencies observed, recommendations made, actions taken by the agency, relevant timelines, and methods used by the auditor to reassess compliance.

Auditor Note: No standard should be found to be "Not Applicable" or "NA". A compliance determination must be made for each standard.

Number of standards exceeded:	3
Number of standards met:	38
Number of standards not met:	0

The on-site visit of the Phoenix/Rubidoux RRC was conducted November 8-9, 2017. During the audit, the auditors determined the facility was in full compliance with the PREA Standards. The Phoenix/Roosevelt RRC facilities were the last of the six BSS facilities to be audited within a few weeks apart. The auditors carefully reviewed all aspects of the facility's operations and found that the Phoenix/Rubidoux RRC facilities had no deficiencies. Overall, the audit found that the staff and resident were very familiar with the PREA Standards, their rights to be free from sexual abuse and harassment, how to report an incident, and where to find services if needed. There were three areas in which the Phoenix/Roosevelt RRC exceeded the standards: 115.233, 115.254, and 115.403.

The results of the Behavioral Systems Southwest PREA Audit for the Phoenix/Roosevelt RRC facility are as follows:

Number of Standards Exceeded: 3

Number of Standards Met: 38

Number of Standards Not Met: 0

Standards

Auditor Overall Determination Definitions

- 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

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.

115.211	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Phoenix/Roosevelt RRC facility's zero-tolerance policy is posted throughout the facility, including the three housing units and on the agency's website. Detailed information can be found in the Behavioral Systems Southwest, Inc (BSS) policies and procedures, the agency's Employee Handbook beginning on page 73, Residents Rules and Regulations, the Bureau of Prisons (BOP) contract with BSS, and the Standard of Work (SOW) requirements by the BOP. The written policy indicates the agency's definitions for sexual abuse and sexual harassment and includes how they will implement the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment and sanctions for such acts. A review of the policy, Employee Handbook, Resident's Rules and Regulations, training curriculum, and interviews with residents and staff, demonstrates that the facility employees, residents and visitors are informed of the zero- tolerance policy and sanctions for those who violate the policy.</p> <p>All allegations of sexual abuse and sexual harassment are immediately forwarded to the BOP. The BOP conducts all investigations and determine sanctions for both staff and residents. Sanctions are determined based on the nature of the allegations and include, but are not limited to: retraining, referrals to an assistance programs, reassignment or relocation, suspension, discharge, and/or legal action.</p> <p>The agency's Executive Vice President Bari Caine-Lomberto is the PREA Coordinator for all of the BSS Community Confinement Facilities and is listed as such on the agency's organizational chart. The coordinator stated she has sufficient time and authority to oversee the agency's efforts in the development, implementation and compliance of the PREA Standards.</p>

115.212	Contracting with other entities for the confinement of residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Phoenix/Roosevelt RRC does not contract with any outside agencies for the confinement of residents. BSS agency is contracted by the BOP to house residents. This contract states that the BSS agency cannot subcontract with other agencies for the confinement of residents. Therefore, this section is not applicable.</p>

115.213	Supervision and monitoring
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Phoenix/Roosevelt RRC facility staffing plan is reviewed by the facility director as well as the PREA Coordinator on an annual basis. The monitoring and review of this plan includes a review of adequate staffing levels to ensure both male and female staff are scheduled on each shift in order to meet the supervision needs of the male and female resident population. The BSS contract with BOP states that BSS must maintain both male and female staff on duty at all times for co-ed facilities such as Phoenix/Roosevelt RRC. BOP and the PREA Standards set the minimum staffing standard, however BSS sets a higher standard and employs more than the minimum number of employees. As the population changes in terms of numbers and male to female resident population, the staff schedule is adjusted accordingly but the number of staff does not reduce when there are fewer residents. Whenever a staff calls off on his/her shift, the facility director is immediately notified and will ensure the shift is appropriately covered. The facility director is responsible for ensuring the staffing plan is in adherence. Staff are required to sign in and out of the logbook for each shift, which is verified by the facility director. Any such deviations from the staffing plan would be documented and reviewed by the facility director. The staffing review considers the composition and dynamics of the resident population when calculating adequate staffing level. Additionally, incidents of substantiated or unsubstantiated sexual abuse is considered when determining the adequate staffing level.</p> <p>Video monitoring technology assists the staff to monitor residents and the facility's daily activities. The facility has cameras carefully mounted in all areas of the facility. A review of the camera placements found there were no blind spots that were not monitored by a video camera. Every area of the facility can be viewed by the staff and facility director through the video monitoring system.</p> <p>The PREA Coordinator conducts an annual review of the facility's staffing patterns to ensure compliance with the male/female staff representation as required in the standard. The Phoenix/Roosevelt RRC facility director will immediately notify the PREA Coordinator when overtime (OT) is needed to properly cover a vacancy due to illness/vacation/vacancy, ensuring that male and female staff are on duty 24 hours per day, seven days per week, and 365 days per year. The staffing plan as well as the annual staffing review is documented.</p>

115.215	Limits to cross-gender viewing and searches
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>BSS policy strictly prohibits cross gender pat-down searches, cross-gender strip searches, and cross-gender visual body cavity searches of male or female residents. The Phoenix/Roosevelt RCC co-ed facility has both with male and female staff during each shift. All staff are trained in conducting searches of both male and female residents. It is written in the BOP contract with BSS that BSS will ensure a specific number of female staff are on duty based on the population and shift. The staff also have the option of using the "wand" which is a metal detection device that the staff are trained to utilize. At no time would a female resident be restricted access to regularly available programming or other opportunities because a female staff was unavailable to conduct the pat-down search.</p> <p>In the case of a transgender or intersex resident, the Phoenix/Roosevelt RRC facility is notified of the resident's gender, sexual preference and genital anatomy by BOP prior to entering the facility. Residents are also informed of BSS' rules and regulations regarding searches. Should a resident be uncomfortable with the agency's contract with BOP regarding searches, they may choose not to transfer to a BSS facility. When transgender and intersex residents arrive at the facility they are searched based upon their genital anatomy. Residents with male genitals will be searched by a male staff and residents with female genitals will be searched by a female staff. If there are ever any concerns, the resident will be searched using a wand. All staff have been trained on how to search all residents in a professional and respectful manner and in the least intrusive manner possible. At no time would a resident be physically examined for the sole purpose to determine their gender status. Interviews conducted with staff show staff are very clear on the policies and procedures regarding searches.</p> <p>When interviewed, staff and residents confirm that staff of the opposite gender are knocking and announcing their presence prior to entering the resident's rooms or restrooms. A review of resident's files found no concerns with the staff's knock and announce notices. Additionally, the residents interviewed stated they are allowed to shower, change clothing, and use restroom facilities without being viewed by staff of the opposite gender. Residents are only allowed to change their clothes in the bathroom which prohibits viewing from anyone. Whenever a staff enters a resident's restroom, they knock, announce their gender and then allow the resident time to respond before entering the restroom.</p>

115.216	Residents with disabilities and residents who are limited English proficient
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The agency has established procedures to ensure that all residents, including those who are hard of hearing, vision-impaired, limited English speaking, or intellectually-impaired, participate in and benefit from the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. The Phoenix/Roosevelt RRC provides PREA information in six languages which include; Armenian, Spanish, Vietnamese, Romanian, Korean, and Hebrew.</p> <p>Phoenix/Roosevelt RRC facility has bilingual staff who are able to translate for some of these languages. The facility also contracts with a company who provides interpreter services whenever needed. Phoenix/Roosevelt RRC prohibits the use of resident interpreters or resident readers, except in exigent circumstances. Additionally, all new residents are required to meet with a case manager within three days of their arrival to the facility. At this time, the case manager will review the PREA information they received at intake to ensure the resident understands the information provided to them. If a resident has limited reading ability, or limited vocabulary, the case manager would take the time to read and explain the PREA information to them.</p>

115.217	Hiring and promotion decisions
	<p data-bbox="321 197 906 231">Auditor Overall Determination: Meets Standard</p> <p data-bbox="321 264 570 298">Auditor Discussion</p> <p data-bbox="321 338 1414 489">The BOP provides guidelines and mandates to the BSS agency regarding hiring and promotion decisions of employees. These mandates require a background check to be completed at time of hire for all new employees and also at the time of the agency's contract renewal. Background checks consist of a review of the:</p> <ul data-bbox="321 533 1068 684" style="list-style-type: none"> • Civil Application System (CAS), • National Crime Information Center (NCIC), • Local law enforcement • Credit checks and prior employment and personal references. <p data-bbox="321 728 1430 1346">Contracts are renewed no more than every five years. BOP conducts these background checks and forwards the outcome to the BSS agency. Potential employees are not able to enter the Phoenix/Roosevelt RRC facility prior to a background clearance. BSS has a policy against hiring anyone with a history of a sexual abuse conviction. BSS requires all applicants to report previous sexual misconduct, to include civil or administrative adjudication, on a supplemental form which is submitted with their application. Additionally, all employees of BSS have the continuing affirmative duty to disclose sexual misconduct in past employment or while employed at a BSS facility, as listed in the Employee Handbook pages 73-79. Any omissions or false information provided during the pre-employment process would bar the person from employment. If there are any omissions or false information provided during a promotional background check/recurring background check, the employee may be subject to immediate termination. All contractors and volunteers are subject to the same background checks and security clearances as employees. A review of staff records included pre-employment background checks, promotional background checks, and recurring background checks within the 5-year requirement. The Phoenix/Roosevelt RRC facility did not have any contractors or volunteers during this reporting period.</p>

115.218	Upgrades to facilities and technology
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Interviews with facility leadership and information contained in the Pre-Audit Questionnaire (PAQ) indicate there have been no substantial expansions or modifications to the facility during this auditing period. The agency; however, updated the video monitoring system at both sites as follows: Phoenix site added three additional cameras and the Roosevelt site added seven additional cameras. Camera positioning assists staff in the supervision of residents and captures potential blind spot areas. The video monitors have recording capability and are located in the security office at both sites, in the program director's office at the Phoenix site and in the assistant program director's office at the Roosevelt site. Video footage is maintained for 21-days and can be retrieved for review should an incident occur at either site.</p>

115.221	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility is not responsible for conducting criminal or administrative investigations and will initiate investigation of a PREA incident through local law enforcement (Phoenix Police Department), the BOP and the Department of Justice. Therefore, BSS does not have a uniform evidence protocol for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. According to BOP's Statement of Work (SOW), BOP is to be immediately notified of a PREA incident and will provide the RRC with instructions when a PREA incident occurs. The BOP Residential Re-Entry Manager (RRM) can be contacted 24 hours a day, seven days per week. Staff are trained to immediately call 911, to separate the victim from the abuser, and to protect the scene and preserve the evidence.</p> <p>BSS policy states, and as per the Employee Handbook, "staff will preserve the scene by disallowing any person access to the area, and assign another staff to stay with the victim until paramedics and law enforcement arrive on scene. Staff will request that the victim not take any actions that could destroy physical evidence, including washing, brushing teeth, changing closed, urinating, defecating, smoking, drinking or eating. Staff first responders will ask if the medical clinic that the victim will be transported to is Safe or Sane and will document the finding."</p> <p>The Phoenix/Roosevelt RRC sites do not house residents under the age of 18 and they do not provide onsite forensic medical examinations. If a resident is in need of services, they are referred to the Scottsdale Family Advocacy Center for victim services and the Maricopa Medical Center. These services are available 24 hours a day, seven days a week. If needed, the facility would provide a qualified staff to accompany the victim to all services. According to BSS policy, the resident will have unimpeded access to all medical/mental health assistance/appointments, which is at no cost to the resident. The facility has established a MOU with Maricopa Integrated Health System and TASC Solutions for third party reporting. There was no resident who required a forensic medical examination in the last twelve months.</p>

115.222	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Phoenix/Roosevelt RRC does not conduct any type of investigation, including a PREA incident, per their contract with BOP. BSS policy states any allegation of sexual abuse, sexual assault or sexual harassment will be referred for investigation to the contracting agency and/or local law enforcement to conduct an internal/administrative and/or criminal investigation. As contained in the BOP SOW, "The contractor will not conduct an investigation of any misconduct allegation without BOP approval. This includes questioning the subject of a misconduct allegation." This policy is also published on the agency website and can be found under the Newsletters tab. If the agency receives any compliant regarding allegations of sexual abuse or sexual harassment, it would be documented on an incident report form. Further, the information would be included in an email to the BOP. Upon receipt of an allegation facility staff are required to notify local law enforcement and the BOP.</p>

115.231	Employee training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Phoenix/Roosevelt staff are trained on the agency's PREA policies and procedures; including the zero-tolerance policy against sexual abuse and harassment which begins on the employees first day of on the job training. Employees are required to sign numerous documents acknowledging they received the training and that they understand the training. This training includes all of the elements required under 115.231 (a). PREA training is on-going and at least one PREA-related topic is covered during the facility's bi-weekly staff meetings. Additional PREA trainings are provided quarterly. Following each quarterly PREA training, staff are given quizzes to test comprehension. All PREA trainings are documented in the employee's file. The agency has developed a Power-Point presentation for new employees as well as refresher training which is required of all employees at least, bi-annually.</p> <p>Fourteen staff files were reviewed and each of the files contained comprehensive documentation reflecting the high level of PREA training each employee receives. This includes the Self Declaration of Sexual Abuse and Sexual Harassment, the Employee Handbook which contains the PREA policies and procedures, PREA quizzes, on-going PREA training and the signed/dated PREA acknowledgement. The files were neatly organized and the information was easy to locate. Fourteen staff were interviewed which includes the program director and the two assistant program directors. Each staff was able to describe the steps they would take if an incident were to occur at the facility or if a resident were to make a report of sexual abuse or harassment while they were on-duty or if they received a report from a third-party reporter. Overall staff appear to have a solid understanding of their role and responsibilities regarding the prevention, detection, reporting and response to an incident of sexual abuse and sexual harassment.</p>

115.232	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Phoenix/Roosevelt RRC did not utilize volunteers or contractors during this auditing cycle. All contractors and volunteers follow the same background checks and PREA training that Phoenix/Roosevelt RRC employees would follow. Background checks are conducted by the BOP. Contractors and volunteers are not allowed on the facility grounds until they pass their background checks and BOP has notified Phoenix/Roosevelt RRC of their clearances. Background checks are completed through the National Crime Information Center (NCIC) and the National Law Enforcement Telecommunication System (NLETS). Applications also include questions relating to prior administrative discipline, allegations or criminal charges of sexual abuse or harassment. Once the BOP has cleared the contractor or volunteer, they must then be trained in various areas to include PREA. BSS has developed a handbook for volunteers and contractors that includes the policies and procedures for the agency's approach to preventing, detecting and responding to sexual abuse or sexual harassment. PREA training also includes testing to ensure the volunteers and contractors understand what they have learned. Upon completion of all PREA training, volunteers and contractors sign and date stating they received the training and understand the curriculum.</p>

115.233	Resident education
	<p data-bbox="321 201 1450 233">Auditor Overall Determination: Exceeds Standard</p> <p data-bbox="321 268 1450 300">Auditor Discussion</p> <p data-bbox="321 342 1450 447">All residents receive information at the time of intake about the zero-tolerance policy, how to report incidents of sexual abuse or sexual harassment, their rights to be free from retaliation for reporting incidents and how to respond to such incidents.</p> <p data-bbox="321 499 1450 993">Auditors reviewed a random selection of 18 resident files and found that all residents had received PREA information upon intake. This information was provided in the Acknowledgment of Training, Prison Rape Elimination Act (PREA) and Sexual Abuse, and Prevention and Intervention training documents as reviewed by the auditors. Residents are provided this training in writing and verbally upon intake and in six different languages. Contracted interpreters are contacted if the resident needs further assistance. For residents who are vision-impaired or who have limited reading skills, security staff or case manager staff would read them the information. The staff would assist with the PREA education and training to ensure resident's comprehension. Once they have completed the training, residents must sign and date stating they understand what they have learned. All residents receive this training/information upon intake and within their 30-days reassessment which is performed by the case managers. When interviewed, all residents were able to clearly articulate that they had received this information upon intake and during a reassessment.</p> <p data-bbox="321 1045 1450 1339">Whenever a resident is transferred to another facility, whether it is a BSS facility or from a different agency, all residents are provided the same PREA training as if they were entering the facility for the first time. Interviews with residents confirmed that they were being provided the PREA information before leaving a prison facility and during intake at Phoenix/Roosevelt RRC. Resident interviews confirmed that they were provided PREA information in the language of their choice. The facility provides resident training and PREA information beyond that which is required by the PREA Standards and therefore, exceed the requirements of this standard.</p>

115.234	Specialized training: Investigations
	<p data-bbox="328 1533 1455 1564">Auditor Overall Determination: Meets Standard</p> <p data-bbox="328 1600 1455 1631">Auditor Discussion</p> <p data-bbox="328 1673 1455 1778">Phoenix/Roosevelt RRC does not conduct investigations of sexual abuse or sexual harassment per BOP and CDCR requirements. All investigations are referred to the BOP and/or local law enforcement.</p>

115.235	Specialized training: Medical and mental health care
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	The agency does not have medical or mental health care practitioners at the facility. Residents receive these services in the community.

115.241 Screening for risk of victimization and abusiveness

Auditor Overall Determination: Meets Standard

Auditor Discussion

As noted in the BSS Employee Handbook on page 75-76, all residents receive screening for risk of victimization and abusiveness upon intake for new residents or those who have transferred from another facility or agency. The new resident intake packet includes the sexual victimization and sexual abusiveness assessment forms. Additionally there is a checklist in the intake packet to ensure the assessment is completed. When interviewed during the on-site visit, residents confirmed that they were asked questions regarding any history of prior sexual abusiveness or sexual victimization. Auditors verified the initial risk screening assessment was conducted within 72-hours of intake during the resident file review.

A sampling of 20 resident files revealed that all residents were provided three assessments regarding sexual victimization and sexual abuse upon intake. These assessment tools, Sexual Victimization Assessment, Sexual Abuse Assessment and the Medical Intake form provide the agency with information to help assist and determine appropriate housing and special needs (Blind, hard of hearing, prior history or sexual abuse or harassment, LGTB status, disabilities, English learning etc.). Should a history of sexual predation be noted, staff will immediately notify the Program Director who will determine the offenders' suitability for placement at the Phoenix/Roosevelt RRC facility. Auditors reviewed the assessment tools and the date the resident signed that they received the PREA information and understood what they had received. In addition, staff and resident interviews confirmed that these assessments were provided upon intake.

The risk assessment tools considers, at a minimum, the following criteria:

1. Resident's age
2. Resident's gender
3. Physical build
4. History of violence/non-violence
5. Sexual victimization
6. Resident's perceived vulnerability
7. Convictions of sexual offenses, adult and children
8. Resident's perceived identity (i.e., gay, lesbian, bisexual, transgender, intersex or gender non-conforming)
9. Mental, physical or developmental disability.
10. Number of times incarcerated

Residents are scored by a series of numbers for a total of High, Medium or Low for risk factors. BOP will be contacted for residents who receive a score of High to discuss if the resident is suitable for the Phoenix/Roosevelt RRC facility based on the physical plant layout of the facility, the resident make up at the facility, and concerns for all resident's safety. A score of High could require that the resident be moved to another facility. A Medium score would require a discussion at the agency level with the Program Review Team (PRT) to address concerns of safety for all residents and any community resources available to address such concerns. This is a standard policy and practice for each BSS facility.

Follow up assessments are conducted within 30-days of the initial intake assessment by a case manager, or in the event of a new referral, a request, and/or any allegations or incidents of sexual abuse or harassment. In doing so, case managers privately meet with the residents to conduct the re-assessment. Residents are informed that there will be no disciplinary actions taken for refusing to answer or for not responding to questions regarding prior victimization, if they have a disability, their own perception of vulnerability or their sexual orientation. A review of all twenty resident files indicated that re-assessments were conducted within 30-days of intake. When interviewed, all residents were able to articulate that they were provided this assessment and information.

115.242	Use of screening information
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Phoenix/Roosevelt RRC uses information obtained by the BOP prior to the resident's arrival at Phoenix/Roosevelt RRC and at the time of the intake screening to ensure residents are afforded safe housing, bed, work, education, and program assignments. Should the offender be assessed to have a high probability of becoming a victim of sexual abuse, staff will immediately contact the BOP and facilitate an immediate transfer request. The agency's primary goal is keep separate residents who are at a high-risk of being sexual victimized from residents at high-risk of being sexually abusive. A medium-risk score requires security staff to place the resident in housing, but discuss the potential issues and concerns with the facility director prior to doing so and during the program review team meeting.</p> <p>Phoenix/Roosevelt RRC receives referral information from BOP well in advance of receiving the resident, which includes, the resident's gender based upon their physical anatomy. Transgender and intersex residents are placed in housing units based upon their physical anatomy; however, residents are informed of this policy while in prison and they have a choice to not enter the program. These concerns are documented in the resident's file. BSS will not, under any circumstances, discipline an offender for failing to answer any questions during the assessment. All showers are located in private bathrooms in each dorm. Special shower curtains made that allow staff to view the resident's feet and head only. All residents have privacy during showers, while changing clothing or while using the toilet.</p>

115.251	Resident reporting
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Residents housed at the Phoenix/Roosevelt RRC facility have multiple internal and external ways in which to privately report an incident 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. At the time of intake residents are provided with a PREA brochure "End the Silence" which explains the agency's Zero Tolerance Policy and the multiple ways in which they can report an incident of abuse. This includes; reporting to BOP, to a staff member, the PREA Compliance Manager or to the PREA Coordinator, by submitting a grievance, a note to staff or a sick call slip, reporting to legal counsel, or to a family member or friend who can make a report on their behalf by calling the Abuse and Incest National Network. Residents can also report externally by making a confidential report to the agency's designated third-party entities, Treatment Assessment Screening Center (TASC) or Maricopa Integrated Health System. BSS maintains Memorandums of Understanding with these community resource providers to take such reports and to immediately forward resident reports to agency officials. Along with the brochure, residents are given a chart detailing the reporting methods. PREA reporting information is located throughout the facility with comprehensive reporting information and phone numbers, in multiple languages in the day room.</p> <p>Interviews with residents confirmed they are aware of at least three ways to make a report of abuse. Additionally, most all residents have cell phones. Although, residents are not permitted to have or use their cell phones while at the facility, they can use their cell phones privately when off-site. Pay phones are also located in various area throughout the facility. Interviews with staff confirm they are aware of their duty to immediately report an incident of sexual abuse or sexual harassment of a resident, and that they would document such incidents as soon as possible, but no later than the end of their shift. This is dictated per BSS policy, located in the employee handbook.</p>

115.252	Exhaustion of administrative remedies
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The agency's administrative procedure for dealing with resident grievances regarding sexual abuse is in accordance BOP's Administrative Remedy Process. All residents are encouraged to file a grievance to the BOP if they have any concerns. Grievance forms are located in a centralized location and are available to the residents at all times. The resident may send the grievance directly to the BOP RRM without going through the facility mail. The purpose of the grievance is to allow the resident the ability to seek a formal review of any issue related to any aspect of his/her confinement. Administrative remedies regarding allegations of sexual abuse may be filed at any time. Residents are not required to attempt an informal resolution regarding sexual abuse allegations.</p> <p>BOP will issue a final decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance. The BOP may claim an extension of time to respond, up to 70 days, if it determined the normal time period is insufficient to make an appropriate decision. The resident shall be notified by the agency of the extension and the date by which a decision will be made.</p> <p>Third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, are permitted to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse and are also be permitted to file such requests on behalf of residents. The agency documents the resident's decision if they decline to have a third-party request an administrative remedy processed on his/her behalf.</p> <p>In regard to emergency grievances, an expedited BP-9 grievance response shall be provided if a remedy is determined to be of an emergency nature which threatens the immediate health and welfare of the resident(s). After receiving the emergency grievance alleging a resident is at substantial risk, Phoenix/Roosevelt RRC staff will immediately forward the grievance to a level of review in which immediate corrective action will be taken. An initial response will be provided within 48 hours and the agency will issue the final decision within five calendar days. This initial response and the final decision will document the determination whether the resident is in substantial risk of imminent sexual abuse, including the actions taken in response to the emergency grievance. While pending the outcome of the BOP decision, the facility would take steps to protect the resident. Phoenix/Roosevelt RRC does not discipline a resident for filing a complaint related to sexual abuse in bad faith. BOP will render a decision regarding discipline on a case-by-case basis.</p>

115.253	Resident access to outside confidential support services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Phoenix/Roosevelt RRC provides residents with access to outside victim advocates for emotional support services related to sexual abuse by giving them mailing addresses and telephone numbers (including toll-free hotline numbers where available), of local, State, and national victim advocacy or rape crisis organizations. This information is posted throughout the facility, on the PREA bulletin board, in the facility's PREA brochure, on the facility's PREA business cards and in the Resident Handout. Residents are provided this information at time of intake, during new resident orientation classes, and during subsequent meetings with their case managers. The facility allows communication between residents and these organizations, in as confidential a manner as possible. Residents can mail private letters, use the facility's pay phones, use their personal cell phone, or another phone while out in the community to access these support/advocacy services.</p> <p>Residents are informed during resident training of the mandatory reporting laws and the limits of confidentiality as per the local, state, and federal reporting laws. Documentation with resident signatures verifying they received such information was contained their files as observed during the onsite visit.</p>

115.254	Third party reporting
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>BSS policy and procedure, the End the Silence Brochure, and the agency's website describes the methods in which to receive a third-party report. Residents can make a report on behalf of another resident both internally and externally. Family members or other visitors are provided with the End the Silence Brochure, which includes contact information, and can make a report on behalf of the resident. The agency has Memorandums of Understanding with two external entities; TASC, dated October 2017, and Mariposa Integrated Health System, dated August 2017, which were reviewed during the audit. Residents, family members or anyone else can also make a report of sexual abuse or sexual harassment to the Abuse and Incest National Network. The facility provided numerous ways for family and friends to report sexual abuse and sexual harassment and therefore exceed this standard.</p>

115.261	Staff and agency reporting duties
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Phoenix/Roosevelt RRC requires all employees to report immediately to the Facility Director any knowledge of suspicion, or information they receive regarding an incident of sexual abuse, sexual harassment, retaliation for reporting against a staff or resident that occurred at their facility, or any other facility, which includes reports from third parties. This information is defined in the Employee Handbook pages 75-76. Should a report of this kind occur, the Program Director or designee will immediately notify BOP and the PREA Coordinator. The Facility Director will also complete a Serious Incident Report and contact local law enforcement.</p> <p>As defined in the Employee Handbook on pages 73-77, any issue of reported sexual abuse or sexual harassment between staff and offender or offender and offender will be reported immediately to the PREA Manager and/or PREA Coordinator. Staff will accept reports of any sexual abuse and/or sexual harassment made verbally, in writing, anonymously, and from third parties. Should a staff receive a verbal report, staff must document the verbal report within 24-hours and provide the report to the PREA Coordinator and/or PREA Manager at the facility; however, staff reported they would document the report and notify the facility director immediately.</p> <p>Staff and residents may report an incident verbally or by a sealed note/letter to the Program Director/PREA Manager confidentially. Staff will not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, in order to make treatment, investigation or other safety and security decisions.</p>

115.262	Agency protection duties
	<p>Auditor Overall Determination: Meets Standard</p> <p>Auditor Discussion</p> <p>Upon learning that a resident is at substantial risk of imminent sexual abuse, the Program Director and BOP will be notified to determine the most appropriate action. Meanwhile, staff will immediately take action to protect the resident based on the nature of the report. This will include but is not limited to:</p> <ul style="list-style-type: none"> • Keeping the resident in the security office • Moving the resident to a room closer to the security office • Monitoring the resident more closely • Doing additional ground checks and head counts • Monitoring the cameras more frequently • Transferring the resident or the perpetrator for the safety of all residents <p>During interviews with Phoenix/Roosevelt RRC employees, they were able to articulate this information. This information can also be found in the Employee Handbook pages, 75-78.</p>

115.263	Reporting to other confinement facilities
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Upon intake, all residents are questioned about prior sexual abuse during any type of incarceration. Should a resident report such abuse, staff would immediately document the information and contact the Program Director for further instruction. Based on the nature of the offense, the Program Director will contact the BOP to request further instruction. BOP would investigate the matter and based on the nature of the offense, local law enforcement may be contacted. Staff would be precluded, if staff were involved, from working with any offenders pending the outcome of the investigation. If the matter was substantiated, all licensing agents would be notified and staff would never be allowed to work at any federal confinement facility again.</p> <p>BOP has employees trained in investigating sexual abuse allegations. The Phoenix/Roosevelt RRC Facility Director would be responsible for ensuring that all allegations of sexual abuse are documented and request that investigations comply with the PREA standards. There were no cases at the Phoenix/Roosevelt RRC facility alleging sexual abuse/harassment while confined at another BSS or BOP facility. Additionally, there were no notifications received that a former BSS resident reported abuse while confined at any other facility. All information was confirmed by reviewing staff and resident files, and interviews with staff and residents as well as the PREA Coordinator.</p>

115.264	Staff first responder duties
	<p data-bbox="326 197 911 233">Auditor Overall Determination: Meets Standard</p> <p data-bbox="326 264 573 300">Auditor Discussion</p> <p data-bbox="326 338 1438 443">The BSS Employee Handbook page 77, clearly defines the staff's responsibility in the event of being the first responder of a sexual abuse incident. As written, first responders are required to:</p> <ul data-bbox="326 457 1419 919" style="list-style-type: none"> • Secure the victim (Separate from abuser if abuser is still on grounds). • Clear the area • Call 9-1-1 • Preserve the scene by disallowing any person access to the area • Assign another staff to stay with the victim until paramedics and law enforcement arrive to the scene. • Request that the victim not take any actions that could destroy physical evidence, including washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking or eating (same for the abuser). • Request medical responders to transport the victim to a SAFE or SANE medical facility and document the findings. • Notify the Program Director and the PREA Coordinator and write their initial report. <p data-bbox="326 961 1443 1150">The Phoenix/Roosevelt RRC has a First Responder Checklist to ensure proper protocols are followed. All Phoenix/Roosevelt RRC staff are trained as first responders. Interviews with staff revealed adequate knowledge of expected duties acting as a first responder. Additionally, the Phoenix/Roosevelt RRC maintains a Safety Incident Program (SIP) binder which contains First Responder Checklist for staff to quickly retrieve in the case of an incident.</p>

115.265	Coordinated response
	<p data-bbox="326 1333 911 1369">Auditor Overall Determination: Meets Standard</p> <p data-bbox="326 1400 573 1436">Auditor Discussion</p> <p data-bbox="326 1474 1446 1814">Phoenix/Roosevelt RRC has a written institutional plan to coordinate actions among first responders, medical and mental health practitioners, investigators, and facility leadership in the event of a sexual abuse incident. All staff are trained to act in the capacity as first responders. The facility does not employ medical or mental health practitioners therefore, staff will ensure the victim is taken to a medical facility with SAFE/SANE certified staff and ensure the victim receives mental health services as necessary. This written institutional plan is maintained in the facility's Safety Incident Program (SIP) binder. Interviews with staff and the Facility Director indicated an understanding of the steps they would take if they needed to act as a first responder.</p>

115.266	Preservation of ability to protect residents from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Phoenix/Roosevelt RRC does not participate in any collective bargaining agreements. Therefore, there are no collective bargaining related limitations on the agency's ability to remove alleged staff sexual abusers from contact with any offender pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted.

115.267 Agency protection against retaliation

Auditor Overall Determination: Meets Standard

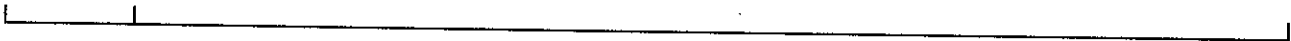
Auditor Discussion

The Phoenix/Roosevelt RRC Employee Handbook defines the staff's requirements for ensuring that all staff and offenders who report sexual abuse or sexual harassment will be free from retaliation by other residents or staff. All staff are required and trained to detect and monitor signs of retaliation. A review of the Phoenix/Roosevelt RRC facility's training records confirmed that staff had been trained in this area. Interviews with staff further confirmed they were aware of how to respond and monitor acts of retaliation which include but are not limited to:

- Monitoring disciplinary action against staff or residents (one staff writing more incident reports on a particular resident than other staff).
- Observing body language of staff and offenders.
- Following up on any reports of retaliation.
- Review video monitors more closely.
- Be aware of staff or residents who complain about a person to try and get them written up.
- Provide them with easy access to someone they feel comfortable within the agency or an outside resource.
- Talk to the person more often.

As mentioned in standard 115.262, the facility will take immediate measures to protect the victim which may include transferring the victim or the abuser to another BSS facility or returning them to BOP. Should the abuser be an employee, that individual would be removed from the facility and ordered to have no contact with the residences or staff pending completion of an investigation. Phoenix/Roosevelt RRC will provide the resident with referrals to free community-based resources to address emotional support. TASC Solutions and Maricopa Integrated Health System will be contacted to provide the resident advocacy services during all phases of the investigation at no cost to the victim. Staff and residents alike were able to articulate this information during their interviews. Resources for services were posted throughout the facility, on the PREA business card, the PREA brochure, and provided to the residents in their handouts during the intake process. This information can also be found in the Employee Handbook.

In the event of a report of sexual abuse, regardless if the incident was determined to be unfounded or unsubstantiated, the staff would continue to monitor the conduct and treatment of all residents who may have a fear of retaliation throughout their confinement at the Phoenix/Roosevelt RRC facility. Any acts of retaliation are grounds for termination from the program or employment as written in the BSS policy. To ensure residents are not subjected to acts of retaliation, the facility would monitor disciplinary reports to make sure there are no petty write ups or increased write ups, inappropriate housing changes, and lack or refusal to communicate by staff. The facility would conduct status checks on the residents by stopping to talk to them more often and discussing any issues they may have with their case manager. The agency would monitor staff retaliation by reviewing changes in performance evaluations, change in facility job assignments, or behavioral changes. Monitoring of staff would continue well over 90-days until there is no concern or suspicion of possible retaliation.



115.271	Criminal and administrative agency investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Phoenix/Roosevelt RRC does not conduct investigations of any misconduct allegation to include anonymous and third-party reporting. This includes questioning the subject of the misconduct allegation. Misconduct of any nature is immediately reported to BOP and local law enforcement (for criminal matters). If allegations are sustained, BOP will determine and impose the appropriate sanctions. These investigating agencies have investigators who are trained in conducting sexual abuse investigations. The investigators from these agencies are responsible for all aspects of the investigation to include but not limited to the collection of evidence and electronic monitoring data, and interviews with victims, witness and perpetrators. BOP may direct Phoenix/Roosevelt RRC to provide preliminary information during the investigation process. Phoenix/Roosevelt RRC is not responsible for communicating with prosecutors regarding criminal investigations. Therefore, they do not assess the credibility of an alleged victim, suspect, or witness. The investigating agency is responsible for all communication with the victim, witness and perpetrator.</p> <p>Phoenix/Roosevelt RRC does not conduct administrative or criminal investigations. When BOP or any of the previously mentioned agencies conduct an administrative investigation, all aspects of the investigation will be reviewed to determine the true facts of the case which includes staff actions. All criminal and administrative investigations are provided in written reports and will include a description of the physical and testimonial evidence, facts of the case and a disposition of the case. Per the PREA Coordinator, all reports are retained for the duration of the resident's incarceration with a BOP facility and for at least 5 years after their release.</p> <p>Resident termination from the program or staff termination from employment would not provide any basis for termination of an investigation. In addition, Phoenix/Roosevelt RRC will cooperate with all investigating agencies and attempt to remain informed of the outcome of the case.</p>

115.272	Evidentiary standard for administrative investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Phoenix/Roosevelt RRC does not conduct investigations; however, when residents are transferred to Phoenix/Roosevelt RRC they are provided copies of the rules and regulations of the facility and sanctions for violation of said rules and regulations. BSS has a zero-tolerance policy. If any staff or resident is in violation of these set of rules, it clearly states in the Employee Handbook and in the Resident's Handout, that they will be terminated from the program/employment for sexual abuse.</p>

115.273	Reporting to residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Although Phoenix/Roosevelt RRC does not conduct investigations, they will remain in communication with the investigating agency until the end of the investigation and provide the resident with information regarding the outcome of the investigation. Phoenix/Roosevelt RRC utilizes the DOJ Survey of Sexual Victimization SSV-4 form and Survey of Sexual Victimization SSV-IA to collect sexual abuse data, in addition to maintaining facility records to document that the resident has been informed of the investigation's outcome. Upon learning of the outcome of an investigation involving the abuser, the resident will be informed if the staff member is no longer with the agency and the outcome of any Criminal Court hearing. All information provided to the resident will be documented.</p>

115.276	Disciplinary sanctions for staff
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>BSS Employee Handbook page 52, clearly defines "Violation of any PREA condition is absolutely forbidden and will result in suspension and/or termination. If the employee engages in sexual abuse, the employee will be terminated." Should there be an incident of sexual abuse or sexual harassment, BSS clearly states that the agency is an "at-will" agency and that any misconduct as defined in the Employee Handbook will result in termination. Misconduct includes:</p> <ul style="list-style-type: none"> • Excessive Tardiness • Excessive absenteeism • Careless conduct/negligence • Leave without approval • Dishonesty • Insubordination/use of expletives • Possession/Consumption of Drugs/Alcohol • Theft • Unapproved use of Company premises/property • Weapons on facility • Defacement of Company property • Physical assault • Divulging confidential information • Violation of Company rules • Previously stated unacceptable conduct • Lack of cooperation with a public agency • Violation of any PREA standard <p>All criminal matters are reported to local law enforcement and to BOP for investigation. Phoenix/Roosevelt RRC has not had any incidents of staff-involved sexual abuse or sexual harassment in the last 12 months.</p>

115.277	Corrective action for contractors and volunteers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>All contractors and volunteers are held to the same standards as employees. If a contractor or a volunteer violates any of the PREA standards, they would immediately be removed from the facility and would not be allowed to have any contact with any of the residents. As with employees, criminal complaints would be filed with the local law enforcement and BOP would be notified. The contractor or volunteer would be "tagged" through the BOP and would not be allowed on any federal confinement facility or contracted facility. Phoenix/Roosevelt RRC has not utilize contractors or volunteers during this reporting period.</p>

115.278 Disciplinary sanctions for residents

Auditor Overall Determination: Meets Standard

Auditor Discussion

The BOP handles all formal disciplinary matters for residents. Should a resident be in violation of a PREA standard, the BOP and law enforcement (for criminal matters) would be contacted. Based on the nature of the offense, BOP would determine if the resident would remain at the facility and what type of discipline he/she would receive. Disciplinary sanctions are clearly documented in the BOP's SOW. This was confirmed by a review of the SOW and by residents and staff interviews. BSS prohibits disciplinary action for a report of sexual abuse made in good faith based upon the reasonable belief that the alleged conduct occurred even if the evidence does not establish evidence to substantiate the allegation.

Prior to arriving at the Phoenix/Roosevelt RRC, residents are provided with the facility rules and regulations and sanctions for violation of said rules and regulations. Upon arrival to Phoenix/Roosevelt RRC, the facility rules, regulations, and sanctions are again reviewed with the resident. The resident must sign and date that they have read the rules, regulations and sanctions and agree to abide by them. This process is repeated whenever a resident enters/reenters the program even if they have been transferred from another BSS facility. When determining sanctions for residents who violate the rules of the program, all factors are taken into consideration on a case-by-case basis to include but not limited to the comparable offenses by other residents, mental health disabilities, prior history of offenses and prior sanctions. In an incident of sexual abuse, both the victim and the perpetrator will be offered community-based services to address the incident or underlying reasons or motivations for the abuse.

Phoenix/Roosevelt RRC employees and residents are prohibited from engaging in sexual acts and are provided written and verbal information regarding violations of such acts. These restrictions and sanctions are written in the contract between BOP and the BSS agency. Employees and residents alike, must sign and date that they have read and understand the rules. Should an employee or resident engage in a sexual act, BOP would terminate the employee from employment and remove the resident from the program. However, if the act was consensual, criminal charges would not be filed.

Phoenix/Roosevelt RRC prohibits all sexual acts between residents. Residents are provided this information upon intake. During the resident interviews, residents confirmed this information. Should residents commit any type of sexual act whether coerced or not, BOP would investigate the matter and determine sanctions based on the nature of the act.

115.282	Access to emergency medical and mental health services
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Phoenix/Roosevelt RRC does not provide any on site medical and/or mental health care. All medical and/or mental health services are located off-site at community-based facilities. Services that specialize in sexual abuse, sexual harassment and trauma-related care are posted throughout the facility to include SAFE and SANE services and locations. All 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. Phone numbers for these services are provided in both 800 (when available) and local numbers. Residents are provided this information in the Resident Handout they receive during the intake process and during PREA training. This was confirmed by a review of the resident's files which contained the resident's signature stating they received the information. All staff are trained in First Responder Duties, should an incident of sexual abuse occur. Furthermore, staff were able to articulate during interviews the preliminary steps they would take to protect the victim by first calling 911 and securing the victim and the scene.</p>

115.283	Ongoing medical and mental health care for sexual abuse victims and abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Phoenix/Roosevelt RRC does not provide medical or mental health services. All services are provided by referrals to community-based services. All services are provided free of charge with no cost to the victim. Victims who have been sexually abused through vaginal penetration are afforded pregnancy test, comprehensive information about pregnancy related medical services and tests for sexually transmitted diseases at these care centers. Continuum of care is at the direction of the physician treating the resident. Should the residents care require transfer to another facility or release from custody, BOP would be notified immediately to make the determination. Phoenix/Roosevelt RRC does not determine the placement of the resident. They do however, inform BOP if the resident's safety or medical condition could or could not be met at a BSS facility.</p> <p>Auditors contacted the community-based agencies and confirmed the information as provided above.</p>

115.286	Sexual abuse incident reviews
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The critical incident review team (CIRT) consists of the PREA Coordinator, the facility's program director, the facility's assistant program director, the security monitor supervisor and the BOP. The PREA Coordinator will facilitate the meeting and will determine the exact composition of the team based on the nature of the incident. If an incident occurs, the team will meet and discuss circumstances surrounding the incident as described in the PREA Standard. Reviews are usually conducted within 72-hours of the incident and during the investigation and always well within the 30-day requirement. Phoenix/Roosevelt RRC does not conduct investigations; however, they do maintain contact with the investigating agency for continual updates.</p> <p>Policy changes are based on the CIRT recommendations. The team will review all aspects of incident as to facts that may have caused the occurrence and factors as listed in the PREA Standard. Policy changes and practices are reviewed based on whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse. Should any of these factors need to take place, they will be initiated immediately and forwarded to all BSS facilities for immediate action.</p> <p>In the event recommendations are made after a review of a critical incident, the facility will implement or consider implementing recommendations for improvement. If for any reason, the recommendations are not implemented, the facility will document its reasons for not doing so.</p> <p>Interview with the PREA Coordinator, indicated that incident-based and aggregated data were securely retained. Annual data can also be found on the BSS agency website.</p>

115.287	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Phoenix/Roosevelt RRC utilizes the standardized Department of Justice Survey of Sexual Violence Incident Report form SSV-IA regarding all individual acts of sexual abuse and the Department of Justice Survey of Sexual Violence Summary Form SSV-4 for an annual report. Definitions for "Sexual Abuse and Sexual Harassment" are listed on these forms. An aggregated incident of sexual abuse report is provided on the BSS website on an annual basis. Phoenix/Roosevelt RRC does not contract with any agencies to house their inmates. The data collected is for the agency's facilities only. Phoenix/Roosevelt RRC does not conduct investigations; however, should an incident occur, Phoenix/Roosevelt RRC will request the relevant information from the investigative agency and report the information on the SSV-IA or the SSV-4 form as required. Specific identifying information collected for reporting purposes shall be redacted so that no individual is identifiable. The Annual PREA Report is available for view by the public on the agency's website under the tab "Newsletters."</p>

115.288	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>BSS reviews data collected and aggregate it annually in order to assess and improve the effectiveness of its sexual abuse prevention, detection and response policies, procedures and training. The Annual PREA Report captures data from January 1 to December 31 of each year and any additional information that is required by the SSV-4 form as required by the DOJ.</p> <p>The report also includes a comparison of the current year's data and corrective actions taken to reduce the incident of sexual abuse, sexual harassment, and retaliation with those from prior years, and provides an assessment of the agency's progress in addressing the sexual abuse. The annual report is prepared by the Executive Vice President/PREA Coordinator and approved by the agency's President/COO. A review of the agency's website and interviews with the PREA Coordinator confirmed the agency is in compliance with this standard. All incident-based and aggregated data is stored and locked in the Executive Vice President's office and is retained for at least 10-years after the data of initial collection. Aggregated sexual abuse data is provided in the annual report and published on the agency's website. All personal identifiers are redacted prior to posting on the agency's website.</p>

115.289	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	All incident-based and aggregated data is stored and locked in the Executive Vice President's office and is retained for at least 10-years after the data of initial collection. Aggregated sexual abuse data is provided in the annual report and published on the agency's website. All personal identifiers are redacted prior to posting on the agency's website.

115.401 Frequency and scope of audits

Auditor Overall Determination: Meets Standard

Auditor Discussion

The Phoenix/Roosevelt RRC facility was last audited in December of 2014 with the final report submitted in December 2014. The facility met the three-year audit cycle requirement. The current audit was conducted in November 2017 with the final report being released in November 2017 which places both sites in compliance with the three-year audit requirement cycle.

The PREA Standards require that the agency audit at least one-third of their facilities each year during the three-year cycle. Although the agency was not in compliance with this requirement during the first and second audit cycles, they were in compliance with having the facility audited within each auditing cycle and prior to three years of the last audit for this facility. Based on this information and confirmation with the PREA Resource Center, they are in compliance with each audit cycle. The agency has agreed that during the next auditing cycle, they will ensure that no less than one-third of their facilities will be audited each year.

During the on-site portion of the Phoenix/Roosevelt facility PREA audit, all areas of the facility were toured and were accessible to the auditors during the on-site visit. These areas included; the living units at the Phoenix and Roosevelt sites, the staff and case managers' offices, the kitchen and day room areas, the security office and the facility exteriors and recreation areas.

The facility was accommodating when the auditors requested additional documentation. During the pre-audit phase, all requested and required documentation was upload to the OAS. When additional documents were requested during the auditing process, the facility director would immediately provide copies or access to the information needed.

The on-site documentation review included; all resident and staff files, maintenance log books, incident and grievance logs for the past twelve months, staff and resident PREA training materials, the facility logbook and case manager notes. Any additional requested documentation or information was immediately provided to the auditors. All files, and documents were very well kept, neatly organized, and readily available to the auditors.

At the time of the on-site audit there were 44 staff employed and 102 residents living on-site. BSS contracts with the Bureau of Prisons (BOP). At the time of the on-site visit, auditors randomly chose 15 staff to interview based on their job titles and duties. Residents were randomly selected by the auditors based on a targeted population (Disabled, LGBTI, Blind, Deaf, or Hard of Hearing, or Sexual Abuse while at the Facility) and a random population of residents. The Phoenix/Roosevelt RRC staff were very accommodating by insuring the auditors had a private room to conduct interviews and ensured interview time was not wasted by having staff and residents available for interviews.

Notice of the PREA audit was provided to the agency and posted at the Phoenix/Roosevelt RRC facility six-weeks prior to the on-sit visit. The facility provided an email with photos of the postings verifying the date they were posted. The auditors had previously audited the facility during the first audit cycle and were familiar with the posted locations. During the on-site audit,

the postings were visible to the auditors and posted throughout the facility. These postings were clearly visible to all residents and visitors. The information contained in the postings provided residents, employees, and third-party persons with information on how to contact the auditors confidentially in writing and by email, in addition to the dates of the on-site audit. The information was also printed and posted in Spanish. There was no correspondence sent to the auditors during the Pre-Audit phase. Overall, the facility and staff was well-prepared for the PREA audit.

115.403	Audit contents and findings
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>The audit reports for all BSS facilities are posted on the BSS website and are accessible to the public. The first audit cycle for the Phoenix/Roosevelt RRC facility was posted immediately upon receipt in 2014 and is currently posted on the website for the public to view. The reports are also available in hard copy at each facility and provided to the public for review upon request.</p> <p>The Phoenix/Roosevelt RRC facility exceeds the standards as they have also made the audit reports available in hard copy at the facility for those individuals who may not have access to a computer. The agency provides alternative ways for the community to review their PREA Audit Report and therefore, exceeds this standard.</p>