

PREA Facility Audit Report: Final

Name of Facility: Vinewood RRC
Facility Type: Community Confinement
Date Interim Report Submitted: NA
Date Final Report Submitted: 11/27/2017

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: 11/27/2017

AUDITOR INFORMATION	
Auditor name:	Brister, Teri
Address:	
Email:	audit_solutions@yahoo.com
Telephone number:	
Start Date of On-Site Audit:	10/12/2017
End Date of On-Site Audit:	10/13/2017

FACILITY INFORMATION	
Facility name:	Vinewood RRC
Facility physical address:	5520 Harold Way, Los Angeles, California - 90028
Facility Phone	323-464-0817
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:	Bari Caine-Lomberto	Title:	EV/PREA Coordinator
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Facility Director			
Name:	Rommel Dumanil	Title:	Director/PREA Compliance Manager
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Facility PREA Compliance Manager			
Name:	Rommel Dumanil	Email Address:	rdumanil@behavioralsystemssouthwest.com

Facility Health Service Administrator			
Name:	N/A	Title:	
Email Address:		Telephone Number:	

Facility Characteristics			
Designed facility capacity:		70	
Current population of facility:		39	
Age Range	Adults: 18-69	Juveniles:	Youthful Residents:
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:	csindholm@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 Vinewood Residential Re-Entry Center (RRC) was conducted on October 12-13, 2017 by Certified PREA Auditors Teri Brister and Christina Kampczyk. Teri Brister was the lead auditor. The PREA audit notice with contact information for the auditors was posted at the facility in various locations six-weeks prior to the on-site audit. This was verified by photos that were sent to the auditors via e-mail. Additionally, these notices were observed in the various locations during the on-site audit. The Pre-Audit Questionnaire (PAQ) was uploaded to the On-line Audit System (OAS) several weeks prior to the on-site visit, along with facility specific PREA information, including staff and resident training records, and the training curriculum for staff. Agency-wide PREA information was uploaded into the PAQ for the Rubidoux facility, which was conducted on September 14-15, 2017. Auditors referred to this PAQ for the agency-wide PREA policies and procedures during the pre-audit review of documentation. Additionally, the PREA Coordinator and Executive Vice President of Behavioral Systems Southwest, Bari Caine-Lomberto, was interviewed during the on-site visit of the Rubidoux facility. Several days prior to the on-site visit, an agenda was sent to Mrs. Caine-Lomberto outlining the agenda for the on-site visit.

On October 14, 2017, the first day of the on-site visit, an entrance meeting was conducted with Executive Vice President/PREA Coordinator Bari Caine-Lomberto and Facility Director/PREA Compliance Manager Rommel Dumanil. During the meeting, we discussed the plan for the two-day site visit. Auditors were provided with the current staff roster including staff positions, the current resident roster by room assignment and a list of targeted residents (blind, deaf, disabled etc.). At the time of the audit, the population was a total of 40 residents, with 34 male residents and 6 female residents. There were twenty staff assigned to the Vinewood RRC at the time of the audit. Following the entrance meeting, Facility Director Dumanil led the auditors on a comprehensive facility tour of the interior and exterior of the three buildings, including; the residential living quarters, the staff office areas, the front lobby and reception/control area, the kitchen, and the classroom and multipurpose room. During the facility tour, auditors observed camera locations and positioning, ensuring that potential blind spots were covered by cameras in order to supplement staff supervision. Additionally, auditors were able to speak with some of the residents during the facility tour regarding PREA practices such as, the knock/announce notice prior to staff entering their rooms or the restrooms, where they could find outside resources for sexual abuse and sexual harassment, and how long the PREA notices and resource information had been posted prior to the auditor's on-site visit. All responses found the facility in compliance with the specific questions asked. The agency's Zero Tolerance policy was posted along with the agency's knock/announce notice which were observed in each of the fifteen living quarters. The notice of the PREA audit was also observed in several locations accessible to residents, staff and visitors.

The auditors were provided with private office space in which to conduct staff and resident interviews. Twelve residents were randomly selected for interviews from the roster provided and this selection included a representative sampling from each housing unit including one disabled male resident, one bisexual female resident and one limited English speaking resident. Overall, three targeted resident

interviews were conducted. There were no transgender or inter-sex residents identified by staff during the on-site visit. Twelve staff interviews were conducted which included the Program Director/PREA Compliance Manager and assistant program director. Of these twelve interviews, seven random staff interviews were conducted and four specialized staff interviews were conducted.

The auditors reviewed twelve staff files, which included the program manager, case managers, and security staff. Each staff file contained the criminal record clearance completed by the Bureau of Prisons (BOP), the employment application, PREA training records and signed acknowledgement of the agency's zero tolerance policy against sexual abuse and sexual harassment. Twelve resident files were reviewed and each file contained; the screenings for risk of victimization and abusiveness, the re-screenings conducted within 30-days, and PREA training records. During the on-site audit, the facility logbook was reviewed. The logbook is a chronological documentation of daily activities, which includes staff signing in and out for shifts, residents departing or returning to the facility, grounds checks and head counts, maintenance issues and any special incident reports. Any PREA-related incident would also be documented in the logbook if one were to occur. The facility also maintains an emergency binder which contains information on how staff would respond in an emergency situation, including contact information. First Responder information is also contained in the emergency binder. Other documentation reviewed during the on-site visit includes resident complaints/grievances and special incident reports. Auditors also observed the visitors sign-in log. All visitors that enter the facility grounds must sign into the facility visitor's log. Contained in this binder is for all visitors to review, is the agency's Zero Tolerance Policy against sexual abuse or sexual harassment. All visitors must sign and date that they were provided and understood the information.

The Vinewood RRC is contracted through the Bureau of Prisons (BOP) for the confinement of offenders and is required by BOP to be PREA compliant. This is the second audit for the facility. The facility successfully completed their first PREA audit in November 2014. Overall, residents reported feeling safe at the facility and are aware of the many reporting methods in which to report an incident of sexual abuse or sexual harassment. An exit meeting was conducted at the end of day two of the on-site audit with the Executive Vice President/PREA Coordinator and the Program Director/PREA Compliance Manager. The facility and staff at the Vinewood RRC were well prepared for the PREA audit. Behavioral Systems Southwest (BSS) scheduled PREA audits for their six facilities to occur within a three-month period of time and the Vinewood RRC was the third PREA audit for the agency during this time period. Since this was the agency's third PREA audit in a relatively short time period, the Vinewood RRC benefited from feedback from the program directors at the Rubidoux RRC and the Orion RRC, regarding the audit process including recommendations made by the auditors at those sites. Program Director Dumanil ensured all requested facility specific documents were prepared for our visit and ensured staff and residents were available for interviews. The on-site visit was very well organized which can be attributed to Program Director Dumanil's preparation and attention to detail. There were no corrective actions required at this facility.

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 Vinewood RRC is located in Los Angeles, California and is operated by Behavioral Systems Southwest, Inc (BSS). BSS is a private for-profit corporation with headquarters in San Clemente, California. The agency provides community correctional services to the Federal Bureau of Prisons (BOP). The agency operates three residential facilities in California and three residential facilities in Arizona, that require PREA Audits. Each RRC operated by BSS is audited by BOP and the American Correctional Association (ACA). Additionally, each RRC operated by BSS is accredited by ACA. The Vinewood RRC facility is under contract with the BOP. The agency's six residential re-entry center were last audited in 2014 and this is Vinewood's second PREA audit. The Vinewood RRC was found in compliance with the PREA Standards in 2014.

All six RRC locations are based on a social service model designed to address the criminogenic risks and needs of the ex-offender population by introducing evidence-based, cognitive behavioral intervention. The 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. The purpose of the RRC is to transition inmates into communities prior to their release from incarceration. The average length of stay at the Vinewood RRC is six months and includes a home detention component in which residents continue to receive monitoring by facility staff. Residents are able to participate in work and school activities outside of the facility and utilize community-based resources. BSS conducts programming in the following areas using Cognitive Behavioral Change curricula and counseling techniques:

- Life Skills Development
- Anger Management
- Stress Management
- Money Management
- Effective Parenting
- Housing Development
- Job Search Assistance
- Employment Development
- Substance Abuse Education and Counseling

Vinewood RRC is located in Los Angeles, California and was originally built in 1921 by silent movie star Mary Pickford. BSS began operating the Vinewood RRC facility in 1981. The facility houses both male and female inmates with a total of 70 beds; fifteen of which are dedicated to female inmates. There are three buildings on the facility grounds with each building containing a housing unit and outdoor patio area. The main building is two stories. The first floor of this building consists of several offices for key staff, administrative staff and security staff, the kitchen, a restroom, storage areas, the control room and a front lobby. Residents departing or returning to the facility from the community enter through the lobby to the control area where they are processed by security staff. Additionally, visitors entering the facility

premises for any reason, enter through the front lobby and are required to check in at the control desk and sign in to the visitor's log. Notices of the PREA audit and the agency's zero tolerance policy were clearly posted in the lobby/control area. Other postings included third-party reporting information including the PREA Coordinator, the National Domestic Violence Hotline and the Suicide Prevention Hotline. There are four dorm-style rooms located on the second floor which houses male residents. Each housing unit at the facility contains the zero-tolerance policy, and the knock/announce notice reminding residents that staff of the opposite gender will announce themselves prior to entering the room.

The second building located on the east side of the facility grounds is comprised of ten bungalow-style rooms with four of these rooms utilized by female residents. Each room contains bunk beds and lockers for residents to store their personal belongings. Each room has an attached or connected bathroom. All bathrooms in the facility are private and with doors. All residents are required by facility rules to change clothing in the bathrooms. The exterior doors to each living unit has a small window for staff to check on residents. There are no cameras located in any of the living units or bathrooms. The outdoor patio area adjacent to this building contains outdoor furniture for the residents use as well as pay phones. The female residents each have a key to secure their rooms.

The third building is located on the west side of the facility grounds and includes the Case Managers' offices, a small classroom, a multipurpose room with a television and vending machines and a laundry room. There are two staircases leading to the second story which is a housing unit for male residents. One of these staircases is completely enclosed and is used only as an emergency exit. This staircase is equipped with an alarm system which will sound loud enough to be heard throughout the facility should someone open the door at either end of the stairwell. There is also a laundry room located on the first floor of this building which is used by both male and female residents at separate designated times. There are two locked storage sheds to the rear of the property for use by maintenance staff. Comprehensive PREA information was observed on the PREA bulletin board in the multipurpose room. This information included the agency's zero tolerance policy, the third-party reporting methods, the contact information for the PREA Coordinator and contact information for the local Rape Crisis Center.

The entire facility is enclosed by a locked gate with a separate entrance which is not locked. There is a total of 21 cameras located in visible areas of the facility interior and exterior. Camera positioning address blind spot areas and enhance staff supervision. The video monitoring systems are located in four areas of the main building; the control room, the administration/security office, the program director's office and the assistant program director's office. Staff are required to view the monitors continuously throughout their shift. Various areas on the facility perimeter are fenced in to prevent access to residents as well as potential blind spots to staff supervision. This facility was observed to be orderly and in well maintained condition. Throughout the facility tour, PREA information was observed by the auditors. Additionally, during the facility tour, auditors communicated with residents who stated they were aware of the audit, that they could communicate with the auditors and that they received PREA-related education upon their arrival to the facility.

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:	4
Number of standards met:	37
Number of standards not met:	0

The on-site visit of Vinewood RRC was conducted October 12-13, 2017. During the audit, the auditors determined the facility was in full compliance with the PREA Standards. The Vinewood RRC facility was the third BSS facility to be audited within a few weeks apart which may have attributed to the facility's full compliance. Regardless, the auditors carefully reviewed all aspects of the facility's operations and found that the Vinewood RRC facility had no deficiencies. The staff have a strong desire and duty to provide a safe and secure environment for their residents and are dedicated to the philosophy of the PREA standards. There were four areas in which the Vinewood RRC exceeded the standards: 115.231, 115.233, 115.254, and 115.403.

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

Number of Standards Exceeded: 4

Number of Standards Met: 37

Number of Standards Not Met: 0

Number of Standards Not Applicable: 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 Vinewood RRC facility has zero tolerance for sexual harassment or sexual abuse. Their zero-tolerance policy is posted throughout the facility and on their 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 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, the Employee Handbook, the 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 PREA 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>Vinewood 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 Vinewood 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 Vinewood RRC. BOP 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 according to the facility director.</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. Vinewood RRC facility directors are to 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
	<p data-bbox="358 268 597 300">Auditor Discussion</p> <p data-bbox="358 338 1443 674">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 Vinewood RCC co-ed facility is equally balanced 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 data-bbox="358 709 1443 1161">In the case of a transgender or intersex resident, the Vinewood 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 is 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 data-bbox="358 1197 1443 1493">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 issues 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 Vinewood RRC provides PREA information in six languages which include; Armenian, Spanish, Vietnamese, Romanian, Korean, and Hebrew. Vinewood 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. Vinewood RRC disallows 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
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>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 review of the:</p> <ul 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>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 Florence 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. The Florence RRC facility did not have any contractors or volunteers during this reporting period. However, BOP contracts for psychiatric services with Dr. Brennan and his office is located at the Florence RRC facility. A review of Dr. Brennan's file confirmed that he received the same PREA training and background check that employees receive. 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.</p>

115.218	Upgrades to facilities and technology
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The facility has not undergone any substantial expansion or modification of existing facilities. During the on-site visit all cameras and monitors appeared to be functioning with no issues. There were no blind spots noticed as cameras view all areas of the facility. Camera monitors were in working order and located in areas where staff and the program director could view them.</p>

115.221	Evidence protocol and forensic medical examinations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Vinewood RRC facility does not house residents under the age of 18 and they do not conduct criminal or administrative investigations. The Employee Handbook, pages 73-79 and BOP's Statement of Work (SOW) pages 16-21 clearly states that all allegations of sexual abuse or sexual harassment are reported to the BOP for investigations and BSS staff are not permitted to question any individuals who are subject of the investigation. Additionally, BSS staff does not collect useable physical evidence; however, they would preserve evidence by securing the scene and the victim/abuser if possible. If the incident is criminal in nature then local law enforcement will be contacted. All staff are required to cooperate with any investigation. Once BOP and/or local law enforcement have completed their investigation, the victim will be informed of the outcome. BSS maintains records regarding the onset of the investigation to the completion of the investigation. When interviewed, staff were able to articulate that investigations were not conducted by the Vinewood RRC staff and only by an outside agency.</p> <p>Vinewood RRC does not have onsite access to forensic medical examinations. If a resident is in need of services, they are immediately referred to The Rape Foundation located at the Santa Monica/UCLA Medical Center. The Rape Foundation offers SAFE and SANE certified forensic nurses in addition to services for counseling at their Verna Harrah Sexual Assault Examination Clinic. The Rape Foundation is available 24 hours a day, seven days a week. If for any reason, The Rape Foundation is not available (which is highly unlikely), the facility would provide a qualified staff to accompany the victim to all services. During interviews with staff, they were able to describe the steps they would take following an incident of sexual abuse.</p>

115.222	Policies to ensure referrals of allegations for investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Vinewood 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 complaint 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: Exceeds Standard	
Auditor Discussion	
<p>All Vinewood RRC employees receive a curriculum-based training on the agency's zero-tolerance policy and all of the elements as described in 115.231 (a) at the time of hire. Employees also receive quarterly refresher training covering a variety of PREA-related topics. At the time of hire, the Employee handbook is discussed in detail with the new employee. This handbook describes the expectations of the new hire, the PREA-related policies and procedures, and repercussion should an employee violate any of the PREA policies.</p> <p>PREA training is tailored to the male and female resident composition at the facility. This training includes written and verbal instruction and a quiz to ensure staff have retained the information they received. All training provided requires the staff to sign and date that they have received the training and understand what they have learned. Additionally, at least one of the PREA standards is discussed during bi-weekly staff meetings which is also documented.</p> <p>When interviewed, employees were clearly able to articulate their responsibilities regarding sexual abuse and sexual harassment prevention, detection, reporting, and response. Staff were also able to describe first responder duties in detail. A review of twelve staff files clearly show the facility is documenting its efforts at providing comprehensive training to the staff. The files show inclusion of the Self Declaration of Sexual Abuse and Sexual Harassment, the signed/dated PREA Acknowledgement, the PREA quizzes and all PREA-related training. The training records were exceptionally well kept and easily trackable. The agencies continued and frequent training regarding the PREA standards, and the agency's exceptionally well documented training records gives this agency an exceeds in this standard.</p>	

115.232	Volunteer and contractor training
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Vinewood RRC did not utilize volunteers or contractors during this auditing cycle. However, all contractors and volunteers must follow the same background checks and PREA training that Vinewood 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 Vinewood 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 related 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 an acknowledgment stating they received the training and understand the curriculum.</p>

115.233	Resident education
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>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>Auditors reviewed a random selection of 12 resident files and found that all residents had received this information upon intake. This information was provided in the Acknowledgment of Training, Prison Rape Elimination Act (PREA) and Sexual Abuse, 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 needed further assistance. For residents who are vision-impaired or who have limited reading skills, security staff or Case Managers 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>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. A sampling of 12 random and targeted resident files were reviewed and confirmed that all residents transferred received such training. In addition, interviews with residents confirmed that they were being provided the PREA information before leaving a prison facility and during intake at Vinewood RRC. Resident interviews confirmed that they were provided PREA information in the language of their choice.</p>

115.234	Specialized training: Investigations
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Vinewood RRC does not conduct investigations of sexual abuse or sexual harassment per BOP. 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. When interviewed, residents confirmed that they were asked questions regarding any history of prior sexual abusiveness or sexual victimization. All resident files confirmed that residents receive such screening within 72 hours of intake.

A sampling of 12 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 Vinewood 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 Vinewood 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 to address concerns of safety for all residents and any community resources available to address such concerns.

Follow up assessments are conducted within 30 days of the initial intake assessment 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 meet the residents to conduct the reassessment.

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 resident files indicated that reassessments 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>Vinewood RRC uses information obtained 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>Vinewood RRC receives referral information from the 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 process. All showers are located in private bathrooms so 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>Vinewood RRC provides multiple internal and external methods for a resident to report sexual abuse, sexual harassment, retaliation by other residents or staff for reporting and staff neglect or violation of responsibilities that may have contributed to the abuse. Residents are provided this information at time of intake, during subsequent meetings with their Case Manager, and during resident orientation classes. They can privately communicate with their Case Manager, a security monitor, or facility administration. If they do not want to report to anyone inside of the facility, they can report to any outside third party; including BOP, law enforcement, The Rape Foundation and Detection Treatment Resource (DTR). DTR is a third-party reporter and will immediately report to the BOP that an incident occurred at the Vinewood RRC, while allowing the resident to remain anonymous. Reports can be made verbally, anonymously or in writing. Residents are also encouraged to report to a friend or family member or anyone else they feel comfortable with. Vinewood RRC emphasizes the importance that residents tell someone. Staff are required to document all allegations of abuse immediately and to follow agency policy regarding notification and steps to ensure residents safety. Staff were clearly able to articulate this information during interviews. This information is also posted on bulletin boards throughout the facility and provided to the residents during intake. Staff are able to make a private report directly to the PREA Coordinator who will handle the sensitive information, or they can make the report directory to BOP, or to law enforcement.</p>

115.252	Exhaustion of administrative remedies
Auditor Overall Determination: Meets Standard	
Auditor Discussion	
<p>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 without having to request a form from staff. The resident may send the grievance directly to the BOP Residential Re-Entry Manager's office without going through the facility mail. The purpose of the grievance is to allow the resident 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 based 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 related 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, Vinewood 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. Vinewood RRC does not discipline a resident for filing a complaint related to sexual abuse in bad faith. BOP will receive this information and 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>Vinewood 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, 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>Vinewood RRC has an established Memorandum of Understanding with Detection Treatment Resources (DTR) to report to BOP if they receive a report that an incident of sexual abuse or sexual harassment has occurred at the facility. The agency has posted on it's website, the process for third-party reporters to file a complaint. In addition, residents receive third-party reporting information in their intake packets and the information is reviewed with them at intake and with their case managers. Family members and friends of the resident can access this information on the BSS website and file a complaint on behalf of the resident. Additionally, family members, friends or other persons associated with the resident, can make a third-party report directly to the PREA Coordinator and can find her number listed on the agency's website or at the facility. 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
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Vinewood 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. 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 the report be verbal to staff, 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 can 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
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<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 can 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 Vinewood RRC employees, they were clearly 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 would 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 be prohibited from working at any federal confinement facility again.</p> <p>BOP has employees trained in investigating sexual abuse allegations. The Vinewood 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 Vinewood 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
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>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 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 on 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>The Vinewood RRC has a First Responder Checklist to ensure proper protocols are followed. All Vinewood RRC staff are trained as first responders. Interviews with staff revealed adequate knowledge of expected duties acting as a first responder. Additionally, the Vinewood 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
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>Vinewood 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
	<p>Vinewood 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.</p>

115.267 Agency protection against retaliation

Auditor Overall Determination: Meets Standard

Auditor Discussion

The Vinewood 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 Vinewood 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 (is 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. Vinewood RRC will provide the resident with referrals to free community-based resources to address emotional support. The Rape Foundation 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 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 Vinewood 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>Vinewood RRC does not conduct an investigation 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 Vinewood RRC to provide preliminary information during the investigation process. Vinewood 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>Vinewood 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, Vinewood 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>Vinewood RRC does not conduct investigations; however, when residents are transferred to Vinewood 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 Handbook, 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 Vinewood 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. Vinewood 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 would 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. Vinewood 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. Vinewood RRC has not utilized 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 described 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 is not sufficient to substantiate the allegation.

Prior to arriving at the Vinewood RRC, residents are provided with the facility rules and regulations and sanctions for violation of said rules and regulations. Upon arrival to Vinewood 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.

Vinewood 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.

Vinewood 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>Vinewood 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 then 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>Vinewood 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 resident's care require transfer to another facility or release from custody, BOP would be notified immediately to make the determination. Vinewood 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 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. Vinewood 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 the 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. 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>Vinewood 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. Vinewood RRC does not contract with any agencies to house their inmates. The data collected is for the agency's facilities only. Vinewood RRC does not conduct investigations; however, should an incident occur, Vinewood 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 aggregates 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
	<p>All incident-based and aggregated data is stored and secured 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>

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 were no correspondents sent to the auditors.

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 Vinewood RRC facility was posted immediately upon receipt in 2014 and is currently posted on the website for the public to view. This was verified by the auditors through a review of the BSS website. The audit reports are also available in hard copy at each facility and provided to the public for review upon request.</p> <p>The Vinewood 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.</p>