

PREA AUDIT REPORT INTERIM FINAL
JUVENILE FACILITIES

Date of report: 04/28/2017

Auditor Information			
Auditor name: Kurt Pfisterer			
Address: 30 Lori Jean Place			
Email: kurtpfisterer@gmail.com			
Telephone number: 518 860 5764			
Date of facility visit: April 10, 2017			
Facility Information			
Facility name: New Outlook Academy			
Facility physical address: 900 Agnew Rd. Pittsburgh, PA 15227			
Facility mailing address: <i>(if different from above)</i> Click here to enter text.			
Facility telephone number: (412) 885-5200			
The facility is:	<input type="checkbox"/> Federal	<input type="checkbox"/> State	<input type="checkbox"/> County
	<input type="checkbox"/> Military	<input type="checkbox"/> Municipal	<input type="checkbox"/> Private for profit
	<input checked="" type="checkbox"/> Private not for profit		
Facility type:	<input type="checkbox"/> Correctional	<input type="checkbox"/> Detention	<input checked="" type="checkbox"/> Other
Name of facility's Chief Executive Officer: Frank Wentzel			
Number of staff assigned to the facility in the last 12 months: 115			
Designed facility capacity: 120			
Current population of facility: 55			
Facility security levels/inmate custody levels: Non-Secure			
Age range of the population: 13 - 19			
Name of PREA Compliance Manager: Frank Wentzel		Title: Executive Director	
Email address: wentzef@theacademysystem.com		Telephone number: (412) 885-5200	
Agency Information			
Name of agency: Community Specialist Corporation			
Governing authority or parent agency: <i>(if applicable)</i>			
Physical address: 900 Agnew Rd. Pittsburgh, PA 15227			
Mailing address: <i>(if different from above)</i> Click here to enter text.			
Telephone number: 412) 885-5200			
Agency Chief Executive Officer			
Name: Frank Wentzel		Title: Executive Director	
Email address: wentzef@theacademysystem.com		Telephone number: (412) 885-5200	
Agency-Wide PREA Coordinator			
Name: Frank Wentzel		Title: Executive Director	
Email address: wentzef@theacademysystem.com		Telephone number: (412) 885-5200	

AUDIT FINDINGS

NARRATIVE

The New Outlook Academy is a non-secure substance abuse treatment program for court adjudicated female adolescents operated under licensure of the Pennsylvania Bureau of Human Services Licensing. The on-site portion of the PREA Audit took place April 10, 2017 and covered the audit period of April 10, 2016 to April 10, 2017. On the morning of April 10, 2017 this auditor entered the facility for purposes of conducting an on sight tour of the facility and interviewing youth, staff, volunteers and contractors. The facility provided a list of all staff by shift and employee job categories and a list of all youth by housing unit. Prior to arrival this auditor reviewed pertinent agency policies, procedures, and related documentation used to demonstrate compliance with the Juvenile Facility PREA Standards. The pre-audit review of documents contained in the Pre-Audit Questionnaire submitted by the facility prompted few questions. Answers to those questions were submitted to this auditor by the facility staff and any additional remaining questions were resolved during the audit. This auditor interviewed 10 of the current 55 youth. The youth interviewed were a representative sample from each of the housing units. Length of stay for those interviewed ranged from one month to four months. There were no youth who identified themselves as lesbian, bisexual, gay, transgender or intersex and no youth identified as gender non-conforming in appearance. There were no youth who needed translation services. No youth had specifically requested to speak with this auditor nor had this auditor received any written correspondence from youth or staff (the audit notice was prominently posted on all housing units and common areas). There were no youth currently in the program who made an allegation of sexual abuse or sexual harassment at the program.

During the tour, additional questions were answered by executive and upper-level management staff. Staff and youth interviews followed and were conducted privately in a room without video surveillance. There are no SANE or SAFE staff employed at the facility. These services are available at the Children's Hospital of Pittsburgh via the Child Advocacy Center. This auditor interviewed members of the incident review team and the staff member charged with monitoring retaliation. Administrative investigations are conducted by the Allegheny County Office of Children, Youth and Families. Criminal investigations are conducted exclusively by the Pittsburgh Bureau of Police. Efforts were made to contact both agencies to verify information provided by the Academy Schools. Efforts were also made to contact the Pennsylvania Coalition Against Rape. The agency Executive Director was previously interviewed by this auditor.

This facility was previously audited for PREA compliance in May of 2015.

DESCRIPTION OF FACILITY CHARACTERISTICS

The New Outlook Academy is a non-secure treatment program for court adjudicated female adolescents operated under licensure of the Pennsylvania Bureau of Human Services Licensing.

New Outlook Academy, located in Pittsburgh, Allegheny County, Pennsylvania, at 900 Agnew Road was established in 1997 in order to provide comprehensive rehabilitative, residential treatment for female offenders. Remaining consistent with the philosophies and objectives of existing programs offered by The Academy Schools, New Outlook utilizes a positive, holistic approach in addressing the unique needs and complex challenges facing young women in the juvenile justice system. Students who range from ages 13-19 and grades 7 – 12 attend New Outlook Academy from numerous Pennsylvania counties and several surrounding states based on adjudication of delinquent by a juvenile court judge.

Students wear a preparatory school uniform, which includes slacks and a blouse, sweater and/or blazer. New Outlook Academy stresses the value and critical importance of education as the cornerstone for success and self-sufficiency. Outside of the school day, students also participate in counseling sessions, trades training, work programs, community service projects and recreational activities which are designed to support and promote the Balanced and Restorative Justice (BARJ) principals.

New Outlook Academy is a licensed, private, year-round school for grades 7 through 12. Upon admission, individual student evaluations are completed to determine appropriate grade level placement. The core subjects of English, Mathematics, Science, and Social Studies are scheduled during the school day for five, forty-five minute periods per week. Physical Education, Health, Humanities and Life Skills are presented in the curriculum for two, forty-five minute periods per week. All credits earned at New Outlook Academy are transferable to a student's transcript at their school of residence. In addition, any student who completes her graduation requirements will earn a New Outlook Academy high school diploma, as well as a \$2,000 scholarship to the school of her choice for post-secondary study.

For those students whose academic needs would best be met by earning a General Equivalency Diploma (GED), New Outlook offers a comprehensive program which includes both preparation and testing.

New Outlook students have access to The Academy Outpatient Drug & Alcohol Program and The Academy Specialized Behavioral Health Program (SBHP), both of which have been accredited by the Commission on Accreditation of Rehabilitation Facilities (CARF) since 2007. The Drug & Alcohol Program is licensed by the Pennsylvania Department of Drug and Alcohol Programs (DDAP) while the SBHP is licensed by the Pennsylvania Department of Human Services. Students will participate in either program based on medical necessity following assessment and evaluation.

This highly-rated program utilizes a multi-dimensional, eclectic approach, which is designed to meet the individual needs of the adolescent client. Led by the Program Director, Medical Director and Licensed Social Worker, the certified Drug and Alcohol Clinical Supervisor and master's-level Mental Health Therapists engage students in both individual and group treatment.

Every student attending New Outlook Academy is eligible to participate in Post-Traumatic Stress Disorder (PTSD) Awareness and Treatment group counseling based on need and assessment. Certified counselors specifically trained in this group process, conduct these intensive group sessions and provide the feedback, counseling and support to effectively address these difficult issues.

On a daily basis, all students participate in various evidence-based group counseling curricula. These include Aggression Replacement Training, Victim Awareness, and Stress in Adolescents.

Individual counseling is also provided to target additional, critical developmental topics including parenting, conflict resolution, self-esteem and grief counseling. Staff members holding the position of Counselor Specialists must have at a minimum a bachelor's degree.

The Trades Training and Job-Readiness Program provide learning opportunities and hands-on experience for students in a variety of industries. The intent is for students to acquire valuable capabilities which are designed to equip them with the tools necessary to live an independent and successful lifestyle. This component further instills a solid and positive work ethic and paves the way to a means of self-sufficiency and accomplishment. Industrial Trades training is an excellent method for fostering a pro-social value system while building positive character traits.

All students at New Outlook are required to perform at least 50 hours of community service; and in many cases, they are able to utilize the skills and techniques they acquire within their trade training and job readiness classes. Community Service projects occur both on and off-campus and include volunteering at senior citizens' centers, food banks and local community events.

New Outlook also offers several on-campus student work programs. These opportunities enable students to demonstrate the positive decision-making and social-interaction skills that they have acquired. Students are expected to not only display positive performance and a strong work ethic in these positions but also serve as mentors and role models for their peers. When a student has a restitution obligation, the money she earns is utilized to fulfill that court-ordered requirement. It is the goal of New Outlook Academy to assist as many students as possible to meet this important aspect of their court order whenever possible.

Students at New Outlook Academy find enjoyment and recreation in the many intramural and campus activities. These activities provide a positive outlet while fostering an atmosphere of teamwork and pro-social interaction skills. Students are also eligible to attend field trips and other off-campus events. New Outlook students attend the ballet, the symphony and other theatrical performances, high school, college and professional sporting events, as well as the circus, zoo, aquarium, aviary, conservatory and amusement parks. Visits to museums, science and history centers and historical landmarks are also scheduled. We believe that this plethora of opportunities broaden our students' experiences and exposure to new situations, cultures and activities.

Each of the programs maintains 24 hour supervisory coverage as well as an On-Call Administrator.

SUMMARY OF AUDIT FINDINGS

Auditor arrived at the facility the morning of April 10, 2017. An entrance meeting was held with the Executive Director (who also serves as the PREA Compliance Manager).

A complete tour of the facility took approximately one hour. All areas were extremely well maintained. The New Outlook Academy does not have a video surveillance system. Observed staffing (5 : 1), while this auditor was on site exceeds the standards requirement of 8: 1. The third floor housing unit has multiple occupancy bedrooms and single user bathrooms with shower. The second floor bedrooms are also multiple occupancy. The second floor has multi-stall showers and toilets which are appropriately partitioned for privacy and properly supervised when more than one youth is in the room. Youth are permitted to shower and use the bathroom alone if requested. This was confirmed by all staff and youth interviewed, and observation of practice. Sight lines are good in all housing areas.

Youth were observed during recreation, in school, during movement, and at meals. Observations of staff supervision practices were consistent with the agencies policies.

The PREA screening for risk is conducted by medical and clinical staff on the date of admission, and documented. All youth interviewed acknowledged being screened on the date of admission as well as being seen by medical staff within 24 hours of admission. In addition to the above, all youth are extensively screened prior to acceptance into the program. Youth with a history and/or adjudication of sexual acting out or sexually aggressive behaviors are not admitted to the program.

Administrative investigations regarding allegations of PREA violations are conducted by Allegheny County Office of Children, Youth and Families investigators. Criminal investigations of sexual abuse and assault are conducted by the Pittsburgh Bureau of Police. Telephone and email contact with the DYS General Counsel confirm that there were no incidents of sexual abuse or assault during this audit period. Forensic examinations and evidence collection are performed at the Children's Hospital of Pittsburgh. Documentation was provided by the agency that Childline contacted regarding 13 allegations. 11 of these allegations were for sexual harassment that did rise to the level necessary to meet the requirements of the PREA standards definition of sexual harassment (the standards require repeated acts). 10 of these allegations were also referred to the Pittsburgh police. Only two of these allegations involved actual physical contact (youth on youth) and both were deemed to be unfounded by outside agencies. Documents provided by the agency indicate that the Pittsburgh police determined that no crime was committed.

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

- Program Director
- Executive Director
- Mental Health Supervisor
- Mental Health Therapist
- Program Supervisor
- Nurse
- Counselor - Teacher (4)
- Supervisor (3)
- Agency PREA Compliance Manager
-

Random direct-care staff were selected for interviews to include staff from all housing units and all areas of program. Experience levels ranged from half a year to over 18 years. All presented as very knowledgeable about their jobs and highly dedicated to keeping youth safe. All staff members knew their obligations as mandated reporters and first responders. All

felt well supported by facility management, and had no fear regarding retaliation for reporting abuse. All staff have received PREA specific training as first responders and all knew what to do if they were a first responder. All felt empowered to proactively address issues related to sexual violence and were able to describe actions they would take to prevent and/or deter potential and/or imminent threats of sexual violence.

A total of ten (out of 55) youth at the facility were interviewed, and included youth from both housing units. Ages ranged from 16 to 19 years. There were no youth currently at the facility that had made an allegation of abuse that occurred at the facility. There were no youth currently at the facility who had reported an allegation of sexual harassment that occurred at the facility. There were no youth at the program who identified as LGBTI or had been identified as gender non-conforming in appearance. All youth acknowledged being asked about sexual orientation upon admission. All youth interviewed had extensive knowledge of the right to be free from sexual abuse, assault or harassment. All youth were aware of multiple methods for reporting abuse. All youth acknowledged being screened upon admission and receiving information upon admission on their right to be free from abuse in any form. No youth reported ever having fear for their safety while at the facility. All said they currently felt safe at the facility.

The quality and organization of the documentation provided to this auditor was very good. The pre-audit questionnaire was submitted in a timely fashion. The referenced documents in the questionnaire were provided electronically.

The organized manner in which the interviews were facilitated by the PREA Compliance Manager and the Executive Director made the process go very smoothly with no wasted time in between interviews.

The New Outlook Academy appears to be an outstanding program for juveniles. The limited scope of this audit (PREA compliance) does not afford the opportunity to go into all the positive aspects of the programs.

Number of standards exceeded: 1 (one) Standard or 2% of the standards

Number of standards met: 41 (forty-one) Standards or 98% of the standards

Number of standards not met: 0 (zero)

Number of standards not applicable: 0 (zero)

Standard 115.311 Zero tolerance of sexual abuse and sexual harassment; PREA Coordinator

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Academy Schools PREA Policy, page 1, clearly articulates the agency’s zero tolerance policy. Agency and facility organization charts clearly depict the role of Facility PREA Compliance Manager. Interview with the PREA Compliance Manager proved his knowledge of the PREA standards and the agency’s commitment to the implementation of the PREA standards. Notice of the PREA compliance audit was posted on all living units and other prominent locations throughout the facility.

Standard 115.312 Contracting with other entities for the confinement of residents

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Academy Schools does not enter into such contracts.

Standard 115.313 Supervision and monitoring

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Academy Schools PREA Policy was reviewed by this auditor. Policy requires the Academy Schools to have a staffing plan in compliance with the PREA standards and that the plan is reviewed annually. The facility has a staffing plan which was provided to this auditor. Documentation of annual review of the plan was also provided. The Academy Schools PREA Policy,

page 4, requires unannounced rounds. This auditor was provided documentation of these rounds and interviews with supervisory staff confirmed that they occur. Observed staffing ratios of 5 : 1 during the on-site audit exceeded the standards during program hours. Over-night staffing in compliance with the standards was documented on staffing schedules, housing unit logs as well as interviews with staff and youth. There were no instances of deviations from the staffing plan due to training, vacations, Family Medical Leave and other types of leave. Overtime is paid to maintain staffing ratios.

Standard 115.315 Limits to cross-gender viewing and searches

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Academy Schools PREA Policy, page 3, prohibits cross-gender searches for any reason. All searches must be conducted with a witness. All random staff interviewed confirmed that cross-gender searches do not occur. All youth interviewed denied ever having been searched by an opposite gender staff. The Academy Schools PREA Policy prohibits searching youth for the purpose of determining if the youth is transgender or intersex. All of the youth interviewed denied ever being searched for this purpose. There are no cameras in bathrooms, showers, youth rooms or anywhere youth are permitted to change clothes. All youth interviewed acknowledged that they have privacy when showering, toileting and changing clothes. All showers and bathrooms that are for multiple users and are appropriately portioned and supervised. All youth interviewed acknowledged that opposite gender staff announces their presence when entering the areas where showering, toileting and cloth changing occur. This practice was also observed throughout the on-site audit.

Standard 115.316 Residents with disabilities and residents who are limited English proficient

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Academy Schools PREA Policy, page 6, requires compliance with this standard. It further states on the same page that the use of resident interpreters is prohibited. This auditor received copies of intake materials in Spanish. The facility has multiple Spanish speaking staff. Special education teachers are available for youth with learning disabilities. A language interpretation service is available for other languages should the need arise. There were no youth currently at the facility that required the services of an interpreter. There were no youth currently at the facility that had disabilities that would require them to receive special services to understand their rights under PREA. All of the above was confirmed via interviews with staff, youth and clinicians.

Standard 115.317 Hiring and promotion decisions

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Pennsylvania Child Protective Services law requires pre-employment background checks and re-checks every five years. These checks include clearance through the Commonwealth’s child abuse registry. Material omissions of sexual abuse or harassment incidents or the provision of materially false information are grounds for termination. Documentation of the clearances was provided to this auditor. Pennsylvania law also includes a list of prohibited offenses that would bar employment working with youth and include all offenses described in this standard. Licensing reviews by the PA Bureau of Human Services Licensing also check for compliance with this standard.

Standard 115.318 Upgrades to facilities and technologies

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

There have been no physical plant upgrades or renovations related to this standard during this audit period.

Standard 115.321 Evidence protocol and forensic medical examinations

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Academy Schools PREA Policy, efforts to enter into a Memorandum of Understanding with the Children’s Hospital of Pittsburgh; and efforts to enter into a Memorandum of Understanding with the Pittsburgh Police were reviewed by this auditor. The policy addresses all aspects of this standard. There were no instances of sexual abuse or assault during this

audit period, and therefore there was no documentation to review (efforts were made via email to confirm this with Allegheny County). Physical evidence collection of criminal acts and forensic examinations are not conducted by facility staff. All staff are trained to preserve incident scenes and measures to prevent evidence from being destroyed. This was confirmed via interviews with staff. Criminal investigations are conducted by the Pittsburgh Police.

Standard 115.322 Policies to ensure referrals of allegations for investigations

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Academy Schools PREA Policy was reviewed by this auditor. The policy meets all the requirements of this standard. It requires that all allegations of sexual harassment and sexual abuse be investigated. It requires that allegations that may be criminal in nature be referred to law enforcement. All the Academy Schools staff are mandated reporters of abuse and all staff interviewed were aware of their obligations to report abuse under Pennsylvania law. The facility reported 13 allegation of potential sexual harassment and/or abuse during this audit period. Documentation of ten of these incidents being referred to law enforcement was provided to this auditor. The allegations were deemed to be non-criminal in nature.

Standard 115.331 Employee training

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Academy Schools PREA Policy and the Committee on Accreditation of Rehabilitation Facilities (CARF) training meet all aspects of this standard and are incorporated into the training received by all staff. All staff interviewed acknowledged that they had received the initial training and training. Documentation was provided to this auditor confirming staff completes a document to confirm understanding of the material presented. Contract employees complete the training. All staff interviewed were aware of their obligations related to the agency’s PREA policy, their obligations as mandated reporters of abuse, their duties as a first responder and agency protocols related to evidence collection.	
The training curriculum utilized by the facility meets all aspects of this standard as follows:	
<input checked="" type="checkbox"/> (1) Agency’s zero tolerance policy for sexual abuse and sexual harassment.	The Academy Schools PREA Policy , Pg. 1
<input checked="" type="checkbox"/> (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures.	The Academy Schools PREA Policy , Pg. 1-3
<input checked="" type="checkbox"/> (3) Residents’ right to be free from sexual abuse and sexual	The Academy Schools PREA Policy , Pg. 1

harassment.	
<input checked="" type="checkbox"/> (4) The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment.	The Academy Schools PREA Policy , Pg. 9
<input checked="" type="checkbox"/> (5) The dynamics of sexual abuse and sexual harassment in juvenile facilities.	Recognizing and Reporting Child Abuse
<input checked="" type="checkbox"/> (6) The common reactions of sexual abuse and sexual harassment juvenile victims.	Recognizing and Reporting Child Abuse
<input checked="" type="checkbox"/> (7) How to detect and respond to signs of threatened and actual sexual abuse.	Recognizing and Reporting Child Abuse
<input checked="" type="checkbox"/> (8) How to avoid inappropriate relationships with residents.	Professional Conduct Expectations
<input checked="" type="checkbox"/> (9) How to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming residents.	Cultural Competency and Professional Conduct Expectations
<input checked="" type="checkbox"/> (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.	Recognizing and Reporting Child Abuse
<input checked="" type="checkbox"/> (11) Relevant laws regarding the applicable age of consent.	Recognizing and Reporting Child Abuse and Professional Conduct Expectations

Standard 115.332 Volunteer and contractor training

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Per the the Academy Schools Volunteer/Intern Orientation Handbook all volunteers and interns must receive PREA training. The PREA training is a review of the Academy Schools PREA Policy. Volunteers and interns must sign an acknowledgement that they have received and understood the training. There were no contractors or volunteers available at the time of the on-site audit. Documentation of contractors or volunteers training and signed acknowledgements were provided to this auditor.

Standard 115.333 Resident education

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

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the Academy Schools’s resident education program is provided to youth by their assigned Mental Health Therapist within 24 hours of admission. This information is part of a larger education program known as “Child’s Rights”. Youth receive materials about PREA and their rights to be free from abuse upon admission. These documents are available in English and the agency has access to translation services for Spanish, or any other language they may encounter. The youth signs an acknowledgement that they understood the material presented. All youth interviewed were aware of the right to be free from abuse and multiple means of reporting allegations of abuse. Posters regarding Pennsylvania’s Childline were clearly visible on all living units and throughout the facility.

Standard 115.334 Specialized training: Investigations

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

the Academy Schools does not conduct investigations of sexual abuse, sexual assault or sexual harassment. Such investigations are conducted by the Pittsburgh Bureau of Police and the Allegheny County Office of Children, Youth and Families.

Standard 115.335 Specialized training: Medical and mental health care

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

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The Academy Schools PREA Policy, page 6 mandates specialized training for medical and mental health staff as per the PREA standards. Documentation of this training, including training for contract providers was provided to this auditor. One medical staff member was interviewed who confirmed receipt of the training and the agency’s protocols for forensic exams and evidence collection. the Academy Schools medical staff does not conduct forensic examinations or collect evidence. The agency’s protocol is to preserve/avoid destruction of evidence and then transport to the designated medical facility (Children’s Hospital of Pittsburgh).

Standard 115.341 Screening for risk of victimization and abusiveness

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

the Academy Schools has the right to refuse admission to any youth deemed not appropriate for their programs. the Academy Schools does not accept youth who are adjudicated sex offenders or have a history of acting out sexually. All youth admitted are screened extensively prior to admission. The Academy Schools PREA Policy, page 4 address the standards related to screening youth for risk of victimization and abusiveness. The screening is documented on the youth's intake questionnaire which is completed by the youth's caseworker. Access to screening information is limited to clinical staff and a limited number of upper level administrators. All of the youth interviewed stated that screening occurred before they were assigned to a bedroom.

Standard 115.342 Use of screening information

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Academy Schools PREA Policy, page 4-5 addresses how the information obtained during screening is utilized to inform programming and housing decisions. Isolation, as it relates to this standard, is not used by the Academy Schools. Isolation is not authorized for the purposes described in this standard. Interviews with all staff and youth confirmed compliance with this standard. The Academy Schools PREA Policy, page 4-5 prohibits youth from being assigned to a housing unit based on gender identity and prohibits gender identity from being used as a risk factor for abusiveness.

Standard 115.351 Resident reporting

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Academy Schools PREA Policy, page 7, appropriately addresses this standard. All youth interviewed knew multiple means (tell staff, Childline, tell parent, call lawyer, file grievance) to report abuse of any kind. All knew where to find the PA Childline number to report abuse outside the agency. None of the youth interviewed had ever reported sexual harassment, sexual abuse or any form of abuse while in the Academy Schools custody. Youth receive materials at admission regarding how to report abuse and there are posters throughout the facility and on all housing units with the information. All staff are mandated reporters of abuse per Pennsylvania regulations and The Academy Schools PREA Policy. All staff interviewed were aware of their obligations as mandated reporters.

Standard 115.352 Exhaustion of administrative remedies

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

This standard does not apply to the the Academy Schools as the grievance process is not the intended mechanism for report sexual abuse, assault or harassment. If you did file a grievance alleging threatened or actual sexual abuse or assault the facility would bypass the grievance process and immediately institute their critical incident response plan. All staff interviewed were able to describe steps they would take to protect a youth from threatened abuse.

Standard 115.353 Resident access to outside confidential support services

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Documentation of efforts to enter into a Memorandum of Understanding for the provision of these services was provided to this auditor. The Academy Schools PREA Policy addresses access to these services. Interviews with medical and clinical staff confirmed that youth would be advised about confidentiality prior to accessing the services. Information is provided to youth via Department of Public Health posters that are on display in all living units and common areas throughout the the Academy Schools Facility. These display the telephone number and mailing address for juveniles to contact. All youth interviewed acknowledged ready access to contact with their families (free telephone calls) and the ability to contact their lawyer if they so desired.

Standard 115.354 Third-party reporting

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Pennsylvania's Childline is widely publicized throughout the state and the facility as the number to call if sexual abuse or harassment is suspected. All youth interviewed acknowledged that they knew they could report abuse via a third party. All staff interviewed acknowledged that they would accept a third party report of abuse and respond in the same manner as if they had witnessed the abuse themselves. The facility provided documentation of three allegations (unrelated to PREA) received from third parties and the referral of these allegations to Allegheny County and the Pittsburgh police.

Standard 115.361 Staff and agency reporting duties

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Academy Schools PREA Policy, page 4 addresses the requirements of this standard. All staff and volunteers are mandated reporters of child abuse. All staff and volunteers receive training as to how to fulfill their obligations as mandated reporters (what to report and how to report it). All staff interviewed were aware of the obligations as mandated reporters and acknowledged receiving mandated reporter training.

Standard 115.362 Agency protection duties

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Academy Schools PREA Policy and Pennsylvania child abuse laws address the requirements of this standard. There were no instances of a youth being determined to be in substantial risk of imminent sexual abuse. All staff interviewed were able to articulate means that they would use to protect youth should this occur. These included immediately calling for a supervisor to respond to the location; keeping the youth under arms-length supervision until the supervisor arrives; and, if necessary based on the imminent nature of the threat, securing the youth alone in a room.

Standard 115.363 Reporting to other confinement facilities

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Academy Schools PREA Policy, page 9 complies with this standard. the Academy Schools did not receive any reports of youth being sexually abused at another confinement facility during this audit period and therefore had no documentation to show this auditor regarding such actions.

Standard 115.364 Staff first responder duties

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

All staff, volunteers and contractors receive training regarding first responder duties. Documentation of training was provided to this auditor. The Academy Schools PREA Policy complies with this standard. the Academy Schools has an institutional plan that meets the requirements of this standard. There were no instances of sexual assault during this audit period, therefore there is no documentation of staff performing these duties. All staff interviewed were able to articulate their first responder duties..

Standard 115.365 Coordinated response

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

A copy of the Academy Schools' institutional plan was provided to this auditor. The plans provide clear and concise direction for response to any alleged PREA violation. There were no instances of sexual assault during this audit period and therefore there was no documentation of the plans use available for review. All staff interviewed were aware of their program's institutional plan and where to locate the document.

Standard 115.366 Preservation of ability to protect residents from contact with abusers

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

relevant review period)

- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

the Academy Schools does not enter into collective bargaining agreements with its employees.

Standard 115.367 Agency protection against retaliation

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Academy Schools PREA Policy, page 9 names the Human Resources Department Director as the person responsible for monitoring for retaliation against staff or youth. There were no allegations of sexual abuse or assault during this audit period and therefore there was no document of monitoring to be reviewed.

Standard 115.368 Post-allegation protective custody

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

the Academy Schools does not use protective custody. The facility reports that it did not use segregation or isolation for the purpose of this standard during this audit period.

Standard 115.371 Criminal and administrative agency investigations

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

- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

the Academy Schools does not conduct investigations of allegations that rise to the level of criminal behavior. These are conducted by the Pittsburgh Bureau of Police. Administrative investigations are conducted by the Allegheny County Office of Children, Youth and Families. the Academy Schools has made documented efforts to advise the Pittsburgh Bureau of Police of the requirements of this standard.

Standard 115.372 Evidentiary standard for administrative investigations

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

the Academy Schools does not conduct administrative investigations allegations of sexual abuse, assault or harassment. Administrative investigations are conducted by the Allegheny County Office of Children, Youth and Families.

Standard 115.373 Reporting to residents

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

There was 13 allegations of sexual harassment/abuse reported to have occurred during this audit period. Documentation was provided to this auditor that the youth were notified of the outcome of the investigation.

Standard 115.376 Disciplinary sanctions for staff

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

- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Academy Schools PREA Policy addresses the requirements of this standard. There were no substantiated instances of sexual abuse, assault or harassment by the Academy Schools staff occurring during this audit period, and therefore there was no documentation to review for compliance.

Standard 115.377 Corrective action for contractors and volunteers

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Academy Schools PREA Policy addresses the requirements of this standard. There were no instances of sexual abuse, assault or harassment by the Academy Schools contractors or volunteers occurring during this audit period, and therefore there was no documentation to review for compliance.

Standard 115.378 Disciplinary sanctions for residents

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

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

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

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

relevant review period)

- Does Not Meet Standard (requires corrective action)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

Youth are extensively screened prior to admission/acceptance into the program. Youth admitted to the Academy Schools are seen by medical staff within 24 hours of arrival. Staff performing the youth's intake utilize a screening tool to determine if a youth has any immediate and/or emergency medical or mental health needs. All youth interviewed confirmed that they were seen by medical staff shortly after arrival at the facility. Interview with medical staff confirmed that screening includes history of sexual abuse. Per medical staff interview, youth have access to all the same medical services available to youth in the community. When a disclosure of prior abuse occurs, and services are offered by Medical and/or Mental Health staff, this is documented in the youth's case file.

Standard 115.382 Access to emergency medical and mental health services

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Academy Schools PREA Policy requires that the youth's medical and mental health needs are met. The Child Advocacy Center at the Children's Hospital of Pittsburgh confirmed via telephone interview that services will be provided to youth victims of sexual abuse and assault at no cost to the youth. There were no incidents of sexual abuse or sexual assault occurring at the Academy Schools during this audit period, and therefore there was no documentation to be reviewed.

Standard 115.383 Ongoing medical and mental health care for sexual abuse victims and abusers

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

There were no incidents of sexual abuse or sexual assault occurring at the Academy Schools during this audit period and therefore there was no documentation to review. In the event that an incident was to occur the victim would receive services from a community provider. As previously noted, services from these providers are at no cost to the victim. All ongoing medical care beyond the scope of facility medical staff would be provided by community providers. The youth would have the option of facility clinical staff or community providers for ongoing mental health services.

Standard 115.386 Sexual abuse incident reviews

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

There were no reported substantiated or unsubstantiated incidents of sexual abuse or sexual assault occurring at the facility during this audit period. The Academy Schools PREA Policy, page 10 complies with this standard. Due to the lack of sexual abuse incidents there was no documentation for this auditor to review.

Standard 115.387 Data collection

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Academy Schools PREA Policy, pages 10 and 12 complies with this standard. The Academy Schools also maintains a log of all critical incidents. Incidents also need to be documented electronically in the Home and Community Services Information System (HCSIS) which is a state-wide database. Combined these systems allow the Academy Schools to access data sufficient to complete the annual survey of sexual violence. This information is published in the agency's Annual Report which is available to the public.

Standard 115.388 Data review for corrective action

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

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

Standard 115.389 Data storage, publication, and destruction

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Academy Schools PREA Policy addresses the data storage requirements of this standard. A review of the data available from the the Academy Schools website supports full compliance for this standard. There is no individual identifying information contained in the aggregate data or the reports related to the data posted.

AUDITOR CERTIFICATION

I certify that:

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

Kurt Pfisterer /s/ _____

April 28, 2017 _____

Auditor Signature

Date