

PREA Agency Audit Report: Final

Name of Agency: Division of Child and Family Services- Juvenile Justice

Facility Type: Juvenile

Date Interim Report Submitted: 12/26/2016

Date Final Report Submitted: 07/04/2017

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: Macilla (Kila) Jager	Date of Signature: 07/04/2017

AUDITOR INFORMATION	
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Start Date of On-Site Audit:	2016-11-04
End Date of On-Site Audit:	2016-11-04

AGENCY INFORMATION	
Name of agency:	Division of Child and Family Services- Juvenile Justice
Governing authority or parent agency (if applicable):	Department of Health and Human Services
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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 Prison Rape Elimination Act (PREA) on-site Agency audit of the Division of Child and Family Services (DCFS) began on November 4, 2016. This audit was completed by Kila Jager from Myrtle Point, Oregon, a U.S. Department of Justice Certified PREA Auditor for Juvenile/adult facilities.

Pre-audit preparation included a thorough review of all documentation and materials submitted by the agency. The documentation reviewed included agency policies, procedures, forms, organizational charts, reports, previous audits, web pages, and other PREA related materials, that were provided to demonstrate Agency compliance with the PREA standards.

This review prompted a series of questions that were communicated back and forth for clarification and review. Answers to the questions were submitted by DCFS and reviewed by the auditor prior to the on-site audit in November 2016 and in the 45 days after the onsite audit.

Due to the agency commitment and the outstanding assistance from the agency PREA Coordinator, the audit went smoothly and no time was wasted. Following the on-site visit, additional documentation was requested and provided. An extensive review of all information provided-including the site interviews, paperwork/documentation, and practice was completed, after the onsite visit.

An Interim Agency Report was provided to DCFS. That report included the Audit Findings/Initial Summary. Each standard was rated and a narrative explanation of the rationale for each rating was included. The Audit Findings/Initial Summary included a summary of the number of standards that were met, not met, exempt, or not applicable. Recommendations for achieving compliance with each standard were provided for use in developing a Corrective Action Plan (CAP.)

During the corrective action period, a corrective action plan was jointly developed. The corrective action plan included:

1. Adding an addendum to the contracts of both contracted agencies to ensure they would adopt and comply with PREA standards;
2. Collecting aggregated data from all contracted facilities and agency facilities to complete the SSV report;
3. Changes in policy, ensuring DCFS policy and practice were consistent in prohibiting hiring or promoting anyone who has contact with residents, who has engaged in the acts described in 115.317;
4. Ensuring all staff and contractors have signed PREA disclosure forms and understand their ongoing duty to report such incidents; ensuring all contractors had documentation of child abuse reporting checks and background checks; and,
5. Ensure staff who are promoted have the required background checks and child abuse checks.

Requested documentation, contact with the agency, and review of documentation/changes made, during the corrective action period, was thoroughly reviewed for compliance. All documentation was uploaded to the online audit file, and compliance and review was completed in the online audit format.

After a thorough review, as required by the National PREA Standards and the Department of Justice, Nevada Department of Child and Family Services is 100% compliant with the National PREA standards agency audit.

This is the final audit report provided to Nevada Department of Child and Family Services (DCFS), detailing all phases of the audit.

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.

Number of standards exceeded:	3
Number of standards met:	6
Number of standards not met:	0

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

115.311	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>Nevada Division of Child and Family Services has PREA policy that has zero tolerance for sexual abuse and sexual harassment. They hired a dedicated PREA Coordinator in July 2016 and have designated PREA Compliance managers in all of their facilities. Their PREA Coordinator has the time and authority to develop, implement, and oversee agency efforts to comply with the PREA. Reviewed the PREA Policy, Juvenile Justice Organizational Chart, and interviewed the PREA Coordinator. Nevada's PREA Coordinator has worked diligently and has high standards for this agency to excel, and has accomplished that.</p>

115.312	Contracting with other entities for the confinement of residents
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>The Nevada Division of Child and Family Services (DCFS) contracts with two facilities--China spring Youth Camp and Spring Mountain Youth Camp. At this current time, these facilities do not have the required PREA language in their contracts. Attached to this audit is an addendum, developed by DCFS) that will be attached to their contracts. The addendum is attached to this audit and has been sent out for signature.</p> <p>During Corrective action, both contracted agencies signed an addendum, to their contract, stating they would adopt and comply with the PREA standards, including moitoring by DCFS.</p>

115.317	Hiring and promotion decisions
	<p data-bbox="252 168 925 201">Auditor Overall Determination: Exceeds Standard</p> <p data-bbox="252 246 518 280">Auditor Discussion</p> <ol style="list-style-type: none"> <li data-bbox="252 324 1460 436">1. The Agency PREA policy prohibits hiring or promoting anyone, who may have contact with residents who: has engaged in any of the actions listed in 115.317a. During corrective action, wording was corrected in policy so this requirement was clearly stated. <li data-bbox="252 459 1420 571">2. Agency policy requires the consideration of any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with residents. <ol style="list-style-type: none"> <li data-bbox="252 582 1228 616">a. The requirements of this standard are met in policy--page 23 section XIII <li data-bbox="252 627 1460 862">b. Human Resource staff were clear that all employees and contractors receive background checks and child abuse registry checks, as well as sign the required PREA form relating to past behavior. In addition, there is a required form, to fill out, that addressed questioning former employers about any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with residents. <li data-bbox="252 884 1444 952">c. Included documentation reviewed were: PREA staff Disclosure forms; PREA policy; DCFS form used to gather information from previous institutional employers <li data-bbox="252 974 1460 1041">d. Staff who are promoted sign a new PREA disclosure form, and a records check, child registry check is completed, if it has been more than three months since one has been done. <li data-bbox="252 1064 1460 1299">3. Before hiring new employees who may have contact with residents, the agency shall: (1) Perform a criminal background records check; (2) Consults any child abuse registry maintained by the State or locality in which the employee would work; and (3) Consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse. <ol style="list-style-type: none"> <li data-bbox="252 1310 1460 1377">a. Page 23 of the PREA policy complies with the requirements of this standard. Before it hires or promotes employees. <li data-bbox="252 1400 1460 1512">b. The DCFS Employment document meets the requirements for this standard. It documents DCFS contacting former employers to inquire about any investigations or criminal referrals for sexual abuse/harassment. <li data-bbox="252 1534 1444 1646">c. Samples are included in this audit of background checks and child abuse registry checks, and they meet the requirements of this standard--as well as a list of all staff and all required checks. <li data-bbox="252 1657 1484 1814">d. PREA logs of all staff and when they signed the PREA disclosure form are included in this audit. Also included in this audit documentation are the state of Nevada PREA log that lists any staff, DOC or Juvenile, who have been terminated or resigned during a PREA investigation and who it was reported to. No juvenile facility staff were listed on this form. <li data-bbox="252 1825 1476 1937">4. The agency shall also perform a criminal background records check, and consult applicable child abuse registries, before enlisting the services of any contractor who may have contact with residents. <ol style="list-style-type: none"> <li data-bbox="252 1948 1404 2027">a. Page 23 of the PREA Policy covers this requirement--Before enlisting the services of a contractor who may have contact with residents. <li data-bbox="252 2083 1420 2150">5. Agency policy requires that either criminal background records checks be conducted at least every five years of current employees and contractors who may have contact with

residents

a. Page 24 of PREA policy confirms the requirement for checks every five years

b. Included in this audit are Background and Child Abuse Registry (CANS) check samples from all three DCFS Juvenile facilities; and PREA policy requiring background checks and Child Abuse Registry checks. A list of all staff and checks done is included; however, contractors were not listed.

During corrective action, DCFS ensured that all contractors complied with the required checks and a list, as well as samples of the checks, are included in the documentation of this audit.

6. The agency shall also ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a)

a. The PREA policy requires the continuing duty to disclose any sexual misconduct listed in this standard and DCFS requires the PREA Disclosure for to be signed by applicants, new hires and employees promoted, and required employees and a continuing duty to disclose such conduct. DCFS developed a form to use for this disclosure and it is included in this audit

i. Samples from each facility are included

ii. A list of all employees and date they signed PREA forms included in this audit

iii. The Division ensures that staff sign a Staff PREA Acknowledgement Statement which will be kept within their permanent employee file.

7. Material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination—per policy and interviews confirm.

a. PREA policy, on page 24, states that material omissions will be grounds for termination

b. Interviews confirmed employees would be terminated for material omissions about PREA related false information given.

8. Unless prohibited by law, the agency shall provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work

a. Page 24 of DCFS PREA Policy: The Division Human Resources will provide information on substantiated allegations, or pending investigations of sexual abuse or sexual harassment, between a current or former employee, and youth upon receiving a request from an institutional employer.

b.. Included in this audit documentation is the Nevada PREA log that lists any staff, DOC or Juvenile, who have been terminated or resigned during a PREA investigation and who this was reported to. No Juvenile staff are listed on this form currently.

115.366	Preservation of ability to protect residents from contact with abusers
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	Nevada is a right to work state and has no collective bargaining agreement

115.387	Data collection
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. The agency collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions.</p> <p>a. DCFS PREA Policy, on page 22, required the collection of the data required by this standard</p> <p>2. The agency aggregates the incident-based sexual abuse data at least annually.</p> <p>a. DCFS PREA policy: Page 23, B, section b, Gather and maintain data from the facilities monthly for federal reporting requirements which include an annual state report which must be posted on the Division's Website.</p> <p>b. DCFS PREA Annual Report for 2015 is included in this audit showing data collected and reported, on website</p> <p>3. The incident-based data collected shall include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice</p> <p>a. PREA policy, page 22, section XI, item 1 meets the policy requirement of this standard</p> <p>b. The agency has submitted a first-time annual report (2015) and has in policy and practice the requirement and format for annual reports.</p> <p>c. The report is posted on their website</p> <p>d. Page 23 section B of DCFS PREA policy meets the requirement of reporting in this standard</p> <p>4. The agency also shall obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents.</p> <p>a. Included in the documentation of this audit are SSV report forms from both contracted facilities (China Spring and Spring Mountain)</p> <p>5. Upon request, the agency shall provide all such data from the previous calendar year to the Department of Justice no later than June 30.</p> <p>a. SSV report are included in this audit (2015</p>

115.388	Data review for corrective action
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. The agency shall review data collected and aggregated pursuant to § 115.387 to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including: (1) Identifying problem areas; (2) Taking corrective action on an ongoing basis; and (3) Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole.</p> <p>a. Included in this audit is the DCFS annual report that includes all data collected and aggravated.</p> <p>b. This data was used in this report to identify needs and actions needed to take to improve the effectiveness of its sexual abuse prevention, detection and response policies, practices, and training.</p> <p>2. The annual report includes a comparison of the current year's data and corrective actions with those from prior years.</p> <p>a. This is the first year of posting an annual report, so there is no comparison data (During corrective action, this report was updated to reflect current years data also)</p> <p>3. The agency makes its annual report readily available to the public at least annually through its website.</p> <p>a. Yes, the first report is posted to Nevada DCFS website and was approved by the Social Services Chief, who reports to the DCFS Juvenile Justice Administrator</p> <p>b. http://dcfs.nv.gov/Programs/JJS/ProgramsOffice/</p> <p>4. The agency may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility, but must indicate the nature of the material redacted.</p> <p>a. Personal information is redacted to ensure that victims or perpetrators cannot be identified or endanger facility safety and security.</p> <p>5. The agency indicates the nature of material redacted.</p> <p>a. No material was redacted as the report was written to protect residents and safety and security of the facility</p>

115.389	Data storage, publication, and destruction
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. The agency ensures that incident-based and aggregate data are securely retained.</p> <p>a. DCFS has a policy NAC 239.697 that ensures data is securely retained and confidential</p> <p>b. This statute is included in documentation for this audit</p> <p>2. Agency policy requires that aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public, at least annually, through its website</p> <p>a. DCFS PREA policy, page 24—requires the annual PREA report and audits to be made readily available on their website and to the public.</p> <p>3. Before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers.</p> <p>a. No personal identifiers were included on the DCFS annual PREA report for 2015—this report is included in the documentation for this audit http://dcfs.nv.gov/uploadedFiles/dcfsvgov/content/Programs/JJS/PREA_A_NNUAL_2015_Report_revised_to_include_Interlocal_data.pdf</p> <p>4. The agency maintains sexual abuse data collected pursuant to §115.387 for at least 10 years after the date of initial collection, unless federal, state, or local law requires otherwise.</p> <p>a. DCFS PREA policy, page 22, section XI, item 3, requires PREA data collected to be maintained for 10 years</p> <p>DCFS has policy NAC 239.697 that ensured date is securely retained and confidential. PREA policy, page 24, requires the annual PREA report and audits are made readily available, on their website, to the public.</p> <p>2015 was the first year that DCFS published a annual PREA report. No identifying personal identifiers were included in this report (during corrective action, this report was updated with current years data)</p> <p>PREA policy, page 22, section XI, item 3, requires PREA data collected to be maintained for 10 years.</p> <p>.</p>

115.401	Frequency and scope of audits
	Auditor Overall Determination: Meets Standard
	Auditor Discussion
	<p>1. 115.401 (a) During the three-year period starting on August 20, 2013, and during each three-year period thereafter, the agency shall ensure that each facility operated by the agency, or by a private organization on behalf of the agency, is audited at least once.</p> <p>a. Nevada DCFS contracted for audits on both Youth facilities operated by the agency. In addition, the agency also contracted for an agency audit in the first three years of the required PREA audits.</p> <p>b. DCFS has contracted to have both previous facilities and the agency, as well as a newly opened facility, audited for PREA compliance by the end of 2018--which meets the requirements of this standard</p>

115.403	Audit contents and findings
	Auditor Overall Determination: Exceeds Standard
	Auditor Discussion
	<p>403</p> <p>1. The agency shall ensure that the auditor's final report is published on the agency's website if it has one, or is otherwise made readily available to the public.</p> <p>a. DCFS has published all required audits to its web page.</p> <p>b. http://dcfs.nv.gov/Programs/JJS/ProgramsOffice/</p> <p>c. http://dcfs.nv.gov/uploadedFiles/dcfsnvgov/content/Programs/JJS/Caliente-PREA-Audit.pdf</p> <p>d. http://dcfs.nv.gov/uploadedFiles/dcfsnvgov/content/Programs/JJS/final%20audit%20form7-16-2015%20final%20report(1).pdf</p> <p>e. http://dcfs.nv.gov/uploadedFiles/dcfsnvgov/content/Programs/JJS/PREA_Audit_Administrative_2015.pdf</p>

Appendix: Provision Findings

115.311 (b)	Zero tolerance of sexual abuse and sexual harassment; PREA coordinator	
	Has the agency employed or designated an agency-wide PREA Coordinator?	yes
	Is the PREA Coordinator position in the upper-level of the agency hierarchy?	yes
	Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities?	yes

115.312 (a)	Contracting with other entities for the confinement of residents	
	If this agency is public and it contracts for the confinement of its residents with private agencies or other entities including other government agencies, has the agency included the entity's obligation to adopt and comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents.)	yes

115.312 (b)	Contracting with other entities for the confinement of residents	
	Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of residents OR the response to 115.312(a)-1 is "NO".)	yes

115.317 (a)	Hiring and promotion decisions	
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the hiring or promotion of anyone who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the bullet immediately above?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse?	yes
	Does the agency prohibit the enlistment of services of any contractor who may have contact with residents who: Has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above?	yes

115.317 (b)	Hiring and promotion decisions	
	Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with residents?	yes

115.317 (c)	Hiring and promotion decisions	
	Before hiring new employees who may have contact with residents, does the agency: Perform a criminal background records check?	yes
	Before hiring new employees who may have contact with residents, does the agency: Consult any child abuse registry maintained by the State or locality in which the employee would work?	yes
	Before hiring new employees who may have contact with residents, does the agency: Consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse?	yes

115.317 (d)	Hiring and promotion decisions	
	Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with residents?	yes
	Does the agency consult applicable child abuse registries before enlisting the services of any contractor who may have contact with residents?	yes

115.317 (e)	Hiring and promotion decisions	
	Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with residents or have in place a system for otherwise capturing such information for current employees?	yes

115.317 (f)	Hiring and promotion decisions	
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions?	yes
	Does the agency ask all applicants and employees who may have contact with residents directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees?	yes
	Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct?	yes

115.317 (g)	Hiring and promotion decisions	
	Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination?	yes

115.317 (h)	Hiring and promotion decisions	
	Unless prohibited by law, does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.)	yes

115.366 (a)	Preservation of ability to protect residents from contact with abusers	
	Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limits the agency's ability to remove alleged staff sexual abusers from contact with any residents pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?	yes

115.387 (a)	Data collection	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes

115.387 (b)	Data collection	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes

115.387 (c)	Data collection	
	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes

115.387 (d)	Data collection	
	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes

115.387 (e)	Data collection	
	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its residents? (N/A if agency does not contract for the confinement of its residents.)	yes

115.387 (f)	Data collection	
	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes

115.388 (a)	Data review for corrective action	
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
	Does the agency review data collected and aggregated pursuant to § 115.387 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes

115.388 (b)	Data review for corrective action	
	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes

115.388 (c)	Data review for corrective action	
	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes

115.388 (d)	Data review for corrective action	
	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes

115.389 (a)	Data storage, publication, and destruction	
	Does the agency ensure that data collected pursuant to § 115.387 are securely retained?	yes

115.389 (b)	Data storage, publication, and destruction	
	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes

115.389 (c)	Data storage, publication, and destruction	
	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes

115.389 (d)	Data storage, publication, and destruction	
	Does the agency maintain sexual abuse data collected pursuant to § 115.387 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise?	yes

115.401 (a)	Frequency and scope of audits	
	During the three-year period starting on August 20, 2013, and during each three-year period thereafter, the agency shall ensure that each facility operated by the agency, or by a private organization on behalf of the agency, is audited at least once. (N/A before August 20, 2016.)	yes

115.401 (b)	Frequency and scope of audits	
	During each one-year period starting on August 20, 2013, the agency shall ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, is audited.	yes

115.403 (f)	Audit contents and findings	
	<p>The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports within 90 days of issuance by auditor. The review period is for prior audits completed during the past three years PRECEDING THIS AGENCY AUDIT. In the case of single facility agencies, the auditor shall ensure that the facility's last audit report was published. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A only if there have been no Final Audit Reports issued in the past three years, or in the case of single facility agencies that there has never been a Final Audit Report issued.)</p>	yes