



**DEPARTMENT OF HEALTH AND HUMAN SERVICES (DHHS)  
DIVISION OF CHILD AND FAMILY SERVICES (DCFS)  
JUVENILE JUSTICE PROGRAMS OFFICE (JJPO)**

**Annual Report On  
Prison Rape Elimination Act (PREA)**

**Pursuant to  
PREA Juvenile Standard § 115.388**

**March 7, 2025**

Prepared by:

Cynthia Casselman  
PREA Coordinator  
Juvenile Justice Services Programs Office  
Division of Child and Family Services  
Department of Health and Human Services  
4126 Technology Way, 1<sup>st</sup> Floor  
Carson City, NV 89706

## **The Prison Rape Elimination Act (28 C.F.R. Part 115):**

In 2003, the Prison Rape Elimination Act (PREA) was signed into law with unanimous support. After the law's passage, the Department of Justice (DOJ) began the steps to create a set of national standards, with input from the National Prison Rape Elimination Commission created by the Act, the public, and federal, state, and local correctional agencies, and private organizations. The purpose of these standards was to provide comprehensive guidelines for 1) preventing, 2) detecting, and 3) responding to sexual abuse and sexual harassment involving both youth and adults in federal, state, and local institutions, including state and community correctional facilities, juvenile detention centers, and jail systems. The DOJ published the resulting Final PREA Standards on August 20, 2012.

Nevada's Department of Health and Human Services, Division of Child and Family Services (DCFS), began implementation activities of the PREA Standards in early 2014. The Division has since fully implemented the Standards at the agency and facility levels.

### **DCFS Facility Information:**

All youth residing in a DCFS facility are protected under PREA. Below is information about each facility:

Caliente Youth Center (CYC), located in Caliente, is DCFS's low-security, staff-secured facility for both male and female youth. Established in 1962, CYC is currently budgeted for 80 youth. CYC operates a full-time accredited high school in cooperation with the Lincoln County School District. Caliente Youth Center also offers vocational certifications, psychological services, individual counseling, psychiatric care, and rehabilitative programming, including Forward Thinking and a Girls Empowerment program.

Nevada Youth Training Center (NYTC), located in Elko, is DCFS's medium-security, staff-secured facility for both male and female youth. This center has a budgeted capacity of 64 youth. First opened in 1915, NYTC operates a full-time accredited high school, Independence High School, with a competitive sports program. The facility also offers vocational certification, substance abuse treatment, individual and group counseling, and rehabilitative programming, including Forward Thinking.

Summit View Youth Center (SVYC), located in Las Vegas, is DCFS's maximum-security, facility-secured placement for male youth. Operated by DCFS since 2016, SVYC has a budgeted capacity of 48 youth who assess as the highest risk for reoffending. Summit View, in cooperation with the Clark County School District, operates a full-time high school. This facility also offers vocational certifications, sexual offender treatment, and mental health services, including Moral Recognition Therapy (MRT)©.

The Division employs an agency level PREA Coordinator, has designated PREA Compliance Managers at all three facilities, and employs a Criminal Investigator who serves as a PREA investigator. In addition, all DCFS facilities participate in Performance-based Standards (PbS), an evidence-based, continuous improvement model for juvenile correctional, detention, and community programs, based on best practices that seek to strengthen priority areas within the facilities, including those that can positively affect the sexual safety of youth.

### **Contracted Provider Information (Standard 115.312):**

The Division contracts with community-based providers who must comply with PREA. Providers who, in the previous 12-month period, housed 50 percent or more juvenile justice-involved youth in any contracted location have an obligation to comply with the PREA Standards in their contract.

The following DCFS contracted providers are required to comply with PREA:

- Pride House LLC, located in Sparks, is administered through Health and Human Services Foundation. They provide community-based residential services to youth who are at least 18 years old on DCFS parole supervision. Pride House had their initial federal PREA audit in January 2025. They are currently pending their interim report from the auditor.
- Firebird LLC, located in Las Vegas, provides residential placement, training, case management, and therapeutic services for youth on DCFS parole supervision who are at least 18 years old. Firebird participated in their first PREA audit in December of 2023. The final report was issued 7/30/2024 documenting full compliance.

### **DCFS Staff Training (115.331) & Youth Education (Standard 115.333 & 115.332):**

To ensure the agency can effectively prevent, detect, and respond to sexual abuse and sexual harassment, all DCFS facility staff receive PREA training at hire and annually thereafter.

PREA staff training components include:

- The State's zero tolerance policy and laws regarding sexual harassment and sexual assault
- How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures
- Residents' right to be free from sexual abuse and sexual harassment
- The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment
- The dynamics of sexual abuse and sexual harassment in juvenile facilities
- The common reactions of juvenile victims of sexual abuse and sexual harassment
- How to detect and respond to signs of threatened and actual sexual abuse and how to distinguish between consensual sexual contact and sexual abuse between residents
- How to avoid inappropriate relationships with residents
- How to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming residents
- How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities
- How to conduct cross-gender pat searches in exigent circumstances

In addition, contractors and volunteers working in the facilities are provided training on PREA, including their obligation to report sexual abuse and sexual harassment.

To ensure youth are well informed about PREA and its protections, education is provided in two sessions, one within 72 hours of admission and the other within 10 days of admission. Education is available in English and Spanish.

PREA youth education includes helping youth:

- Understand the agency's zero tolerance policy regarding sexual abuse and sexual harassment
- Understand the definitions of sexual abuse and sexual harassment
- Understand how to report incidents or suspicions of sexual abuse and sexual harassment
- Understand their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents
- Understand the agency's policies and procedures for responding to such incidents

The Division has prioritized PREA staff training and youth education as a crucial preventative measure, as well as utilizing Department of Justice (DOJ) guidance within the PREA Standards in Focus, the knowledge gained from every PREA audit, and information obtained from finalized investigations.

#### **Other Prevention Strategies (Standards 115.313, 115.315, 115.317, & 115.341-115.342):**

In addition to staff training and youth education:

- Facilities have minimum staff-to-youth ratios of 1:8 during waking hours and 1:16 during sleeping hours, to ensure adequate staffing levels. Any deviations from these ratios are documented by the facility.
- Facilities take proactive steps to avoid cross-gender viewing and searches.
- New hires and candidates for promotion are screened through a criminal background check process.
- Facilities assess a youth's risk for victimization and propensity for perpetration utilizing a PREA risk assessment completed upon admission and periodically, to ensure youth are placed in appropriate housing and programming within the facility.

#### **DCFS Sexual Abuse and Sexual Harassment Reporting Mechanisms (Standard 115.351):**

Staff must immediately report all witnessed or reported sexual abuse and sexual harassment to their supervisor.

Youth and third parties have a variety of ways to report sexual abuse and sexual harassment, including:

- Report to any facility staff member, including the PREA Compliance Manager
- Call the DCFS PREA Coordinator directly at 1-888-421-9971
- Report electronically on the DCFS PREA webpage at:  
<https://dcfs.nv.gov/Programs/JJS/PREAHome/> using the link Report a PREA Incident
- Report to the DCFS external reporting source, Nevada 211 by calling:
  - 2-1-1 or
  - 1-866-535-5654

- Submit a written grievance (available to facility-based youth)

In addition to the reporting options, unannounced rounds are conducted in varying areas around each facility at least three times per week, as another detection strategy.

### **Federal PREA Audits (Standard 115.401):**

To demonstrate ongoing compliance with the PREA Standards, DCFS must undergo an audit, performed by a certified federal PREA auditor, for one-third of its facilities each year of every 3-year auditing cycle.

For each 3-year auditing cycle, DCFS completes a PREA audit at one facility per year. For the current auditing cycle, SVYC was audited in 2022; CYC was audited in 2023; and NYTC will be audited in 2025. In addition, a PREA audit at the agency level was conducted in 2024. All final audit reports are available on the PREA webpage on the DCFS website: <https://dcfs.nv.gov/Programs/JJS/PREAHome/>

### **PREA Governor's Certification (Standard 115.501):**

The Governor of each state reports to the DOJ, on an annual basis, the status of PREA compliance for all facilities under the operational control of the State's Executive Branch. Each Governor must certify that 1) the state is in full compliance; or 2) the state assures its intention to adopt and achieve full compliance with the PREA Standards. In making this determination, the Governor considers the results of the most recent agency audits along with other relevant information. The Governor's Certification for Nevada is based on both DCFS facilities and Nevada Department of Corrections (NDOC) facilities. In 2024, Governor Joe Lombardo certified the state's assurance to achieve full compliance with the PREA Standards.

### **PREA Definitions for Sexual Abuse (Standard 115.6):**

The following are the definitions for sexual abuse. Incidents meeting these definitions are investigated:

1. Sexual abuse (staff-on-youth) includes any of the following acts, with or without consent of the youth:
  - a. Contact between the penis and the vulva or the penis and the anus, including penetration, however slight;
  - b. Contact between the mouth and the penis, vulva, or anus;
  - c. Contact between the mouth and any body part where the staff member, contractor, volunteer, or intern has the intent to abuse, arouse, or gratify sexual desire;
  - d. Penetration of the anal or genital opening of another person, however slight, by a hand, finger, object, or other instrument;
  - e. Any act of intentional contact, either directly or through clothing, of the genitalia, anus, groin, breast, inner thigh, or buttocks of any person, excluding contact incidental to a physical alternation;
  - f. Any attempt, threat, or request by a staff member, contractor, volunteer, or intern to engage in activities described in *a* through *e* of this section.

- g. Any display by a staff member, contractor, volunteer, or intern of his or her uncovered genitalia, buttocks, or breast in the presence of a youth; or
  - h. Voyeurism by a staff member, contractor, volunteer, or intern. Voyeurism means an invasion of privacy of a youth for reasons unrelated to official duties, such as peering at an inmate using a toilet in his or her room/cell to perform bodily functions; requiring a youth to expose his or her buttocks, genitals, or breasts; or taking images of all or part of a youth's naked body or of the youth performing bodily functions.
2. Sexual abuse (youth-on-youth) includes any of the following acts, if the victim does not consent, is coerced into such act by overt or implied threats of violence, or is unable to consent or refuse:
  - a. Contact between the penis and the vulva or the penis and the anus, including penetration, however slight;
  - b. Contact between the mouth and the penis, vulva, or anus;
  - c. Penetration of the anal or genital opening of another person, however slight, by a hand, finger, object, or other instrument; or
  - d. Any act of intentional contact, either directly or through clothing, of the genitalia, anus, groin, breast, inner thigh, or buttocks of any person, excluding contact incidental to a physical alternation.

#### **PREA Definitions for Sexual Harassment (Standard 115.6):**

The following are definitions for sexual harassment. Incidents meeting these definitions are investigated:

1. Sexual harassment (youth-on-youth) includes:

Repeated and unwelcome sexual advances, requests for sexual favors, verbal comments, gestures, or actions of a derogatory or offensive sexual nature by one inmate, detainee, or resident directed toward another.

2. Sexual harassment (staff-on-youth) includes:

Repeated verbal comments or gestures of a sexual nature to an inmate, detainee, or resident by a staff member, contractor, or volunteer, including demeaning references to gender, sexually suggestive or derogatory comments about body or clothing, or obscene language or gestures.

#### **DCFS PREA Investigations (Standard 115.371):**

All allegations meeting the PREA Standard or policy definitions for sexual abuse and sexual harassment are fully investigated:

- When an allegation of sexual abuse is made, local law enforcement is notified. All facilities have Memorandum of Understanding (MOU) agreements with local law enforcement within their jurisdiction.

- When an allegation of sexual harassment is made, specially trained DCFS investigatory staff complete an administrative investigation.
- Sexual harassment rising to the level of criminal conduct will be referred to law enforcement.
- Administrative investigations are conducted after criminal investigations have been finalized, or when local law enforcement declines to investigate.
- Administrative investigation findings are based on a preponderance of evidence (civil court standards) to include:
  - Substantiated – the investigation determined that the event occurred or most likely occurred.
  - Unsubstantiated – the investigation determined that evidence was insufficient to determine whether the event occurred or did not occur.
  - Unfounded – the investigation determined that the event did not occur.
- Facility staff monitor for retaliation for at least 90 days from the report of an incident that has been substantiated or unsubstantiated, to ensure reporters of sexual abuse and sexual harassment do not suffer retaliatory actions.
- Youth victims are informed of the finding of the investigation.
- An Incident Review Team completes a review of the incident, for all administrative investigations ending in a substantiated or unsubstantiated finding. This review determines if any changes in policy or practices are needed, whether any underlying dynamics existed, if physical barriers were present, if monitoring technology needs augmenting, if inadequate staffing levels contributed to the incident, and team recommendations.
- The PREA Coordinator reviews and approves all investigations and related documents for completeness and policy adherence.

### **DCFS PREA Investigation Data:**

DCFS began collecting PREA investigation data in 2015. Archived data is available on the DCFS PREA webpage at: <https://dcfs.nv.gov/Programs/JJS/PREAHome/>

- In 2024, 16 PREA investigations were conducted statewide within all DCFS facilities.

### **Substantiated Allegations:**

- In 2024, there were 7 substantiated allegations, 3 involving youth-on-youth sexual abuse, 1 involving staff-on-youth sexual harassment, and 3 involving youth-on-youth sexual abuse.

### **Unsubstantiated Allegations:**

- In 2024, there were 6 unsubstantiated allegations, 6 involving youth-on-youth sexual harassment.

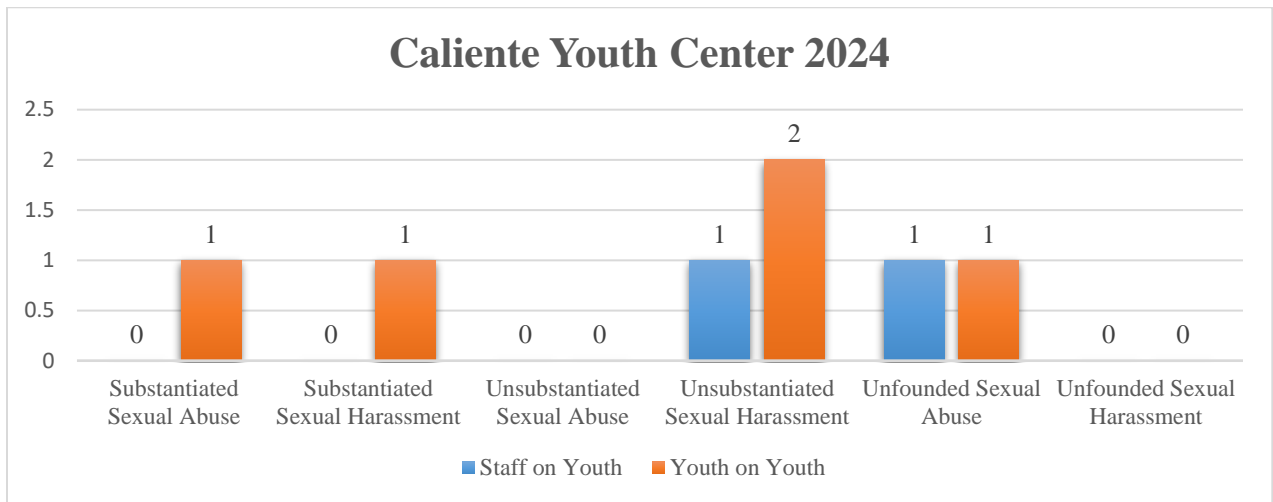
### **Unfounded Allegations:**

- In 2024, there were 3 unfounded allegations, 2 involving youth-on-youth sexual abuse, 1 involving youth-on-youth sexual harassment.

**Contracted Provider PREA Investigation Data:**

- In 2024, Pride House LLC did not report any investigations. Firebird LLC reported 2 allegations, 1 substantiated allegation of youth-on-youth sexual harassment, 1 unfounded allegation of, youth-on-youth sexual abuse.

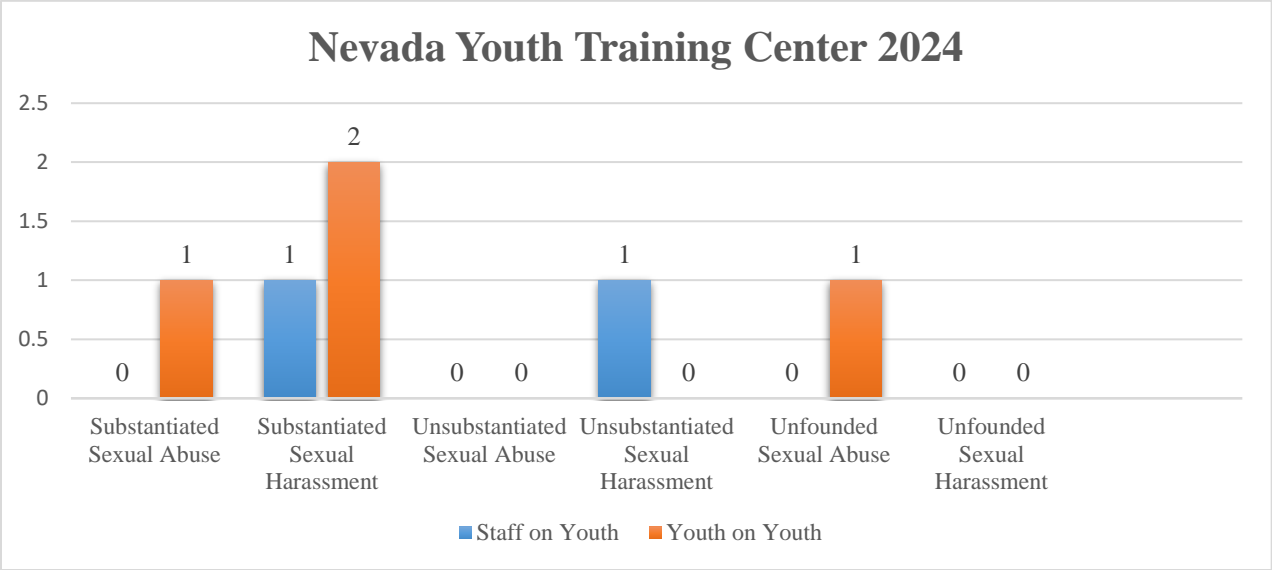
**2024 PREA Investigations by DCFS Facility:**



Caliente Youth Center had 7 investigations with the following findings:

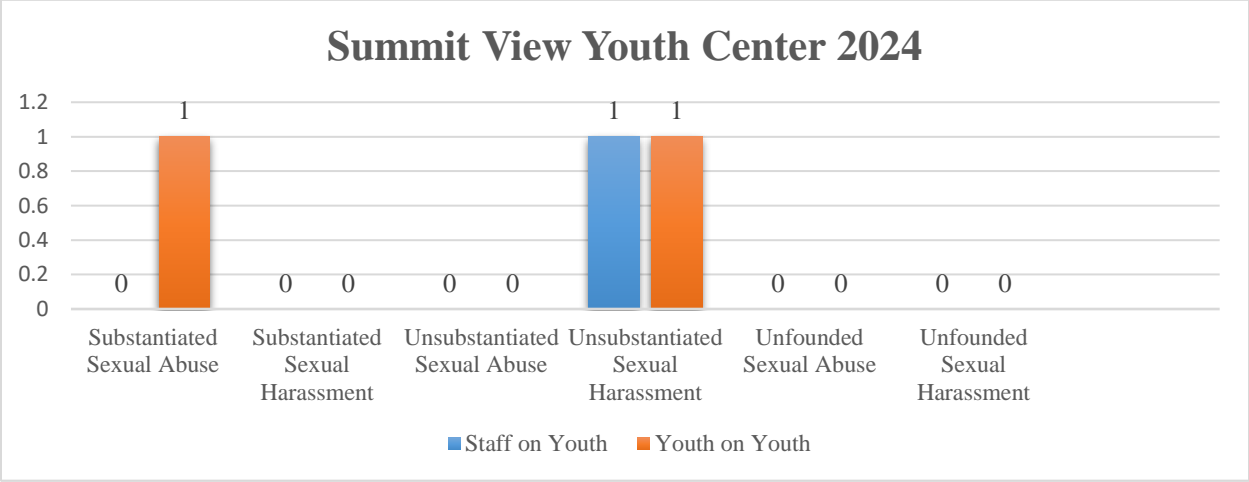
- Substantiated – There were 2 substantiated allegations: 1 youth-on-youth sexual abuse and 1 youth-on-youth sexual harassment.
- Unsubstantiated – There were 3 unsubstantiated allegations: 2 youth-on-youth sexual harassment and 1 staff-on-youth sexual harassment.
- Unfounded – There were 2 unfounded allegations: 1 youth-on-youth sexual abuse and 1 staff-on-youth sexual abuse.





Nevada Youth Training Center had 6 investigations with the following findings:

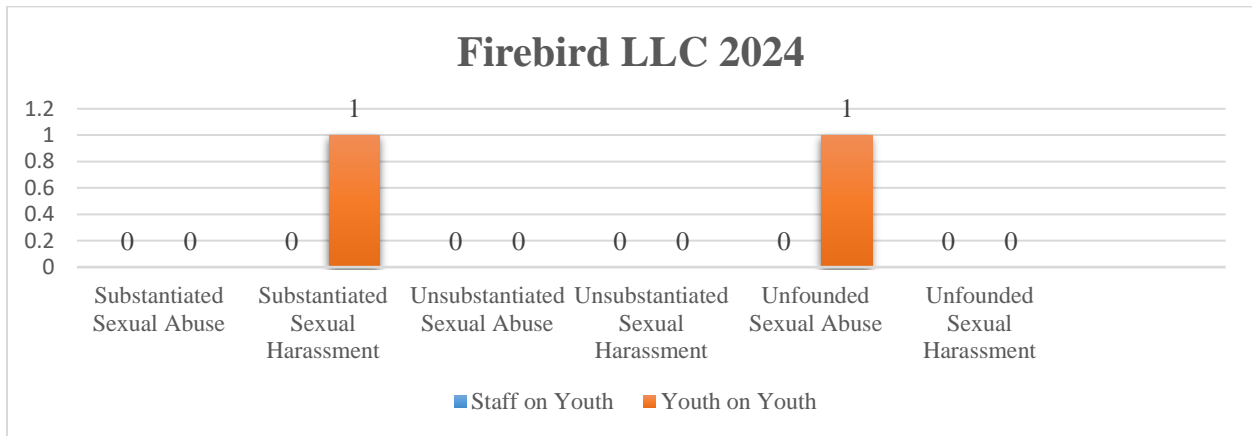
- Substantiated – There were 4 substantiated allegations: 1 staff-on-youth sexual harassment, 1 youth-on-youth sexual abuse, and 2 youth-on-youth sexual harassment.
- Unsubstantiated – There was 1 unsubstantiated allegation of staff-on-youth sexual harassment.
- Unfounded – There was 1 unfounded allegation of youth-on-youth sexual abuse.



Summit View Youth Center had 3 investigations with the following findings:

- Substantiated – There was 1 substantiated allegation of youth-on-youth sexual abuse.
- Unsubstantiated – There were 2 unsubstantiated allegations: 1 staff-on-youth sexual harassment and 1 youth-on-youth sexual harassment.

**2024 PREA Investigations by Contracted Providers:**



Firebird LLC had 2 investigations with the following findings:

- Substantiated – There was 1 substantiated allegation of youth-on-youth sexual harassment.
- Unfounded – There was 1 unfounded allegation of youth-on-youth sexual abuse.

Pride House LLC reported no allegations/investigations.

**PREA Accomplishments in 2024:**

- Completed projects within the DOJ FY21 and FY22 Reallocation grant, including screen enhancements to the DCFS web-based case management system to better capture required PREA data.
- Implemented staff and youth training at SVYC regarding increasing youth education, victim advocacy services, and staff education regarding dealing with youth in a confinement setting and setting appropriate boundaries through partnership with Signs of Hope through use of the DOJ FY21 PREA grant.
- Identified needed repairs for CYC’s video surveillance system and contracted with vendor to complete repairs with funds from the DOJ FY21 PREA grant.
- Received full PREA compliance for CYC and Agency audits.
- Successfully hired and trained a Criminal Investigator for PREA investigations.
- Trained facility-level investigators to conduct PREA administrative investigations at all DCFS facilities.
- Assisted with contracted independent living facilities to become PREA compliant.
- Installation of video surveillance system at NYTC (ARPA funding).

**PREA Action Steps for 2025:**

- Prepare for and complete a federal PREA audit at NYTC and Pride House LLC in January 2025.
- Hire and train Program Officer III (PREA Coordinator) for Juvenile Justice Programs Office.
- Complete installation of NYTC’s video surveillance system.

- Complete upgrade of SVYC’s video surveillance system (ARPA funding).
- Train new PREA Compliance Managers at DCFS facilities.
- Update PREA trainings for staff, including additional training regarding professional boundaries when working with youth in a confinement setting.
- Implement monthly PREA refresher trainings for staff and youth.
- Train new instructors to deliver PREA curriculum to staff and youth at DCFS facilities.

**References:**

- Information Sources:
  - DCFS PREA Administrative Investigation Reports
  - Federal PREA Audit Final and Interim Reports
  - PREA Resource Center: <http://www.prearesourcecenter.org/>
  - Department of Justice Prison Rape Elimination Act Juvenile Facility Standards: <https://www.prearesourcecenter.org/sites/default/files/library/preafinalstandardstyp-pe-juveniles.pdf>
  - 2024 Governor’s Assurance for Audit Year 2 of Cycle 4
  - Pride House LLC and Firebird LLC