

# PRISON RAPE ELIMINATION ACT (PREA)



## COST IMPACT ANALYSIS

PREPARED FOR THE  
DEPARTMENT OF JUSTICE  
OFFICE OF JUSTICE PROGRAMS

## FINAL REPORT June 18, 2010

Cost impact analysis of the NPREC  
standards specific to 49 sites.

Booz | Allen | Hamilton

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## Executive Summary

This document is the final report of the Prison Rape Elimination Act (PREA) Cost Impact Analysis, an effort to assist the Bureau of Justice Assistance (BJA) in the review of the standards published by the National Prison Rape Elimination Commission (NPREC) on June 23, 2009. This document assesses the costs specific to each standard, assesses variations within the cost estimates, and addresses a comprehensive view of implementation and compliance on a national level. It covers five sectors of correctional operations: state prison systems, state and local juvenile facilities, community corrections, and local/county jails, police lockups.

Table E-1: Standards with Negligible or Non-Existent Costs

Standards with a negligible or non-existent cost impact		Compliance
RE1	Inmate reporting	96%
DC4	Data storage, publication, and destruction	94%
MM2	Access to emergency medical and mental health services	90%
DI1	Disciplinary sanctions for staff	88%
OR4	Coordinated response	86%
IN2	Criminal and administrative agency investigations	86%
RE4	Third-party reporting	71%
OR2	Reporting to other confinement facilities	69%
OR3	Staff first responder duties	69%
OR1	Staff and facility head reporting duties	67%
DI2	Disciplinary sanctions for inmates	65%
MM1	Medical and Mental Health Screenings - history of sexual abuse	55%

### Overall Cost Impacts

Among the 41 PREA standards, 12 have negligible or non-existent cost impacts as shown in Table E-1. The majority of the sites visited during this project, approximately 8 out of 10, demonstrated compliance with these standards. For the sites not in compliance with these standards, there was no indication that meeting the PREA standards would result in any measurable cost. Twenty-six standards have anywhere from a very minimal to modestly sizable cost impact most often affecting numerous sites and sectors but with some variability. Table E-2 lists these standards organized, from highest-to-lowest according to ongoing costs. These 26 standards have varying degrees of compliance. Some are compliant with relatively more standards than others. To illustrate this, Table E-3 shows that seven out of the 26 standards have a compliance rate of 70% or higher. This means that for each standard in that list, at least 70% of the sites in this study demonstrated compliance. For example, Evidence Standard for Administrative Investigations (IN6) shows a 96% compliance rate. In other words, 96% or 47 sites out of 49, in this study exhibited compliance with this standard. This standard, therefore, has a relatively low cost and a high compliance.

Table E-2: Standards with a Minimal or Modest Cost

Standard	Description	Total Costs (\$K)	
		Upfront	On-Going
MM3	Ongoing medical and mental health care for sexual abuse victims and abusers	\$12	\$5,773
PP2	Contracting with other entities for the confinement of inmates	\$0	\$5,695
AU1	Audits of standards	\$0	\$5,167
TR1	Employee training	\$4,484	\$4,375
PP1	Zero tolerance of sexual abuse	\$48	\$3,768
RP2	Agreements with outside public entities and community service providers	\$33	\$1,611
SC2	Use of screening information	\$170	\$1,605
RP1	Evidence protocol and forensic medical exams	\$25	\$1,396
IN1	Duty to investigate	\$18	\$1,264
ID6	Supplement to SC-2	\$9	\$746
SC1	Screening for risk of victimization and abusiveness	\$530	\$677
PP6	Hiring and promotion decisions	\$4	\$284
RP3	Agreements with outside law enforcement agencies	\$21	\$258
RP4	Agreements with the prosecuting authority	\$21	\$250
DC3	Data review for corrective action	\$352	\$176
TR3	Inmate education	\$458	\$161
TR5	Specialized training: Medical and mental health care	\$1,462	\$153
TR2	Volunteer and contractor training	\$572	\$142
DC1	Sexual abuse incident reviews	\$2	\$126
RE2	Exhaustion of administrative remedies	\$6	\$105
IN3	Evidence standard for administrative investigations	\$1	\$79
DC2	Data Collection	\$17	\$72
PP5	Accommodating inmate with special needs	\$2	\$47
TR4	Specialized training: Investigations	\$316	\$15
OR5	Agency protection against retaliation	\$500	\$0
RE3	Inmate access to outside confidential support services	\$98	\$0

This contrasts with the remaining 19 standards, Table E-4, that show relatively low compliance rates. In this case, Audits of Standards (AU1) can be seen to have a 0% compliance rate whereby no sites demonstrated compliance. This should come to no surprise since there are no audits currently available. A similar conclusion can be made for Zero Tolerance of Sexual Abuse where only four sites (or 8% of the 49 total sites) have a PREA Coordinator on staff.

Table E-3: Standards with Compliance Less than 70%

Standard		Total Costs (\$K)		Overall Compliance
		Upfront	On-Going	
IN3	Evidence standard for administrative investigations	\$1	\$79	96%
RP3	Agreements with outside law enforcement agencies	\$21	\$258	88%
PP5	Accommodating inmate with special needs	\$2	\$47	88%
RP4	Agreements with the prosecuting authority	\$21	\$250	88%
DC2	Data Collection	\$17	\$72	80%
PP2	Contracting with other entities for the confinement of inmates	\$0	\$5,695	73%
DC3	Data review for corrective action	\$352	\$176	73%

Table E-4: Standards with Compliance Less than 70%

Standard		Total Costs (\$K)		Overall Compliance
		Upfront	On-Going	
RP1	Evidence protocol and forensic medical exams	\$25	\$1,396	69%
SC2	Use of screening information	\$170	\$1,605	69%
DC1	Sexual abuse incident reviews	\$2	\$126	59%
RE3	Inmate access to outside confidential support services	\$98	\$0	59%
OR5	Agency protection against retaliation	\$500	\$0	59%
MM3	Ongoing medical and mental health care for sexual abuse victims and abusers	\$12	\$5,773	57%
ID6	Supplement to SC-2	\$9	\$746	51%
TR2	Volunteer and contractor training	\$572	\$142	43%
TR5	Specialized training: Medical and mental health care	\$1,462	\$153	43%
TR4	Specialized training: Investigations	\$316	\$15	41%
IN1	Duty to investigate	\$18	\$1,264	41%
SC1	Screening for risk of victimization and abusiveness	\$530	\$677	45%
TR1	Employee training	\$4,484	\$4,375	37%
RE2	Exhaustion of administrative remedies	\$6	\$105	33%
TR3	Inmate education	\$458	\$161	31%
RP2	Agreements with outside public entities and community service providers	\$33	\$1,611	24%
PP6	Hiring and promotion decisions	\$4	\$284	22%
PP1	Zero tolerance of sexual abuse	\$48	\$3,768	8%
AU1	Audits of standards	\$0	\$5,167	0%

Three standards (PP3, PP4, and PP7) account for 99% of all upfront costs, and one, PP7, accounts for 96% of all upfront costs, seen in Table E-5. This finding is attributed primarily to undefined and misinterpreted requirements based on the current language of the standard. Two standards (PP3 and PP4) account for 76% of all ongoing costs, solely driven by increased staffing required to meet the intent of the standards as they are written. This table also shows that two of the three (PP4 and PP7) have relatively low compliance rates meaning that few sites exhibit compliance. Inmate Supervision (PP3) on the other hand, shows a combination of a high cost and high compliance rate, indicating that of the few sites noncompliant with the standard, the cost impacts are very high.

Table E-5: Standards with the Highest Costs

Standard		Total Costs (\$K)		% of Total Costs		Overall Compliance
		Upfront	On-Going	Upfront	On-Going	
PP3	Inmate supervision	\$1,665	\$88,848	0%	38%	73%
PP4	Limits to cross-gender viewing and searches	\$21,293	\$89,974	3%	39%	39%
PP7	Assessment and use of monitoring technology	\$770,634	\$20,354	96%	9%	31%

Another means to determine the relative cost impact and its magnitude is to compare a site's overall cost impact to its annual operating budget. This can provide a measure of the relative impact on a site's daily operations and whether they can or cannot absorb the additional costs as a result of PREA. Tables E-6 and E-7 (one for annual, ongoing costs and another for one-time, upfront costs) depict the cost impacts by standard across each of the five sectors. The Harvey Balls™ represent an order of magnitude distinguishing between relatively low and high costs. They are based on a percentage of the annual

aggregate operating budget for each sector. Standards that do not result in any cost impact for any sector are not depicted in the tables. The degree to which each Harvey Ball is shaded indicates the magnitude of the cost impact, or percentage of the overall operating budget. An empty ball ○ represents

standards that do not result in any cost impact. A quarter-shaded ball ◐ represents an overall impact on annual operating budget between 0% and 0.25%, and a half-shaded ball ◑ represents an impact between 0.25% and 0.50%. A fully-shaded ball ● represents any percent impact on annual operating budget that is greater than 0.50%. For example, Inmate Supervision for prisons is represented by a fully-shaded Harvey Ball. The aggregate costs of all the prison systems in this study is 0.51% of their aggregate operating budget. Meanwhile, the upfront costs in Table E-7 on the next page shows a full Harvey Ball for Assessment and Use of

Monitoring Technology (PP7), representing an upfront percent impact of 4.83% for prisons. The primary reason for the significantly higher percentage is attributed to the investment required for technical modernization and retrofits. Thus a site could theoretically be compliant with 99% of the standards with the exception of PP7 and still exhibit a large cost impact.

Table E-6: Yearly Cost Impacts as % of Annual Operating Budget

Priority	Standard	Prisons	Jails	Juvenile	Comm. Corr.	Lockups
1	PP4 Limits to cross-gender viewing and searches	●	◐	◐	●	◐
2	PP3 Inmate Supervision	●	●	◐	◐	○
3	PP7 Assessment and use of monitoring technology	◐	◐	◐	n/a	○
4	MM3 Ongoing medical and mental health care	◐	◐	◐	○	n/a
5	AU1 Audits of standards	◐	◐	◐	◐	◐
6	TR1 - TR5 Training and education	◐	◐	◐	◐	◐
7	PP2 Contracting with other entities for the confinement of inmates	◐	◐	◐	◐	○
8	PP5 Accommodating inmates with special needs	◐	◐	○	◐	◐
9	PP1 Zero tolerance of sexual abuse	◐	◐	◐	◐	◐
10	SC1/SC2 Screening for risk of sexual abuse	◐	◐	◐	○	◐
11	RP2-RP4, RE3 Contract modifications for outside services	◐	○	◐	◐	○
12	RP1 Evidence protocol and forensic medical exams	◐	◐	◐	◐	○
13	IN1/IN3 Investigations	◐	◐	◐	○	○
14	DC6 Supplement to SC-2: Use of screening information	○	◐	n/a	n/a	n/a
15	PP6 Hiring and promotion decisions	◐	◐	◐	◐	◐
16	DC1-DC3 Gathering, reviewing, and reporting data	◐	◐	◐	◐	○
17	RE2 Exhaustion of administrative remedies	◐	◐	○	○	○
18	OR5 Agency protection against retaliation	○	○	○	○	○

Monitoring Technology (PP7), representing an upfront percent impact of 4.83% for prisons. The primary reason for the significantly higher percentage is attributed to the investment required for technical modernization and retrofits. Thus a site could theoretically be compliant with 99% of the standards with the exception of PP7 and still exhibit a large cost impact.

Appendix A includes similar tables with additional detail for each site categorized by sector.

Table E-7: Ongoing Cost Impacts as % of Annual Operating Budget

Priority	Standard	Prisons	Jails	Juvenile	Comm. Corr.	Lockups
1	PP4 Limits to cross-gender viewing and searches					
2	PP3 Inmate Supervision					
3	PP7 Assessment and use of monitoring technology				n/a	
4	MM3 Ongoing medical and mental health care					n/a
5	AU1 Audits of standards					
6	TR1 - TR5 Training and education					
7	PP2 Contracting with other entities for the confinement of inmates					
8	PP5 Accommodating inmates with special needs					
9	PP1 Zero tolerance of sexual abuse					
10	SC1/SC2 Screening for risk of sexual abuse					
11	RP2-RP4, RE3 Contract modifications for outside services					
12	RP1 Evidence protocol and forensic medical exams					
13	IN1/IN3 Investigations					
14	DC6 Supplement to SC-2: Use of screening information			n/a	n/a	n/a
15	PP6 Hiring and promotion decisions					
16	DC1-DC3 Gathering, reviewing, and reporting data					
17	RE2 Exhaustion of administrative remedies					
18	OR5 Agency protection against retaliation					

**Overall Compliance**

Sites have varying degrees of compliance with the standards ranging from a high of 88% to a low of 38%. The site with the highest ranking (MA Department of Youth Services) is compliant with 88% of the standards. The average compliance is 63%. Table E-8 on the next page shows the compliance rates for each site in the study.

On average and collectively, lockups have the highest compliance rate at 74%, while jails have the lowest rate at 61%. The higher compliance rates among lockups may be a reflection of the fewer number of standards, their relative small size, and the low number of samples in this study (four). The other four sectors in this study all have relatively close compliance rates; between 67% and 61%.

A general correlation exists between lower compliance rates and higher costs, however this is just a general pattern and there are several exceptions. Nine of the 41 standards have compliance rates under 40%. Two of these standards, the PREA Audit (AU1) and the PREA Coordinator (PP1), would not be expected to have any compliance because the NPREC standards have not been officially promulgated although four sites already have staff assigned as PREA Coordinator.



Table E-9 at the bottom of the page shows each of the 29 standards with a notable cost impact and their underlying causes for the cost impact. The standards are organized according to magnitude of the

Table E-8: Compliance Rates by Site

Site	Sector	Percent Compliance	Site	Sector	Compliance % of Standards
MA DYS	Juvenile	88%	IN DYS	Juvenile	63%
MA DOC	Prison	85%	OYA	Juvenile	63%
AR JA	Juvenile	85%	Middleton PD	Lockups	63%
Denver County	Jail	84%	Albany County	Jail	61%
Seattle PD	Lockups	82%	Norfolk City	Jail	61%
OR DOC	Prison	80%	MO PP	Community Corrections	61%
MO DYS	Juvenile	78%	Aiken County	Jail	59%
CA DOC	Prison	76%	Marion County	Jail	59%
MA OCC	Community Corrections	74%	Sacramento County	Jail	56%
Peumansend Creek	Jail	73%	Hennepin County	Jail	56%
DCPA	Lockups	73%	WA Pierce County	Jail	56%
Rocklin PD	Lockups	73%	NY DOC	Prison	54%
MN DOC	Prison	71%	VA DOC	Prison	54%
Essex County	Jail	70%	Pulaski County	Jail	54%
AR DOC	Prison	68%	Jefferson County	Jail	53%
RI DOC	Prison	68%	WA DOC	Prison	51%
Ada Juv	Juvenile	68%	MO DOC	Prison	49%
CA DJJ	Juvenile	68%	SC DOC	Prison	49%
IN DOC	Prison	66%	Alachua County	Jail	49%
WI Pierce County	Jail	66%	Anoka County	Jail	49%
AR DCC	Community Corrections	66%	IN DOR	Community Corrections	48%
Miami-Dade	Jail	63%	WA CC	Community Corrections	47%
SC PPP	Community Corrections	63%	CO DOC	Prison	41%
CO DYC	Juvenile	63%	FL DJJ	Juvenile	40%
			IDJC	Juvenile	38%

ongoing cost impact from highest to lowest. Although there are clearly some relatively significant upfront costs that overshadow the ongoing costs (e.g., PP7), prioritizing the standards by ongoing costs emphasizes the long-term cost impact as a result of the NPREC Standards. Some standards are bundled together: the training standards (TR1 through TR5); the Screening Standards (SC1 and SC2); Gathering, Reviewing and Reporting Data Standards (DC1 through DC3);

Contract Modifications for Outside Services (RP2 though RP3 and RE3); and Investigations (IN1 and IN3). Booz Allen believes that they are either dependent upon each other (such as data reviewing, or screening standards) or are logically tied to each other because of their similarities in breadth and scope (such as the training, investigations, and contract modification standards) and any attempt to decouple one will either diminish the value of the others or jeopardize the collective objective of the set.

Table E-9: Major Cost Drivers and Underlying Causes

Cost Impact Rank	Standard	Underlying Cost Driver
1	PP4 Limits to cross-gender viewing and searches	The prohibition of cross-gender pat down searches results in major workforce realignments given the current male/female staffing ratios relative to inmate male/female ratios.
2	PP3 Inmate Supervision	With a level of subjectivity based upon one's definition of what is considered adequate, many sites perceive a need to hire more staff as a means of preventing sexual abuse.
3	PP7 Assessment and use of monitoring technology	Agencies are required to utilize video monitoring systems to eliminate sexual abuse with little to no guidance on the extent, quality, and specifications of this technology as it relates to their site's characteristics and operations.
4	MM3 Ongoing Medical and Mental Health Care	Agencies must provide medical and/or mental health treatment to all known <i>abusers</i> of sexual violence, greatly expanding the number of offenders served.
5	AU1 Audits of standards	Agencies must conduct a triennial audit of all facilities.
6	TR1 - TR5 Training and Education	Agencies are required to expand or modify current training programs to cover all employees (including non-sworn officers and administrative assistants), contractors and volunteers, offenders, and ensure specialized training is provided to investigators and the medical and mental health care staff.
7	PP2 Contracting with other entities for the confinement of inmates	Contracted facilities must comply with all NPREC standards, passing any increased costs over to agencies in the form of increased fees.
8	PP5 Accommodating inmates with	Agencies must implement new policies and procedures to provide interpretive services.
9	PP1 Zero tolerance of sexual abuse	Every site requires a PREA Coordinator requiring hiring additional staff.
10	SC1 and SC2 Screening for Risk of Sexual Abuse	Agencies are required to modify existing tools or implement procedures where one does not exist.
11	RP2 - RP4 and RE3 Contract modifications for outside services	Agencies must enter or attempt to enter into contractual agreements with outside entities to provide confidential emotional support, transition services, and at times, investigative and law enforcement services
12	RP1 Evidence protocol and forensic	Agencies must provide a victim advocate during the medical exam process.
13	IN1 and IN3 Investigations	Agencies will see and increased volume of investigations as a result of more reports of sexual abuse
14	ID6 Supplement to SC-2: Use of Screening Information	Agencies are required to house immigrant detainees separate from the general inmate population, resulting in physical plant investments or increase personnel.
15	PP6 Hiring and promotion decisions	Agencies are required to conduct criminal background checks on employees considered for promotion.
16	DC1 - DC3 Gathering, Reviewing and Reporting Data	Agencies are required to enhance existing processes for gathering, reviewing and reporting of sexual abuse data, resulting in addition personnel costs as a level of effort.
17	RE2 Exhaustion of Administrative Remedies	Agencies are required to modify existing policies or accompanying a victim to federal court. In addition, this contradicts with PLRA.
18	OR5 Agency protection against retaliation	Agencies are required modify existing inmate tracking systems to accommodate additional data characteristics.



Table 1: Site Legend

## Introduction

The Prison Rape Elimination Act (PREA) of 2003 (P.L. 108-79) established the National Prison Rape Elimination Commission (NPREC) to develop and implement national standards for the detection, prevention, reduction and punishment of prison rape<sup>1</sup>. The Bureau of Justice Assistance (BJA) tasked Booz Allen to assist in the review process of the standards published by NPREC on June 23, 2009 to assess their cost impact at correctional institutions across the country. This report provides an analysis of the cost impact based on data from 49 sites<sup>2</sup> representing 13 prisons, 16 jails, 10 juvenile facilities, 6 community corrections, and 4 lockups. Geographically, 12 sites are in the Midwest, 8 are in the Northeast, 13 are in the South, and 16 are in the West. Table 1 lists the sites included in this study along with the acronyms used throughout the report.

## Methodology

The Booz Allen team, consisting of criminal/juvenile justice subject matter experts (SME) and cost estimating specialists, conducted on-site face-to-face meetings with representatives from each of the 49 sites. The objective of these meetings was to obtain a cost impact of implementing new policies and procedures as a result of the NPREC standards. To provide guidance for the discussions and data gathering, the Booz Allen team developed and used a questionnaire based on the *Standards for the*

Prisons	State	Acronym
<b>Midwest</b>		
Minnesota Department of Corrections	MN	MN DOC
Indiana Department of Corrections	IN	IN DOC
Missouri Department of Corrections	MO	MO DOC
<b>Northeast</b>		
New York State Department of Correctional Services	NY	NY DOC
Rhode Island Department of Corrections	RI	RI DOC
Massachusetts Department of Corrections	MA	MA DOC
<b>South</b>		
Virginia Department of Corrections	VA	VA DOC
Arkansas Department of Corrections	AR	AR DOC
South Carolina Department of Corrections	SC	SC DOC
<b>West</b>		
Washington Department of Corrections	WA	WA DOC
Oregon Department of Corrections	OR	OR DOC
California Department of Corrections and Rehabilitation	CA	CA DOC
Colorado Department of Corrections	CO	CO DOC
<b>Jails</b>		
<b>Midwest</b>		
Hennepin County Adult Detention Center	MN	Hennepin County
Anoka County Jail	MN	Anoka County
Pierce County Jail	WI	WI Pierce County
Marion County Jail	IN	Marion County
Jefferson County Jail	MO	Jefferson County
<b>Northeast</b>		
Albany County Correctional Facility	NY	Albany County
Essex County Jail	MA	Essex County
<b>South</b>		
Aiken County Detention Center	SC	Aiken County
Peumansend Creek Regional Jail	VA	Peumansend Creek
Norfolk City Jail	VA	Norfolk City
Miami Dade County	FL	Miami-Dade
Alachua Regional Jail	FL	Alachua County
Pulaski County Region Detention Center	AR	Pulaski County
<b>West</b>		
Sacramento County Jail	CA	Sacramento County
Denver County Jail	CO	Denver County
Pierce County Jail	WA	WA Pierce County
<b>Juvenile Detention</b>		
<b>Midwest</b>		
Indiana Division of Youth Services	IN	IN DYS
Missouri Division of Youth Services	MO	MO DYS
<b>Northeast</b>		
Massachusetts Department of Youth Services	MA	MA DYS
<b>South</b>		
Florida Department of Juvenile Justice	FL	FL DJJ
Arkansas Juvenile Assessment	AR	AR JA
<b>West</b>		
Oregon Youth Authority	OR	OYA
California Department of Juvenile Justice	CA	CA DJJ
Colorado Division of Youth Corrections	CO	CO DYC
Ada County Juvenile Court Services	ID	ACJCS
Idaho Department of Juvenile Corrections	ID	IDJC
<b>Community Corrections</b>		
<b>Midwest</b>		
Indiana Office of the Deputy Commissioner of Reentry	IN	IN DOR
Missouri Division of Parole & Probation	MO	MO PP
<b>Northeast</b>		
Massachusetts Office of Comm. Corrections	MA	MA OCC
<b>South</b>		
South Carolina DOC- Dept. of Probation, Parole & Pardon Services	SC	SC PPP
Arkansas Department of Community Corrections	AR	AR DCC
<b>West</b>		
Washington Department of Corrections, Community Corrections	WA	WA CC
<b>Lockups</b>		
<b>Northeast</b>		
Middleton Police Department	MA	Middleton PD
<b>West</b>		
Seattle Police Department	WA	Seattle PD
Rocklin Police Department	CA	Rocklin PD
Denver County Pre-arrangement Detention Facility	CO	DCPA

<sup>1</sup> Public Law 108-79, 108th Congress. "Prison Rape Elimination Act of 2003." September 4, 2003.

<sup>2</sup>The participating state prison systems, community correction jurisdictions, juvenile correction agencies, jail and lockup facilities are collectively referred to as "sites" throughout the document. Independently, however, they will retain their respective titles.

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*Prevention, Detection, Response, and Monitoring of Sexual Abuse* by NPREC. The purpose of the questionnaire, discussed in Appendixes C and D, was to solicit data, tailored to the appropriate sector, concerning the cost impact for each site and standard.

The primary role of the SMEs was to provide context behind the discussions during the interviews and background of the operating environments for each of the sites. Each SME brought a considerable amount of knowledge about PREA (a couple of SMEs having participated in the NPREC standards development) and many years of employment in the corrections industry or significant academic work in the corrections field. Balanced with Booz Allen analysts, the study's methodology ensured objectivity and independence when determining and estimating costs. Every cost for every site went through rigorous tests and verification. At no time did Booz Allen accept a site's cost estimate as final without further scrutiny, validation, and at times adjustments. This process often times resulted in prolonged communications for many weeks after the initial visit.

It is also noted that there was a wide degree of varying interpretations of certain standards despite every effort to baseline our assumptions for each of the standards during each site visit. To the greatest attempt, Booz Allen maintained open lines of communications to ensure that each site understood our questions and we subsequently understood and agreed with their response. Nevertheless, a number of costs were either subject to wide variations, unobtainable, or fraught with so much uncertainty that an approximation based on sound principles and logic was difficult to estimate. To resolve this issue, Booz Allen developed specific standard costs that were used in such instances. Each of these costs is based on the overall findings and/or reasonable assumptions in the field of corrections.

Booz Allen determined compliance based on a discussion about current practices, policies, and procedures with the site's themselves. Any claim of compliance was validated and tested by subject matter experts, policy documentation, or sufficient evidence of said claim. The scope of this project did not entail audits of their operations or whether they met any yet-to-be defined audit requirements for PREA. For example, the scope of this project did not include a workforce analysis to determine if security staff are providing inmate supervision necessary to protect inmates from sexual abuse per Standard PP3. Such an analysis would require clear auditing requirements, benchmarks, and target staffing levels for each type of facility that does not exist. Instead, the Booz Allen team relied upon the qualitative assessment of the individual site's compliance relative to reported sexual abuse incidents. When feasible, the Booz Allen team would conduct a facility tour and obtain staffing and facility plans; however, this was not possible during the majority of the site visits because many represent multiple facility systems throughout their state. For more detailed information about the Methodology, Questionnaire Development, and the actual questionnaires used in this study, see Appendixes C through E.

### *Organization of Document*

The results of the study are captured in two sections of the document: 1) Compliance Analysis and 2) Primary Cost Impacts and their Underlying Causes. The Compliance Analysis section is a discussion about the compliance of each site, sector, and standard. It highlights the compliance of each of the standards, the relative compliance rankings of the sites included in this study, and assesses compliance ranges relative to their cost estimates captured in this study. It provides a quick assessment to determine which standards are problematic and which are considered relatively easy to implement. The Primary Cost Impacts and their Underlying Causes section is a presentation of each standard that exhibits a cost,

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its impact on each of the sectors, and the reasons for the cost and whether such costs are common or rare occurrences.

The Background and Scope section provides a brief history of PREA, the development of the standards, and Booz Allen's role in the review and analysis of the standards. The Methodology section details the approach of the study and the site selection criteria, followed by the Assumptions section that documents general assumptions and standard cost calculations used throughout the study.

Appendix A (Underlying Causes of Cost Impacts by Sector) presents the same findings discussed in the Primary Cost Impacts and their Underlying Causes but with additional detail. It is organized by sector so that domain/sector experts can easily glean the cost impact in their sector. Appendix B serves as a reference section for specific site-by-site characteristics and costs. The data therein is the same as Appendix A and the Primary Cost Impacts and their Underlying Causes section but organized by site with additional detail on a site's demographics, background, and characteristics.

The standards discussed in this report refer to standards as they are written for the adult jails and prisons sector in the NPREC standards. However, some variations exist among the juvenile agency, community corrections and police lockup standards. For purposes of this study, the reader can assume that each of the adult jails and prisons standards maps to their related standards in juvenile facilities, community corrections, and police lockups. For example, PP5 in adult jails and prisons maps to PP6 in police lockups; PP7 maps to PP8; PP-1 to TR2; TR-4 to TR-3; PP6 to PP7; and both SC1 and SC2 to PP4. For juvenile agencies, SC1 in adult jails and prisons maps to AP1 and SC2 maps to AP2. Likewise for community corrections, MM3 in adult jails and prisons maps to MM2 in community corrections. One standard, PP7, is not in community corrections however, so that standard does not apply to them.

## Compliance Analysis

Booz Allen began this study with the hypothesis that a site's compliance rating (i.e., how compliant a site is with the collective standards) would be a measure of its cost impact. For example, a site with a relatively low compliance rating would have higher costs than a site with a relatively higher rating. This section explores this theory by diving into the compliance rates of each site and the compliance of each standard (i.e., how many sites are compliant with each standard). The analysis indicates some general trends and correlations between a site's compliance and its costs but numerous anomalies suggest that the theory is inconclusive.

### Compliance by Standard

From a standard-by-standard perspective, there are some in which 100% of the sites included in this study are compliant and others in which no sites are compliant. Several standards have requirements that are common or best practice in most correctional facilities today and thus have high compliance rates. Other standards require policy changes, the adoption of new policies altogether and/or the enhancement of existing practices. These standards generally have moderate to low compliance rates. Some standards (such as the PREA Coordinator and PREA audits) are specific to the adoption of PREA and have very low compliance rates.

Table 2: Percent of Sites Compliance with Each Standard

Stand.	Description	% Comp.
DI1	Disciplinary sanctions for staff	98%
IN3	Evidence standard for administrative investigations	96%
RE1	Inmate reporting	96%
MM2	Access to emergency medical and mental health services	96%
DC4	Data storage, publication, and destruction	94%
OR4	Coordinated response	93%
ID6	Supplement to SC-2	90%
PP5	Accommodating inmate with special needs	88%
RP3	Agreements with outside law enforcement agencies	88%
RP4	Agreements with the prosecuting authority	88%
IN2	Criminal and administrative agency investigations	88%
DC2	Data Collection	80%
OR2	Reporting to other confinement facilities	76%
OR3	Staff first responder duties	76%
PP2	Contracting with other entities for the confinement of inmates	73%
DC3	Data review for corrective action	73%
PP3	Inmate supervision	73%
OR1	Staff and facility head reporting duties	73%
MM3	Ongoing med & mental health care for sex abuse victims and abusers	72%
RE4	Third-party reporting	71%
DI2	Disciplinary sanctions for inmates	71%
RP1	Evidence protocol and forensic medical exams	69%
SC2	Use of screening information	69%
MM1	Medical and Mental Health Screenings - history of sexual abuse	63%
OR5	Agency protection against retaliation	62%
RE2	Exhaustion of administrative remedies	59%
DC1	Sexual abuse incident reviews	59%
TR5	Specialized training: Medical and mental health care	47%
SC1	Screening for risk of victimization and abusiveness	45%
TR2	Volunteer and contractor training	43%
TR4	Specialized training: Investigations	41%
IN1	Duty to investigate	41%
PP4	Limits to cross-gender viewing and searches	39%
TR1	Employee training	37%
RE3	Inmate access to outside confidential support services	36%
PP7	Assessment and use of monitoring technology	35%
TR3	Inmate education	33%
RP2	Agreements with outside public entities and comm. ser. Providers	27%
PP6	Hiring and promotion decisions	20%
PP1	Zero tolerance of sexual abuse	8%
AU1	Audits of standards	0%

The compliance rates for each standard, as shown in Table 2, vary from 0% to 98%. A majority of the standards, 27 in total, have compliance rates between 41% and 88%. Nine of the 41 standards have compliance rates under 40%. Two standards, the PREA audit (AU1) and the PREA Coordinator (PP1), would not be expected to have any compliance since the standards have not been promulgated yet, although four sites do have staff assigned to PREA Coordinator duties. Training and education also have low compliance rates and relatively high costs. The training and education standards, TR1 - TR5, all have compliance rates below 48%. Most sites provide some form of training and education; however many will be required to enhance their programs to include PREA specific issues. Other sites will be required to expand the training to cover all employees, contractors, and volunteers.

Six of the 41 standards have compliance rates of 90% or above. As mentioned above, several of the standards include requirements that were found to be common practice in most of the sites visited and thus have very high compliance rates. These include subjecting staff to disciplinary sanctions when Violating Agency Sexual Abuse Policy (DI1), Substantiating Sexual Abuse Allegations if Supported by a Preponderance of the Evidence (IN3), Ensuring that Offenders Have Multiple Internal ways to Report Sexual Abuse (RE1), Providing Access to Emergency Medical and Mental Health Services (MM2), Securely Storing Sexual Abuse Data (DC4), and Coordinating a Response to Sexual Abuse Allegations (OR4). No costs are associated with any of the above six standards.

**Compliance by Site**

Although NPREC standards have yet to be formally promulgated, every site included in this study has already exhibited policies and procedures to meet compliance, several demonstrating compliance with more than 80% of the standards. Many of these sites began implementing changes soon after PREA legislation was signed in 2003 and subsequently have been aided in their effort with PREA grant funding to cover implementation of new training or screening procedures. A few sites even have a salaried PREA Coordinator on staff. Despite some of the PREA policies in place however, several other sites are compliant with less than 50% of the standards.

Table 3: Site by Site Overall Compliance

Site	Sector	Percent Compliance
MA DYS	Juvenile	88%
MA DOC	Prison	85%
AR JA	Juvenile	85%
Denver County	Jail	84%
Seattle PD	Lockups	82%
OR DOC	Prison	80%
MO DYS	Juvenile	78%
CA DOC	Prison	76%
MA OCC	Community Corrections	74%
Peumansend Creek	Jail	73%
DCPA	Lockups	73%
Rocklin PD	Lockups	73%
MN DOC	Prison	71%
Essex County	Jail	70%
AR DOC	Prison	68%
RI DOC	Prison	68%
Ada Juv	Juvenile	68%
CA DJJ	Juvenile	68%
IN DOC	Prison	66%
WI Pierce County	Jail	66%
AR DCC	Community Corrections	66%
Miami-Dade	Jail	63%
SC PPP	Community Corrections	63%
CO DYC	Juvenile	63%
IN DYS	Juvenile	63%
OYA	Juvenile	63%
Middleton PD	Lockups	63%
Albany County	Jail	61%
Norfolk City	Jail	61%
MO PP	Community Corrections	61%
Aiken County	Jail	59%
Marion County	Jail	59%
Sacramento County	Jail	56%
Hennepin County	Jail	56%
WA Pierce County	Jail	56%
NY DOC	Prison	54%
VA DOC	Prison	54%
Pulaski County	Jail	54%
Jefferson County	Jail	53%
WA DOC	Prison	51%
MO DOC	Prison	49%
SC DOC	Prison	49%
Alachua County	Jail	49%
Anoka County	Jail	49%
IN DOR	Community Corrections	48%
WA CC	Community Corrections	47%
CO DOC	Prison	41%
FL DJJ	Juvenile	40%
IDJC	Juvenile	38%

As shown in Table 3, compliance among individual sites varies greatly, ranging from a high of 88% to a low of 38%. The median compliance among all sites is 63%. Collectively, lockups have the highest compliance rate, at 74%, while jails have the lowest rate at 61% illustrated in Table 4. The higher compliance rates among lockups may be a reflection of the fewer number of standards, their relative small size, and the low number of samples in this study (4). The other four sectors in this study all have relatively close compliance rates; between 67% and 61%.

MA DOC and OR DOC have the highest compliance rate among prisons, 85% and 80%, respectively. Among jails, the highest compliance rates are for Denver County and Peumansend Creek, 88% and 73%, respectively. MA DYS and AR JA have the highest compliance rates in the juvenile sector, 88% and 85%, respectively. MA OCC and the Seattle PD have the highest compliance rate for community corrections and lockups, 74% and 82%, respectively.

Table 4: Compliance by Sector

Sector	Average Compliance
Lockups	74%
Juvenile	65%
Prisons	62%
Community Corrections	61%
Jails	60%

In regard to compliance by region of the country, the data shows that in general jurisdictions in the Northeast and West tend to have higher compliance rates, but here too, there is only a loose correlation with several exceptions. Among the 10 jurisdictions with the highest compliance rates, 7 are located in the Northeast or West, while among the jurisdictions with the 10 lowest compliance rates; 6 are located in the Midwest or South. Exceptions include AR JA, MO DYS, and Peumansend Creek (located in the South and Midwest), which have relatively high compliance rates and WA DOC, WA CC, CO DOC, and IDJC (located in the West), which have low compliance rates. Among individual states, Massachusetts fares best in regards to the number of sites with high compliance rates; three of the four Massachusetts sites in this study have compliance rates that fall within the top 10.

**Compliance in Relation to Costs**

This section shows the relation between compliance levels and the cost impact for each sector. They categorize a sector's compliance level into bands and show the cost impact for each site within its respective band (e.g., 40% - 49% compliant). It is a means to validate the hypothesis whereby sites with lower compliance levels face generally higher costs to meet the PREA standards.

This study found that a loose correlation exists between compliance levels and costs, however it is inconclusive as there are a few anomalies and caveats. Generally, as the rate of compliance declines, costs increase. In other words, a site that is not compliant with many standards will exhibit a greater cost impact as opposed to a site that is compliant with relatively more standards. The primary caveat is that it depends on which specific standards a site is compliant. For example, a site that is not compliant with Assessment and Use of Monitoring Technology (PP7) will usually exhibit higher costs because of the investment required for technical modernization and retrofits. Thus a site could theoretically be compliant with 99% of the standards except PP7 yet still exhibit a significant cost impact. Technical Supervision (PP7), with a compliance rate of 35%, has the greatest upfront cost among all standards (collectively across all sites). The upfront cost is primarily associated with purchasing and installing cameras and other video technology. Prisons accounted for the vast majority of the technical supervision costs, followed by juvenile facilities and jails. Another standard with a low compliance rate that carries major costs is the Limits to Cross-Gender Viewing and Searches (PP4). This is because most prisons do



not currently prohibit cross-gender pat downs. The costs associated with this standard are primarily related to hiring more male staff to more closely match the higher proportion of incarcerated men, without compromising security.

The same can be said for jurisdictions that are not compliant with inmate supervision (PP3) and Limits to Cross-Gender Viewing and Searches (PP4) both of which are driven by the cost of labor. This is due to the high unit cost of the standard, driven by personnel salaries, ranging from \$35,000 - \$70,000 per person per year for those sites that do not believe they have an adequate number of staff to prevent sexual abuse. Large jurisdictions with many facilities that are under-staffed may require a significant number of additional full time equivalents (FTEs) to reach an adequate level, leading to a substantial increase in yearly costs.

**Prisons**

Among prisons costs are generally higher for the jurisdictions that have lower to moderate compliance rates. Falling in the 50% to 59% compliance range, NY DOC is estimated to have the highest upfront costs, while the MO DOC, in the lowest compliance range, is estimated to have the highest ongoing cost. The large upfront costs for NY DOC are primarily associated with Assessment and Use of Monitoring Technology (PP7), consisting of the purchase and installation of video surveillance equipment. The large ongoing costs for MO DOC are primarily associated with Inmate Supervision (PP3) and Limits to Cross-Gender Viewing and Searches (PP4), where costs consist of salaries for additional personnel. As noted earlier, PP7, PP3, and PP4 have the highest costs for prisons, among all the NPREC standards; indicating that the level of costs may be more strongly associated with the standards in which the jurisdictions are compliant with rather than the overall compliance rate.

The prison systems with the highest compliance rates generally have lower costs, except for IN DOC and CA DOC, which have relatively high upfront costs and ongoing costs, respectively. Falling in the 60% to 69% compliance range, the IN DOC has the third highest upfront cost, among all prison systems in the study while the CA DOC, falling in the 70% to 85% compliance range, has the third highest ongoing cost. Similar to NY DOC and MO DOC, the large upfront costs for IN DOC are entirely associated with PP7 and PP4 while the large ongoing costs for CA DOC are primarily associated with Limits to Cross-Gender Viewing and Searches (PP4).

Table 5: Prisons – Compliance Level and Cumulative Cost (\$K)

40% - 49% Compliant				50% - 59% Compliant			
	CO DOC	MO DOC	SC DOC		WA DOC	NY DOC	VA DOC
Upfront	\$3,505	\$3,227	\$4,273	Upfront	\$3,206	\$627,096	\$30,998
Ongoing	\$2,879	\$63,867	\$3,322	Ongoing	\$12,256	\$37,411	\$16,246

60% - 69% Compliant				70% - 85% Compliant				
	IN DOC	AR DOC	RI DOC		MN DOC	CA DOC	MA DOC	OR DOC
Upfront	\$20,055	\$286	\$803	Upfront	\$11	\$8,761	\$4,278	\$258
Ongoing	\$5,365	\$12,520	\$265	Ongoing	\$433	\$30,428	\$710	\$774

**Jails**

Among jails costs generally do not correlate closely with level of compliance. Miami-Dade, falling in the 60% to 69% compliance range is estimated to have the highest upfront and ongoing costs. But there are

some similarities with prisons. Miami-Dade's very large upfront costs are almost entirely associated with PP7, consisting of the purchase and installation of video surveillance equipment. The modestly large upfront costs for Pulaski County are primarily associated with Limits to Cross-Gender Viewing and Searches (PP4), where costs consist of a severance payout after laying off female staff. Sacramento County has a relatively low compliance rate and also among the highest costs. Sacramento County's upfront cost is primarily associated with PP7 and Specialized Training (TR4 and TR5), and its ongoing costs result primarily from Inmate Supervision (PP3).

The jails with the highest compliance rates, ranging from 70% to 88%, do generally have low costs, except for Peumansend Creek's upfront cost, which is relatively high. This again is associated with the Assessment and Use of Monitoring Technology (PP7) and Limits to Cross-Gender Viewing and Searches (PP4).

Table 6: Jails – Compliance Level and Cumulative Cost (\$K)

49% - 59% Compliant									
	Aiken County	Alachua County	Anoka County	Hennepin County	Jefferson County	Marion County	Pulaski County	Sacramento County	WA Pierce County
Upfront	\$507	\$205	\$52	\$148	\$175	\$130	\$1,874	\$1,047	\$101
Ongoing	\$29	\$797	\$312	\$118	\$598	\$124	\$124	\$5,972	\$309

60% - 69% Compliant				
	Albany County	Miami-Dade	Norfolk City	WI Pierce County
Upfront	\$20	\$25,144	\$20	\$433
Ongoing	\$1,057	\$7,281	\$124	\$433

70% - 88% Compliant			
	Denver County	Essex County	Peumansend Creek
Upfront	\$134	\$13	\$642
Ongoing	\$1	\$101	\$58

*Juvenile*

Among juvenile corrections agencies a stronger correlation exists between compliance and costs, where costs are generally higher for the jurisdictions that have lower compliance rates; however, much of this is still attributed to the specific standards with which the jurisdictions are noncompliant. The FL DJJ, which has the second lowest compliance rate among all jurisdictions in this study, has the highest upfront cost and second highest ongoing cost among the juvenile sites. The FL DJJ's upfront costs are almost entirely associated with the Assessment and Use of Monitoring Technology (PP7) while its ongoing costs are mostly related to employee training (TR1). Because FL DJJ is a large jurisdiction and much of its staff does not currently receive training specific to PREA issues; roughly 4,800 staff will require additional training.

The CO DYC and the IN DYS, both with roughly average compliance rates, also have relatively high costs. CO DYC has the second highest upfront cost, while IN DYS has the highest ongoing cost. The CO DYC's upfront costs are almost entirely associated with the Assessment and Use of Monitoring Technology (PP7); while IN DYS's ongoing costs are largely associated with Inmate Supervision (PP3).

Juvenile corrections agencies with the highest compliance rates generally have the lowest costs relative to the other sectors. The AR JA, MA DYS, and MO DYS all have compliance rates in the top 10 of all 49 jurisdictions, and have generally low costs. These costs are primarily associated with the Assessment and Use of Monitoring Technology (PP7), Training (TR1 - TR5), and Audits of Standards (AU1). It should not be a surprise that Training and Audits of Standards are within this list because they typically have lower costs relative to other standards. However, with Monitoring Technology in the list, it is noteworthy

that it does not result in higher costs since this is one of the biggest cost drivers of all the standards. With such a low cost, it suggests that juvenile agencies with high compliance rates do not require major investments in surveillance technology (among to juvenile agencies in this study).

Table 7: Juvenile – Compliance Level and Cumulative Cost (\$K)

38% - 48% Compliant			49% - 63% Compliant			
	FL DJJ	IDJC		CO DYC	IN DYS	OYA
Upfront	\$38,066	\$353	Upfront	\$17,781	\$2,607	\$4,138
Ongoing	\$4,165	\$1,266	Ongoing	\$3,383	\$4,965	\$473

64% - 77% Compliant			78% - 88% Compliant			
	ACJCS	CA DJJ		AR JA	MA DYS	MO DYS
Upfront	\$3	\$1,193	Upfront	\$7	\$933	\$310
Ongoing	\$115	\$3,041	Ongoing	\$85	\$574	\$310

### Community Corrections

Among community corrections jurisdictions costs also do not generally correlate closely with level of compliance. IN DOR has the lowest compliance rates in the study but also has relatively low costs. IN DOR is compliant with many standards associated with the highest costs such as Inmate Supervision (PP3) and Limits to Cross-Gender Viewing and Searches (PP4). Note that the standard for the Assessment and Use of Monitoring Technology (PP7), a major cost driver for many jurisdictions in other sectors, does not apply to community corrections.

The AR CC and MO PP, both falling in the 59% to 69% compliance range, have the highest ongoing costs in community corrections; the costs for both jurisdictions are primarily associated with Limits to Cross-Gender Viewing and Searches (PP4). The WA CC, in the lowest compliance range, has the highest upfront costs. Unlike many other jurisdictions the upfront costs for WA CC are not concentrated in any one standard rather, they are spread across numerous standards, including Employee Training (TR1), Specialized Training (TR4 and TR5), Screening (SC1 and SC2), and Gathering, Reviewing and Reporting Data Standards (DC1 - DC3).

Table 8: Community Corrections – Compliance Level and Cumulative Cost (\$K)

48% - 58% Compliant			59% - 69% Compliant			70% - 75% Compliant	
	IN DOR	WA CC		AR DOC	MO PP	SC PPP	MA OCC
Upfront	\$33	\$184	Upfront	\$49	\$47	\$53	\$129
Ongoing	\$50	\$1,267	Ongoing	\$1,997	\$1,757	\$88	\$315

### Lockups

Among the four lockups in this study, costs do not correlate at all with the compliance level most likely because there is simply a smaller sample. In fact, the lockup with the highest level of compliance, Seattle PD, also has the highest costs. Seattle PD’s major cost is for Accommodating Inmates with Special Needs (PP5)<sup>3</sup>. Standard PP5 is unique in that it is only a major cost factor for lockups. In addition to the Seattle PD, the Rocklin PD and the DCPA also have relatively high costs associated with PP5. This is unique to the lockup sector because only three other jurisdictions across all other sectors are not compliant with this standard; the overall compliance rate for the standard is 88%. The Seattle PD has by

<sup>3</sup> PP5 maps to PP4 in the standards for lockups

far the largest cost associated with PP5 among all lockup facilities in this study. As a whole, 99.7% of all ongoing costs associated with standard PP5 are in the lockups sector while 92% of the upfront costs for PP5 are also in lockups.

Table 9: Lockups – Compliance Level and Cumulative Cost (\$K)

60% - 69% Compliant		70% - 79% Compliant			80% - 89% Compliant	
	Middleton PD		DCPA	Rocklin PD		Seattle PD
Upfront	\$5	Upfront	\$65	\$19	Upfront	\$28
Ongoing	\$81	Ongoing	\$77	\$802	Ongoing	\$3,051

## Primary Cost Impacts and their Underlying Causes

This section discusses the standards exhibiting a notable cost impact based on the 49 sites included in this study. This discussion covers 29 standards listed according to magnitude of the ongoing cost impact from highest to lowest. Although there are clearly some relatively significant upfront costs that overshadow the ongoing costs (e.g., PP7), prioritizing the standards by ongoing costs emphasizes the long-term cost impact as a result of the standards and the belief that significant adjustments to annual base funding allocations are more difficult to secure than one-off investments, particularly in today's economy where state and local budgets are under increased scrutiny. Table 10 shows the 29 standards with notable costs sorted from highest-to-lowest ongoing costs. These are total costs across all sectors and do not take into account unique sector characteristics and resulting cost impacts that this narrative will address. The following pages only address the standards that have a notable cost impact.

Table 10: Standards with Notable Costs and the % of Total Costs

Standard		Total Costs (\$K)	
		Upfront	On-Going
PP4	Limits to cross-gender viewing and searches	\$21,293	\$89,974
PP3	Inmate supervision	\$1,665	\$88,848
PP7	Assessment and use of monitoring technology	\$770,634	\$20,354
MM3	Ongoing medical and mental health care for sexual abuse victims and abusers	\$12	\$5,773
	Contracting with other entities for the confinement of inmates	\$0	\$5,695
AU1	Audits of standards	\$0	\$5,167
TR1	Employee training	\$4,484	\$4,375
PP1	Zero tolerance of sexual abuse	\$48	\$3,768
RP2	Agreements with outside public entities and community service providers	\$33	\$1,611
	Use of screening information	\$170	\$1,605
RP1	Evidence protocol and forensic medical exams	\$25	\$1,396
IN1	Duty to investigate	\$18	\$1,264
ID6	Supplement to SC-2	\$9	\$746
SC1	Screening for risk of victimization and abusiveness	\$530	\$677
PP6	Hiring and promotion decisions	\$4	\$284
RP3	Agreements with outside law enforcement agencies	\$21	\$258
	Agreements with the prosecuting authority	\$21	\$250
DC3	Data review for corrective action	\$352	\$176
TR3	Inmate education	\$458	\$161
TR5	Specialized training: Medical and mental health care	\$1,462	\$153
TR2	Volunteer and contractor training	\$572	\$142
DC1	Sexual abuse incident reviews	\$2	\$126
RE2	Exhaustion of administrative remedies	\$6	\$105
IN3	Evidence standard for administrative investigations	\$1	\$79
	Data Collection	\$17	\$72
PP5	Accommodating inmate with special needs	\$2	\$47
TR4	Specialized training: Investigations	\$316	\$15
OR5	Agency protection against retaliation	\$500	\$0
RE3	Inmate access to outside confidential support services	\$98	\$0

Table 10 also shows the standard's relative proportion of total costs. This is calculated by dividing the total costs for each standard divided by the grand total (separately for ongoing and upfront). This pinpoints very quickly which standards are the largest cost drivers, highlighting three in particular (PP4, PP3, and PP7). These three standards account for 99% of all upfront costs and PP7 accounts for 96% of all upfront costs. This is attributed primarily to undefined and misinterpreted requirements based on the current language of the standard. Two standards (PP3 and PP4) account for 76% of all ongoing costs, solely driven by increased staffing required to meet the intent of the standards as they are written.

Another means to determine the relative cost impact and its magnitude is to compare a site's overall cost impact to its annual operating budget. This can provide a measure of the relative impact on a site's daily operations and whether it can or cannot absorb the additional costs as a result of PREA. Tables 11 and 12 (one for annual, ongoing costs; another for one-time, upfront costs) depict the cost impacts by standard across each of the five sectors. The Harvey Balls™ represent an order of magnitude distinguishing between relatively low and high costs. They are based on a percentage of the annual aggregate operating budget for each sector. Standards that do not result in any cost impact for any sector are not depicted in the tables. The degree to which each Harvey Ball is shaded indicates the magnitude of the cost impact, or

percentage of the overall operating budget. An empty ball ○ represents standards that do not result in any cost impact. A quarter-shaded ball ◑ represents an overall impact on annual operating budget between 0% and 0.25%, while a half-shaded ball ◒ represents an impact between 0.25% and 0.50%. A fully-shaded ball ● represents any percent impact on annual operating budget that is greater than 0.50%. For example, Inmate Supervision for prisons is represented by a fully-shaded Harvey Ball. The aggregate costs for this standard is 0.51% of the aggregated sites' operating budget. In Table 11, the same fully-shaded symbol for prison has an upfront percent impact of 4.83% on prisons' Assessment and Use of Monitoring Technology (PP7). The primary reason for the significantly higher percentage is attributed to the investment required for technical modernization and retrofits. Thus a site could theoretically be compliant with 99% of the standards with the exception of PP7 but would still exhibit a large cost impact.

Table 11: Ongoing Cost Impacts as % of Annual Operating Budget

Priority		Prisons	Jails	Juvenile	Comm. Corr.	Lockups
1	Limits to cross-gender viewing and searches	●	◑	◑	●	●
2	Inmate Supervision	●	●	◒	◑	○
3	Assessment and use of monitoring technology	◑	◑	◑	n/a	○
4	Ongoing medical and mental health care	◑	◑	◑	○	n/a
5	Audits of standards	◑	◑	◑	◑	◑
6	Training and education	◑	◑	◒	◑	◑
7	Contracting with other entities for the confinement of inmates	◑	◑	◑	◑	○
8	Accommodating inmates with special needs	◑	◑	○	◑	◑
9	Zero tolerance of sexual abuse	◑	◑	◑	◑	◑
10	Screening for risk of sexual abuse	◑	◑	◑	○	◑
11	Contract modifications for outside services	◑	○	◑	◑	○
12	Evidence protocol and forensic medical exams	◑	◑	◑	◑	○
13	Investigations	◑	◑	◑	○	○
14	Supplement to SC-2: Use of screening information	○	◑	n/a	n/a	n/a
15	Hiring and promotion decisions	◑	◑	◑	◑	◑
16	Gathering, reviewing, and reporting data	◑	◑	◑	◑	○
17	Exhaustion of administrative remedies	◑	◑	○	○	○
18	Agency protection against retaliation	○	○	○	○	○

As shown in these tables, only three standards have fully filled Harvey Balls, the same referenced earlier (PP4, PP3, and PP7). These are considered the most problematic in terms of both compliance and cost impact.



Table 12: Upfront Cost Impacts as % of Annual Operating Budget

Priority		Prisons	Jails	Juvenile	Comm. Corr.	Lockups
1	Limits to cross-gender viewing and searches					
2	Inmate Supervision					
3	Assessment and use of monitoring technology				n/a	
4	Ongoing medical and mental health care					n/a
5	Audits of standards					
6	Training and education					
7	Contracting with other entities for the confinement of inmates					
8	Accommodating inmates with special needs					
9	Zero tolerance of sexual abuse					
10	Screening for risk of sexual abuse					
11	Contract modifications for outside services					
12	Evidence protocol and forensic medical exams					
13	Investigations					
14	Supplement to SC-2: Use of screening information			n/a	n/a	n/a
15	Hiring and promotion decisions					
16	Gathering, reviewing, and reporting data					
17	Exhaustion of administrative remedies					
18	Agency protection against retaliation					

With a few exceptions, this section addresses each standard with an ongoing cost percentage greater than zero, presented in order of the greatest cost impact to the least. The exceptions include the Training Standards (TR1 through TR5); the Screening Standards (SC1 and SC2); Gathering, Reviewing and Reporting Data Standards (DC1 through DC3), Investigations (IN1 and IN3) and Contract Modifications for Outside Services (RP2 though RP3 and RE3). Each is bundled together because Booz Allen believes that each is either dependent on the other (e.g., data reviewing or screening standards) or is tied logically to the other based on its similarities in breadth and scope (e.g., training, investigations, and the contract modification standards). As such, the cost impact for these standards is first presented as an aggregate cost followed by specific standard detail in the narrative.

Each standard or cost impact is first described in context of our overall findings, regardless of sector. However, because of the relatively significant variations between the sectors, this is followed by a brief summary of the cost impact on each of the five sectors. Finally, all costs are presented in thousands of dollars.

**Cost Impact #1 – Limits to Cross-Gender Viewing and Searches (PP4)**

Limits to Cross-Gender Viewing and Searches (PP4) exhibits one of the lowest compliance measures (39% overall) combined with one of the highest cost impacts, accounting for 38% of the total ongoing cost impact across all sites in the study. The following chart underscores the magnitude of this standard, which affects every sector but most prominently, from an ongoing cost impact perspective, prisons, community corrections, and lockups.

Sector	Upfront Range		Yearly Range		Percent Compliant
	High	Low	High	Low	
Prisons	\$14,985	\$ 48	\$33,920	\$ 2,573	8%
Jails	\$ 1,762	\$ 2	\$ 384	\$ 38	38%
Juvenile	\$ 85	\$ 85	\$ 680	\$ 680	70%
Community Corrections	\$ 48	\$ 34	\$ 1,849	\$ 1,656	67%
Lockups	\$ 24	\$ 6	\$ 3,043	\$ 698	25%

The underlying cause of this impact is attributed solely to the prohibition of cross-gender pat down searches within the standard.

The NPREC standard PP4 states, *“Except in the case of emergency or other extraordinary or unforeseen circumstances, the facility... restricts cross-gender pat down searches.”*

Every sector expressed a significant amount of consternation about this standard highlighting numerous obstacles mostly around major workforce realignments given the current male/female staffing ratios relative to inmate male/female ratios. Specifically, every sector has relatively more female correctional officers than female inmates, resulting in females frequently conducting pat downs on male inmates as part of normal operating procedures.

Cross-gender pat down searches are a common practice for all sectors but juvenile corrections agencies. For most it is institutionalized in policies and procedures and has been practiced for many years with a fundamental belief that frequent and surprise pat downs are a critical component to ensuring a safe environment. Specific pat down procedures differ from site-to-site. Sites appreciate the control they have to manage pat down procedures without gender constraints. Some have pat downs at certain posts while others use pat downs randomly so as avoid establishing any patterns for the offender to exploit. Few sites consider pat downs during hiring decisions with the majority being gender agnostic. There was a common sentiment that pat downs were equally effective by either gender and potentially equally abused by either gender.

Some sites (19 of the 49) are selective regarding their cross-gender pat downs having policies that are nearly compliant such as prohibiting pat downs of female offenders by male officers while not restricting female officers from cross-gender pat downs. Similarly, some prison systems prevented male officers from working in all-female facilities, effectively prohibiting cross-gender pat downs. These few sites employ bona fide occupational qualifications (BFOQ) based on gender when making their decisions regarding the hiring and retention of employees. It was only seen at sites that have not been legally challenged on the merits of equal employment or Federal statutes, specifically at sites that did not have union representation or past litigation. This unique hiring practice results in a workforce where the gender balance is much more in line with the U.S. workforce than is the inmate population.

Pat downs do not appear to be as common at juvenile corrections agencies. Given a higher offender-to-officer ratio, it is more likely that an officer of the same gender would be available to conduct pat downs.

Two additional economic or environmental drivers support such practices: 1) labor market factors that supply proportionally more female correctional officers than female inmates compounded by the disproportionate scale of available resources for large facilities in relatively remote locations and 2) local or state laws that mandate equal opportunity employment, which create a barrier to removing cross-gender pat down searches.

*Prisons*

The NY DOC reported the need to hire female correction officers to eliminate cross-gender pat downs at female facilities, estimated at a cost of \$33.9 million for 620 female corrections officers at their five female facilities. Likewise, the MO DOC would accrue a cost of over \$18.3 million in annual costs and \$362,000 upfront to hire 381 additional male staff. This level of support would provide three additional posts per institution and supervision to provide on-call same gender pat search capability. Similarly, the VA DOC estimated 50 additional male staff resulting in a \$2.6 million annual salary cost impact. Some systems on the other hand, would have to reduce their staff to balance their gender ratio. The IN DOC for example, reported the need to reduce their female staff by 639 officers (replacing them with male staff), none of which could be absorbed in other custody positions resulting in a one-time, upfront severance payout of \$15 million. Likewise, MA DOC anticipates having to replace 69 female staff with male staff resulting in approximately \$2 million in severance pay. CO DOC, on the other hand, believes female officers could be absorbed by a female only facility, but would cost \$650,000 in moving expenses.

Sites	Upfront	Yearly	Notes
NY DOC	\$ 589	\$33,920	Increase number of CO staffing at female facilities by 50%.
CA DOC	\$ 479	\$26,313	500 additional female FTEs would be required to supervise women's facilities.
MO DOC	\$ 362	\$18,254	Male staff will need to be hired to supplement current staff.
VA DOC	\$ 48	\$ 2,573	50 additional male FTEs (BFOQs) are required.
IN DOC	\$14,985		Severance pay for 639 female officers.
MA DOC	\$ 1,974		Severance pay for 69 female officers.
CO DOC	\$ 650		Moving expenses associated with transferring male and female posts.

RI DOC was the only state system that reported full compliance with this standard. This anomaly attributed to a low percentage of female officers (13%), a relatively small system, and a culture that does not face any Federal, State, or union challenges when it comes to equal employment hiring practices. These legal challenges were frequently brought up by most of the sites asserting that Federal and equal employment statutes would prevent them from complying with PREA, particularly if it resulted in any gender-based hiring decision. Many of them (AR DOC, CA DOC, MN DOC, OR DOC, SC DOC, and WA DOC,) have already faced considerable legal challenges and made an attempt to include these costs in this study. AR DOC for example, expressed a need to fully double its current staff of 3,247 officers to avoid violating state and local statutes. Booz Allen on the other hand did not include this cost as it is deemed speculative and distracts from the primary reason for their noncompliance which is Federal and state statutes.

*Jails*

Of the 16 jails, 10 reported noncompliance, of which 6 reported cost impacts ranging from \$2,000 to \$1.8 million for upfront costs and \$38,000 to \$384,000 for ongoing costs as shown in the table below. The majority of jails in this study have proportionately more female correctional officers than female inmates. This results in females frequently conducting pat downs on male inmates as part of normal operating procedures, often times out of necessity. Of the 10 noncompliant facilities the average percentage of female officers is 32% and the average percentage of female inmates is 16%.

Sites	Upfront	Yearly	Notes
WI Pierce County	\$ 5	\$ 384	5 additional FTEs to create one full-time post.
Albany County	\$ 5	\$ 309	5 additional female FTEs.
Anoka County	\$ 5	\$ 259	5 additional FTEs to create one full-time post.
Peumansend Creek	\$ 233	\$ 38	Severance pay for 13 female officers, and salary matching for new hires.
Pulaski County	\$ 1,762		Severance pay for 82.5 female FTEs.
Sacramento County	\$ 2		Fees associated with a policy change.

To meet this standard, demonstrating a few examples, WI Pierce County anticipated a need to add one additional post (24/7) with five additional FTEs at a total annual cost of \$384,000. Albany County expressed a concern that the labor market is not producing enough female candidates, stemming from a NY State Agility Test applied equally to all male and female officers. As a result, fewer women can pass the test, resulting in a unique case where they do not have enough female officers to be available to conduct female pat downs. In order to comply, Albany County will need to institute a more concerted and aggressive recruitment of five additional female officers (those able to pass the agility test) resulting in an annual cost impact of \$309,000. Due to facility constraints, Anoka County would need to install a 24 hour male deputy rover position (5 FTEs) with an estimated annual cost impact of \$259,000 per year. Peumansend Creek would need an increase of 13 male officers and an equal decrease in female officers resulting in an estimated \$233,000 in severance costs along with an 8% wage premium to attract qualified male applicants resulting in an ongoing cost impact of \$38,000. To balance its ratio, Pulaski County would need to replace 85 female FTEs, resulting in a one-time severance payout of \$1.7 million.

*Juvenile*

Compliance with this NPREC standard is substantially easier for juvenile facilities for two reasons; (1) juvenile facilities have a higher staff to resident ratio allowing for increased supervision; (2) most juvenile facilities have policies that prohibit cross-gender pat downs. Of the ten juvenile sites in this report, three reported noncompliance with only the CA DJJ reporting a cost as represented in the table below.

Sites	Upfront	Yearly	Notes
CA DJJ	\$ 85	\$ 680	Annual cost of 4 male FTEs to perform additional pat-downs, costs for policy writing and HR support.

The CA DJJ estimated \$680,000 for the addition of four male staff to assist with an anticipated 40% increase in pat downs for male staff.

*Community Corrections*

Of the six community correction jurisdictions, four reported noncompliance and only two reported a cost. The average percentage of male staff is 36% while the average percentage of female inmates is 16%. The two jurisdictions (AR DCC and MO PP) and their respective costs are presented in the table below.

Sites	Upfront	Yearly	Notes
AR DCC	\$ 48	\$ 1,849	50 additional male FTEs and associated operations cost.
MO PP	\$ 34	\$ 1,656	36 additional FTEs and associated operations cost.

The AR DCC has estimated the need to redeploy female staff (moving them from male to female facilities) and hiring 50 additional male staff (ensuring each post in the male facilities has a male present) for a net impact on its budget of \$1.8 million annually. Furthermore, because the local labor pool in AR simply does not provide enough qualified male applicants, AR DCC would need to increase its average salary by 33% to ensure that enough male applicants are available. MO PP would run against federal regulations making any gender-related workforce adjustment potentially illegal. Therefore, the path of least resistance is obtaining additional FTE authority to hire more male officers, specifically three per shift at the CRC and one per shift at the CSC resulting in an annual cost impact of \$1.7 million to cover 36 FTEs including salary, expenses, and benefits.

*Lockups*

As it relates to lockups, prohibition of cross-gender pat downs falls under standard PP5. Similar to other sectors, the lockups sector expressed great difficulty with prohibiting cross-gender pat downs. The primary reason for the difficulty is that law enforcement officers not corrections officers manage the lockups, and the rules and laws of offender treatment in the field differ from offender treatment in a correctional institution. Law enforcement officers simply do not consider their detention, temporary holding, and pre-arraignment facilities in the same light as jails and prisons. Their mission is law enforcement, not incarceration, whereby the temporary custody of an offender is simply a transition from the point of offense to longer -term incarceration at a county jail. Subsequently, police departments view this standard as contradictory to existing case law, which upholds the rights of officers to conduct cross-gender pat downs in the field with most officers assuming that those rights and procedures apply to the holding facility as well. Of the four lockup facilities, three were noncompliant with two having a relatively high cost estimate as a result of this standard. The primary cause of the cost impact is increased staffing, primarily female officers on call at all hours in the event of a pat search.

Sites	Upfront	Yearly	Notes
Seattle PD	\$ 24	\$ 3,043	25 additional FTEs to staff 5 lockup facilities 24/7.
Rocklin PD	\$ 6	\$ 698	5.5 additional FTEs to staff the lockup facility 24/7.

To become compliant with this standard, the Seattle PD would be required to hire a substantial number of female officers requiring a minimum of 25 FTE female officers at a cost of \$3 million per year. Rocklin PD estimates a need for 5.5 additional female officers to staff the lockup facility 24/7 at an annual cost of \$698,000. This would allow for a female officer to always be on duty with a male officer at the lockup facility. The DCPA facility allows female officers to conduct cross-gender pat downs on male inmates but does prohibit male officers from cross-gender pat searches. To meet the PREA standard, DCPA will need to realign its workforce, redeploying its female officers out of the male facility. Initially this will result in a shortage of male officers suggesting a cost impact. However, because the Denver County Jail

and DCPA are merging under one roof, it is Booz Allen's assertion that there are male resources from Denver County Jail to cover for the open positions in the pre-arraignment facility. This is clearly a unique case where meeting this standard does not result in a cost impact.

### **Cost Impact #2 - Inmate Supervision (PP3)**

Inmate Supervision (PP3) exhibits a relatively high compliance measure (73% of all the sites are compliant) yet accounts for 38% of the total ongoing cost impact across every sector in the study. This suggests that the majority of the sites have policies and procedures in place that they feel are adequate to minimize sexual abuse. However, for those that do not the cost barrier is rather significant. As shown in the chart below, the ongoing costs are most prominent for prisons yet still considerably significant for jails and juvenile and nonexistent for lockups.

Sector	Upfront Range		Yearly Range		Percent Compliant
	High	Low	High	Low	
Prisons	\$ 878	\$ 91	\$44,273	\$ 4,940	46%
Jails	\$ 112	\$ 10	\$ 6,723	\$ 393	81%
Juvenile	\$ 74	\$ 24	\$ 3,703	\$ 1,250	80%
Community Corrections	\$ 16	\$ 16	\$ 884	\$ 884	83%

There are significant variations in costs among the few sites that do require additional supervision. The variability in costs is due to multiple interpretations regarding the level of staff that is considered adequate to prevent sexual abuse combined with the characteristics (age and design) of the physical plant. Although sites may have a desire to increase staff to generally minimize all disruptive behavior, the level that is adequate to prevent sexual abuse is often subjective with crude industry standards (e.g., staff to offender ratios) as a measurement to determine the adequate level of staff. These measurements frequently do not take into account the varying permutations of physical, environmental and operational characteristics.

With this in mind, the underlying cause of the cost impact for Inmate Supervision is the need to hire more staff as a means of preventing sexual abuse.

The NPREC standard PP3 states, *“Security staff provides the inmate supervision necessary to protect inmates from sexual abuse.”*

The supervision of inmates lends itself to a certain level of subjectivity based upon one's definition of what is considered adequate. The level of staff employed at correctional institutions is often dictated by state and local budgets conditions. The sites that have inadequate levels of staff generally cited state or local budget constraints as the primary reason.

In order to report the cost impact consistently across varying types of supervision and population sizes, sites were encouraged to use the number of sexual abuse incidents confirmed over the past several years to identify any trends that might signal a problem. Because trends associated with the majority of the sites studied suggest a flat or declining number of incidents reported and confirmed, there were few compelling reasons to justify an increase in inmate supervision suggesting that a basis for cost cannot be determined solely on the number of incidents confirmed.

It is generally understood, and was frequently discussed during the site visits, that increased supervision will help deter and prevent sexual abuse before it ever happens but it should not be considered to be the most effective means of deterrence/prevention. For example, contrary to logic, OR DOC believes the majority of incidents occur when staffing levels are highest. Additionally, many sites expressed an



interdependence of physical and technical supervision, sometimes relying on one or the other depending on the culture and environment of the site/system. Nevertheless, increased supervision has a major cost impact on sites with numerous underlying reasons.

**Prisons**

Among the prisons where cost is estimated for physical supervision, all feel that they are operating at staffing levels lower than their target levels. Of the 13 prisons in this study, only four are estimated to have costs associated with physical supervision. Due to the sheer size of prison systems, costs for inmate supervision are greatest in this sector. Annual costs ranged from \$4.9 million for VA DOC to \$44 million for MO DOC, whereas upfront costs ranged from \$91,000 for VA DOC and \$878,000 for MO DOC.

Site	Upfront	Yearly	Notes
MO DOC	\$ 878	\$44,273	Increase number of COs by 20% above current level.
AR DOC	\$ 285	\$11,791	Additional rounds are needed in older facilities. Increase in salaries to attract additional staff.
WA DOC	\$ 157	\$10,531	Staffing cost to eliminate self-relieving posts.
VA DOC	\$ 91	\$ 4,940	Increased LOE related to adding a post to 3 dormitory housing units in 6 dormitory facilities.

Although cost for physical supervision is high, it represents a small portion of the operating budget of the state prison systems; with the exception of MO DOC, where the cost represents 9% of the operating budget. MO DOC is estimated to need 924 additional correctional officers placed throughout its 21 facilities, a 20% increase above its current staff level. Among prisons, AR DOC has the second highest cost among prisons, associated with inmate supervision. AR DOC notes that a few of its older facilities will require additional staff to cover blind spots, based on the original construct of its facilities, suggesting that the physical layout of facilities can impact the number of staff required to provide adequate supervision.

**Jails**

A majority of the jails in this study considered themselves in compliance with this standard and most attributed their low levels of incidents of sexual abuse to their supervision models, commonly direct supervision. As shown in the chart below, only three out of the 16 facilities believed that they needed to hire additional staff to minimize the incidence of sexual abuse and work towards eliminating it altogether. The three jails that have a cost impact are Miami-Dade, Sacramento County, and Jefferson County, each of which has physical supervision as one of the greatest cost impacts on their operations.

Site	Upfront	Yearly	Notes
Miami-Dade	\$ 112	\$ 6,723	Increased LOE to adequately provide supervision.
Sacramento County	\$ 17	\$ 4,360	Additional 6 FTEs required per shift.
Jefferson County	\$ 10	\$ 393	Additional 10-12 FTEs to adequately supervise inmates.

Miami-Dade, the largest jail in this study, is estimated to have \$112,000 in upfront costs and \$6.7 million in yearly costs associated with hiring additional correctional officers. Miami-Dade identifies a need to hire 89 Officers, 21 Corporals, six Sergeants, and two Lieutenants. Sacramento County is estimated to have \$4.4 million in annual costs to increase the number of officers per shift from 38 to 44. Sacramento County has witnessed numerous staff reductions as a result of a very tight squeeze on state funding, which has been very common throughout the public sector in California as the state grapples with unprecedented

budget issues. Over the past couple of years, there have been multiple positions cut and several positions demoted including an 80% cut back of medical staff. Similarly, Jefferson County has witnessed a 25% reduction in their staff over the past few years, dropping from 40 officers to 30 officers. Although it has had only two sexual abuse incidents in the past 2 years, it believes that the risk of abuse has increased and there is greater potential for abuse than ever before. Jefferson County Jail requires 10 to 12 additional staff to adequately supervise inmates with a cost impact of \$393,000 per year.

### Juvenile

Most juvenile corrections agencies in this study reported very few substantiated incidents of sexual abuse. A few agencies did report increases over the past few years but these are believed to be related to an increase in awareness and a subsequent increase in reporting. Booz Allen understands that this seemingly contrary to the BJS Special Report: *Sexual Victimization in Juvenile Facilities Reported by Youth, 2008-09*<sup>4</sup> finding that an estimated 12% of incarcerated youth experienced some sort of sexual victimization in the past year. There are some possible explanations for the diverging results. The BJS Study is based on self-reporting whereas the data that Booz Allen received from sites is based on "reported" incidents, suggesting that many incidents are simply not reported. Our study represents many fewer sites and is not considered to be a statistical sampling of incarcerated juveniles. Nevertheless the BJS Special Report merits further review relevant to the prevalence of sexual abuse at sites not included in this study.

As shown on the following table, only the IN DYS and CO DYC are estimated to have costs for inmate supervision.

Site	Upfront	Yearly	Notes
IN DYS	\$ 74	\$ 3,703	78 additional FTEs required.
CO DYC	\$ 24	\$ 1,250	25 additional FTEs to bring staffing to 5.2 shift-relief factor.

The IN DYS believes that staffing ratios at its facilities need to reach one staff per 10 residents to be considered adequate and identifies the need to hire 78 additional FTEs to reach this ratio, at an estimated cost of \$3.7 million in yearly wages and benefits and operational expenditures. The CO DOC is estimated to require 25 additional staff members to provide adequate supervision at a yearly cost of \$1.3 million.

### Community Corrections

Inmate supervision was not viewed as an issue for most community corrections jurisdictions. As depicted in the table below, only one of the six community corrections jurisdictions in this study, WA CC, is estimated to have costs associated with physical supervision.

Site	Upfront	Yearly	Notes
WA CC	\$ 16	\$ 884	1 additional FTE for each of the 13 work release centers.

WA CC is estimated to require 13 additional staff, 1 FTE at each of its 13 work release centers, to provide adequate supervision; a yearly cost of \$884,000. The WA CC has seen an increase in reported incidents

<sup>4</sup> Allen J. Beck, Ph.D., Paige M. Harrison, and Paul Guerino, BJS Special Report: *Sexual Victimization in Juvenile Facilities Reported by Youth, 2008-09*. January 2010. US Department of Justice. Office of Justice Program, Bureau of Justice Statistics.

of sexual abuse, but not necessarily an increase in substantiated cases. This is likely due to recent efforts to better educate and train offenders on reporting policies that make it easier for offenders to make claims, but most of which are found to be unsubstantiated after investigations. Nevertheless, WA CC administrators believe that additional correctional officers are required to address the increased reports if this signals any underlying causes of heightened risk factors associated with sexual abuse. One additional officer at each of the 13 work release centers appears to be a reasonable assumption to address the increased reporting.

**Lockups**

None of the lockups in this study are estimated to have costs associated with inmate supervision.

**Cost Impact #3 - Assessment and Use of Monitoring Technology (PP7)**

Assessment and Use of Monitoring Technology (PP7) has the greatest upfront cost impact of all standards accounting for 96% of all upfront costs. This impact is attributed to the significant investment costs required to procure and install monitoring technology. Maintaining such IT systems in the out-years is also expensive with the resulting ongoing cost impact accounting for 8% of total ongoing costs across all sites. This rather large cost impact is relatively widespread with the majority of sites noncompliant (69%) suggesting that it is not just a few isolated cases driving the cost but a common finding among the 49 sites in this study.

For those sites with a cost impact, this standard also has the most variation with costs to retrofit or enhance monitoring technology from a few hundred thousands of dollars to investment costs approaching a billion dollars. Such variation is burdened by multiple interpretations of what is deemed to be "cost effective" and "appropriate" monitoring technology along with an overwhelming recognition of the merits of technology to respond to sexual abuse. As the table below shows, upfront costs for prisons ranged from \$221 million to \$621.5 million, whereas yearly costs ranged from \$86,000 to \$8.1 million. This represents a variation in upfront cost of approximately \$621.3 million and a variation in yearly cost of almost \$8 million. Meanwhile upfront jail and juvenile costs varied by approximately \$25 million and \$38 million, respectively. Community Corrections are exempt from this standard and lockups did not exhibit any costs.

Sector	Upfront Range		Yearly Range		Percent Compliant
	High	Low	High	Low	
Prisons	\$621,500	\$ 221	\$ 8,143	\$ 86	8%
Jails	\$ 25,000	\$ 116	\$ 179	\$ 2	50%
Juvenile	\$ 38,000	\$ 6	\$ 2,163	\$ 1	20%
Community Corrections	n/a	n/a	n/a	n/a	n/a
Lockups					100%

The cost variability within sectors is mostly attributable to the number of facilities in a jurisdiction, explaining the large variance in the prisons and juvenile sectors that each have instances whereby systems are composed of numerous facilities across the state. For example, the RI DOC consists of only eight facilities requiring updates and technical modification while NY DOC is responsible for 67 facilities. For juvenile corrections agencies, the FL DJJ provided a cost impact associated with 101 facilities spread throughout the entire state. The greater number of facilities analyzed typically results in a larger cost

impact. Other factors such as the age and physical design of the infrastructure can also contribute to a certain degree of variation.

The fundamental, underlying cause of this cost impact is due to the requirement for agencies to utilize video monitoring systems and other technology to eliminate sexual abuse.

The NPREC standard PP7 states, *“The agency uses video monitoring systems and other cost-effective and appropriate technology to supplement its sexual abuse prevention, detection, and response efforts.”*

As a testament to the variation in costs, there was a significant degree of varying interpretations of this standard without any clear benchmarks or technical standards to target. Because every facility is essentially starting from a different degree of technical modernization and has a different opinion of what is "appropriate," there will continue to be considerable challenges in adopting this standard. Sites frequently asked if there is any more specific guidance to technical requirements to clarify this standard. Technical requirements suggested included a benchmark on video quality (e.g., number of mega pixels, analog versus digital), archiving standards (e.g., number of days), staff monitoring ratios (e.g., number of staff per cameras monitored), or coverage requirements (e.g., core areas that require surveillance taking into account a wide array of physical and facility designs). This last example could include standards on certain locations that must have video surveillance or specific quantity of cameras utilized based on supervision practices and facility characteristics.

**Prisons**

As shown in the chart below, 12 agencies found an increased level of video monitoring was necessary to supplement sexual abuse prevention, detection, and response efforts. AR DOC was the only site that thought it had adequate monitoring technology; therefore, Booz Allen considered AR DOC compliant for this study.

Site	Upfront	Yearly	Notes
VA DOC	\$ 30,080	\$ 8,143	Additional cameras, monitoring staff, and maintenance.
CA DOC	\$ 8,281	\$ 2,381	Upgrade video monitoring in 33 facilities and personnel
CO DOC	\$ 2,675	\$ 2,312	Additional cameras and monitoring staff are required.
SC DOC	\$ 4,050	\$ 2,128	Additional cameras, installation, and monitoring staff are
NY DOC	\$621,500	\$ 1,750	Increased video monitoring coverage in 39 facilities and
IN DOC	\$ 5,048	\$ 450	Upgrade video monitoring, new equipment cost, and
MN DOC		\$ 135	Cost to conduct annual security audit.
OR DOC	\$ 221	\$ 86	Purchase and installation of cameras in one facility and cost to conduct yearly assessment.
WA DOC	\$ 2,642		Upgrade video monitoring, new equipment cost, and standardizing video storage.
MA DOC	\$ 2,294		Upgrade video monitoring and new equipment cost.
MO DOC	\$ 1,915		Additional cameras and monitoring staff are required.
RI DOC	\$ 800		Additional camera equipment in minimum security facilities.

The primary cost driver for monitoring technology is upfront investments costs associated with the purchasing and installing equipment. The NY DOC estimates nearly \$622 million to install video surveillance in 35 of its male facilities and four of its female facilities. This cost includes \$220 million

for 11 large maximum security facilities, \$360 million for 24 medium-security facilities, \$15 million for four female facilities, plus additional building space at \$27 million to handle the video monitors and related equipment necessary to manage the systems and extra staff that would provide real-time monitoring of surveillance. Whereas NY DOC cost estimate is based on the costs associated with one large camera project for each of its medium and maximum security prisons, costs would be significantly higher if NY DOC were required to undergo a process of adding supplemental cameras as often as every year. Each annual project would require a new procurement, camera system redesign and construction at significant cost.

A building’s age poses numerous obstacles to install a camera system resulting in significant increases to the cost. Retrofitting old buildings with modern technology requires significant construction and demolition costs. Older construction also requires much greater camera density to achieve similar coverage than a modern facility built to maximize visibility. The facility at Bedford Hills, NY for example, opened in 1901 as a reformatory for women. Today the facility consists of 57 buildings in a variety of styles and ages totaling 585,740 square feet. In 2004, a project to design and install video surveillance was completed after 2 years at a cost \$3.6 million to install a modern system consisting of 300 cameras.

As is the case with all technology, recurring costs in the form of equipment maintenance and upgrades must be considered. Additional recurring costs to consider include labor. An additional level of effort is required to monitor an increased level of surveillance. The VA DOC, for example, anticipates requiring an additional 24/7 post at each of its prisons resulting in an additional 84 FTEs. This results in nearly \$8.1 million in yearly operations and maintenance costs.

*Jails*

Generally, jails considered their facilities adequately equipped to provide technical supervision of its inmates. Only seven out of 16 jurisdictions studied estimated a cost impact in order to comply with those cost shown in the table below.

Site	Upfront	Yearly	Notes
Marion County	\$ 116	\$ 179	Additional cameras and monitoring staff are required.
Jefferson County	\$ 164	\$ 143	Additional cameras and monitoring staff are required.
WA Pierce County		\$ 2	Cost to conduct yearly assessment.
Miami-Dade	\$ 25,000		Upgrade video monitoring coverage in 5 facilities.
Sacramento County	\$ 684		Upgrade video monitoring and new equipment cost.
Aiken County	\$ 500		Upgrade video monitoring and new equipment cost.
Peumansend Creek	\$ 400		Upgrade video monitoring and new equipment cost.

Aiken County's costs reflect its current plans to overhaul its existing surveillance system composed of 85 antiquated cameras of which only 16 have archiving capability. Similarly, Essex County is currently in the process of adding 396 cameras along with archiving capabilities at a cost of \$2.2 million. For this study, the cost of \$2.2 million was considered sunk, it provides a basis of comparison with the other responses. Marion County and Peumansend Creek both do not consider their coverage adequate throughout their facilities. In fact Peumansend Creek has a system that is no longer supported by its vendor, making its current system obsolete and forcing it to replace its current system if and when they system breaks or maintenance costs are untenable. The cost impact for both facilities includes additional

equipment to meet their monitoring needs while Marion County's costs also include additional resources to monitor equipment.

Recent technical assessments at Miami-Dade have highlighted a need for additional video surveillance. Consisting of five detention centers, Miami-Dade has a documented technical assessment recommending a need for major video surveillance upgrades. Similar to concerns common in the state prison systems, Miami-Dade is made up of older buildings requiring expensive retrofit designs and more cameras than contemporary jails that have more visible space.

*Juvenile*

All juvenile corrections agencies in this study have at least some video monitoring in place however, all (except MO DYS, which upgraded much of its video monitoring technology 2 years ago) believe that some enhancements are required. Some facilities lack video monitoring coverage in vital common areas while others lack archiving capabilities and still others have outdated equipment that is in need of upgrades or replacement. The following table depicts the costs for the eight juvenile corrections agencies that will have a cost impact for monitoring technology.

Site	Upfront	Yearly	Notes
CA DJJ	\$ 904	\$ 2,163	Additional cameras and monitoring staff are required.
CO DYC	\$ 17,753	\$ 192	Upgrade video monitoring, new equipment cost, maintenance cost, and cost to conduct a yearly assessment.
IN DYS	\$ 2,500	\$ 140	Additional cameras and maintenance.
FL DJJ	\$ 38,000	\$ 86	Upgrade video monitoring and new equipment cost for 101 facilities and cost to conduct yearly assessment.
OYA	\$ 4,001	\$ 58	Additional cameras and monitoring staff are required.
IDJC	\$ 174	\$ 5	Upgrade video monitoring, new equipment cost, and cost to conduct yearly assessment.
AR JA	\$ 6	\$ 1	Additional cameras and maintenance.
MA DYS	\$ 925		Upgrade video monitoring and new equipment cost.

FL DJJ estimates \$38 million necessary to adequately equip its 101 residential and detention facilities with the necessary technical equipment. Similar to prisons and jails, FL DJJ's cost considers size, physical structure of their facilities, and whether a facility is pre-wired for surveillance.

The CO DYC has the second largest cost associated with technical supervision among the nine juvenile systems studied. Unlike the FL DJJ, the CO DYC based their estimate off of square footage; estimating \$27 per square foot to upgrade its facilities to provide adequate coverage. The CO DYC has 10 facilities in need of upgrades, encompassing 657,526 square feet of space; the estimated cost to upgrade these facilities is roughly \$18 million.

**Cost Impact #4 – Ongoing Medical and Mental Health Care (MM3)**

This standard accounts for 2.5% of the overall costs across all sectors and has a compliance rate of 57%. Isolated sites across varying sectors anticipate a significant cost impact associated with providing ongoing care and mental health care particularly as it relates to care for all known abusers. Most sites provide such care for victims but stop short of providing commensurate care for abusers. In addition, some sites



shared a concern about providing such care to *all known* abusers particularly with a relatively high proportion of sex offenders entering their jurisdiction or site. As shown in the table below, these costs are distributed across all sectors (excluding lockups) with a predominately large impact on ongoing costs since these services are not considered one-time investments.

Sector	Upfront Range		Yearly Range		Percent Compliant
	High	Low	High	Low	
Prisons			\$ 3,000	\$ 293	69%
Jails	\$ 7	\$ 1	\$ 1,209	\$ 56	69%
Juvenile			\$ 750	\$ 59	80%
Community Corrections					100%
Lockups	n/a	n/a	n/a	n/a	n/a

For most sites, inmates labeled as sex offenders are required to attend a sex offender program. This labeling is determined from the nature of the criminal offense, not from a screening instrument at intake. This process likely misses many abusers who might be incarcerated for an unrelated offense. Discovery of past sexual abuse incidents (via an enhanced screening tool) will add to the number of offenders in the program. Often, this treatment is not provided on an ongoing basis. Annual costs for prisons to comply range from \$3 million to \$293,000. Jail facilities that recognize a cost impact have provided an annual range between \$1.2 million and \$56,000, while juvenile facilities anticipate a range anywhere between \$750,000 and \$59,000. Significant variances in costs are due to different views on what providing ongoing care may do to a system's current treatment program and/or the increased level of effort that will be required to provide the appropriate care to not only inmates who have been abused or are know sex offenders, but all known *abusers* or perpetrators of sexual abuse.

The underlying cause of this impact is due to the need to provide medical and/or mental health treatment to all known abusers of sexual violence. The NPREC standard MM3 states the following:

*“The facility conducts a mental health evaluation of all known abusers and provides treatment, as deemed necessary by qualified mental health practitioners..”*

**Prisons**

Many prison jurisdictions such as the NY DOC and MA DOC provide evaluations and ongoing treatment at any time as needed within the system. In the case of IN DOC, all known abusers are not currently provided with ongoing treatment. Predators labeled as sex offenders by the court system are not necessarily automatically sent to the sex offender treatment program. IN DOC anticipates a significant increase in the number of inmates who will require treatment. An annual cost of \$3 million to increase the current treatment program by 75% has been provided. In addition to providing service to all known abusers, the WA DOC anticipates a significant burden associated with providing ongoing mental health treatment to inmates. An annual estimate of \$293,000 has been provided to ensure ongoing care to approximately 30 cases.

Site	Upfront	Yearly	Notes
IN DOC		\$ 3,000	3/4 cost of full sex offender treatment program due to increase in number of participants.
WA DOC		\$ 293	On-going treatment to approximately 30 inmates on average per year.



*Jails*

Three jail jurisdictions, Sacramento County, Alachua County, and Norfolk City anticipate an increased level of effort associated with providing ongoing medical and mental health treatment to its inmates. In the case of Sacramento County, current medical and psychiatric staffing levels are not sufficient to conduct ongoing medical and/or mental health evaluations and treatment to all known abusers of sexual abuse. Meeting such a requirement would require hiring six additional FTEs to provide care on a 24/7 basis. The annual cost impact would be approximately \$1.2 million with upfront new hire costs of approximately \$7,000. Similarly, Alachua County would be required to hire an additional four FTEs at \$406,000 annually and Norfolk City would be required to hire one additional FTE at \$56,000 annually.

Site	Upfront	Yearly	Notes
Sacramento County	\$ 7	\$ 1,209	6 additional FTEs to provide on-going treatment of inmates.
Alachua County	\$ 4	\$ 406	4 additional FTEs to provide on-going treatment of inmates.
Norfolk City	\$ 1	\$ 56	1 additional FTE to provide on-going treatment of inmates.
Miami-Dade		\$ <1	Cost to provide on-going care to one inmate per year based on most recent recorded number of proven incidents.

*Juvenile*

Juvenile facilities express similar concerns as that of the prison and jail sectors. The IN DYS and the IDJC anticipate an increase in the number of residents included in sex offender treatment programs. This would include those who have not been adjudicated but exhibit signs of sexually abusive behavior. As shown in the chart below, additional treatment would require an increase in level of effort amounting to \$750,000 annually for IN DYS and \$59,000 annually for the IDJC.

Site	Upfront	Yearly	Notes
IN DYS		\$ 750	3/4 cost of full sex offender treatment program due to increase in number of participants.
IDJC		\$ 59	On-going treatment of approximately 15 residents who have sexually abusive behaviors but have not been adjudicated.

**Cost Impact #5 - Audits of Standards (AU1)**

Without any audit process available or practiced across the country, this was the only standard that has a 0% compliance yet it will impact every site uniformly with ongoing costs as shown in the table below. Any yearly cost variation realized within a sector was due solely to a variation in the number of facilities. All together this standard accounts for just over 2% of the overall impact on total ongoing costs without any upfront costs.

Sector	Upfront Range		Yearly Range		Percent Compliant
	High	Low	High	Low	
Prisons			\$ 724	\$ 86	0%
Jails			\$ 41	\$ 8	0%
Juvenile			\$ 574	\$ 6	0%
Community Corrections			\$ 119	\$ 6	0%
Lockups			\$ 3	\$ 3	0%

Lacking definitive guidelines regarding what a PREA audit might entail, Booz Allen has elected to standardize the cost impact of a triennial audit. The cost impact of an audit consists of an auditor’s fee and an internal level of effort cost realized by a facility’s audit-related duties and activities. The auditor’s fee is composed of labor costs and travel expenses (e.g., meals and incidental expenses, lodging, air fare, and mileage) and is dependent on the complexity of the audit (i.e., its sector and number of facilities within a system). Prisons for example, were assumed to require 4 days to audit, jails were assumed to take 3 days, juvenile and community corrections facilities were assumed to take 2 days, and lockups were assumed to be 1 day audits. More information regarding the detail behind our audit-related assumptions can be found in the *Assumptions* section below.

The underlying cause of this cost impact is due to the need to conduct a triennial audit of all facilities, including those that are contracted. The NPREC standard AU1 states the following:

*“The public agency ensures that all of its facilities, including contract facilities, are audited to measure compliance with the PREA standards. Audits must be conducted at least every three years by independent and qualified auditors.”*

**Prisons**

As previously mentioned, prisons are assumed to be subjected to a 4-day audit per facility. Based on this assumption, yearly cost impacts vary from \$724,000 to audit 67 facilities at NY DOC to \$86,000 to audit eight facilities as part of the RI DOC. The following table shows the audit cost for each prison in this study.

Site	Upfront	Yearly	Notes
NY DOC		\$ 724	Cost to conduct an audit at 67 facilities.
CA DOC		\$ 356	Cost to conduct an audit at 33 facilities.
SC DOC		\$ 324	Cost to conduct an audit at 30 facilities.
VA DOC		\$ 302	Cost to conduct an audit at 28 facilities.
CO DOC		\$ 259	Cost to conduct an audit at 24 facilities.
AR DOC		\$ 227	Cost to conduct an audit at 21 facilities.
IN DOC		\$ 227	Cost to conduct an audit at 21 facilities.
MO DOC		\$ 227	Cost to conduct an audit at 21 facilities.
MA DOC		\$ 194	Cost to conduct an audit at 18 facilities.
OR DOC		\$ 151	Cost to conduct an audit at 14 facilities.
WA DOC		\$ 140	Cost to conduct an audit at 13 facilities.
MN DOC		\$ 108	Cost to conduct an audit at 10 facilities.
RI DOC		\$ 86	Cost to conduct an audit at 8 facilities.

**Jails**

Jails are assumed to be subjected to a 3-day audit process per facility. The cost to conduct a triennial audit on Miami-Dade’s five jail facilities results in a yearly cost impact of \$41,000. Sacramento County

and WA Pierce County both have two facilities at an annual cost of \$16,000. The remaining jails analyzed consisted of only one facility each. Therefore in each instance, their yearly cost impact equates to \$8,000. The following table shows the audit cost for each of the jails in this study.

Site	Upfront	Yearly	Notes
Miami-Dade		\$ 41	Cost to conduct an audit at 5 facilities.
Sacramento County		\$ 16	Cost to conduct an audit at 2 facilities.
WA Pierce County		\$ 16	Cost to conduct an audit at 2 facilities.
Aiken County		\$ 8	Cost to conduct an audit at 1 facility.
Alachua County		\$ 8	Cost to conduct an audit at 1 facility.
Albany County		\$ 8	Cost to conduct an audit at 1 facility.
Anoka County		\$ 8	Cost to conduct an audit at 1 facility.
Denver County		\$ 8	Cost to conduct an audit at 1 facility.
Essex County		\$ 8	Cost to conduct an audit at 1 facility.
Hennepin County		\$ 8	Cost to conduct an audit at 1 facility.
Jefferson County		\$ 8	Cost to conduct an audit at 1 facility.
Marion County		\$ 8	Cost to conduct an audit at 1 facility.
Norfolk City		\$ 8	Cost to conduct an audit at 1 facility.
Peumansend Creek		\$ 8	Cost to conduct an audit at 1 facility.
Pulaski County		\$ 8	Cost to conduct an audit at 1 facility.
WI Pierce County		\$ 8	Cost to conduct an audit at 1 facility.

### Juvenile

Juvenile facilities are assumed to be subjected to a 2-day audit process per facility. Based on this assumption, yearly cost impacts vary from \$574,000 to audit 101 FL DJJ facilities to \$6,000 to audit ACJCS. The following table shows the audit cost for each of the juvenile corrections agencies in this study.

Site	Upfront	Yearly	Notes
FL DJJ		\$ 574	Cost to conduct an audit at 101 facilities.
MA DYS		\$ 324	Cost to conduct an audit at 57 facilities.
MO DYS		\$ 182	Cost to conduct an audit at 32 facilities.
CO DYC		\$ 62	Cost to conduct an audit at 11 facilities.
OYA		\$ 62	Cost to conduct an audit at 11 facilities.
AR JA		\$ 45	Cost to conduct an audit at 8 facilities.
IN DYS		\$ 40	Cost to conduct an audit at 7 facilities.
CA DJJ		\$ 34	Cost to conduct an audit at 6 facilities.
IDJC		\$ 17	Cost to conduct an audit at 3 facilities.
ACJCS		\$ 6	Cost to conduct an audit at 1 facility.

### Community Corrections

Community corrections are assumed to be subjected to the same 2-day audit as juvenile facilities. Based on this assumption, yearly cost impacts vary from \$119,000 to audit 21 facilities as part of the MA OCC to \$6,000 to audit one facility as part of the IN DOR, MO PP, and SC PPP. The following table shows the audit cost for each Community Correction jurisdiction in this study.

Site	Upfront	Yearly	Notes
MA OCC		\$ 119	Cost to conduct an audit at 21 facilities.
WA CC		\$ 85	Cost to conduct an audit at 15 facilities.
MO PP		\$ 45	Cost to conduct an audit at 8 facilities.
AR DCC		\$ 40	Cost to conduct an audit at 6 facilities.
IN DOR		\$ 6	Cost to conduct an audit at 1 facility.
SC PPP		\$ 6	Cost to conduct an audit at 1 facility.

**Lockups**

Lockups are assumed to be subjected to a 1-day audit. Based on this assumption, each lockup studied resulted in a yearly cost impact of \$3,000 or the cost associated with conducting a triennial audit at one Lockup facility. The following table shows the audit cost for each of the lockup in this study.

Site	Upfront	Yearly	Notes
DCPA		\$ 3	Cost to conduct an audit at 1 facility.
Middleton PD		\$ 3	Cost to conduct an audit at 1 facility.
Rocklin PD		\$ 3	Cost to conduct an audit at 1 facility.
Seattle PD		\$ 3	Cost to conduct an audit at 1 facility.

**Cost Impact #6 - Training and Education (TR1 through TR5)**

Almost every site included in this study was noncompliant with one if not all the training standards with Employee Training (TR1) alone accounting for nearly 2% of the overall cost impact across all sectors. A vast majority of sites require some additional training and education to comply with NPREC standards and subsequently have associated costs. The table below bundles all the training costs together because training and education for employees, offenders volunteers, and contractors (in Booz Allen's assessment) are intricately related to one another and there can be some cross-pollination of curriculum between standards. Although there is some consistency in noncompliance, the costs associated with this standard are not relatively high but they do vary considerably among sites. In total, 39 of the 49 sites in this study, or 80%, have costs associated with training and education.

Sector	Upfront Range		Yearly Range		Percent Compliant
	High	Low	High	Low	
Prisons	\$ 4,504	\$ 30	\$ 226	\$ 14	63%
Jails	\$ 328	\$ 4	\$ 261	\$ 1	20%
Juvenile	\$ 163	\$ 1	\$ 3,417	\$ 24	48%
Community Corrections	\$ 128	\$ 8	\$ 123	\$ 2	33%
Lockups	\$ 64	\$ 4	\$ 16	\$ 1	33%

The fundamental, underlying cause of this cost impact is due to the requirement for agencies to train all employees (including non-sworn officers and administrative assistants), train all contractors and volunteers, provide education to inmates and offenders, and ensure specialized training is provided to investigators and the medical and mental health care staff.

The NPREC standard TR1 states, *“The agency trains all employees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures.....”*

TR2 states, *“The agency ensures that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency’s sexual abuse prevention, detection, and response policies and procedures....”*

TR3 states, *“During the intake process, staff informs inmates of the agency’s zero-tolerance policy regarding sexual abuse and how to report incidents or suspicions of sexual abuse. Within a reasonably brief period of time following the intake process, the agency provides comprehensive education to inmates regarding their right to be free from sexual abuse and to be free from retaliation for reporting abuse, the dynamics of sexual abuse in confinement, the common reactions of sexual abuse victims, and agency sexual abuse response policies and procedures.....”*

TR4 states, *“.....the agency ensures that agency investigators conducting sexual abuse investigations have received comprehensive and up-to-date training in conducting such investigations in confinement settings.....”*

TR5 states, *“The agency ensures that all full- and part-time medical and mental health care practitioners working in its facilities have been trained in how to detect and assess signs of sexual abuse and that all medical practitioners are trained in how to preserve physical evidence of sexual abuse.....”*

Although many sites have begun implementing processes and changes to their training procedures, most do not meet the intention of the standard as it is written, particularly Appendix B of the NPREC standards. Additional training costs arise from the need to provide training specific to confinement settings for investigators and to provide training on preserving physical evidence of sexual abuse to medical and mental health care practitioners. In many instances curriculum and training material will need to be developed to include all aspects of PREA and additional level of effort from trainers will be required; these often encompass large upfront costs. In some cases non-medical care contractors do not receive any training on sexual abuse, which will require a large increase in level of effort to remedy. Annual costs are also incurred from the additional effort required to provide refresher training and to train new staff.

### *Prisons*

Of the 13 prisons in this study, eight are estimated to have costs associated with training and education. Most costs are relatively modest, given the size of prison systems, with the exception of NY DOC's upfront training costs of \$4.5 million. While employees at NY DOC receive training on sexual abuse, current training does not meet expectations defined by the NPREC standards. Additional training will be required for 27,000 staff including direct employees, contractors, volunteers, and medical staff. All other DOCs have training and education costs of less than \$1 million as depicted in the table below.

Site	Upfront	Yearly	Notes
MO DOC	\$ 51	\$ 226	Refresher training for employees and training for investigators.
NY DOC	\$ 4,504	\$ 115	Training for employees, contractors, volunteers, and medical staff, and to develop a lesson plan and provide appropriate materials for inmate education.
MN DOC		\$ 77	Additional employee training and refresher education for inmates.
VA DOC	\$ 550	\$ 63	Train contractors, investigators, and mental and medical health staff, and provide inmate education.
RI DOC	\$	\$ 29	Updated training module for employees.
WA DOC	\$ 47	\$ 20	Curriculum development and materials cost.
SC DOC	\$ 155	\$ 14	Costs for developing materials.
OR DOC	\$ 30		Training for medical and mental health staff.

For many prisons, the cost impact associated with Training Employees, Volunteers and Contractors (TR1 and TR2) was limited to developing PREA-related material and delivering refresher training. When practical, the curriculum to train employees is shared with contractors and volunteers to minimize the cost impact. Typically any cost impact associated with the Training of Agency Investigators Conducting Sexual Abuse Investigations (TR5) is due to current curriculum lacking information regarding investigations in confinement settings. The SC DOC, VA DOC, WA DOC, and MO DOC each acknowledged that their current curriculum lacked training in confinement settings. In regards to the Training of Medical and Mental Health Staff (TR4), the main issue was curriculum related to preserving physical evidence of sexual abuse.

### *Jails*

All 16 jails included in this study require additional training and/or education to comply with this standard. Upfront costs for jails ranged from \$328,000 for Sacramento County to \$4,000 for Marion County. Yearly costs for jails ranged from \$261,000 to less than \$1,000. Much of Miami-Dade's large yearly costs are associated with refresher training for its employees and to provide education to its inmates. Sacramento County's large upfront costs are primarily a result of the need to train its 100 medical and mental health care staff.

Site	Upfront	Yearly	Notes
Miami-Dade	\$ 28	\$ 261	Additional employee training and refresher training and for additional inmate education.
Albany County	\$ 5	\$ 122	Additional training to staff, volunteers, and medical and mental health staff and for inmate education.
Denver County	\$ 132	\$ 33	Training of staff to include refresher training.
Alachua County	\$ 170	\$ 25	Training for contractors, investigators, and medical and mental health staff.
WI Pierce County	\$ 6	\$ 21	Costs to train employees, contractors, investigators, health care staff, and to develop material for inmate education.
Pulaski County	\$ 31	\$ 20	Costs are to train employees and volunteers and to provide sexual abuse education to inmates.
WA Pierce County	\$ 97	\$ 16	Costs to provide initial training to all staff required under the standard and to provide refresher training to employees.
Peumansend Creek	\$ 9	\$ 11	Yearly cost for refresher training and upfront cost to train investigators.
Hennepin County	\$ 125	\$ 7	Upfront cost to develop curriculum and train employees, investigators and medical/mental health and yearly cost for refresher.
Anoka County	\$ 28	\$ 5	Yearly cost for refresher training and upfront cost for inmate education and to train investigators.
Norfolk City	\$ 17	\$ 3	Costs to develop material for inmate education and to train investigators and medical/mental health staff.
Sacramento County	\$ 328	\$ 1	Cost to train medical staff and volunteers and to provide inmate education.
Marion County	\$ 4	\$ 1	Cost to train investigators and volunteers.
Aiken County	\$ 6	\$ <1	Cost to train employees and develop an orientation video.
Jefferson County		\$ <1	Cost to provide refresher training to 30 employees.
Essex County	\$ 8		Material to educate inmates and train investigators and medical/mental health staff.

Primary costs drivers include modifications to current curriculum and training to an expanded set of employees, contractors, and volunteers in order to cover PREA material. Because of their smaller size relative to prisons, it is assumed in this study that jails can leverage the PREA Coordinator to assist in curriculum development and even training delivery when feasible. This assumption was applied to each jail on a case-by-case basis depending on its size. The costs to Train Employees (TR1) are by far the largest of the training cost estimates. Although training in some form is provided to most staff, it often excludes training on PREA related issues. Specialized Training for Investigations (TR4) and Medical and Mental Health Care (TR5) had a significantly less of a cost impact. For most jails in this study, the investigators are employed by the sheriff's office that manages the jail and are accustomed to conducting investigations in confinement settings. Medical and mental health staff on the other hand typically are employed by the county health department and receive their training on sexual abuse through individual medical and professional licensure requirements. This training is conducted outside the jail and external to its own training operations. Inmate education has a relatively low cost impact, much of it consisting of costs to develop educational materials.

*Juvenile*

As shown in the table below, 9 of 10 juvenile corrections agencies require additional training and/or education, with upfront costs ranging from \$163,000 for CA DJJ to \$1,000 for ACJCS and yearly costs ranging from \$3.4 million for FL DJJ to \$24,000 for MO DYS. FL DJJ has by far the largest yearly costs as a result of the need to train 4,800 employee. All other jurisdictions have lower training costs, much of it associated with enhancing current training to include PREA issues, extending the training to contractors and volunteers, and including specialized training for investigators and medical and mental health care staff.



Site	Upfront	Yearly	Notes
FL DJJ	\$ 65	\$ 3,417	Cost to train employees and all other personnel under this standard and to provide resident education
CO DYC	\$ 1	\$ 61	One FTE to train employees, on-going site training at the facilities, and the quality assurance process (audit) at each facility.
IDJC	\$ 129	\$ 60	Cost for employee training, including refresher, investigators and medical staff, and to develop materials for resident education
OYA	\$ 133	\$ 35	Cost to train contractors and medical staff
MO DYS	\$ 98	\$ 24	Cost to train employees, including refresher, and to train contractors, volunteers, and medical staff
CA DJJ	\$ 163		Cost to train investigators and medical staff
IN DYS	\$ 25		Cost for external investigators, Correctional Peace Officers curriculum and confinement-specific training material.
MA DYS	\$ 5		Cost to train 2 investigators, at \$2.5K each
ACJCS	\$ 1		Refresher education for residents

Similar to jails, Training of Employees (TR1) represents the largest cost impact. Primary costs drivers include modifications to current training curriculum and training to an expanded set of employees, contractors, and volunteers to cover PREA material. It is assumed in this study that some of the smaller juvenile correctional agencies can leverage the PREA Coordinator to assist in curriculum development and even training delivery when feasible. Training for Contractors and Volunteers (TR2) is relatively low assuming that the curriculum from TR1 can be leveraged. Specialized Training for Investigations (TR4) and Medical and Mental Health Care (TR5) are estimated to have the lowest cost impact. For some of the juvenile correctional agencies in this study, local or state authorities not directly employed by the jurisdiction conduct the investigations. These authorities, usually state and local police departments, generally receive training on sexual abuse but do not receive training specific to conducting investigations in confinement settings. All medical and mental health staff on the other hand are employed directly and/or contracted by the juvenile corrections agencies in this study. The medical and mental health care staff generally receive training on sexual abuse through individual medical and professional licensure requirements; this training is conducted outside the juvenile facilities and external to their own training operations. In these cases it is difficult to ensure that the training they receive is compliant with the standard.

### Community Corrections

As shown in the table below, five of six community corrections jurisdictions require additional training, with MA OCC having the highest upfront and yearly costs, \$128,000 and \$123,000, respectively. MA OCC ensures employees are trained on sexual abuse but the current curriculum is not comprehensive enough to cover all PREA topics. To do so will require modifications to their training curriculum. The ongoing costs reflect refresher training to be delivered on a regular basis to 99 Community Correction staff, 879 probation officers, and 138 parole officers and all contractors. All other community corrections training and education costs are modest in comparison.

Site	Upfront	Yearly	Notes
MA OCC	\$ 128	\$ 123	Cost of materials and staff time to implement training.
WA CC	\$ 47	\$ 20	Cost to develop training materials and train employees
IN DOR	\$ 32	\$ 11	Cost to develop training materials for employees and offender education
SC PPP	\$ 52	\$ 3	Cost to train employees, volunteers, and investigators
MO PP	\$ 8	\$ 2	Cost to provide education to offenders and to train investigators

Although most community corrections jurisdictions have costs associated with training, the costs are far less than those estimated for prison, jails, and juvenile facilities. Most community corrections jurisdictions require only modest modifications to existing curriculum and additional training time to deliver the required material. Most jurisdictions offer some sort of sexual abuse training at orientation for new hires (TR1 and TR2) but it is often not comprehensive enough to cover PREA and sometimes excludes administrative staff (or un-sworn officers), volunteers, or contractors. As with the other jurisdictions, training employees has the largest cost impact for community corrections, while Specialized Training (TR4) and Medical and Mental Health Care (TR5) have a lower cost impact.

### Lockups

As it relates to lockups, training falls under standards TR1 through TR3. As shown in the chart below, none of the lockup facilities in this study conduct training in accordance with the NPREC standards and each one has a cost impact. Costs are estimated to range from \$64,000 to \$4,000 for upfront costs and \$16,000 to \$1,000 for yearly costs. The DCPA, the largest among the lockup facilities in this study, has by far the highest costs. DCPA's costs are associated with staff time required to update its current training program to cover NPREC standards.

Site	Upfront	Yearly	Notes
DCPA	\$ 64	\$ 16	Cost for updating training to cover PREA material, consisting of staff time for both initial training and refresher training.
Middleton PD	\$ 4	\$ 4	Cost to employee and volunteer train
Rocklin PD	\$ 6	\$ 1	Cost for employee and to renegotiate a contract with Lexipol to develop and monitor this additional policy.
Seattle PD	\$ 4		Cost to develop a 30 minute video on sexual abuse for employees.

**Cost Impact #7 - Contracting with Other Entities for the Confinement of Inmates (PP2)**

Contracting with private and public (e.g., county jails) facilities for the confinement of offenders is a practice seen at 13 of the 49 sites included in this study. It has no upfront costs and the ongoing costs account for nearly 2% of the overall cost impact across all sectors with a compliance rate of 73%, which is relatively high. With a high compliance and a modest impact on the costs, this suggests that costs are isolated in a select set of sites but as the table below shows, these costs are scattered across the sectors except for lockups since they typically do not contract out for such services.

Sector	Upfront Range		Yearly Range		Percent Compliant
	High	Low	High	Low	
Prisons			\$ 1,259	\$ 41	62%
Jails			\$ 755	\$ 755	94%
Juvenile			\$ 1,577	\$ 1,018	70%
Community Corrections			\$ 34	\$ 23	33%
Lockups					100%

For those sites contracting with private facilities, some correctional agencies mandate that all contracted facilities follow the same policies and procedure as the jurisdiction places on its own facilities, often times having regulations codified in contracts. As for public institutions like county jails, it is assumed that the institution is held to the same PREA standards as everyone else. Nevertheless as is seen throughout the study, there is a cost impact on certain standards and it is very likely that the contracting entity will pass those costs on as higher fees. Some sites however, have unique contracting agreements with private entities that prevent any additional or higher fees regardless of whether requirements and regulations change. Such cases are noted but are relatively rare. The tables in this section illustrate the upfront and ongoing cost impacts by sector for those contracting for the confinement of offenders.

For this standard, the major underlying causes of costs are that contracted facilities must comply with all NPREC standards. In many instances the costs accrued by contractors to comply are passed over to jurisdictions in the form of increased fees. The NPREC standard PP2 states,

*“....Any new contracts or contract renewals include the entity’s obligation to adopt and comply with the PREA standards and specify that the public agency will monitor the entity’s compliance with these standards as part of its monitoring of the entity’s performance.”*

**Prisons**

Of the 13 prisons in this study, four are estimated to have costs associated with this standard, seen in the table below. All costs are ongoing, assuming that the contractor will pass on any increased costs (whether upfront or ongoing) to the contracting facility in the form of higher monthly or annual fees. Each of these costs are essentially a proportion of a site's overall cost impact where the proportion is a factor of contracted inmates to total inmates. Therefore a site with a relatively high overall PREA cost impact will also have a high PP2 cost impact, assuming the contracted facilities are essentially at the same rate of compliance, or lower, as the contracting facility.

Site	Upfront	Yearly	Notes
CA DOC		\$ 1,259	Contracts out for the confinement of approximately 7,700 inmates.
IN DOC		\$ 735	Contracts out for the confinement of 2,400 inmates.
AR DOC		\$ 253	Contracts out for the confinement of 280 inmates.
SC DOC		\$ 41	Contracts out for over 300 inmates.

Of particular note, CA DOC suggested that their contracted facilities (all county jails) must abide by California Code of Regulations (CCR) Title 15 with an implicate assumption that cost would not increase. However, understanding the budget difficulties in California and elsewhere, it is reasonable to assume that each of these contracted jails, all held to the same PREA standards, will themselves incur additional costs that they could easily pass on to CA DOC in the form of higher inmate fees. AR DOC suggested that they would need to re-house their inmates contracted out to their county and city jails under the assumption that these entities may choose not to abide by PREA. This study assumes a greater likelihood that these entities will ultimately adopt the PREA standards and pass on additional and increased costs to AR DOC. The following table shows the cost impact of PP2 on the prisons included in this study.

*Jails*

Among the jails in this study only one, Marion County Jail, is estimated to have any cost impact associated with this standard for contracting for the confinement of a significant number of their inmates with an estimated yearly cost impact of \$737,000.

Site	Upfront	Yearly	Notes
Marion County		\$ 755	Contracts out for approximately 1,375 inmates.

*Juvenile*

Five of the 10 juvenile corrections agencies in this study contract with other entities for the confinement of residents, but only two exhibit any cost impact shown in the table below.

Site	Upfront	Yearly	Notes
CO DYC		\$ 1,577	Contracts out for 748 youth.
IDJC		\$ 1,018	Contracts out for approximately one-half of all youth.

IDJC contracts with up to 19 facilities for the housing of its residents and the CO DYC contracts 48 facilities. CO DYC estimates yearly costs of \$1.6 million with the vast majority of the costs associated with needing to update the technological supervision of its contracted facilities; specifically the purchase and installation of cameras. IDJC will have increased yearly costs of \$1 million. Unlike the CO DYC, these costs are not concentrated in any one standard, but rather is spread among several standards that the contracted facilities will be required to comply with. Two jurisdictions that have rather extensive reliance on contracting (FL DJJ and MA DYS) do not exhibit any costs here. The MA DYS has contracts with 37 providers throughout the state to house its residents in 57 facilities but believes that their contractors meet the PREA standards. FL DJJ, on the other hand anticipates a significant cost impact since 84% of their offenders are housed in a contracted facility. However, with so many offenders under contractor supervision, their increased costs are embedded throughout all their standards and not isolated solely in PP2.

**Community Corrections**

Three community corrections jurisdictions (IN DOR, WA CC, and MO PP) each have contracted facilities under their jurisdiction. IN DOR reported two contracted facilities managed by their Duval Residential Center. As these are very small operations with close and integrated management by Duval administrators, they do not anticipate any required contract modifications and/or cost increases. WA CC, on the other hand contracts out 13 out of their 15 work release centers meaning that the vast majority of their offenders are housed in contracted facilities, yielding an annual cost of \$34,000. Finally, MO PP contracts out with five facilities, covering 1.3% of their total offender population with an estimated cost of compliance of \$23,000 per year.

Site	Upfront	Yearly	Notes
WA CC		\$ 34	Contracts out for approximately 642 offenders in work release centers.
MO PP		\$ 23	Contracts out for approximately 250 beds.

**Lockups**

None of the lockups in this study contract for the confinement of offenders so there are no reported costs.

**Cost Impact #8 - Accommodating Inmates with Special Needs (PP5)**

A majority of jurisdictions across all sectors are very cognizant of the need to ensure offenders are provided the tools necessary to effectively communicate regardless of any handicap or illness, supporting the relatively high compliance rate of 88% across all sites. Nevertheless this study does show that this standard accounts for almost 2% of the total cost impact, largely isolated in the lockups sector shown in the table below. This is primarily due to their small size and limited resources to provide interpretive services that exist across all the other sectors.

Sector	Upfront Range		Yearly Range		Percent Compliant
	High	Low	High	Low	
Prisons			\$ 1	\$ 1	92%
Jails			\$ 8	\$ 8	94%
Juvenile					100%
Community Corrections	\$ 2	\$ 2	\$ 1	\$ 1	67%
Lockups			\$ 38	\$ 38	50%

The underlying cause of this impact is due to the need to ensure everyone has the ability to communicate effectively and directly with staff. The NPREC standard PP5 states the following:

*“The agency ensures that (inmates) who are limited English proficient [LEP] deaf, or disabled, are able to report sexual abuse to staff directly, through interpretive technology, or through non-inmate interpreters.”*

**Prisons**

Nearly all, 92%, of jurisdictions studied were found to be in compliance with PP5. The lone exception, CO DOC, requires approximately \$1,000 annually to ensure sign-language interpreter services are available for those inmates that require them. Remaining jurisdictions reported having multiple ways for inmates with special needs to report incidents of sexual abuse, including TTY machines for the deaf, language lines and staff for the LEP, and access to mental health care staff and sister agencies for the

mentally disabled. In each instance, providing access to these services is either written policy or court ordered.

Site	Upfront	Yearly	Notes
CO DOC		\$ 1	Fees for sign-language interpreter services.

*Jails*

Similar to prisons, jails were compliant in almost every instance. In the case of Anoka County, additional equipment and interpreter services are requested to accommodate inmates’ needs.

Site	Upfront	Yearly	Notes
Anoka County		\$ 8	Purchase of additional equipment for deaf and disabled inmates. Increased use of on-site interpreters (LEF and deaf), translation technology (language lines and video relay), and increased LOE to provide security.

*Juvenile*

All juvenile facilities analyzed as part of our study were found to be in complete compliance with PP5. Methods reported include: TTY machines for the deaf, language lines and staff for LEP residents, and mental health care staff for the mentally disabled.

*Community Corrections*

Currently SC PPP does not have interpretive services available at their disposal. A cost of \$1,000 annually was estimated based on 20 hours of service. While the WA CC has multiple translation services available, their pamphlets and booklets are currently only provided in English and Spanish. With a very diverse population consisting of Chinese, Cambodians, Koreans, Russians, Laotians, and Vietnamese, additional materials are required to ensure offenders of all nationalities are able to interpret communication properly with staff. As shown in the chart below, a cost impact has been provided in the amount of \$2,000 was provided. Remaining jurisdictions mentioned numerous services that are available including interpreters, language telephone lines for nearly every language, Internet translation, university foreign language students, TTY machines for the deaf, and mental health staff for the mentally challenged.

Site	Upfront	Yearly	Notes
SC PPP		\$ 1	Cost to contract out for interpretive services.
WA CC	\$ 2		Cost to provide materials in numerous foreign languages.

*Lockups*

Relative to other sectors, lockups have a much smaller staff and far fewer resources at their disposal to meet this standard. With fewer staff, there is a lower probability that an officer speaks a foreign language. Because incarceration is not a police department's primary mission, it is likely that there are insufficient funds to support interpretive services, particularly when offenders are infrequent and stay for only a couple of hours. Rocklin PD demonstrated this scenario, in which the influx of Spanish-speaking inmates has made it very difficult for them to meet the language demands of its detainees. Consequently, Rocklin PD would like to incentivize bilingual staff who accepts a position with the PD by providing a

5% increase in salary. At a minimum six FTEs are required to make this initiative successful, Rocklin PD estimates a yearly cost impact of \$38,000.

Site	Upfront	Yearly	Notes
Rocklin PD		\$ 38	Incentives associated with hiring bilingual staff.

**Cost Impact #9 - Zero Tolerance of Sexual Abuse (PP1)**

Although the PREA standards are not formally promulgated, most sites have policies describing a zero tolerance of sexual abuse. However the reason this standard is the ninth highest ranked in terms of cost impact is due to the requirement of a PREA Coordinator which very few sites actually have. With upfront costs limited to hiring and training a new employee, the primary cost driver is the annual salary of a senior level position. Regional cost of living standards aside, this standard exhibits the most uniformity and consistent cost among all the standards since the requirements are objective and clear. With a low compliance across all sites (8% overall) this cost impact is just over 2% of the total cost. The following tables show the distribution across each of the sectors. For most of the sites visited, the cost is the result of one additional full-time staff member added to their management and operational budget requirements.

Sector	Upfront Range		Yearly Range		Percent Compliant
	High	Low	High	Low	
Prisons	\$ 1	\$ 1	\$ 145	\$ 9	23%
Jails	\$ 1	\$ 1	\$ 199	\$ 20	6%
Juvenile	\$ 1	\$ 1	\$ 140	\$ 34	0%
Community Corrections	\$ 1	\$ 1	\$ 113	\$ 33	0%
Lockups	\$ 1	\$ 1	\$ 63	\$ 5	0%

As mentioned above, the underlying cause of this impact is solely due to the designated PREA Coordinator position. The NPREC standard PP1 states the following:

*“The agency employs or designates a PREA coordinator to develop, implement, and oversee agency efforts to comply with the PREA standards.”*

**Prisons**

As shown in the chart below, among the 13 prison systems, 10 were noncompliant each of which provided a cost estimate. Nine out of those 10 require a full-time staff member to fill this position with salary levels varying state by state as a factor of the cost of living and going wages.

Site	Upfront	Yearly	Notes
RI DOC	\$ 1	\$ 145	1 FTE salary, benefits and new hire operations costs.
AR DOC	\$ 1	\$ 121	1 FTE salary, benefits and new hire operations costs.
CA DOC	\$ 1	\$ 115	1 FTE salary, benefits and new hire operations costs.
VA DOC	\$ 1	\$ 112	1 FTE salary, benefits and new hire operations costs.
MN DOC	\$ 1	\$ 106	1 FTE salary, benefits and new hire operations costs.
SC DOC	\$ 1	\$ 91	1 FTE salary, benefits and new hire operations costs.
MO DOC	\$ 1	\$ 79	1 FTE salary, benefits and new hire operations costs.
IN DOC	\$ 1	\$ 72	1 FTE salary, benefits and new hire operations costs.
NY DOC	\$ 1	\$ 71	1 FTE salary, benefits and new hire operations costs.
CO DOC		\$ 9	Salary increase to existing PREA Coordinator to cover NPREC requirements.

The level of effort and cost of a senior level staff member is the sole cost driver associated with this standard. To meet the intent of the standard, Booz Allen required that each system employ one senior-



level staff member to oversee the responsibilities of the PREA coordinator. Although the standard is clear on what it requires, some prison systems thought that one senior-level FTE was either too much or too little. RI DOC and the MN DOC, for example thought it unnecessary to hire a senior-level position believing that that grade level was too high and unwarranted. Others such as the NY DOC and the VA DOC, with a combined capacity of nearly 100,000 inmates, thought that the equivalent of one senior-level position would not adequately meet the responsibilities of the position without providing additional support. For these large systems, they would likely go above and beyond the standard particularly due to the additional reporting and monitoring requirements (for which it can be assumed that supplemental PREA staff might assume those roles and cover the costs of those standards).

*Jails*

Of the 16 jails participating in this study, 15 were noncompliant, each of which reported a cost estimate.

Site	Upfront	Yearly	Notes
Sacramento County	\$ 1	\$ 199	1 FTE salary, benefits and new hire operations costs.
WA Pierce County	\$ 1	\$ 163	1 FTE salary, benefits and new hire operations costs.
Miami-Dade	\$ 1	\$ 141	1 FTE salary, benefits and new hire operations costs.
Alachua County	\$ 1	\$ 136	1 FTE salary, benefits and new hire operations costs.
Denver County	\$ 1	\$ 124	1 FTE salary, benefits and new hire operations costs.
Albany County	\$ 1	\$ 101	1 FTE salary, benefits and new hire operations costs.
Hennepin County	\$ 1	\$ 101	1 FTE salary, benefits and new hire operations costs.
Essex County	\$ 1	\$ 93	1 FTE salary, benefits and new hire operations costs.
Marion County	\$ 1	\$ 92	1 FTE salary, benefits and new hire operations costs.
Pulaski County	\$ 1	\$ 92	1 FTE salary, benefits and new hire operations costs.
Norfolk City	\$ 1	\$ 56	1 FTE salary, benefits and new hire operations costs.
Jefferson County	\$ 1	\$ 53	1 FTE salary, benefits and new hire operations costs.
Anoka County	\$ 1	\$ 25	0.25 FTE salary, benefits and new hire operations costs.
Aiken County	\$ 1	\$ 21	0.5 FTE salary, benefits and new hire operations costs.
WI Pierce County	\$ 1	\$ 20	0.5 FTE salary, benefits and new hire operations costs.

*Juvenile*

All of the juvenile corrections agencies participating in this study reported noncompliance with this standard, each of which reported a cost estimate.

Site	Upfront	Yearly	Notes
CA DJJ	\$ 1	\$ 140	1 FTE salary, benefits and new hire operations costs.
MO DYS	\$ 1	\$ 101	1 FTE salary, benefits and new hire operations costs.
OYA	\$ 1	\$ 92	1 FTE salary, benefits and new hire operations costs.
CO DYC	\$ 1	\$ 86	1 FTE salary, benefits and new hire operations costs.
FL DJJ	\$ 1	\$ 76	1 FTE salary, benefits and new hire operations costs.
IN DYS	\$ 1	\$ 72	1 FTE salary, benefits and new hire operations costs.
MA DYS	\$ 1	\$ 71	1 FTE salary, benefits and new hire operations costs.
ACJCS	\$ 1	\$ 59	0.5 FTE salary, benefits and new hire operations costs.
AR JA	\$ 1	\$ 38	0.5 FTE salary, benefits and new hire operations costs.
IDJC	\$ 1	\$ 34	0.5 FTE salary, benefits and new hire operations costs.

*Community Corrections*

All of the community corrections jurisdictions participating in this study reported noncompliance with this standard, each of which reported a cost estimate.

Site	Upfront	Yearly	Notes
WA CC	\$ 1	\$ 113	1 FTE salary, benefits and new hire operations costs.
AR DCC	\$ 1	\$ 107	1 FTE salary, benefits and new hire operations costs.
SC PPP	\$ 1	\$ 78	1 FTE salary, benefits and new hire operations costs.
MA OCC	\$ 1	\$ 73	1 FTE salary, benefits and new hire operations costs.
MO PP	\$ 1	\$ 71	1 FTE salary, benefits and new hire operations costs.
IN DOR	\$ 1	\$ 33	1 FTE salary, benefits and new hire operations costs.

**Lockups**

All of the lockup facilities participating in this study reported noncompliance with this standard, each of which reported a cost estimate.

Site	Upfront	Yearly	Notes
Rocklin PD	\$ 1	\$ 63	0.5 FTE salary, benefits and new hire operations costs.
DCPA	\$ 1	\$ 57	0.5 FTE salary, benefits and new hire operations costs.
Middleton PD	\$ 1	\$ 53	0.5 FTE salary, benefits and new hire operations costs.
Seattle PD	\$ <1	\$ 5	Handled by the Audit, Accreditation, and Policy department at minimal cost.

**Cost Impact #10 - Screening for Risk of Sexual Abuse (SC1 and SC2)**

Screening for Risk of Victimization and Abusiveness (SC1) and Use of Screening Information (SC2) are treated as one cost impact in this study because they are considered dependent upon each other, one standard or process logically supporting the other. Any attempt at decoupling the two would undermine the intent of either one. Together, these two standards account for nearly 2% of the overall costs. In terms of compliance, more sites are compliant with SC2 (63%) than SC1 (39%) mostly because they have screening procedures in place but require upfront modifications to meet the standard. As shown in the table below, the costs exhibit some significant variation from a low upfront cost of \$1,000 to a high of nearly \$2.8 million. This variation is evident in the ongoing costs as well with a low of \$1,000 to a high of \$1.5 million.

Sector	Upfront Range		Yearly Range		Percent Compliant
	High	Low	High	Low	
Prisons	\$ 226	\$ 1	\$ 804	\$ 437	62%
Jails	\$ 80	\$ 1	\$ 133	\$ 1	47%
Juvenile	\$ 2,753	\$ 1	\$ 1,530	\$ 60	60%
Community Corrections	\$ 64	\$ 64			58%
Lockups			\$ 20	\$ 20	75%

Most sites currently utilize a formal screening process, however the vast majority of the sites in this study thought that they would need to update their screening instruments to include PREA-related questions mostly because they fell short of meeting all the PREA criteria or were not gender-specific. Each site was at a different degree of compliance, some requiring modest modifications with little or no costs and some requiring significant modifications depending on the state of their current classification process and "gap" between that and the PREA standard.

The underlying cause of this impact is solely due to screening requiring sites to modify existing tools or implement procedures where one does not exist.

The NPREC standard SC1 states, “Employees must conduct this screening using a written screening instrument tailored to the gender of the population being screened.”

The NPREC standard SC2 states, “Employees use information from the risk screening (SC1) to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive.”

**Prisons**

Among the 13 prisons participating in this study, eight reported noncompliance and seven provided a cost estimate as described in the table below.

Site	Upfront	Yearly	Notes
MO DOC		\$ 804	Additional LOE to administer the screening instrument at intake.
SC DOC	\$ 54	\$ 665	Development of new screening instrument and 1 additional FTE at 17 facilities.
OR DOC	\$ 5	\$ 437	Development of new screening instrument and 5 additional FTEs for increased work load.
VA DOC	\$ 226		Integration of new screening instrument.
CO DOC	\$ 176		Increased LOE for programmer to modify existing screening instrument.
WA DOC	\$ 56		Cost to upgrade system and train staff.
RI DOC	\$ 1		Increased LOE for programmer to modify existing screening instrument.

A majority of the costs are the result of having instruments that are not gender-specific or screening processes that are not conducted at all classification reviews. Therefore, there are upfront costs associated with modifying the screening tool and ongoing costs to cover the increased workload of conducting more screenings. Where modifications are needed, prison systems such as the VA DOC can expect an upfront cost impact of approximately \$50,000 associated with integrating the newly developed risk screening tool into their current review process. CO DOC also considered the cost impact associated with integrating modifications of the screening assessment tool into their offender management system, resulting in upfront costs of \$176,000 to update their Offender Release of Information to Law Enforcement (ORILE) database. Unable to gather specifics regarding a cost impact of this standard on its offender management system, a system similar to CO DOC, Booz Allen assumed an equal impact for VA DOC.

The OR DOC only screens offenders on an as-needed basis. With an increased workload as a result of screening all offenders, they will be subject to a cost impact of \$437,000 per year to cover five additional staff to conduct screenings.

When a screening instrument is not currently utilized, the cost to develop an instrument and provide the necessary level of effort to conduct screenings is expected to be considerable. Currently the SC DOC uses a cell assignment form to match cell mates. This is not considered to be a screening instrument as defined in the standard therefore SC DOC requires a new instrument and procedure to conduct its screenings. To develop and implement a written screening instrument throughout its facilities, the SC DOC estimates \$35,000 in upfront costs. In addition, SC DOC will require 17 additional caseworkers at

\$665,000 per year and \$19,000 in operations costs to execute the screening process on all inmates in each facility.

*Jails*

Among the 16 jails participating in this study, 12 reported noncompliance, of which nine provided a cost estimate as described in the table below.

Site	Upfront	Yearly	Notes
Alachua County	\$ 2	\$ 133	2 FTEs to meet the demand for increased level of screening and to make informed decisions based on new criteria.
WA Pierce County	\$ 1	\$ 111	1 FTE for increased level of screening.
Miami-Dade	\$ 3	\$ 111	1 FTE for increased level of screening. Additional LOE to modify screening instrument. Yearly cost to separate inmates and house separately.
Albany County		\$ 1	Printing cost for new form to use during admission process.
Pulaski County	\$ 80		Cost to modify screening instrument for gender.
Hennepin County	\$ 20		Cost to modify screening instrument in the electronic jail management system.
Anoka County	\$ 10		Cost to modify screening instrument in existing jail software.
Denver County	\$ 1		Cost to modify screening instrument in existing jail software.
Sacramento County	\$ 1		Additional LOE to create and implement a new form.
Aiken County	\$ <1		Cost to modify screening instrument.

Each site except WA Pierce County currently utilizes a formal screening process. However modifications to existing screening instruments are required to include the requirements of SC1, primarily gender-specific questions. Each participating jail varied in degree of compliance, where some require modest modifications with little or no costs and others require significant modifications at a steep cost. Alachua County, WA Pierce County, and Miami-Dade seem to have a very large gap between current processes and compliance. They require not only significant modifications but also additional employees to manage and execute screening altogether, with Miami-Dade even requiring costs to house inmates separately.

*Juvenile*

As it relates to the juvenile sector, screening for risk of sexual abuse falls under standards AP1 and AP2. Of the 10 juvenile corrections agencies participating in this study, four reported noncompliance, three of which reported a cost estimate as described in the table below.

Site	Upfront	Yearly	Notes
IDJC	\$ 2,753	\$ 1,530	Additional LOE to develop screening instrument and to administer the new tool. Additional space needed to separate juveniles.
CA DJJ	\$ 14	\$ 60	Increased LOE to develop a screening instrument and to make informed decisions.
ACJCS	\$ 1		Cost to modify the screening instrument.

At the IDJC residents are screened during intake on a needs assessment, yet, there is not an instrument in place to measure for predators and victims. The IDJC estimates \$45,000 to develop a screening instrument and an additional \$24,000 in yearly administering costs. Further, IDJC indicates that 37% of its juvenile offenders have a history of sexual offending, or 128 offenders. With only 113 beds available, IDJC anticipates requiring a minimum of 15 additional beds. IDJC has provided an upfront cost for a 36-bed expansion and an ongoing cost per day of \$275 per offender.

*Community Corrections*

Of the six community corrections jurisdictions that participated in this study, only two reported noncompliance and only WA CC has an associated cost impact as described in the table below.

Site	Upfront	Yearly	Notes
WA CC	\$ 64		Cost to develop screening instrument and train personnel. Increased LOE to upgrade information system and train staff on new procedures.

The Screening Standards are required of community correction facilities, not jurisdictions solely governing probation and parole (SC PPP and MO PP). WA CC screens every offender who enters a work release center and again when an offender is transferred, however WA CC asserts that their screening instrument and process is not in compliance with SC1, leading to a one-time cost of \$11,000 to develop a written screening instrument and train personnel on administering procedures. The level of effort associated with upgrading the information systems, training time, and documentation of new procedures was estimated to cost \$54,000 in upfront fees.

*Lockups*

Of the four lockup facilities participating in this study, only Middleton PD reported noncompliance seen in the table below.

Site	Upfront	Yearly	Notes
Middleton PD		\$ 20	Additional LOE for booking based on updated screening criteria.

The Middleton PD estimates that additional screening requirements would lengthen the booking procedure and shorten the time that arresting officers can be in the field. The Middleton PD estimated that the NPREC standards would result in an hour extra for each booking. To cover the cost of backfilling occupied positions the Middleton PD estimated \$20,000 to cover these additional hours

**Cost Impact #11 - Contract Modifications for Outside Services (RP2 through RP4 and RE3)**

Agreements with Outside Public Entities and Community Service Providers (RP2), Agreements with Outside Law Enforcement Agencies (RP3), Agreements with the Prosecuting Authority (RP4), and Inmate Access to Outside Confidential Support Services (RE3) are treated as one cost impact in this study because they share similar characteristics and each require establishing contracts or agreements for external services (unrelated to the confinement of inmates) and for the case of RE3, ensuring that offenders are aware of the victim advocate services available to them. Collectively, these three standards account for just under 1% of the total cost impact across all sectors. Although most sites are compliant with both RP3 and RP4 (88% compliance for each), the compliance rate for RP2 is considerably less at

24% due to the nature of the services. RP3 and RP4 rely upon services generally mandated by state and county laws whereas RP2 is dependent on non-profit organizations that are not mandated by law and in fact are often discouraged from supporting offenders resulting in lower compliance and higher costs. Finally RE3 is somewhat related to RP2. When an agency decides to contract with or enter into an agreement with a local or national non-profit to provide emotional or transitional support services, that agency will need to ensure that offenders are aware of these services and have the knowledge of how to contact them. This is seen as a one-time, upfront cost to capture printing and material expenses.

Sector	Upfront Range		Yearly Range		Percent Compliant
	High	Low	High	Low	
Prisons	\$ 20	\$ 1	\$ 1,214	\$ 40	56%
Jails	\$ 26	\$ 1			64%
Juvenile	\$ 46	\$ 1	\$ 50	\$ 8	60%
Community Corrections	\$ 4	\$ 1	\$ 126	\$ 126	50%
Lockups					100%

Contracting with outside entities for services is a practice that was seen at numerous sites in this study. These include contracts with local non-profit organizations that provide Emotional Support Services (RP2) and local law enforcement entities that provide Investigative Support (RP3) and Prosecutorial Support (RP4). The vast majority of sites (76%) do not have existing contracts with emotional support providers subsequently leading to the primary cost driver in this category. Booz Allen uncovered instances where a rape crisis center would charge a fee when providing services to an offender due to Victims of Crime Act (VOCA) funding restrictions. Many sexual assault service providers are funded in whole or in part by the VOCA Victim Assistance formula grant program. These funds cannot be used for “perpetrator rehabilitation and counseling.” Sub-recipients cannot knowingly use VOCA funds to offer rehabilitative services to offenders. Likewise, VOCA funds cannot support services to incarcerated individuals, even when the service pertains to the victimization of that individual. Overall, this funding restriction makes it difficult for non-profit agencies to provide their services free of charge to incarcerated sexual assault victims if much of their funding comes from this formula grant program. Other sites cited a lack of demand for such services in their community, with fewer providers to choose from resulting in higher costs.

Of lesser consequence in terms of a cost impact was any agreement with law enforcement entities. Most sites cited local regulations or state statues that enforced local law enforcement officials to investigate all crimes and prosecute them with sufficient evidence. There were few occurrences in which a site expressed difficulties with obtaining adequate service from their local law enforcement agencies requiring them to enter into contract agreements if such services were not enforced or guaranteed by state or local statute.

The major underlying causes for these standards are twofold: 1) jurisdictions must enter or attempt to enter into a Memorandum of Understanding (MOU) with outside service providers to provide inmates with confidential emotional support services related to sexual abuse and to help victims of sexual abuse during their transition from incarceration to the community, and 2) some sites must actually pay for local law enforcement services when it comes to providing services to inmates.



The NPREC standard RP2 states, “...*The agency also maintains or attempts to enter into MOUs or other agreements with community service providers that are able to: (1) provide inmates with confidential emotional support services related to sexual abuse and (2) help victims of sexual abuse during their transition from incarceration to the community...*”

The NPREC standard RP3 states, “... *the agency maintains or attempts to enter into a written MOU or other agreement specific to investigations of sexual abuse with the law enforcement agency responsible for conducting investigations...*”

The NPREC standard RP4 states “... *the agency maintains or attempts to enter into a written MOU or other agreement specific to investigations of sexual abuse with the law enforcement agency responsible for conducting investigations.*”

The NPREC standard RE3 states “...*the facility provides inmates with access to outside victim advocates for emotional support services related to sexual abuse. The facility provides such access by giving inmates the current mailing addresses and telephone numbers, including toll-free hotline numbers, of local, State, and/or national victim advocacy or rape crisis organizations and enabling reasonable communication between inmates and these organizations.*”

**Prisons**

Of the 13 prisons in this study, only six are estimated to have costs associated with standards RP2 through RP4 shown in the table below.

Site	Upfront	Yearly	Notes
WA DOC	\$ 4	\$ 1,214	Development of MOUs with law enforcement agencies and the DA's office. Cost to provide outside access to services.
NY DOC	\$	\$ 500	Emotional support and transition services throughout the state.
AR DOC		\$ 72	Development of MOUs with service providers.
CO DOC	\$ 1	\$ 60	Increased LOE to ensure coordinated process and that referrals are made.
IN DOC	\$ 10	\$ 40	Development of MOUs with service providers.
MO DOC	\$ 20		Cost to provide outside access to services.
SC DOC	\$ 4		Development of MOUs with service providers.

NY DOC's relatively large ongoing costs cover agreements for emotional services in each of the 32 counties with an institution and contracts for transition support services in all 62 NY counties. IN DOC's cost estimate was calculated based on an assumption of the number of inmates requiring services assuming a fixed hourly rate for a local service provider for both emotional and transitional support. The annual cost impact at WA DOC is associated with numerous factors, the largest of which being the costs associated with contracts to provide emotional and transitional services, \$761,000 per year of the total \$1.2 million impact on this standard. Despite the prevalence of service providers in WA, a recent inquiry into who could contract with WA DOC revealed numerous obstacles due to VOCA funding restrictions meaning WA DOC would have to pay for these services that would otherwise (as found in most places across the country) be provided free of charge. Making up the remainder of the cost impact, WA DOC would have to develop agreements with law enforcement agencies throughout the state subsequent to a recent discovery that one of the largest counties in Washington will no longer investigate crimes that are not against county residents. Because there is no consistency in how counties handle investigations and



no state statute enforcing local law enforcement to conduct investigations, a formal agreement with all 39 counties in the state is required. WA DOC also believes that MOUs are necessary with DA Offices, based on the inconsistent manner with which prosecutors move investigations through the court system.

*Jails*

Most facilities in this study have some sort of agreement in place with an external vendor or community organization that provides emotional support and can help victims of sexual abuse transition from incarceration to the community. These partnerships are arranged loosely and mostly are not codified with an MOU or formal written agreement. Formalizing this partnership however, does not equate with a significant or reportable cost for most facilities. On the other hand some facilities do expect costs mostly due to administrative or legal fees to draft and formalize the agreement. These costs are all between \$500 and \$2,000 and impact WA Pierce, Essex, Hennepin, Alachua, and Aiken counties shown in the table below.

Site	Upfront	Yearly	Notes
Alachua County	\$ 26		Cost to provide inmates with outside access to support services and development of MOUs.
Marion County	\$ 9		Cost to provide inmates with outside access to support services.
Sacramento County	\$ 5		Cost to provide inmates with outside access to support services.
Anoka County	\$ 4		Cost to provide inmates with outside access to support services.
Essex County	\$ 2		Development of MOUs with service providers and cost to provide outside access to support services.
Hennepin County	\$ 2		Development of MOUs with service providers.
WA Pierce County	\$ 2		Development of MOUs with service providers and cost to provide outside access to support services.
Aiken County	\$ 1		Development of MOUs for the Cumbee Center.

*Juvenile*

A majority of the juvenile correction agencies in this study do not use MOUs or other agreements with outside public entities for the provision of the services identified in this standard, which include support services, investigative services and prosecuting procedures; only five believe that a cost will be incurred to do so shown below.

Site	Upfront	Yearly	Notes
ACJCS	\$ 1	\$ 50	Development of MOUs with service providers.
IN DYS	\$ 3	\$ 30	Transitional services of residents and cost to provide outside access to support services.
CA DJJ	\$ 24	\$ 19	Development of MOUs with service providers and process for receiving reports from a public entity, and for transitional services.
IDJC	\$ 46	\$ 8	Development of MOUs with service providers.
MO DYS	\$ 4		Cost to provide outside access to support services.

The costs are associated primarily with the Provision of Support Services (RP2) by outside entities and community service providers. It is estimated that the IN DYS will accrue an annual cost of \$30,000 to contract with an outside entity to provide support service. ACJCS has a contract with a service provider

but it does not provide the specific services required by PREA, requiring them to look elsewhere and establish a contract with a new entity costing approximately \$50,000 per year. On the other hand, CA DJJ expects to incur a one-time cost of \$20,000 as a result of establishing a process for receiving reports from public entities and coordination of the services to residents. This will be followed by an annual cost of \$19,000 for transition counseling services to victims of sexual abuse.

In regards to Conducting Criminal Investigations and Prosecuting Violations (RP3 and RP4, respectively), most juvenile correction jurisdictions in this study noted that state and local police investigate cases and local prosecutors, such as District Attorney’s, prosecute violation. Because these entities operate under state and local statutes, MOU’s would generally not be required. IDJC on the other hand feels that MOUs would be required and if the state statute did not meet the standard, they would have to develop MOUs with each of the state’s 44 counties for both investigations and prosecutions resulting in a one-time cost of \$42,000.

*Community Corrections*

As for establishing MOUs with law enforcement, only one community corrections site has a modest ongoing cost associated with these NPREC Standards, WA CC. Because WA CC is integrated with WA DOC, they share the same, yet proportional to size, cost impact. The estimated cost associated with contracts to provide emotional and transitional services is \$79,000 per year for the same reason as WA DOC, VOCA funding restrictions and the need to pay for services that would otherwise be free.

WA CC would have to develop agreements with law enforcement and prosecuting agencies at each of the state’s 39 counties to ensure investigations are conducted estimated at \$47,000 per year. In addition, this cost covers agreements with other agencies that do not receive VOCA funding.

Site	Upfront	Yearly	Notes
WA CC	\$ 4	\$ 126	Development of MOUs with outside service providers and 39 counties for investigation of crimes and prosecutions. Costs to provide outside access to support services.
MO PP	\$ 3		Cost to provide outside access to support services.
IN DOR	\$ 1		Cost to provide outside access to support services.

*Lockups*

As it relates to lockups, contract modifications and/or policy updates fall under standards PP2, RP2, and RP3. None of the lockups in this study are estimated to have costs associated with NPREC standards RP2 through RP4. Given the relatively few number of inmates housed in lockups and the short duration of time they are confined, lockups generally do not contract with other facilities and do not provide services as outlined in this standard.

**Cost Impact #12 - Evidence Protocol and Forensic Medical Exams (RP1)**

Evidence Protocol and Forensic Medical Exams (RP1) has a relatively minimal cost impact when compared with the other standards, yet there are some sites and scenarios that suggest this could have a sporadic impact nationwide. As shown in the chart below, upfront costs vary by a few thousand dollars and are the result of two factors, upfront costs associated with hiring a new employee or maintaining and developing an MOU. Yearly cost associated with prisons range anywhere from \$842,000 to \$6,000, \$61,000 to less than \$1,000 for jails, and \$230,000 to \$1,000 for juvenile facilities. Any yearly costs

associated with community corrections result in less than \$1,000, while a study of lockups revealed no yearly cost impact.

Sector	Upfront Range		Yearly Range		Percent Compliant
	High	Low	High	Low	
Prisons	\$ 11	\$ 8	\$ 842	\$ 6	62%
Jails	\$ 1	\$ 1	\$ 61	\$ 1	75%
Juvenile	\$ 4	\$ 4	\$ 230	\$ 1	70%
Community Corrections					67%
Lockups					75%

The underlying cause of this impact is due to the requirement for agencies to make available a victim advocate during the medical exam process. The NPREC standard RP1 states,

*“The facility makes available a victim advocate to accompany the victim through the forensic medical exam process.”*

**Prisons**

Of the 13 prison systems analyzed, more than half responded that a victim advocate is made available by the local hospital in coordination with the Sexual Assault Nurse Examiner (SANE), resulting in zero cost. Others, such as the CA DOC, have MOUs in place between each of its 31 institutions and a local rape crisis center. Shown in the table below, upfront costs range from a low of \$8,000 for SC DOC to develop an MOU and \$4,000 for IN DOC for upfront costs associated with a new employee. The real impact however, is seen in the ongoing costs. These costs are considerably higher, upwards of \$843,000 per year to cover the cost of maintaining agreements and/or contracts with victim advocacy services that provide emotional and transitional support services.

Site	Upfront	Yearly	Notes
IN DOC	\$ 11	\$ 842	Part-time internal advocate at each facility.
NY DOC		\$ 250	"Fee for Service" contract to provide services.
AR DOC		\$ 6	Designation of current FTE from victim response team to serve as victim advocate.
SC DOC	\$ 8		Modification of current medical contract to provide support.

The prison systems in this study shared various strategies to provide victim advocacy support in the event it was not available free of charge at the local hospital. NY DOC, for example, must develop a contract with local hospitals to accompany their victims of sexual assault. An estimate of \$250,000 annually has been recorded using Medicaid rates as a fee structure. To ensure availability of a victim advocate throughout the process, others such as the IN DOC require that an internal position including overtime and benefits be created, resulting in an annual cost of \$842,000. AR DOC suggests designating a current member of their victim response team as a victim advocate. An annual cost of \$6,000 was provided for training and any overtime associated with providing victim advocacy services.

**Jails**

Half of the facilities are currently providing victim advocacy services in coordination with the SANE at the local hospital, medical center, or through other community-based groups such as the local Rape Crisis Center or YWCA. Of the 16 jails studied, only three identified a cost impact associated with providing

victim advocacy services. Alachua County requires that an internal position including overtime and benefits be created, resulting in an annual cost of \$61,000. Peumansend Creek has identified a victim advocacy support service within their community which provides these services at a nominal annual fee of approximately \$1,000. Aiken County will need \$100 to cover the level of effort of a current staff member not assigned to the security section to accompany a victim during the medical exam process, assuming one incident per year.

Site	Upfront	Yearly	Notes
Alachua County	\$ 1	\$ 61	Additional LOE to provide advocacy services.
Peumansend Creek		\$ 1	Fee charged by outside advocacy support group to provide service.
Aiken County		\$ <1	Per incident fee based on one incident per year.

*Juvenile*

In most cases, victim advocacy services are made available to juvenile facilities by an outside entity such as a local hospital or a victim advocacy provider within the community. Two of the ten juvenile corrections agencies analyzed however, have a cost associated with providing victim advocacy services to its residents. In the case of the IN DYS, which consists of seven facilities, some of which are located in rural areas of the state, victim advocacy services are not always provided by the local hospital. It may also be difficult to find community-support services which are available when requested. For these reasons, and to ensure an advocate is made available 24/7 in the event of an emergency, the IN DYS requests an additional part-time FTE at each facility. This results in an annual cost estimate of approximately \$230,000. Based on a relatively low number of incidents confirmed over the past couple of years, both the FL DJJ and the IDJC provided an estimate based off of a per incident fee. IDJC on the other hand provided an estimate based on a cost per incident. This approach is considered more cost effective especially for jurisdictions that encounter a relatively low number of incidents on a yearly basis.

Site	Upfront	Yearly	Notes
IN DYS	\$ 4	\$ 230	0.5 FTE at each of 7 facilities to provide internal victim advocate.
FL DJJ		\$ 4	Per incident fee based off of average number of incidents annually.
IDJC		\$ 1	Hourly fee of a victim advocate based off of number of previous incidents.

*Community Corrections*

None of the community correction jurisdictions in this study are estimated to have any notable costs associated with forensic medical exams.

*Lockups*

None of the lockups in this study are estimated to have costs associated with forensic medical exams.

**Cost Impact #13 - Investigations (IN1 and IN3)**

IN1 and IN3 account for just over 0.5% of total overall ongoing costs and have an average compliance rate of 68% with IN1 having 41% and IN3 having 96%. Its primary impact is due to additional staff to conduct more frequent investigations or ensure that investigations are conducted properly and thoroughly.

As the table shows below, the cost impact was not as widespread as the noncompliance rate would suggest, impacting only six sites across prisons, jails, and juvenile facilities.

Sector	Upfront Range		Yearly Range		Percent Compliant
	High	Low	High	Low	
Prisons	\$ 10	\$ 1	\$ 516	\$ 98	54%
Jails	\$ 1	\$ 1	\$ 182	\$ 182	78%
Juvenile	\$ 3	\$ 1	\$ 227	\$ 64	55%
Community Corrections					92%
Lockups					75%

The primary underlying cause of this cost impact is due to an increased volume of investigations as a result of more reports.

The NPREC standard IN1 states, *“The facility investigates all allegations of sexual abuse, including third-party and anonymous reports....”*

The NPREC standard IN-3 states, *“Allegations of sexual abuse are substantiated if supported by a preponderance of the evidence.”*

**Prisons**

Due to an anticipated higher number of investigations and reports as a result of PREA, primarily more reports, MA DOC will require 11 additional investigators at an annual cost of \$516,000 plus associated one-time upfront hiring costs. Similarly, OR DOC anticipates a workload increase to carry out more investigations requiring two part-time investigators in two parts of the state, resulting in one FTE or \$98,000 per year plus associated one-time upfront hiring costs.

Site	Upfront	Yearly	Notes
MA DOC	\$ 10	\$ 516	11 additional FTEs due to changes in grievance regulations and third-party reporting.
OR DOC	\$ 1	\$ 98	Additional 0.5 FTE on both the east and west of state to account for increased workload.

**Jails**

Only one jail, Sacramento County indicated a need for an additional investigator at a cost of \$182,000 per year plus associated one-time upfront hiring costs. They feel this would allow for every incident to be investigated as well as notification of completed investigations.

Site	Upfront	Yearly	Notes
Sacramento County	\$ 1	\$ 182	1 additional FTE to ensure all reports are investigated and notification of completed investigations is made.

**Juvenile**

IDJC does not have an investigation unit. With an anticipated increase in reporting, it is estimated that IDJC will need to add at least one internal investigator to ensure that incidents are investigated by trained, qualified staff. This would include responding to and reporting on all third-party reports and would result in an annual cost of \$64,000 per year plus associated one-time upfront hiring costs. Likewise, MA DYS expects to hire at least two more investigators to comply with an expanded sexual abuse definition which will lead to additional investigations and level of effort. Two investigators at MA DYS hired with this

specific expertise have an annual cost of \$178,000 plus associated one-time upfront hiring costs. Finally, OYA asserts it will need three additional investigators at a cost of \$227,000 per year plus associated one-time upfront hiring costs

CO DYC relies upon their local Social Service Agency and/or law enforcement agencies to conduct all investigations of sexual abuse but does not believe they are being administered adequately. With anticipated increased sexual abuse reports as a result of PREA, CO DYC believes that the addition of an Inspector General will support a better practice and Ensure Cases are Investigated when Substantiated by a Preponderance of the Evidence (IN3). CO DYC is the only site among the 49 to have a cost for IN3. This cost is \$79,000 per year plus associated one-time upfront hiring costs.

Site	Upfront	Yearly	Notes
OYA	\$ 3	\$ 227	3 additional FTEs would be required. OYA is currently understaffed.
MA DYS	\$ 2	\$ 178	2 additional FTEs required due to anticipated increase in number of investigations.
CO DYC	\$ 1	\$ 79	1 additional FTE to ensure that proper investigations are taking place based on standard.
IDJC	\$ 1	\$ 64	1 additional FTE is required to ensure investigators are conducted as the standard requires.

**Cost Impact #14 - Supplement to SC2: Use of Screening Information (ID-6)**

Accounting for a mere 0.3% of total overall ongoing costs, the use of screening information of immigrant detainees is notable because of its low compliance rate (51%) and potential for its impact on the U.S. Marshals Service (USMS) and Immigration and Customs Enforcement (ICE). Going into this study, it was assumed that (primarily) jails would be unprepared for this standard because it requires housing inmates separately subsequently requiring significant facility or physical infrastructure modifications if a site chooses to take these detainees. If a site decides to no longer house detainees as a result of PREA, the burden is passed back to USMS and ICE.

Prison and jail jurisdictions included in our study were asked to reveal any existing relationships with ICE for the temporary housing of detainees. While no prison jurisdictions anticipate a cost impact associated with compliance, several jail facilities revealed a cost impact related to the separate housing of immigrant detainees.

Sector	Upfront Range		Yearly Range		Percent Compliant
	High	Low	High	Low	
Prisons					100%
Jails	\$ 9	\$ 9	\$ 515	\$ 3	81%
Juvenile	n/a	n/a	n/a	n/a	n/a
Community Corrections	n/a	n/a	n/a	n/a	n/a
Lockups	n/a	n/a	n/a	n/a	n/a

The underlying cause of this impact is attributed to the need for immigrant detainees to be separated from the general inmate population. The NPREC standard ID6 states,

*“Any facility that houses both inmates and immigration detainees houses all immigration detainees separately from other inmates...”*



*Jails*

To house immigrant detainees separate from other inmates, jail facilities currently found to be noncompliant would require either an increased level of effort or additional cell blocks. For example, Albany County anticipates that nine additional FTEs will be required in order to ensure that ICE detainees are housed separately from the rest of the population. Although a formal agreement does not currently exist, they mention that taking such measures to ensure separation would not be cost effective based upon the current revenue generated. Therefore, Albany County would opt not to house these detainees going forward. Although Marion County does not believe that any additional level of effort would be required, they are concerned that if their jail facility were at capacity additional cell space would be required. For 10 inmates on average, this would equate to approximately \$19,000 per month or \$228,000 per year.

Site	Upfront	Yearly	Notes
Albany County	\$ 9	\$ 515	9 additional FTEs required to ensure ICE detainees are housed separately.
Marion County		\$ 228	Additional cell block is required to house approximately 10 ICE detainees separately per month.
Pulaski County		\$ 3	On average, 23 ICE detainees per year for up to 48 hours would be required to be held separately.

**Cost Impact #15 - Hiring and Promotion Decisions (PP6)**

Hiring and Promotion Decisions (PP6) has a relatively low compliance rate (22% overall) yet relatively low costs to meet compliance with this standard. As shown in the table below, upfront costs are limited to only prisons and jails and average \$1,000 whereas ongoing costs impact everyone but lockups with a low of \$1,000 and high of \$80,000 per year. These costs are a direct correlation with the number of employees for each site, roughly equating to the number of annual promotions. Therefore the costs are most prominent at state prison systems where they might have staff counts in the thousands, and occasionally, require an additional staff member dedicated to running background checks.

Background checks on new hires are a common practice among correctional institutions, however background checks for employees being considered for promotion are not as common resulting in low compliance rates among the sites included in this study with nominal costs to comply.

Sector	Upfront Range		Yearly Range		Percent Compliant
	High	Low	High	Low	
Prisons	\$ 1	\$ 1	\$ 80	\$ 4	23%
Jails	\$ 1	\$ 1	\$ 5	\$ 1	6%
Juvenile			\$ 8	\$ 1	30%
Community Corrections			\$ 3	\$ 3	33%
Lockups					25%

The major underlying cause for the cost impact is the requirement to conduct criminal background checks on employees considered for promotion. An additional, but far less frequent, cause for the cost impact includes the requirement to contact all prior institutional employers. The NPREC standard PP6 states,

*“.....Consistent with Federal, State, and local law, the agency makes its best effort to contact all prior institutional employers for information on substantiated allegations of sexual abuse; must*



*run criminal background checks for all applicants and employees being considered for promotion.....”*

Many sites rely on periodic checks, often automatic and annual feeds, alerting them of criminal activity among its employees. Increasing the frequency of this to include staff considered for a promotion yields additional fees and/or a level of effort to conduct more criminal background checks. It was assumed that even if employees are subject to annual criminal background checks, there was a small probability that that background check synchronized with promotions meaning that an additional check would be required to meet compliance. As a cost-saving measure, DOJ might want to consider adding language such that a criminal background check would be required within a certain number of months from the date of promotion. Therefore if an employee receiving a promotion recently had his/her automatic, annual background check, that check could be used in the promotion assessment.

**Prisons**

A majority of costs for prison systems are associated with conducting background checks on employees being considered for promotion, estimated at \$50 per instance shown in the table below.

Site	Upfront	Yearly	Notes
CO DOC	\$ 1	\$ 80	Cost based off of 713 promotions annually. Additional LOE is also required.
SC DOC	\$ 1	\$ 58	Annual cost to conduct background checks and 1
AR DOC		\$ 50	Cost to conduct background checks for 1,000 promotions
VA DOC	\$ 1	\$ 41	1 additional FTE required to conduct background checks.
WA DOC		\$ 12	Cost to conduct background checks for 235 promotions.
MN DOC		\$ 6	Cost to conduct background checks for 122 promotions.
RI DOC		\$ 4	Cost to conduct background checks for 80 promotions.

A majority of prison systems conduct background checks internally, limiting the cost impact of such an investigation to an additional level of effort, insignificant enough to note in this study. Where checks are completed by an external agency, additional fees are accumulated. SC DOC will incur an additional cost impact having to hire one FTE to support contacting prior institutional employers. Similarly, the VA DOC requires one additional FTE at \$41,000 annually, whose resources will be used to investigate employees and potential new hires based on guidelines addressed in the standard. The CO DOC, with the highest cost impact among prisons, is estimated to require one FTE in addition to the costs to conduct background checks.

**Jails**

Every jail included in this study conducts criminal background checks on new hires but not for promotions. Only the Norfolk City jail ensures that its contractors reach prior employers to verify past employment breaches regarding sex violence. This results in an estimated cost of \$1,000. All other costs, shown in the table below, are associated with conducting background checks on employees being considered for promotion, and are assumed to be \$50 per background check.

Site	Upfront	Yearly	Notes
Marion County		\$ 5	Cost to conduct background checks for 100 promotions.
Sacramento County		\$ 3	Cost to conduct background checks for 63 promotions.
Miami-Dade		\$ 2	Cost to conduct background checks for 45 promotions.
Alachua County		\$ 2	Cost to conduct background checks for 40 promotions.
Hennepin County		\$ 1	Cost to conduct background checks for 25 promotions.
Albany County		\$ <1	Cost to conduct background checks for 5 promotions.
Pulaski County		\$ <1	Cost to conduct background checks for 4 to 5 promotions.
Denver County		\$ <1	Cost to conduct background checks for 3 promotions.
Norfolk City	\$ 1		Cost to modify contract to ensure contractor is contacting previous employers.

*Juvenile*

Similar to jails, all juvenile facilities conduct background checks for new hires but most do not conduct the checks for promotions. None of the juvenile facilities are estimated to have a cost impact for contacting prior employers, because most already do this or can at no additional cost. As shown in the table below, all costs are associated with conducting background checks on employees being considered for promotion.

Site	Upfront	Yearly	Notes
FL DJJ		\$ 8	Cost to conduct background checks for 166 promotions.
MO DYS		\$ 3	Cost to conduct background checks for 60 promotions.
CO DYC		\$ 3	Cost to conduct background checks for 53 promotions.
IDJC		\$ 1	Cost to conduct background checks for 12 promotions.

*Community Corrections*

Only one community correction site is estimated to have a cost impact associated with conducting background checks or contacting prior institutional employers. WA CC, with roughly 62 promotions per year, will bear a yearly cost of \$3,000 to conduct the additional background checks.

Site	Upfront	Yearly	Notes
WA CC		\$ 3	Cost to conduct background checks for 62 promotions.

*Lockups*

As it relates to lockups, background checks for hiring and promotions falls under standard PP7 and estimates are less than \$1,000.

**Cost Impact #16 - Gathering, Reviewing and Reporting Data (DC1 through DC3)**

Sexual Abuse Incident Reviews (DC1), Data Collection (DC2), and Data Review for Corrective Action (DC3) are treated as one cost impact in this study because they are considered dependent upon each other, one standard or process logically supporting another. Any attempt at decoupling the two would undermine the intent of the others. This standard has some of the highest compliance rates and lowest overall cost impact as shown in the table below. Of the sites not in compliance, a level of effort and database automation/integration were found to be the primary cost drivers associated with the gathering,

reviewing, and reporting of sexual abuse data. The compilation of a review team consisting of upper management officials with input from line supervisors, investigators, and practitioners, resulted in a wide array of very subjective cost impacts.

Sector	Upfront Range		Yearly Range		Percent Compliant
	High	Low	High	Low	
Prisons	\$ 301	\$ 1	\$ 85	\$ 1	69%
Jails			\$ 1	\$ 1	71%
Juvenile	\$ 15	\$ 1	\$ 72	\$ 5	87%
Community Corrections	\$ 50	\$ 50	\$ 1	\$ 1	39%
Lockups	\$ 6	\$ 6			83%

The underlying cause of this impact is solely due to enhancing existing processes for gathering, reviewing and reporting of sexual abuse data.

The NPREC standard DC1 states, *“The facility treats all instances of sexual abuse as critical incidents to be examined by a team of upper management officials, with input from line supervisors, investigators, and medical/mental health practitioners.”*

The NPREC standard DC2 states, *“The incident-based data collected includes, at a minimum, the data necessary to answer all questions from the most recent version of the BJS Survey on Sexual Violence.”*

The NPREC standard DC3 states, *“Using these data, the agency identifies problem areas, including any racial dynamics underpinning patterns of sexual abuse, takes corrective action on an ongoing basis, and, at least annually, prepares a report of its findings and corrective actions for each facility as well as the agency as a whole.”*

### *Prisons*

Of the 13 prison systems participating in this study, nine reported noncompliance, resulting in a cost estimate shown in the table below. The main cost driver among these four NPREC standards was the review team found in DC1.

Site	Upfront	Yearly	Notes
CO DOC	\$ 1	\$ 85	Cost of a review team based on a confirmed number of incidents and 1 additional FTE to review, compile, and report data.
NY DOC	\$ 1	\$ 81	Cost of a review team based on a confirmed number of incidents and 1 additional FTE to prepare report for facility head.
VA DOC	\$ 1	\$ 72	1 additional FTE to review, compile, and report data.
WA DOC	\$ 301	\$ 46	Database improvements and 1 additional FTE to monitor new database.
MO DOC		\$ 4	Cost of a review team based on a confirmed number of incidents.
CA DOC		\$ 3	Cost of a review team based on confirmed number of incidents.
OR DOC		\$ 1	Cost of a review team based on a confirmed number of incidents.
SC DOC		\$ 1	Cost of a review team based on a confirmed number of incidents.
MN DOC	\$ 10		Increased LOE to automate database.

The NY DOC, WA DOC, CO DOC, and the VA DOC found that the creation of report findings and recommendations for improvement would require additional FTE support. In each instance, this additional resource will be used to collect, review, and analyze an increasing flow of sexual abuse data into the system. To accurately collect and report on the influx of data, it is estimated to cost the MN DOC a one-time charge of \$10,000 to automate its database. Similarly, the WA DOC requires upfront costs of \$301,000 to make necessary improvements to its current data collection system.

**Jails**

Among the 16 jails participating in this study, nine reported noncompliance but only three had a cost impact shown in the table below.

Site	Upfront	Yearly	Notes
Sacramento County		\$ 1	Cost of a review team based on a confirmed number of incidents.
Hennepin County		\$ 1	Cost of a review team based on a confirmed number of incidents.
WA Pierce County	\$ <1	\$ <1	Cost of a review team based on a confirmed number of incidents and cost to formalize a process.

Gathering, reviewing and reporting data was not a significant cost driver for the jail sector. Certain evidence that was examined when looking at this standard included whether the facility was currently reporting data (e.g., BJS survey on sexual violence), the volume of sexual abuse incidents, and the site's current reporting and review processes and procedures. Few costs were expressed to comply with these standards and it was found that most costs could be minimized by using the PREA Coordinator. Hennepin County and Sacramento County believed that they would need to establish a multidisciplinary review team as described in DC1.

*Juvenile*

Of the 10 juvenile correction agencies participating in this study, four reported noncompliance, with two reporting a cost estimate indicated in the table below.

Site	Upfront	Yearly	Notes
CO DYC	\$ 1	\$ 72	1 additional FTE to gather data from contracted facilities and prepare annual report.
CA DJJ	\$ 15	\$ 5	Increased LOE to develop report and cost to maintain that data for 3 extra years.

A majority of the juvenile corrections agencies in this study were found to be in full compliance with these standards; the only exceptions being the CA DJJ and CO DYC. The CO DYC estimated \$72,000 for one FTE responsible for gathering data from contracted facilities and preparing an annual report. The CA DJJ estimated \$15,000 to upgrade files and existing servers to store data for an additional three years.

*Community Corrections*

The six participating community corrections jurisdictions all reported noncompliance, with only the WA CC reporting a cost shown in the table below.

Site	Upfront	Yearly	Notes
WA CC	\$ 50	\$ 1	Cost of a review team based on a confirmed number of incidents.

WA CC uses Sierra, a newly deployed data tracking system that uses sexual abuse data to assess the effectiveness of current procedure. However, it excludes the consideration of racial dynamics. Modifying this system to meet the standard is estimated to cost \$50,000 upfront. The WA CC does not have a review team in place in accordance with the requirements of DC1. Booz Allen standardized the costs associated with formalizing a review team based off of number of confirmed incidents.

*Lockups*

Of the four lockup facilities, only one reported noncompliance and a cost estimate. The Rocklin PD estimates the need to update internal records management system to provide the functionality to aggregate and report on sexual abuse incidents.

Site	Upfront	Yearly	Notes
Rocklin PD	\$ 6		Cost to update internal records management system.

**Cost Impact #17 - Exhaustion of Administrative Remedies (RE2)**

Although this standard had a negligible cost impact, it is noted in this assessment since most prison jurisdictions were found to be noncompliant with an inmate's exhaustion of administrative remedies after a 48-hour time period. Several noted that this standard would directly contradict with the Federal Prison Litigation Reform Act (PLRA) and expressed concern over its pending consequences to current grievance procedures adopted throughout agencies. In most instances however, quantifying a cost impact as a result of this change in policy was indeterminate or speculative at best.

Sector	Upfront Range		Yearly Range		Percent Compliant
	High	Low	High	Low	
Prisons	\$ 1	\$ 1	\$ 72	\$ 72	0%
Jails	\$ 3	\$ 2	\$ 25	\$ 8	69%
Juvenile					90%
Community Corrections					83%
Lockups					100%

The underlying cause of this impact is solely due an offender having exhausted his/her administrative remedies 48 hours after alerting the agency the need for protection and the contradiction with PLRA. In terms of cost however, the underlying causes are modifications to existing policies or accompanying a victim to federal court. The NPREC standard RE2 states,

*“An inmate seeking immediate protection from imminent sexual abuse will be deemed to have exhausted his or her administrative remedies 48 hours after notifying any agency staff member of his or her need for protection..”*

**Prisons**

CO DOC expressed a cost impact of an increased level of effort associated with a change in policy restricting investigations to 90 days. A cost of \$72,000 annually was provided to hire one additional Grievance Officer to help meet a shortened deadline.

Site	Upfront	Yearly	Notes
CO DOC	\$ 1	\$ 72	Additional FTE support in order to meet a reduction in grievance policy deadline from 95 to 90 days.

**Jails**

Because of a shortened time frame of incarceration in jails, most did not believe that the 48-hour policy would have a measurable cost impact on their facility. Where a cost impact was quantifiable, it was limited to the level of effort attributable to documenting or modifying a policy and additional level of effort to transfer inmates and provide them with appropriate supervision. Located close to federal court, Alachua County determined an increased level of effort would be required to temporarily house federal inmates being heard in federal court. Anoka County considered the cost that it would take to accompany an increased number of inmates to court. Essex County and Sacramento County provided a cost associated with the development and modification of facility policy.

Site	Upfront	Yearly	Notes
Alachua County		\$ 25	Additional LOE required to house Federal inmates being heard in Federal court.
Anoka County		\$ 8	Increased LOE associated with accompanying inmates to court.
Essex County	\$ 3		Modification of policy for 48-hour rule.
Sacramento County	\$ 2		Developing a policy for the 48-hour rule.

**Cost Impact #18 - Agency Protection Against Retaliation (OR5)**

OR5 does not have any ongoing costs but is included here due to the one-off upfront cost impact identified at NY DOC. As shown in the chart below, overall, this standard has a compliance rate of 59% however, with the exception of one site, can be met without any additional costs for all sites.

Sector	Upfront Range		Yearly Range		Percent Compliant
	High	Low	High	Low	
Prisons	\$ 500	\$ 500			54%
Jails					71%
Juvenile					60%
Community Corrections					40%
Lockups					100%

With only one site reporting a cost for this standard, the underlying cause is the requirement to modify existing inmate tracking systems to accommodate additional data characteristics. The NPREC standard RE2 states:

*"The agency monitors the conduct and/or treatment of inmates or staff who have reported sexual abuse or cooperated with investigations, including any inmate disciplinary reports, housing, or program changes, for at least 90 days following their report or cooperation to see if there are changes that may suggest possible retaliation by inmates or staff."*

**Prisons**

NY DOC does not have a formal monitoring system in place. Inmates and staff who believe they have been subjected to retaliation for reporting any type of misconduct or for cooperating with an investigation would typically contact the Office of the Inspector General. Modifications to NY DOC's inmate tracking system to accommodate this data would cost approximately \$500,000, a one-time expenditure.

Site	Upfront	Yearly	Notes
NY DOC	\$ 500		Development of a system to permit Central Office monitoring of inmate victims and witnesses.



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## Background and Scope of Study

On September 3, 2003, the Prison Rape Elimination Act of 2003 (P.L. 108-79), hereafter referred to as the PREA, was enacted by the U.S. Congress to address the problem of sexual abuse of persons in the custody of U.S. correctional agencies. PREA applies to all public and private institutions and community-based agencies that house or supervise adult or juvenile offenders. This legislation established NPREC charged with the mission to develop proposed standards to prevent, detect, respond to, and monitor the sexual abuse of incarcerated and detained individuals throughout the United States. On June 23, 2009, the Commission presented its final report to the President, the U.S. Congress, the Attorney General, the Secretary of Health and Human Services, and other federal and state officials. The final report (available online at <http://nprec.us/publication/>) includes the following major provisions:

- Development of standards for detection, prevention, reduction, and punishment of prison rape.
- Collection and dissemination of information on the incidence of prison rape.
- Award of grant funds to help state and local governments implement the purposes of the PREA.

To assist in the review process toward publication of these standards, BJA, a component of the Office of Justice Programs (OJP) within the U.S. Department of Justice (DOJ), is working with Booz Allen Hamilton (Booz Allen) to address the costs of implementing these standards.

### *Scope*

This cost impact study represents the second phase of a three-phased project. In Phase I, initial budgetary cost projections were developed for the implementation of national standards under PREA for nine sites and were submitted to the DOJ in February 2010. The document provided summary and detailed data of nine locations identified by the BJA. Specifically, it provided preliminary cost projections for the implementation of each standard as formulated by the NPREC. These standard-specific cost projections took into account the assessed difficulty of implementation and the extent to which the existing facility or jurisdiction does, or does not, have policies and procedures in place related to the standard. Costs reflected startup, as well as ongoing operational costs on an annualized basis.

Phase II (this report) uses the lessons learned from Phase I and focuses on the standards that have highest likelihood of a cost impact and the underlying causes. It represents a larger sample of up to, but no more than, 50 sites across the country representing five sectors, including state prison systems, local jail jurisdictions, police lockups, state and local juvenile facilities, and community corrections. Specifically, this report will:

- Determine costs specific to each of the proposed standards from a larger number of sites. Booz Allen will determine the number of variations that are sufficiently distinctive to require separate estimates and ensure the completeness of cost components for each variation within each sector. The sectors include federal and state prison systems, local jail jurisdictions, police lockups, state and local juvenile corrections agencies, and community corrections jurisdictions. Booz Allen shall ensure the completeness of cost components for each sector and collect enough data to estimate the cost components for each site type in each sector.

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- Collect detailed cost data from up to 50 additional sites. The total number selected within each sector shall be determined based on initial assessments of variability among cost components, with greatest effort directed to sectors with the greatest variation.
  - Address a comprehensive view of implementation and compliance on a national level, and must be completed in a time frame supportive of implementation required under the Act. The analysis will present “order of magnitude” estimates based on a viable number of sites that will achieve an acceptable level of confidence in the results.
  - Assess the accounting methods of each jurisdiction or facility and adjust the data accordingly to obtain more reliable/comparable cost estimates.
  - Cover additional activities to include:
    - Working with corrections authorities to acquire sufficient data to determine costs linked to each standard;
    - Assessing site-level costs data to insure accuracy, completeness and comparability;
    - Conducting onsite meetings with correctional authorities, as needed, to complete work tasks;
    - Producing site-level data files that contain aggregated data for each standard

During Phase III, Booz Allen will develop a cost model designed to facilitate the development of financial and schedule guidelines for full implementation of the standards to facilitate monitoring of ongoing financial viability of the NPREC standards and to support ongoing funding justification at the state and local levels.

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## Study Methodology

### *Overview*

OJP/BJA contracted Booz Allen to complete a cost impact analysis of the NPREC standards on different correctional facilities, including Adult Prisons & Jails, Juvenile Facilities, Community Corrections, and Police Lockups. This section describes the study team and the data gathering and data analysis methodologies that have guided the study thus far.

**Study Team** – To accomplish this task, Booz Allen assembled a team of qualified specialists in cost analysis and estimating, criminal justice, and correctional operations. Booz Allen is providing project management, cost analysis, cost estimating support and expertise, logistics and planning support, and overall leadership and quality assurance for this effort. Our specialist in criminal justice provides domain and academic knowledge on sexual violence and correctional institutions and operations, including targeted expertise on criminal justice policies and programs in the U.S. prison/jail system and sexual violence in correctional settings. Our specialists in correctional operations are providing correctional operations domain experience with specific experience in managing jails, prisons, and juvenile detention facilities across the U.S. They are prominent members of correctional professional societies, many of whom have served in leadership positions. They bring an extensive knowledge of the operational requirements of correctional agencies and a deep understanding of the impact of policy and regulation impacts, particularly the PREA, on operating budgets. Each of the specialists supporting this study has extensive knowledge of and/or first-hand experience with NPREC and its mission, some of whom participated in previous PREA studies and analyses of the standards.

**Data Gathering** – Data gathering took place in two phases. Phase I focused on gathering data from 11 sites<sup>1</sup> throughout the country with the objective to identify major findings that would be further explored in Phase II.

The first step in the data gathering for Phase II was the modification of the Phase I questionnaire (see Appendix C - Approach to Questionnaire Development and Data Gathering). Using the results from Phase I, Booz Allen isolated questions about standards deemed to have the highest potential for a cost impact. Those standards were then translated into questions that addressed the level of detail found in the checklist items, as published in the Commission Standards, with subsequent questions designed to understand the underlying cause of the cost impact (e.g., cost drivers). The survey questions were categorized into two primary areas: Major Findings and Minor Findings. The Major Findings and Issues focused on obtaining a deeper understanding of common and frequent cost drivers in Phase I while the Minor Findings & Issues focused on confirming or denying certain one-off findings in Phase I that may or may not have a real cost impact yet warranted additional research.

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<sup>1</sup> Nine were required by contract but 11 actually participated.

The questionnaire was imperative in guiding the discussions at each site and for ensuring that data gathering could be completed within the 2 hours allotted for each meeting—a time determined to be sufficient for data gathering while respecting the schedule constraints of the survey participants and their primary function of managing their operations.

Booz Allen also developed a demographic form to obtain additional background information on a site's unique characteristics such as the incidence and prevalence of sexual abuse; the size the site/jurisdiction in terms of the number of facilities, staff and inmates; and other variables used in the analysis such as whether or not the staff are unionized.

The questionnaires and demographic forms were sent in advance of each meeting, and most sites reviewed the materials to familiarize themselves with the study and the specific data to be gathered. It was not anticipated that the site would provide answers to the questionnaire upon our arrival. Most did not, but a few did take time to fill out the questionnaire and demographic form in advance, expediting the interview process tremendously. Whether filled out or simply reviewed in advance, the questions were designed to facilitate an interactive, and sometimes spirited, discussion on the NPREC standards, the extent of their compliance, and the challenges of compliance from a financial perspective.

Each meeting was attended by, most frequently, four Booz Allen representatives to include an interview facilitator, a primary note taker, and two subject matter experts with significant experience in the field of correctional operations and management. Representatives from the site included the director<sup>1</sup> (for the majority of the sites) and members of the director's staff such as the chief of operations, budget director, training lead, and at times medical and mental health care professionals. Each meeting began with introductions, a description of the purpose of the cost impact study, and instructions to facilitate the discussions and anticipated questions and answers. All sites were familiar with PREA requiring very little background descriptions of the NPREC standards. The mood of each meeting was amicable and the Booz Allen team received absolutely no resistance from any of the sites about the inconvenience of participating.

To keep these meetings on track and on point, Booz Allen steered participants away from any discussions about the merit, efficiency, or efficacy of the standards, focusing solely on the cost impacts of the PREA standards on their particular site per the statement of work. At the conclusion of each meeting, the Booz Allen team negotiated a date (typically 2–3 weeks out) to expect responses containing specific cost data used in this report. To facilitate a response, Booz Allen typed up the meeting notes and discussion and pre-populated a data template to be returned to each site immediately after the interview.

The data template used throughout our study was divided into two parts. Part I included those standards determined to be both major and minor findings and issues discussed in detail as part of our site visits. Part II referenced specific qualitative aspects of standards addressed in Part I and each of the remaining NPREC standards not considered to be a major cost driver. Part II gave

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<sup>1</sup> This could be the Secretary for state systems for prisons, community corrections, or juvenile systems; sheriff or jail administrator for jails; and police chief for lockups.

each site an opportunity to review the NPREC standards in their entirety, determine whether or not they were compliant, and while a rare occurrence, provide any potential cost impact not considered a major or minor finding or issue based on our Phase I study.

**Data Analysis** – After receiving the data, Booz Allen analyzed the results, which often required extended and continued conversations with site personnel to clarify data and responses. The analysis, primarily conducted in a Microsoft Excel-based cost model, segregated the data by standard, site, and area and then divided the data into *upfront* and *yearly maintenance costs*, defined as follows, in order to report immediate versus ongoing cost impact:

- Upfront costs, as defined in this report, are any one-time costs required to bring a facility into full compliance with the NPREC standards, without any implied ongoing/maintenance costs.
- Yearly maintenance costs, as defined in this report, are the ongoing operational costs required to sustain PREA compliance on an annual basis.

Booz Allen neither aggregated the data with the intent of arriving at an analytical conclusion, nor was the data used to represent a sample of a population for statistical purposes. This report simply presents the cost impact data for the implementation of NPREC standards on the 49 selected sites.

#### *Applying Lessons Learned from Phase I to Phase II*

Phase I set the stage for Phase II, identifying specific standards that either have or do not have a cost impact. Phase I also served as a logistical pilot phase for the much larger data collection effort in Phase II. The data obtained during Phase I were analyzed and categorized into major issues and findings. These issues and findings included an analysis of the data received and an interpretation of the results and subsequent hypotheses of how the data should be understood. This particular analysis was not conducive to gaining insight into the underlying causes of the costs associated with each of the issues and standards; there were many instances where the data were isolated, incongruent, or inconclusive, mostly due to the small sample size included in this study. This was expected with Phase II designed to remediate these shortcomings.

The sites visited during Phase I included two local jails, three statewide prison systems, two statewide juvenile systems, two local juvenile facilities, and one statewide community corrections system. All sites included in that report were selected by the OJP/BJA. Representation for a lock-up facility was not accomplished during Phase I, however one site during the data collection, the Ohio Bureau of Community Sanctions in Columbus, Ohio, returned data for jails and lockups throughout the state. Booz Allen qualified these data results with the Ohio Department of Rehabilitation and Correction (ODRC) in accordance with the PREA definition of “lockup” and “jail” and presents this data as such in this report.

Over 7 weeks in the fall 2009, Booz Allen conducted 2-hour meetings with each facility. Two Booz Allen representatives and at least one specialist with functional expertise in the relevant correctional facility sector attended each meeting. Attendees from the facilities ranged from 1 to 30, with an average of six participants, representing directors, operational managers, medical staff, mental health staff, investigators, and correctional officers. Each meeting began with introductions, a description of the purpose of the cost impact study, and instructions to facilitate the discussions and anticipated questions and answers. The

mood of each meeting was amicable, and the Booz Allen team received no resistance from the sites about the inconvenience of participating.

The results of Phase I were a set of major findings. The list below highlights 12 major issues and findings as they relate to cost impacts or difficulties with implementing the NPREC standards. They are arranged by impact severity (highest to lowest), as determined by the amount of attention a particular standard received during the data collection and/or its resulting cost impact. The questionnaire for Phase II was based on these findings.

**Phase I Major Finding #1 – Cross-Gender Pat Downs**

The prohibition of cross-gender pat downs may result in significant operational, workforce, and organizational impacts across the Adult Jails & Prisons, Community Corrections, and Police Lockups sectors, leading to substantially increased costs that stem from legal issues and the reorganization of staff. This finding will have less of an impact on juvenile facilities due to generally higher staff to resident ratios and child protection laws.

**Phase I Major Finding #2 – Inmate/Resident Supervision – Physical Supervision**

This issue reflects one of the widest variability in costs because of the varying interpretations of how best to provide the supervision necessary to protect inmates from sexual abuse. Responses varied in the costs associated with them—ranging from plans to enhance staffing to adequate levels (as defined differently by each site) to direct supervision models with significant staffing increases.

**Phase I Major Finding #3 – Inmate/Resident Supervision – Technical Supervision**

Similar to Issue #2, this issue reflects a very wide variability in costs from the sheer number of technological alternatives available to sites—ranging from modest enhancements of current surveillance equipment to full-blown installations of high-end surveillance systems with complex data storage capabilities.

**Phase I Major Finding #4 – PREA Coordinator**

The requirement of a PREA Coordinator will continue to be a cost impact for every site, resulting in a relatively large cost impact on the aggregate. This cost impact however, is matter of jurisdiction, and it increases or decreases proportionately with the level of decentralization versus centralization.

**Phase I Major Finding #5 – Training and Education**

Not surprisingly, there is a correlation between the training and education requirements and the number of trainees, whether they are employees, volunteers, or contractors. However, because of the many alternatives for delivering training, whether it be classroom or computer based, and the varying frequency of delivering recurring training, this finding resulted a relatively wide range in costs.

**Phase I Major Finding #6 – Victim Advocacy**

The requirement for a victim advocate will continue to be an issue and a cost driver in Phase II, yet the costs associated with this requirement are relatively low when compared to the other issues. We believe that, similar to the PREA Coordinator position, the victim





*Site Selection Methodology*

Driving the site selection for the PREA cost impact study were four objectives: 1) Investigate and analyze variations from the results of the first phase of this study to determine common themes and outliers, 2) Provide an equitable representation of cost impacts across sectors, regions of the country, and operational demographics, 3) Identify sites that have a reasonable expectation that they can be willing and effective participants in this study and 4) Develop a list of sites that facilitate efficient travel and logistics with the ability to visit multiple sectors (prisons, jails, community corrections, etc.) on one site trip.

The map to above, and table below identify the sites included in the PREA cost impact study.

In addition to Phase I findings, the site selection for this final report was influenced by a number of factors considered vital to assessing the cost impact of implementing the proposed PREA standards issued by the PREA commission. These factors include the following:

- Geographic location
- Size/capacity of the system/facility
- Number of staff
- Average daily population (ADP)
- ADP to staff ratio
- Number of facilities
- ADP to facilities ratio
- Average cost of care per day
- Union presence
- Age limit of resident population (juvenile)
- States participating in Performance Based Standards (PbS) (juvenile)

Region/State	SECTOR					TOTAL
	Adult Prisons	Jails	Community Corrections	Juvenile Facilities	Lockups	
<b>Northeast</b>	<b>3</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>8</b>
Rhode Island	1	-	-	-	-	1
Massachusetts	1	1	1	1	1	5
New York	1	1	-	-	-	2
<b>Midwest</b>	<b>3</b>	<b>4</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>12</b>
Minnesota	1	1	-	-	1	3
Missouri	1	1	1	1	-	4
Indiana	1	1	1	1	-	4
Wisconsin	-	1	-	-	-	1
<b>South</b>	<b>3</b>	<b>6</b>	<b>2</b>	<b>2</b>	<b>-</b>	<b>13</b>
Arkansas	1	1	1	1	-	4
Florida	-	2	-	1	-	3
South Carolina	1	1	1	-	-	3
Virginia	1	2	-	-	-	3
<b>West</b>	<b>4</b>	<b>3</b>	<b>1</b>	<b>5</b>	<b>3</b>	<b>16</b>
California	1	1	-	1	1	4
Colorado	1	1	-	1	1	4
Idaho	-	-	-	2	-	2
Oregon	1	-	-	1	-	2
Washington	1	1	1	-	1	4
<b>TOTAL</b>	<b>13</b>	<b>15</b>	<b>6</b>	<b>10</b>	<b>5</b>	<b>49</b>

The statistics analyzed were provided by the *American Correctional Association (ACA) 2009 Directory*, the *2009-2010 ACA National Jail and Adult Detention Directory*, and the *Council of Juvenile Correctional Administrators (CJCA) Yearbook 2009*. A breakdown of counts by region, state and sector can be found in Appendix A.

Having visited nine locations and gathered data on 11 sites during the Phase I study, the Booz Allen team’s objective was to (1) identify as many sites nationwide that mirrored the demographic composition of Phase I; (2) identify new sites that broadened the diversity of the sites visited previously; and (3) winnow down the list such that it provides an equitable and balanced representation of the wide variety of correctional facilities and jurisdictions throughout the country (limited our selection to the lower 48 states). We aimed to cluster as many sectors into one site as feasibly possible to ease the financial and time burden on travel logistics. Finally, we initially targeted more than 50 sites with the goal of securing "no more than 50 sites" following the SOW under this contract. Although we were optimistic that we would have 100% participation from all these sites, we understood a reality that a few sites would opt out

of the study due to logistical/scheduling conflicts or, regrettably, an unwillingness to participate. Meeting this expectation with a few last minute drop-outs, the study ultimately received full participation from 49 sites. The following paragraphs describe the justification for the sites selected in this study.

**Adult Prison Systems**

12 prison systems and one combined jail-prison system were selected as part of the Phase II study. More adult prisons and jails were chosen over the other sectors simply due to their relative proportion (e.g., # of inmates, # of employees, and budget), to the others. The location of these sites was dispersed evenly throughout each of the four regions of the U.S. In general, adult prisons analyzed as part of the Phase I study shed particular light on concerns associated with certain standards such as PP4 – Limits to Cross-gender Viewing and Searches and PP3 – Inmate Supervision. Both the Pennsylvania Department of Corrections (PA DOC) and the Connecticut Department of Corrections (CT DOC) expressed grave concern over restrictions linked with cross-gender pat down searches and federal and state statutes. By analyzing similar prison systems throughout the United States, we were better able to determine if these concerns and severe impacts to cost were commonplace or merely an outlier to the norm.

Three prisons were selected in the Northeast. RI DOC was chosen because it represents a combined jail-prison system. Similar to CT DOC, RI DOC provided an opportunity to compare jail-prison systems, while simultaneously, adding to the diversity of our selected sites. Further, the RI DOC represented the smallest of the prison systems being analyzed in terms of capacity, number of staff, ADP, and number of facilities, while simultaneously accounting for one of the highest amounts in terms of cost of care per day. The RI DOC allowed us to determine what effect, if any, the size and average cost of care per day, implementing PREA had on a prison system.

Region/State	SECTOR
	Adult Prisons
<b>Northeast</b>	<b>3</b>
Rhode Island	1
Massachusetts	1
New York	1
<b>Midwest</b>	<b>3</b>
Minnesota	1
Missouri	1
Indiana	1
<b>South</b>	<b>3</b>
Arkansas	1
South Carolina	1
Virginia	1
<b>West</b>	<b>4</b>
California	1
Colorado	1
Oregon	1
Washington	1
<b>TOTAL</b>	<b>13</b>

The NY DOC has a capacity exceeding 66,000 inmates, third largest of the prison systems represented. Further, with a total of 67 facilities, we have gained a better understanding of the cost impact PREA has on implementing standards across one of the most complex and culturally diverse prison systems in the nation.

Minnesota, Missouri, and Indiana provide a good representation of prison systems in the Midwest. Capacities range from nearly 10,000 inmates in Minnesota to more than 31,000 inmates in Missouri, with an ADP between approximately 9,600 in Minnesota and 31,000 in Missouri. Further, cost of care per day ranges from \$45/day in Missouri to nearly \$90/day in Minnesota shedding light on which potential economic factors affect a jurisdiction’s commitment to providing care to its inmates. Minnesota and Missouri are represented by a union, but Indiana is not. This particular difference provided us to the opportunity to study how a union’s presences impacts any potential staff changes associated with cross-gender pat downs. The blend of small, medium, and large systems, with varying characteristics, allowed the Phase II study to identify any potential cost drivers exhibited throughout the Midwest prison systems.

Arkansas, South Carolina, and Virginia represented the South. Similar to the Midwest, the VA DOC, SC DOC, and AR DOC, vary significantly on many factors considered important to the site selection process referenced above. Each system’s capacity ranges from 13,000 inmates (AR DOC) to upwards of 32,000 inmates (VA DOC). Further, staff population ranges from 3,200 in AR DOC to just over 6,000 in VA DOC. These discrepancies allowed us to analyze the impact a large variation in multiple factors has on cost drivers.

In the West, prison systems included the states of California, Colorado, Oregon, and Washington. CA DOC has an ADP of approximately 170,000 inmates, 33 state prison facilities, and a staff population of approximately 63,000. CA DOC presented a major opportunity to identify significant cost drivers in one of the largest and most complex prison systems in the country. Also, with an ADP to capacity ratio of nearly 3:1, we were able to gain some insight into the cost impact overcrowding might have on implementing PREA standards. CO DOC and WA DOC were chosen for their significant size and geographical dispersion throughout the Western region of the U.S. OR DOC is recognized nationally among correctional agencies for providing inmates with the cognitive, behavioral, and job skills they need to become productive citizens. We were able to gain a better understanding of the effects implementing PREA has on a model institution.

**Jails**

Fourteen jail facilities and one jail system were selected as part of the Phase II study. The location of these sites was dispersed evenly throughout each of the four regions of the United States. In general, jails analyzed as part of the phase I study shed particular light on concerns associated with certain standards such as PP4 – Limits to Cross-Gender Viewing and Searches and PP3 – Inmate Supervision. Kent County Jail (KCJ) initially responded that this standard was impractical and that they would not be able to comply under any circumstance. Louisville Metro Department of Corrections (LMDC) budgeted \$1.5 million yearly to adhere to policy standards associated with Inmate Supervision. By analyzing similar jail facilities throughout the U.S., we were better able to understand the quantitative and qualitative impact that the NPREC standards will have on jail facilities.

In the Northeast, two jail jurisdictions were selected. The Albany County Correctional facility, originally opened in 1931, is one of the largest county correctional facilities in the State of New York. Classified as one of 12 mega facilities (1,000+ beds) in New York, Albany County allowed us to consider the cost impact associated with one of the larger and older jail facilities being analyzed which served as a good benchmark when further investigating direct supervision and PP3.

Minnesota, Missouri, Indiana, and Wisconsin provided a good representation of jail facilities in the Midwest. Similar to the uniqueness of each prison system represented by the Midwest, jail facilities were represented by one mega facility (1,000+ beds), two medium facilities (50-249 beds), and one small facility (1-49 beds). The Pierce County Jail in Wisconsin represented the lone small jail facility selected

Region/State	SECTOR
	Jails
<b>Northeast</b>	<b>2</b>
Massachusetts	1
New York	1
<b>Midwest</b>	<b>4</b>
Minnesota	1
Missouri	1
Indiana	1
Wisconsin	1
<b>South</b>	<b>6</b>
Arkansas	1
Florida	2
South Carolina	1
Virginia	2
<b>West</b>	<b>3</b>
California	1
Colorado	1
Washington	1
<b>TOTAL</b>	<b>15</b>

as part of phase II. Further, because none of the jails represented by the Midwest are ACA accredited, the team was better able to determine whether ACA-accredited facilities are more or less likely to have less of a cost impact than unaccredited (by ACA) facilities.

Arkansas, Florida, South Carolina, and Virginia represented the South. Categorized as mega facilities (1000+ beds), KCJ and LMDC estimated a significant cost impact associated with PP7 – Assessment and Use of Monitoring Technology and PP3 – Inmate Supervision. Miami-Dade’s five correctional facilities, with a capacity of almost 6,000 and an ADP of over 6,300 inmates, allowed us to determine whether high impact costs associated with certain standards are commonplace throughout large, integrated jail systems. In order to maintain an accurate representation of different size jail facilities throughout the South, three large jail facilities (250-999 beds) were selected; the Norfolk City Jail and the Peumansend Creek Regional Jail in Virginia, and the Aiken County Detention Center in South Carolina, and one medium jail facility (50-249), the Pulaski County Regional Detention Facility in Arkansas.

In the West, jail facility site selection included the states of California, Colorado, and Washington. The Sacramento County Jail was the largest single jail facility analyzed as part of our Phase II study, with a capacity of more than 4,000 beds. Two additional mega facilities (1000+ beds), the Denver County Jail and the Pierce County Detention/Corrections Center in Washington State, were chosen as representative jail facilities in the West region because of their size and potential for helping us to identify cost drivers associated with implementing PREA. Additionally, the Pierce County Detention/Corrections Center has expressed a keen interest in this study and was very willing to participate.

**Juvenile Facilities**

At 10, juvenile facilities represented the third most sites chosen in the selection process. One of the primary reasons for selecting more juvenile facilities over community corrections and lockups is due to the recent publicity of the juvenile detention statistics released by BJS in mid-January. In addition, the placement of the juvenile correctional agency within the executive branch of state government impacts the agencies’ jurisdiction, authority, scope of services, budgets, and leadership. This profile was taken into consideration when making site selections and the team was conscientious of selecting at least one representative juvenile facility from each of the four agency profiles in existence. Further, we understand the distinction associated with the different types of facilities and programs categorized under each juvenile system. For the purposes of our Phase II cost study, the team included sites categorized as institution, secure treatment, and training school, detention, reception/assessment/diagnostic center, and other secure residential facility (ranch, camp). Finally, we made our site selection based on PbS participation, a program to improve the conditions, practices, and services in youth correction and detention facilities.

Region/State	SECTOR
	Juvenile Facilities
<b>Northeast</b>	<b>1</b>
Massachusetts	1
<b>Midwest</b>	<b>2</b>
Missouri	1
Indiana	1
<b>South</b>	<b>2</b>
Arkansas	1
Florida	1
<b>West</b>	<b>5</b>
California	1
Colorado	1
Idaho	2
Oregon	1
<b>TOTAL</b>	<b>10</b>

The Arizona Department of Juvenile Corrections (ADJC) and the Texas Youth Commission (TYC), both free-standing programs, identified a high cost impact associated with PREA standards, PP3 – Resident Supervision, RE-4 – Third-party Reporting, RP1 – Evidence Protocol and Forensic Medical Exams, TR1

– Employee Training, and DC1 – Sexual Abuse Incident Reviews. By visiting additional free-standing, secure facilities such as the IDJC in the West, Booz Allen was able to compare the high cost impact realized as part of our Phase I study, with similarly organized juvenile systems while in different regions of the country.

Florida Parishes Juvenile Detention Center budgeted for more than \$900,000 in costs associated with camera replacement and one server. Likewise, the TYC received \$18.5 million in 2007 for installation of video monitoring equipment and \$1.5 million for 12 new FTEs to maintain the system. Assessing large and complex systems such as the FL DJJ and the CA DJJ, both much larger than Florida Parishes and TYC, we were able to gain a better understanding of how size can directly impact the implementation of certain PREA standards.

While Phase I provided a great foundation to begin Phase II, we used Phase II as an opportunity to expand our juvenile selection to other agency profiles and facilities/programs that captured a representative sample of all juvenile systems/facilities throughout the United States, thus broadening our diversity of selected sites.

The MA DYS represented an agency under human services, categorized by 57 institution, secure treatment, and training school facilities. Categorized as a PbS, with a capacity of 1,000 beds, and an age limit of 21 years, the MA DYS will served as a good representative sample of a juvenile system in the Northeast with characteristics that had not yet been assessed upon completion of Phase I.

The Midwest was represented by the states of Missouri and Indiana. The MO DYS falls under the Division of Child Welfare/Social Service and represented 32 facilities in total, with a capacity of 801. MO DYS allowed us to analyze juvenile systems under the division of child welfare/social service, to determine what cost effect, if any, this type of system might have in addition to other agency profiles. The IN DYS, under the Division of Adult Corrections, represented seven facilities with a capacity of just over 1,100 and an ADP of 805. The size of the system, coupled with yet another division not previously analyzed as part of Phase I, made this juvenile system appealing.

The South was represented by two juvenile systems in the states of Arkansas and Florida. The FL DJJ is a free standing system of 25 detention facilities and 76 residential facilities with the capacity to house approximately 6,400 residents. At 101, the FL DJJ boasts 47 more facilities than its next largest competitor, MA DYS, chosen as part of our study. The high number of facilities allowed us to examine potential cost drivers associated with implementing PREA throughout a large, complex system. Specifically, we were able to closely analyze those standards that have a direct correlation to large facility, high capacity systems, such as PP7 – Assessment and Use of Monitoring Technology and AU1 – Audits of Standards. Because the State of Florida does not participate in PbS, our team was able to identify any additional cost impact associated with not participating in the PbS program. The AR JA falls under the agency profile of Division of Child Welfare/Social Services. It is classified as a reception facility, the only one of its kind chosen as part of our Phase II study. By analyzing the AR JA, we were able to determine any significant cost impact associated with a juvenile reception facility, heretofore not included in this study.

The West included three state run systems and one independent detention facility, located in California, Colorado, Oregon, and Idaho. With a capacity of approximately 4,600 beds, the CA DJJ provided a great

opportunity to examine the largest juvenile system chosen as part of our Phase II process. It was one of two Division of Adult Correction profiles analyzed, consisting of six secure institutions. Furthermore, it boasts the highest age limit at 25. We were given the opportunity to consider all of these factors when analyzing a potential cost impact. The CO DYC is an agency under human services consisting of 11 secure facilities. Booz Allen considered Colorado a great opportunity to investigate a distinct agency responsible for the management and oversight of state-operated and privately contracted residential facilities in the Western region of the nation. Finally, the IDJC serves as a free-standing agency in the executive branch, responsible for three state correctional centers. Also, in an effort to assist Idaho’s 44 counties with the development of the juvenile system under the Juvenile Corrections Act, the Department has a District Liaison assigned to each of the seven judicial districts that are available to provide assistance to county elected officials, the courts, probation, and contract placement providers. We examined what benefits or drawbacks, if any, this relationship had on implementing PREA standards.

### Community Corrections

Six community corrections facilities were chosen as part of the Phase II selection process. During Phase I, the Ohio Bureau of Community Sanctions (OBCS) served as the lone representative of our cost impact study. The OBCS oversees the state’s subsidy programs, including halfway houses, Community Corrections Act, and community-based facility programs. Accounting for more than 26 agencies and 159 probation agencies, the cost impact associated with implementing PREA standards was high. In selecting sites for purposes of the Phase II study, our focus was on geographically dispersed community corrections systems which capture the size and complexity of the OBCS. Doing so allowed us to examine the high cost impact associated with standards such as Prevention Planning, Training and Education, Screening, Official Response, Medical and Mental Health Care, and Data Collection and Review. Doing so, we were able to determine whether costs associated with the OBCS were an anomaly or a growing trend of costs associated with implementing PREA standards throughout all community corrections systems in the country.

Region/State	SECTOR
	Community Corrections
<b>Northeast</b>	<b>1</b>
Massachusetts	1
<b>Midwest</b>	<b>2</b>
Missouri	1
Indiana	1
<b>South</b>	<b>2</b>
Arkansas	1
South Carolina	1
<b>West</b>	<b>1</b>
Washington	1
<b>TOTAL</b>	<b>6</b>

The MA OCC encompasses over 20 adult community correctional centers spread throughout the entire state. According to the *Utilization of Community Corrections Centers Statistical Report, FY 2008*, on average, 1,147 offenders were participating in programs at the community corrections centers. The community correction centers are community based, intensive supervision sites, delivering bundled sanctions and services, including treatment and education. As the lone representative in the Northeast, the size, complexity, and similar service offerings, made the MA OCC a prime candidate for comparison with the OBCS.

The Midwest included community corrections systems in the states of Missouri and Indiana. The IN DOR oversees both adult work release facilities and adult contract facilities and has realized a growth in number of participating counties from 19 to 73. In addition, over 53,000 adults were being served during FY 2008, 51% of which were felons. Their increase in growth and oversight of varying programs and



contracted facilities throughout the state, made participation of IN DOR essential to the community corrections section of our study.

The South included community corrections facilities in Arkansas and South Carolina. The AR JA and the SC PPP prerelease centers provided a good geographic dispersion of the remaining portion of the Southern region of the United States. SC PPP allowed us to focus our efforts on six specific prerelease centers to determine any additional cost impact associated specifically with prerelease centers conforming to standards set by the PREA commission. Similarly, the AR JA is responsible for parole and probation services and community correctional facilities. With a vast array of programs including probation, regional correctional facilities, education, and mental health services, AR JA provided further insight into the high cost impact associated with OBCS.

### Lockups

Unlike the other sectors, Phase I did not yield a clear strategy for locating and identifying lockups, primarily because there was only one lockup representative during that study, the Delhi Township Police Department.

Locating and arranging site visits with lockups remotely (via phone or email) posed several challenges because, as we learned, few lockups have primary points of contact that are solely responsible for the holding facility since they are run out of a police department and officers are responsible for field duty and inmate supervision as an ancillary duty. To overcome these challenges, Booz Allen employed a strategy of locating candidates while on existing site visits for the other sectors. To locate candidates we relied upon recommendations and referrals from jail administrators under the assumption that most had professional relationships with lockups in their respective counties, frequently obtaining transfers from these lockups. For example, the Essex County Jail Director referred our team to Middleton PD and the same approach was used for Seattle PD, DCPA, and Rocklin PD, having received recommendations from WA Pierce County Jail, Denver County Jail, and Sacramento County Jail, respectively.

Region/State	SECTOR
	Lockups
<b>Northeast</b>	<b>1</b>
Massachusetts	1
<b>West</b>	<b>3</b>
California	1
Colorado	1
Washington	1
<b>TOTAL</b>	<b>4</b>

Overall, this study reflects four lockup sites including three from the West (Seattle PD, Rocklin PD, and DCPA) and one from the Northeast (Middleton PD). The Rocklin PD has four holding cells within their facility, an ADP of four, with a capacity of 10. The Middleton PD, has three holding cells, an ADP of two, with a capacity of 12. The Seattle PD has five precincts each for a total of 18 cells. The DCPA, a larger lockup facility more closely associated with a jail, has a capacity of 158 and an ADP of more than 200.



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## Assumptions

### *Definition of Sexual Abuse*

Booz Allen operated under a targeted definition of *sexual abuse*, specially addressing physical rape, penetration, and contact. For the purposes of this report, Booz Allen did not include *sexual harassment* in its definition of sexual abuse. This exclusion is noteworthy as sexual harassment is defined by the PREA as “repeated and unwelcome sexual advances, requests for sexual favors, verbal comments, or gestures or actions of a derogatory or offensive sexual nature by one inmate directed toward another.” Furthermore, the PREA glossary defines *sexual abuse* to “encompass (1) inmate-on-inmate sexual abuse, (2) inmate-on-inmate sexual harassment, (3) staff-on-inmate sexual abuse, and (4) staff-on-inmate sexual harassment.” Although we understand the importance and impact of this broader definition, the inclusion of sexual harassment and subsequent compliance with the NPREC standards was determined to be out of the scope of this study. Specifically, the costs associated with eliminating all forms of sexual harassment would be colossal in nature, if even possible. Therefore, the Booz Allen team defined sexual abuse consistent with the BJS’s *Survey on Sexual Violence*, Form SSV-IA, with the exclusion of sexual harassment under the belief that its inclusion is broader than the intent of PREA and NPREC.

- Nonconsensual Sexual Acts: Contact of any person without his or her consent, or of a person who is unable to consent or refuse; and contact between the penis and the vagina or the penis and the anus including penetration, however slight; or contact between the mouth and the penis, vagina, or anus; or penetration of the anal or genital opening of another person by the hand, finger, or other object
- Abusive Sexual Contact: (less severe) Contact of any person without his or her consent, or of a person who is unable to consent or refuse; and intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, or buttocks of any person
- Excludes incidents in which the intent of the sexual contact is to harm or debilitate rather than to sexually exploit
- Staff Sexual Misconduct: Any behavior or act of a sexual nature directed toward an inmate by an employee, volunteer, contractor, official visitor, or other agency representative (exclude inmate family, friends, or other visitors). Sexual relationships of a romantic nature between staff and inmates are included in this definition. Consensual or nonconsensual sexual acts including intentional touching of the genitalia, anus, groin, breast, inner thigh, or buttocks with the intent to abuse, arouse, or gratify sexual desire; or completed, attempted, threatened, or requested sexual acts; or occurrences of indecent exposure, invasion of privacy, or staff voyeurism for sexual gratification

### *Presentation of Costs*

For the purposes of simplification, all costs in this study are shown in 2010 dollars, and the ongoing yearly costs do not reflect future or inflated costs that would be needed in any budget or funding exercise. Costs for each standard are presented as *upfront* (one-time, initial investment costs) and *ongoing or yearly* (annual recurring operational maintenance, expenditures, and/or refresh). This study also assumes consistent services for the life of any contract entered upon by a site/jurisdiction

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and that no further modifications or adjustments to current policies, procedures, or operations will be necessary any time in the future. Although this is an unrealistic assumption, forecasting the many permutations and variations of future services is outside the scope of this study.

#### *Determination of Compliance and Validating Site Responses*

Booz Allen determined compliance based on a discussion about current practices, policies, and procedures with the site's themselves. Any claim of compliance was validated and tested by SMEs, policy documentation, or sufficient evidence of said claim. The scope of this project did not entail audits of their operations and whether they met any yet-to-be defined audit requirements for PREA. For example, project scope excluded a workforce analysis to determine if security staff are providing inmate supervision necessary to protect inmates from sexual abuse per Standard PP3. Such an analysis would require clear auditing requirements, benchmarks, and target staffing levels for each type of facility that do not exist. Instead, the Booz Allen team relied upon the qualitative assessment of the individual site's compliance relative to reported sexual abuse incidents. When feasible, the Booz Allen team would conduct a facility tour and obtain staffing and facility plans however this was not possible during the majority of the site visits as many represent multiple facility systems throughout their state.

Booz Allen received many responses that described different methods to comply with the same standards. We do not assume to have the authority to determine which method is best in the spirit of PREA. For example, one site may choose to comply with a training standard using computer-based or IT-based delivery. Although this may cost more than a classroom based method, Booz Allen cannot determine that one is better than the other for that particular facility.

#### *Definition of Lockup*

According to the NPREC definition, a lockup is “a temporary holding facility of a Federal, State, or local law enforcement agency. Lockups include locked rooms, holding cells, cell blocks, or other secure enclosures under the control of a law enforcement, court, or custodial officer. Lockups are primarily used for the temporary confinement of individuals who have recently been arrested or are being transferred to or from a court, local jail, state prison, or other agency.” Booz Allen interprets the NPREC definition of a lockup to include local police departments with temporary holding cells or correctional facilities with temporary holding cells that are not administratively or operationally part of the local jail at the county or state level.

This study employed this definition in its selection of lockups while it was not without its hurdles. While exploring potential lockups to include in this study, Booz Allen identified a few jails that operated stand-alone booking facilities that briefly housed detainees while they waited on processing, a court summons, or a posted bond. Although, these facilities are within the scope of the NPREC definition, they are an inseparable part of the jail, sharing the same resources, correctional officers, and administrative staff. Booz Allen did not consider these booking units/facilities as part of this study. Due to their close relationship (both by proximity and resources) these holding facilities have access to all the functions and resources of the jail and thus do not portray a stand-alone lockup. In addition, due to the shared responsibilities of the two entities, it is unclear who would be responsible for compliance with the standards. Finally, the cost impact of the NPREC standards on the booking

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unit/facility would be indeterminate from the entire jail because the holding facility is typically considered a small component of the total cost of the jail's operations.

#### *Inmate Supervision (PP3)*

Staffing shortages can lead to many destabilizing acts and rectifying this goes far beyond protecting inmates from sexual abuse to include all violent activities. One might argue that an increase in staffing should not be fully attributable to PREA (providing inmate supervision necessary to protect inmates from sexual abuse) however, for this study, PREA would be the only federal requirement to increase staffing so it is assigned 100% of the cost impact.

#### *Roles and Responsibilities of the PREA Coordinator*

NPREC standards suggest a PREA Coordinator should develop, implement, and oversee agency efforts to comply with PREA. It is also mentioned that the PREA Coordinator should have an integral role in the design of a training program. Booz Allen considers the PREA Coordinator's roles and responsibilities to be more manageable in an environment consisting of one facility. For this reason, Booz Allen assumes the responsibilities and any associated cost impact resulting from the development and training of a PREA curriculum or the data collection and review process will be provided for under the annual salary plus benefits of the PREA Coordinator position.

#### *Immigrant Detainees*

Immigrant detainees are detainees in the custody of Immigration and Customs Enforcement, (ICE) or Customs and Border Protection (CBP) and do not include inmates that are arrested for breaking local or state laws only to be determined after intake that they are illegal immigrants. This study assumes that these inmates are not subject to the supplemental standards for immigrant detainees (ID-1 through ID -11). It should be noted however, that this study did not include any sites from the State of Arizona. With recent enactment of Arizona Senate Bill 1070, it is very likely that such inmates, otherwise arrested on violation of local law for an un-jailable offense, would now be incarcerated and subject to these standards and required to be housed separately. Although the law requires that an illegal alien be transferred immediately to the custody of ICE or CBP, it is very likely that the local law enforcement officials will house the detainee until the Federal Government transfers them to federal detention. If so, this could have a major cost impact on jails and lockups throughout the state if incarceration rates of illegal aliens increase.

#### *Litigation*

The potential for litigation arose frequently during our site visits, particularly for prison systems surrounding standard PP4, Limits to Cross-Gender Viewing and Searches, and RE2, Exhaustion of Administrative Remedies. A common solution to meet standard PP4 is a workforce realignment however, many sites expressed federal or state statutes that would prevent them from making any gender based hiring or workforce decisions. Similarly, most prison systems expressed considerable concern about RE2's contradiction with the PLRA, again an issue where PREA is running up against a federal law. For both instances there was some discussions and evidence of past litigation and source documentation but to consider any cost in the context of this study is speculative and, arguably biased because the study does not investigate potential litigation in the event a correctional institution is brought to court to defend itself in a sexual abuse case. Under the scope of this study

and contract, this is not a cost benefit analysis whereby such a study would then include these intangible or qualified costs and benefits. Under these parameters, no litigation costs, whatsoever, are included in the cost impact calculations of this report.

#### *Labor Costs*

All costs estimates for additional staff reflect salaries and benefits (retirement, medical, social security, and paid time off). In addition, all new hires have associated operations cost to reflect the cost of office furniture and supplies, office equipment, communications services, institutional expenses (uniforms, badges, etc.), training, public safety supplies (weapons and ammunition) and other expenses, other than salary and fringe benefits, associated with employing personnel. See Operations Costs below for a standard cost calculation used throughout this study.

#### *Recurring Training of Volunteers and Contractors*

Though not required as part of TR2 – Volunteer and Contractor Training, analysis discovered a certain level of turnover identified by jurisdictions when referring to training of their volunteers and contractors. Booz Allen assumes that jurisdictions will realize a certain level of turnover yearly, and that replacement volunteers and contractors will be required to receive training on PREA. Consequently, Booz Allen assumes a 25% turnover ratio and has included a yearly maintenance cost equal to 25% of upfront cost provided by each jurisdiction to ensure replacement volunteers and contractors are trained accordingly.

#### *Contracting for the Confinement of Inmates*

Facilities that have contracts in place for the confinement of inmates will be required to ensure those contractors have met the same PREA standards as is required of them. This will result in higher costs for the contracted facilities as they must abide by the same PREA standards as the contracting facility, incurring investment and higher ongoing costs. And these higher costs will likely be passed on to the contracting facility in the form of higher annual or monthly fees. This study assumes that these increased fees will be proportional to the increased costs of the contracting facility based on the underlying assumption that the contracting facility holds the contractor to similar operating standards, policies, and procedures. To determine this proportion, Booz Allen assumes these costs are a portion of inmates confined by contractors to total inmates confined by the jurisdiction in question. For example, if jurisdiction X contracted out 250 inmates, and housed 1,000 within their own confines, a factor of .25 would be used to calculate the cost impact. This factor is multiplied by the site's ongoing costs (excluding costs associated with the PREA coordinator and audits which are solely the burden of the contracting facility) to reflect the contracted facility's ongoing cost impact. The contractor will also have a financial incentive to recoup their investment costs as result of PREA. Booz Allen assumes these upfront costs are amortized over a 10-year life cycle meaning that one-tenth of the upfront cost impact is applied to the ongoing costs. That way, the contractor is sufficiently recouping both their increased investment and ongoing costs by passing it on to the contracting facility in higher fees.

#### *Standard Costs*

Numerous costs were subject to wide variations, unobtainable, or fraught with so much uncertainty that an approximation based on sound principles and logic was difficult to estimate. To resolve this

issue, Booz Allen developed specific standard costs that were used in such instances. Each of these costs is based on the overall findings and/or reasonable assumptions in the field of corrections. The following standard costs are found throughout the analysis and noted when used. The basis of assumptions for each standard cost is noted below.

**Criminal Background Checks:**

The cost to conduct criminal background checks is estimated by Booz Allen to be \$50 per background check. This cost consists of an \$18 fee to access criminal records from government sources and \$32 in level of effort costs for staff to complete the background check process. The access fee was identified in a prior Booz Allen study and represents the fee charged by the Government to access individual records.

*Assumptions:*  
 Access fee = \$18  
 Time required = 1.5 hours  
 Average wage of staff conducting check = \$21.33 per hour (salary and benefits)  
*Formula:*  
 Cost of background check = access fee + (No. of hours to complete check \* Avg salary of staff conducting the check)

The level of effort cost assumes that the time required to conduct each background check is 1.5 hours and that the wage for staff conducting the check is \$21.33 per hour.

**Table 13: Costs per Criminal Background Check**

	Access fee	LOE	TOTAL
Cost per check	\$ 18	\$ 32	\$ 50

**PREA Audit:**

Since PREA audits have not been developed yet, it was necessary for Booz Allen to estimate a standard cost for these audits across each sector. The total costs for audits are shown in the table below. Booz Allen estimated the cost of a PREA audit based on information collected from the MO DOC on their estimated cost of a PREA audit for prisons and from

*Assumptions:*  
 Number of Auditors = 4  
 Auditors fee per hour = \$75  
 Hotel rate = \$110 per night  
 Meals and incidentals = \$66 per day  
 Air Travel = \$270 round trip  
 Mileage = 300 miles per audit at .50 per mile  
 Staff cost = \$73,200 (salary + benefits) per year

information on past ACA audits conducted at LA DOC prisons. This information was then benchmarked against cost data for ACA and other audits from all other jurisdictions in this study, for consistency. The cost of an audit consists of the auditor’s fee and level of effort costs accrued by the facilities for audit associates duties and activities. The auditors fee is made up of labor costs and travel expenses (meals and incidental expenses, lodging, air fare, and mileage), shown in the table below. The auditor’s fee costs are based on cost provided by MO DOC for a 4-day audit of prison facilities. The auditor’s fee to audit a prison was estimated on a per-day basis and applied to jails, juvenile corrections, and lockups. Prisons were assumed to require 4 days to audit, jails were assumed to take 3 days, juvenile and community corrections facilities were assumed to take 2 days, and lockups were assumed to be 1 day audits. The LOE costs for audits are based on information from past LA DOC audits, where one FTE was required to support audits for four prisons per year. The cost for one FTE is assumed to be \$73,200 (salary +

benefits); this equates to an \$18,300 LOE cost per for prisons. The LOE costs for jails, juvenile, community corrections, and lockups is based on the costs for prisons adjusted for fewer days, based on the proportion that auditors labor cost decline for each day.

**Table 14: PREA Audit Costs per Facility**

Auditors Fee	Cost Per Day	Prisons (4 day audit)	Jails (3 day audit)	Juvenile & Community Corrections (2 day audit)	Lockups (1 day audit)
Auditors Labor (non-fixed cost)	\$ 2,400	\$ 9,600	\$ 7,200	\$ 4,800	\$ 2,400
Meals and Incidental Expenses (non-fixed)	\$ 264	\$ 1,056	\$ 792	\$ 528	\$ 264
Hotel (non-fixed)	\$ 440	\$ 1,760	\$ 1,320	\$ 880	\$ 440
Air Travel (fixed costs)	\$ 1,080	\$ 1,080	\$ 1,080	\$ 1,080	\$ 1,080
Mileage (fixed cost)	\$ 600	\$ 600	\$ 600	\$ 600	\$ 600
Total Auditors fee		\$ 14,096	\$ 10,992	\$ 7,888	\$ 4,784
LOE Cost		\$ 18,300	\$ 13,725	\$ 9,150	\$ 4,575
<b>TOTAL COST</b>		<b>\$32K</b>	<b>\$25K</b>	<b>\$17K</b>	<b>\$9K</b>

**Operations Cost:**

Operations costs include the cost of office furniture and supplies, office equipment, communications services, institutional expenses (uniforms, badges, etc.), training, public safety supplies (weapons and ammunition) and other expenses, other than salary and fringe benefits, associated with employing personnel. Booz Allen standardized operations costs and applied them to the cost associated with employing staff, where only salary and benefits are known. The operations costs are estimated for office and medical staff and security staff on a yearly and one-time basis. The yearly cost is the recurring cost that is accrued each year while the one-time cost is the cost of items that are only purchased once, upon hire. The office and medical staff estimates are based on information provided by MO DOC on the cost to employ a PREA Coordinator. Operations costs for security staff are based on the cost for office staff adjusted to compensate for the different functions. Costs are calculated on a per FTE, per year basis and include the following:

**Table 15: Operations Cost Per FTE per Year**

	Office expense	office equipment (includes computer, phone, etc.)	Communications expense (internet and Phone service)	Institutional expense (uniforms, badges, etc.)	other expenses	Training expenses	Public Safety Supplies (weapons and ammunition)	Total
<b>Office staff and Medical Staff</b>								
Yearly cost	300	48	100	600	100	300		\$ 1,448
one-time cost		792				300		\$ 1,092
<b>Security Staff</b>								
Yearly cost	100	100	100	800	100	300	200	\$ 1,700
one-time cost		50				300	600	\$ 950

**Severance packages for potential lay-offs**

In the event that a jurisdiction has declared that replacement of particular staff members is necessary to comply with an NPREC standard, Booz Allen assumes a cost impact associated with a severance package will be realized. Typically, severance packages include up to six months of salary (usually depending on years of service), payment for unused vacation and/or sick leave, medical, dental, and life insurance benefits, and any associated retirement benefits. All things

considered, Booz Allen assumes an accurate upfront cost impact associated with a severance package to be 50% of current yearly salary including benefits.

**Review team of upper management officials including input from line supervisors, investigators, and practitioners**

Sexual Abuse Incident Reviews (DC1) requires that a team of upper management officials, with input from line supervisors, investigators, and medical and mental health practitioners, review the details of every sexual abuse incident following each substantiated allegation. The associated cost impact provided by jurisdictions was a result of inconsistent interpretation of the standard and an unknown level of effort required to comply. And, while Booz Allen has made every effort to document each jurisdiction's interpretation and cost consideration in their respective narratives, the team felt underlying assumptions were required to accurately and consistently report on a potential cost impact.

Booz Allen interprets a review team of upper management officials to consist of four senior-level staff and one junior analyst. A cost to conduct a 1-hour review with these five officials was determined based on each jurisdiction's senior and junior-level salary. Once calculated, this hourly fee was multiplied by each jurisdiction's average number of confirmed sexual abuse incidents over the past several years.

Site Specific Assumptions

*MO DOC and MO PP*

MO DOC is a unified system covering probation and parole, community corrections, and adult prisons. Booz Allen received duplicative training cost estimates for NPREC standard TR4: Specialized training: Investigations from the MO DOC (prisons) and MO PP. Costs were split proportionately between the two systems based on 2008 and 2009 confirmed sexual abuse incidents.

*WA DOC and WA CC*

The WA DOC provided cost for both its prison system and community corrections since the two divisions are integrated under the responsibility of the DOC. For example, the WA DOC developed a cost impact associated with the development and use of a screening instrument to dually serve its prison and community corrections divisions. Booz Allen determined that an accurate breakout of this cost could be estimated based on the capacity of its prison system versus its community corrections division. Similarly, cost for RP2 – RP4, which includes agreements with outside public entities, conducting or contracting for criminal investigations, and authorities that prosecute violations, were divided based upon the number of sexual abuse incidents reported by each division. Further, WA DOC reported that they currently employ one PREA coordinator. Booz Allen assumes the majority of the PREA coordinator's current responsibilities reside in the prison division. Therefore, no additional cost impact has been estimated for a PREA Coordinator under WA DOC. However, the salary including benefits for a senior-level PREA Coordinator to oversee the WA CC has been estimated.



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*Denver Pre-Arrestment and Denver County Jail*

Although Denver County Jail indicated that there would be a cost impact for standards TR1 and SC1, officials were unable to facilitate the estimation of a quantifiable cost impact. As a result, Booz Allen developed cost estimates based on information developed or retrieved from other sites with comparable or relevant data. The cost estimate for TR1, for example, leveraged a per-person training cost from DCPA, located just a few miles away with similar economic and labor characteristics. With 145 staff receiving training at an approximate cost for TR1 of \$64,000 upfront and \$16,000 ongoing, the per-person cost of training at DCPA is roughly \$441 upfront and \$110 on going per person. Multiplying these per-person costs with the number of staff at Denver County (302) yields an upfront training cost of \$133,000 and ongoing cost of \$33,000. The cost estimate for SC1 mirrors the response given by Sacramento County which expressed similar concern that their screening instrument would require certain modifications to ensure it was gender-specific. Further, Sacramento County based their estimate on staff time required to provide the necessary enhancements. During our site visit, Denver County noted that the main contribution to an estimated cost impact would indeed be labor. Therefore, Booz Allen has leveraged the cost impact provided by Sacramento and incorporated it into SC1 for Denver County

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## Appendix A: Underlying Causes of Cost Impacts by Sector

### Prisons

The study reflects 13 prison systems including the Rhode Island Department of Corrections (RI DOC), Massachusetts Department of Corrections (MA DOC), and the New York State Department of Correctional Services (NY DOC), in the North, the Minnesota Department of Corrections (MN DOC), the Missouri Department of Corrections (MO DOC), and the Indiana Department of Corrections (IN DOC), in the Midwest, the Arkansas Department of Corrections (AR DOC), South Carolina Department of Corrections (SC DOC), and Virginia Department of Corrections (VA DOC), in the South, and the California Department of Correction and Rehabilitation (CDCR), Colorado Department of Corrections (CO DOC), Oregon Department of Corrections (OR DOC), and the Washington Department of Corrections (WA DOC) in the West.

The ongoing and upfront tables highlighted with Harvey Balls, on the following two pages, represent an order of magnitude signifying a cost impact in relation to overall budget for the prisons sector. The degree to which each Harvey ball is shaded indicates the magnitude of the cost impact. An empty ball represents standards that do not result in any cost impact. On the other hand, a fully-shaded ball represents a percent impact on annual operating budget that is greater than 0.50%. A quarter-shaded ball and half-shaded ball represent an overall impact on annual operating budget between 0% and 0.25% and 0.25% and 0.50%, respectively. For example, the MA DOC upfront cost impact as a percentage of annual operating budget for assessment and use of monitoring technology is equal to 0.45% and therefore represented by a half-shaded Harvey ball.

Table 16: Prisons Ongoing Cost Impacts as % of Annual Operating Budget

Priority		AR DOC	CA DOC	CO DOC	IN DOC	MA DOC	MN DOC	MO DOC	NY DOC	OR DOC	RI DOC	SC DOC	WA DOC	VA DOC
1	Limits to cross-gender viewing and searches	○	●	○	○	○	○	●	●	○	○	○	○	◐
2	Inmate Supervision	●	○	○	○	○	○	●	○	○	○	○	●	◐
3	Assessment and use of monitoring technology	○	◐	◑	◑	○	◐	○	◐	◐	○	●	○	●
4	Ongoing medical and mental health care	○	○	○	◑	○	○	○	○	○	○	○	◐	○
5	Audits of standards	◐	◐	◐	◐	◐	◐	◐	◐	◐	◐	◐	◐	◐
6	Training and Education	○	○	○	○	○	◐	◐	◐	○	◐	◐	◐	◐
7	Contracting with other entities for the confinement of inmates	◐	◐	○	◐	○	○	○	○	○	○	◐	○	○
8	Accommodating inmates with special needs	○	○	◐	○	○	○	○	○	○	○	○	○	○
9	Zero tolerance of sexual abuse	◐	◐	◐	◐	○	◐	◐	◐	○	◐	◐	○	◐
10	Screening for risk of sexual abuse	○	○	○	○	○	○	◐	○	◐	○	◐	○	○
11	Contract modifications for outside services	◐	○	◐	◐	○	○	○	◐	○	○	○	◐	○
12	Evidence protocol and forensic medical exams	◐	○	○	◐	○	○	○	◐	○	○	○	○	○
13	Investigations	○	○	○	○	◐	○	○	○	◐	○	○	○	○
14	Supplement to SC-2: Use of screening information	○	○	○	○	○	○	○	○	○	○	○	○	○
15	Hiring and promotion decisions	◐	○	◐	○	○	◐	○	○	○	◐	◐	◐	◐
16	Gathering, reviewing, and reporting data	○	◐	◐	○	○	○	◐	◐	◐	○	◐	◐	◐
17	Exhaustion of administrative remedies	○	○	◐	○	○	○	○	○	○	○	○	○	○
18	Agency protection against retaliation	○	○	○	○	○	○	○	○	○	○	○	○	○

Quartile 1 ○ = 0%  
 Quartile 2 ◐ = 0% - 0.25%  
 Quartile 3 ◑ = 0.25%-0.5%  
 Quartile 4 ● = > 0.5%

Table 17: Prisons Upfront Cost Impacts as % of Annual Operating Budget

Priority		AR DOC	CA DOC	CO DOC	IN DOC	MA DOC	MN DOC	MO DOC	NY DOC	OR DOC	RI DOC	SC DOC	WA DOC	VA DOC
1	Limits to cross-gender viewing and searches	○	◐	◑	●	◑	○	◐	◐	○	○	○	○	◐
2	Inmate Supervision	◐	○	○	○	○	○	◐	○	○	○	○	◐	◐
3	Assessment and use of monitoring technology	○	◐	◑	●	◑	○	◑	●	◐	◑	●	●	●
4	Ongoing medical and mental health care	○	○	○	○	○	○	○	○	○	○	○	○	○
5	Audits of standards	○	○	○	○	○	○	○	○	○	○	○	○	○
6	Training and Education	○	○	○	○	○	○	◐	◐	◐	◐	◐	◐	◐
7	Contracting with other entities for the confinement of inmates	○	○	○	○	○	○	○	○	○	○	○	○	○
8	Accommodating inmates with special needs	○	○	○	○	○	○	○	○	○	○	○	○	○
9	Zero tolerance of sexual abuse	◐	◐	○	◐	○	◐	◐	◐	○	◐	◐	○	◐
10	Screening for risk of sexual abuse	○	○	◐	○	○	○	○	○	◐	◐	◐	◐	◐
11	Contract modifications for outside services	○	○	◐	◐	○	○	◐	◐	○	○	◐	◐	○
12	Evidence protocol and forensic medical exams	○	○	○	◐	○	○	○	○	○	○	◐	○	○
13	Investigations	○	○	○	○	◐	○	○	○	◐	○	○	○	○
14	Supplement to SC-2: Use of screening information	○	○	○	○	○	○	○	○	○	○	○	○	○
15	Hiring and promotion decisions	○	○	◐	○	○	○	○	○	○	○	◐	○	◐
16	Gathering, reviewing, and reporting data	○	○	◐	○	○	◐	○	◐	○	○	○	◐	◐
17	Exhaustion of administrative remedies	○	○	◐	○	○	○	○	○	○	○	○	○	○
18	Agency protection against retaliation	○	○	○	○	○	○	○	◐	○	○	○	○	○

Quartile 1 ○ = 0%  
 Quartile 2 ◐ = 0% - 0.25%  
 Quartile 3 ◑ = 0.25%-0.5%  
 Quartile 4 ● = > 0.5%

**Prison Cost Impact#1: Limits to Cross-Gender Viewing and Searches (PP4)**

The ability of prison systems across the country to comply with a prohibition to cross-gender pat down searches is marred in current gender staffing ratios relative to inmate gender ratios, many of which are imbalanced with proportionately more male inmates than male officers. As a result, there simply are not enough male officers available for same-gender pat down searches.

In order to comply, many systems feel the most appropriate solution is to either replace female staff with additional male staff, or hire additional male staff and operate at a decreased utilization rate (to avoid violating federal or state statues requiring equal opportunity hiring practices). However, many systems including the VA DOC expressed concern over the ability to find qualified male staff, specifically in rural areas, that possess the character necessary to pass a stringent background check and are willing to accept the salary being offered. If able to locate appropriate male candidates, the MA DOC anticipates having to replace 69 female staff with males resulting in approximately \$1.9M in severance and \$66K in upfront

operations costs associated with hiring additional staff. The VA DOC will hire 50 additional male staff at \$48K in upfront cost and approximately \$2.6M annually. Similarly, it is estimated that the MO DOC would accrue a cost of over \$18M annually and \$362K upfront to hire 381 additional male staff. This level of support would provide three additional posts per institution and supervision to provide on-call same gender pat search capability. Others, such as the NY DOC, estimate increasing the number of staffing by 50% at its female facilities. This results in 620 additional female COs for an annual cost impact including salary and benefits of approximately \$33.9M and nearly \$600K in upfront operations costs. Some systems also expressed concerns about violating Federal and state statutes as they relate to equal hiring practices. These systems were NYS DOC, MA DOC, OR DOC and MN DOC, and AR DOC. Other systems such as MN DOC and WA DOC specifically cited union presences as a major concern in adhering to this standard. On the other hand RI DOC suggested its ability to prohibit cross-gender pat downs is partly due to a lack Federal/state statutes or union concerns.

The MN DOC, SC DOC, OR DOC, and AR DOC, recognized a potential cost impact, albeit unquantifiable. In its largest facility, Faribault, the MN DOC noted as many as 50% of its COs are female. Current staffing patterns at facilities such as Faribault make it difficult for an agency such as the MN DOC to alter staffing patterns without anticipating the need for new hires, severance pay, etc. Similarly, the SC DOC reports it would be nearly impossible to meet this standard given the mismatch gender ratio of employees to inmates (45% female employees, 93% male inmates). The OR DOC cites federal statute preventing them from complying with this standard. Due to Federal statute regarding Civil Rights, AR DOC reported that termination of female staff is not an option. They suggested doubling staff in order to have a CO of both genders at each post and restricting the opposite gender's ability to secure certain areas within the facility would provide the only suitable outcome. While the Booz Allen team felt it necessary to document their suggested plan of action, we determined the cost estimated to implement their plan of action to be unreasonable. However, we do note that the AR DOC does not feel any other policies could be modified in order to meet this standard. In addition, AR DOC feels adhering to the standard would not eliminate sexual misconduct, but rather limit it to the same sex.

One unique and cost-effective solution considered by the CO DOC is the transfer of female COs from male facilities and male COs from female facilities. The associated cost impact is \$5K per staff for 130 staff to transfer facilities for a total upfront cost of \$650K.

### **Prison Cost Impact #2: Inmate Supervision (PP3)**

The Physical Supervision of Inmates lends itself to a certain level of subjectivity based upon one's definition of what is considered adequate. In order to report consistently across varying types of supervision and population size, systems were encouraged to use the number of sexual abuse incidents confirmed over the past several years to identify any trends that might signal a problem. Because trends associated with the majority of the systems studied suggest a flat or declining number of incidents reported and confirmed, there were few compelling reasons to justify an increase inmate supervision suggesting that a basis for cost cannot be determined solely on the number of incidents confirmed.

Booz Allen understands that a basis for cost cannot be determined solely on the number of sexual abuse incidents confirmed. Clearly, increased supervision will go to great lengths to deter and prevent sexual abuse before it ever happens. Other factors were considered when identifying findings associated with Inmate/Resident Supervision. For example, the OR DOC suggests the majority of incidents occur when staffing levels are highest, contrary to logic. Additionally, many systems expressed an interdependence

of both physical and technical supervision, sometime relying on one or the other depending on the culture and environment of the site/system. Nevertheless, it has a major cost impact on systems with a number of underlying reasons.

The age and structure of prison facilities also plays a factor in the need for physical supervision. AR DOC, for example, suggests a few of its older facilities will require additional staff to cover blind spots, based on the original construct of its amenities. They estimate requiring an additional 250 COs and 50 Lieutenants, for a yearly salary including benefits and matching of approximately \$11.8M annually. Meanwhile, MA DOC reported that in its older facilities it has already increased its physical presence, and therefore requires no additional increase in supervision in response to PREA.

Discussion with the VA DOC found that staff insubordination might have a direct effect on providing inmates with adequate supervision on a consistent basis. When an employee is late to work or a no-show, the need for additional FTEs is required. Having this backup available on hand in anticipation of an unforeseen circumstance, could directly impact the safety and security of inmates from sexual violence. It is estimated that adding a 24/7 post to each of three dormitory housing units in six dormitory facilities will cost approximately \$4.9M annually. Similarly, the WA DOC feels additional FTEs are required at several posts throughout its facilities that are currently self-relieving. By providing additional resources at these posts, WA DOC feels it is adequately providing physical supervision. It is estimated that such action will result in a cost impact of \$10.5M annually and \$157K upfront for an additional 165.5 FTEs. According to WA DOC, doing so will remove all self-relieving posts in its facilities and provide the adequate supervision necessary to comply with the standard.

The SC DOC estimated one additional CO per wing per shift for its seventeen medium and maximum security facilities. However, further analysis revealed that SC DOC relies more heavily on video surveillance than physical supervision. An initial estimate upwards of \$50M in physical supervision was determined to provide an equivalent amount of supervision as approximately \$4M in upfront camera equipment and \$2M in yearly maintenance. Further analysis regarding this estimate has been provided under Prison Cost Impact #3: Assessment and Use of Monitoring Technology.

### **Prison Cost Impact #3: Assessment and Use of Monitoring Technology (PP7)**

Use of technical supervision has a number of significant cost drivers. Foremost, the cost associated with purchasing and installing equipment is the greatest investment cost to a system. The NY DOC discussed its current plans to minimize sexual abuse in its female facilities through adequate use of monitoring systems. It also mentioned four relatively new maximum security facilities that rely heavily on video monitoring to assist in addressing all activity, including sexual abuse. DOCS' correctional facilities have very different physical plants, sizes and functions. Furthermore NY DOC has several different types of surveillance systems in place in a number of our medium and maximum security correctional facilities. These systems can best be placed into three categories: limited coverage systems, expanded coverage systems and full coverage systems. Limited coverage systems have surveillance cameras in specified areas of the facility usually limited to Special Housing Units (disciplinary and/or segregation units), reception or draft areas, mess halls and/or visiting rooms. Expanded coverage systems have recently been added to several of NY DOC's female correctional facilities. These systems cover corridors, common areas in housing units and program areas in addition to Special Housing Units, reception areas, mess halls and visiting rooms. Full-coverage systems have extensive camera coverage of all areas in which inmates are permitted.

Only two prisons in New York State, Upstate and Five Points, currently have full-coverage surveillance systems. These facilities were opened in 1999 and 2000, respectively. These facilities were new construction, designed and built as state-of-the-art correctional facilities with maximum visibility. Because the video surveillance systems were part of the original design, the cost of the surveillance systems in those two facilities represents a fraction of the cost of installing a similar system in an existing correctional facility.

For comparison purposes, Five Points Correctional Facility is a modern maximum security facility. It has ten primary interconnected buildings totaling 870,359 square feet with a capacity of 1,500 inmates in a double-cell configuration. The complex covers an area of 72 acres and has approximately 1,200 cameras. The system cost \$5.2M to install when the facility was built (and therefore unoccupied). On the other hand Bedford Hills Correctional Facility is a maximum security facility for female inmates with a capacity of 926 inmates primarily in single cells. The facility at Bedford Hills originated with an 1892 law providing for a reformatory for women. The reformatory opened in 1901 under the jurisdiction of the State Board of Charities. Today, the facility consists of 57 buildings in a variety of styles and ages totaling 585,740 square feet. NY DOC designed and installed a surveillance system in a two-year project completed in February 2004. It cost \$3.6M dollars to retrofit Bedford Hills Correctional Facility with a modern surveillance system consisting of 300 cameras.

Typically, older facilities pose numerous obstacles for contractors to install a camera system and thus construction in an existing, occupied correctional facility takes substantially longer resulting in significant increases to the cost. Further, older construction requires much greater camera density to achieve similar coverage than modern construction built to maximize visibility. NY DOC feels it is necessary to add surveillance systems to an additional 35 facilities and increase coverage in four female facilities. The cost impact associated with this investment is approximately \$621.5M. This cost includes \$220M for 11 large maximum security facilities, \$360M for 24 medium-security facilities, \$14.8M for four female facilities, additional building space to handle the video monitors and related equipment necessary to manage the systems, and additional staff costs to provide real-time monitoring of surveillance.

It is estimated to cost \$2.6M in upfront cost for the installation and purchase of DVR equipment and monitors at the CO DOC. The VA DOC feels it is necessary to double its current amount of cameras at each of its 28 major institutions, resulting in \$30M upfront for equipment. Similarly, the SC DOC, RI DOC, MA DOC, WA DOC, OR DOC, IN DOC, and MO DOC all provided a cost impact associated with new and/or upgraded equipment ranging from \$220K at the OR DOC, to approximately \$5M at the IN DOC. According to the CA DOC, a conservative estimate equates to \$8.3M in upfront cost, or \$250K per facility for 33 facilities to install additional monitoring technology. The CA DOC voiced further concern regarding the condition of its older facilities. Facilities with lead abatement and asbestos make it very difficult to install cameras. And, while they feel increased technical supervision is necessary in these facilities, extensive renovation costs will need to be incurred prior to installment or the increased technical supervision will be rendered cost-ineffective.

Of course, as is the case with all technology, recurring costs in the form of equipment maintenance and upgrades must be considered. Each prison system analyzed noted significant maintenance costs associated with the upkeep of its technology. At the AR DOC, \$4M has already been invested in video technology upgrades. Meanwhile, the NY DOC currently spends \$480K annually in maintenance fees associated with its current technology. When you consider the increase in surveillance systems



mentioned above, the NY DOC estimates an additional cost impact of approximately \$1.5M to \$2M will be incurred. Likewise, the VA DOC anticipates \$250K annually to perform the necessary maintenance required of surveillance equipment. In almost all instances, additional cost associated with the maintenance of current technology will be realized.

Another cost driver associated with the technical supervision of inmates is labor. An additional level of effort, or labor, is required to monitor additional cameras. CO DOC, for example, anticipates \$2.3M annually for additional staff to support increased technical supervision at each of its facilities, while the VA DOC anticipates \$7.9M annually for 28 new posts (one for each facility) to monitor surveillance and perform maintenance. In addition, CA DOC estimates they will require the need for 33 additional Program Technicians at a yearly impact of \$1.6M.

Finally, in addition to video monitoring and surveillance, other forms of technology like radio frequency bracelets and wands were considered in order to comply with this standard. However, based on the prison systems included in this study, these forms of technology did not indicate much of an impact in reducing sexual abuse misconduct. The general consensus is that video monitoring and surveillance is the most effective technical solution in preventing sexual abuse and helping to aid in the resolution of investigations,

By considering funds that have already been invested, it is easier to understand the projected cost impacts provided above. NY DOC, for example, has currently committed \$13.8M in technical supervision of its female facilities and committed \$10.2M to its last two maximum security facilities. The cost of equipment can vary significantly depending upon the capability of the equipment being installed. As a result, this standard yields the greatest variability among all the standards. MA DOC received an early PREA grant to install between 200 – 225 cameras with archiving capabilities at a cost of \$360K, or \$2K per camera. Likewise, MN DOC recently received an early PREA grant in the amount of \$704K that was partially used to purchase additional cameras. Similarly, current video monitoring at the RI DOC includes 350 cameras, each with archiving capability. The cost per camera was \$3.25K. By 2005, the AR DOC had invested \$1.1M in video technology upgrades and between 2005 and 2009 that amount had increased to \$1.9M. Upgrades included archival technology ( $\approx$  \$200K to convert VHS to digital), installing vision panels on doors, and converting cameras from black and white to digital and color videos.

#### **Prison Cost Impact #4: Zero tolerance of Sexual Abuse (PP1)**

Several prison systems analyzed, including the MA DOC and OR DOC have already employed a PREA Coordinator. Remaining systems struggle to gauge the level of effort required to successfully perform the duties and responsibilities of a PREA coordinator as outlined. While a full-time PREA coordinator is required for state prison systems, both the RI DOC and the MN DOC felt it unnecessary to hire a senior-level position. Others, such as the NY DOC and the VA DOC, with a combined capacity of nearly 100,000 inmates, felt the equivalent of one senior-level position would not adequately meet the responsibilities of the position without providing additional support.

LOE, in the form of increased staff support is the sole cost driver associated with this standard. To meet the intent of the standard, we required that each system employ one senior-level staff member to oversee the responsibilities of the PREA coordinator. However, because a wide degree of variation in inmate

capacity and number of staff is present amongst state-wide prison systems, those that felt additional support is necessary were provided the opportunity to document the number of personnel required and their respective salaries. While Booz Allen did not consider the cost impact of these additional FTEs, we felt it important to document DOCs concerns and the varying levels of staff that DOCs felt would be required to adequately support the PREA Coordinator position. The NY DOC, for example, suggested they would require a deputy commissioner, an assistant commissioner, two field auditors, and a clerical position. The AR DOC initially requested the equivalent of twelve ACA Managers (one for each of its facilities) and an ACA Coordinator. Further, the CA DOC estimated a cost impact for developing a PREA Unit, to include an Associate Director, Associate Warden, and two Lieutenants. Again, information provided above is informational and did not influence the overall cost impact.

The following table lists the budget requirements for an additional staff member assuming a senior level position reporting directly to the agency head. All costs are annual and include salary plus benefits. Operational costs have also been incorporated and include office furniture and supplies, office equipment, communications services, training, and other expenses above and beyond salary and fringe benefits.

Jurisdiction	Upfront	Yearly	Notes
RI DOC	\$ 1	\$ 145	1 FTE salary, benefits and new hire operations costs.
AR DOC	\$ 1	\$ 121	1 FTE salary, benefits and new hire operations costs.
CA DOC	\$ 1	\$ 115	1 FTE salary, benefits and new hire operations costs.
VA DOC	\$ 1	\$ 112	1 FTE salary, benefits and new hire operations costs.
MN DOC	\$ 1	\$ 106	1 FTE salary, benefits and new hire operations costs.
SC DOC	\$ 1	\$ 91	1 FTE salary, benefits and new hire operations costs.
MO DOC	\$ 1	\$ 79	1 FTE salary, benefits and new hire operations costs.
IN DOC	\$ 1	\$ 72	1 FTE salary, benefits and new hire operations costs.
NYS DOCS	\$ 1	\$ 71	1 FTE salary, benefits and new hire operations costs.
CO DOC		\$ 9	Salary increase to existing PREA Coordinator to cover NPREC requirements.
MA DOC			Senior-level position already funded
OR DOC			Senior-level position already funded
WA DOC			Senior-level position already funded

**Prison Cost Impact #5: Training and Education (TR1 through TR5)**

Training, as outlined by the NPREC standards, must be provided to all employees, volunteers, contractors, investigators, and medical and mental health care practitioners. In addition, periodic refresher training must be provided to all employees. While the number of training hours and frequency of refresher training may vary by jurisdiction, the cost drivers do not. Cost drivers associated with training and education include instructor fees, labor hours, material cost, and academy/seminar fees.

For the most part, PREA Training of Employees (TR1) is already a common practice throughout prison systems, resulting in minimal to modest costs to sharpen or modify curriculum and/or provide ongoing training. MO DOC, for example, will need to modify their current policy mandating PREA refresher training. This will require training 7,913 staff on a yearly basis for a total yearly cost impact of approximately \$214K. With less than 1/5 the number of staff, it is estimated to cost the RI DOC \$29K annually to provide its staff with the same level of in-service training.

The outlier to this analysis is the NY DOC. While employees at the NY DOC receive training on sexual abuse, current training does not meet expectations defined by the NPREC standards. Labor hours to develop a curriculum, along with overtime associated with providing 27,000 employees with four hours of training, results in a cost impact of approximately \$3.7M.

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Notable mention belongs to MA DOC. It is a pioneer in the industry for adopting PREA into the training curriculum<sup>7</sup>. Currently, all new recruits receive a four hour training session, while all employees receive a two hour annual in-service training

Similar to employee training, most prison systems meet the training requirements associated with volunteers and contractors (TR2). Where contact by contractors and volunteers with inmates is limited, volunteers and contractors receive written information (such as a pamphlet) regarding the prevention of sexual abuse of inmates. Where recurring or more frequent contact with inmates takes place, more extensive training is warranted. The VA DOC, for example, has numerous contractor and volunteers that receive training during orientation but the volunteer training, in particular, is not extensive enough to cover the PREA topics, requiring modifications to the curriculum estimated at \$250K for an upfront, one-time cost. This will also result in modifications of the training delivery to volunteers yielding an additional ongoing cost of \$63K. Likewise, NY DOC anticipates having to train approximately 200 contracted staff on PREA, a third of which are estimated to be replaced on an annual basis. Labor hours associated with this required training is estimated at approximately \$42K upfront and \$10K annually.

Typically, any cost impact associated with the training of agency investigators conducting sexual abuse investigations is due to current curriculum lacking information regarding investigations in confinement settings. The SC DOC, VA DOC, WA DOC, and MO DOC each acknowledged that their current curriculum lacked training in confinement settings. It is estimated to cost the SC DOC \$5K in fees to the Criminal Justice Academy to provide specialized training to 30 investigators. Similarly, it will cost the VA DOC approximately \$2K for its agents to receive training through the Department of Criminal Justice Services, while costing the WA DOC approximately \$20K which includes the cost of curriculum development, materials, and student hours for a two-day training session. The cost impact for MO DOC to provide outside training to its 47 investigators including instructor fees and per diem amounts totals approximately \$51K upfront.

Certain jurisdictions, such as the RI DOC, reported providing the same training to its medical and mental health staff as it does to the rest of its employees. Instances where this training includes detecting signs of sexual abuse as well as preservation of evidence, compliance is met. However, where training was ignored or does not meet the threshold of PREA, cost associated with instructor hours, increased labor hours of staff, and materials is borne. The cost impact associated with the SC DOC is \$150K to train 575 practitioners in-house. Further, because certain medical staff at the VA DOC is not included in training because of time and cost, \$48K in salary is estimated. The NY DOC will be required to train 400 New York State Office of Mental Health (OMH) staff. It is estimated that training will likely take 6 to 8 separate sessions and cost approximately \$750K upfront. Further, NY DOC anticipates having to provide a certain number of new full and part-time practitioners with similar specialized training. The yearly cost impact to provide such training is estimated at \$105K. It is estimated to cost the WA DOC approximately \$27K to provide training that includes preservation of physical evidence, while the OR DOC anticipates similar training of 200 staff at approximately \$30K. It should be noted, OR DOC is investigating the availability of a crisis center which might be able to provide this training free of charge.

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<sup>7</sup> Janine M. Zweig, Rebecca L Naser, John Blackmore, and Megan Schaffer. "Addressing Sexual Violence in Prisons: A National Snapshot of Approaches and Highlights of Innovative Strategies." Urban Institute, Justice Policy Center. October 2006.

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The MA DOC brought 10,000 inmates through a clinical training class on sexual abuse and PREA standards. The trainers for this class were medical staff and investigators that supervised inmate groups of 40-60. In addition, booths were setup to provide inmates with literature on PREA, and emotional support services were made available. PREA pamphlets are regularly provided to inmates as a form of refresher training, in addition to a 15-minute refresher training class for inmates that transition facilities.

For the most part, prison systems rely on informational videos, pamphlets, and orientation presentations to educate inmates at intake. Staff is on hand to lend support and answer any questions. These services are common practice and resulting in modest costs. In most instances, education of inmates is limited to the intake process and as part of a transfer to a new facility. MN DOC, for example, plans on updating its educational materials requiring additional labor and printing costs of \$75K. The estimated cost of \$14K annually for SC DOC includes a caseworker and corrections officer for 20 minutes a week at each of its 17 facilities. Similarly, there is an anticipated cost from the WA DOC of approximately \$20K annually for training materials and staff time to ensure its inmates are provided the appropriate education. The RI DOC on the other hand plans to make a copy of its orientation video for approximately \$200 and play it consistently throughout its facilities. Similarly, the CO DOC and IN DOC provide refresher training to inmates through a DVD presentation. As evident above, multiple approaches to providing inmates with recurring education are available. The preferred method of providing that recurring education can have a significant impact on the underlying cost.

The following tables on the next couple of pages show the cost impacts by site according to the five training standards.

Employee Training (TR-1)			
Site	Upfront	Yearly	Notes
MO DOC		\$ 226	Modification of policy requiring two additional hours of PREA-related training to approximately 8,000 staff yearly.
RI DOC		\$ 29	In-service training cost at ½ hour of overtime annually.
MN DOC		\$ 2	Training on PREA-related material is provided to all employees. Annual cost of \$2K associated with provided recurring training.
NY DOC	\$ 3,700		Approximately 20 hours of PREA curriculum development time and overtime cost associated with four hour training of approximately 27,000 staff. Significant cost associated with recurring training is not anticipated.
AR DOC			Staff receives in-class training from 1-16 hours based on their level of exposure to inmates. Recurring training is provided.
CA DOC			4 hour initial classroom training session and a 2 hour annual refresher session is provided to all staff.
CO DOC			All new staff receives basic training. Annual refresher training is also provided.
IN DOC			Classroom training is provided to all staff. Annual refresher training is also provided.
MA DOC			All new recruits are required to attend a 4 hour class. Annual refresher training is also provided.
OR DOC			PREA training to include an annual refresher course is provided to all employees.
SC DOC			Training is provided as part of new employee orientation and one hour mandatory training is provided to all employees annually.
WA DOC			All employees receive initial PREA training and in-service refresher training.
VA DOC			Training is classroom-based and is offered during initial orientation and as in-service training on a yearly basis.

Volunteer and Contractor Training (TR-2)			
Site	Upfront	Yearly	Notes
VA DOC	\$ 250	\$ 63	Training of jail staff at numerous contracted facilities. Recurring cost at 25% initial training impact.
NY DOC	\$ 42	\$ 10	4 hours of training to approximately 200 primary care contractors. Recurring cost at 25% initial training impact.
AR DOC			Initial orientation training and annual refresher training is provided.
CA DOC			Classroom-based training is provided on a recurring basis.
CO DOC			Basic training is provided as well as on a recurring basis.
IN DOC			Training is provided to all volunteers and contractors.
MA DOC			Contractors are provided a 3-hour class on PREA-related material and are required to get recertification. Volunteers are provided pamphlets.
MN DOC			Contractors receive training during their basis training. Training program for volunteers is being revised to include PREA-specific material at no additional cost.
MO DOC			Training on PREA-related material is provided to all volunteers and contractors.
OR DOC			Classroom training is provided to all volunteers and contractors.
RI DOC			Classroom training is provided to all volunteers and contractors.
SC DOC			Training is provided by in-house coordinators.
WA DOC			1 hour of initial training and 30 minutes of recurring training provided annually.

Inmate Education (TR-3)			
Site	Upfront	Yearly	Notes
MN DOC		\$ 75	A presentation and handbooks are provided at all intake centers. Cost provided is for training existing inmates once every three years.
WA DOC		\$ 20	Inmates are provided comprehensive intake and transfer training. Cost provided for training materials and staff time associated with refresher training.
SC DOC		\$ 14	PREA orientation via video is provided to all newly committed inmates. One caseworker and one CO for 20 minutes a week for all 17 institutions is required to provide refresher education.
VA DOC	\$ 250		Training of inmates at numerous contracted facilities.
NY DOC	\$ 13		Development of a lesson plan and related training materials along with cost to develop an education video for recurring training.
RI DOC	\$ <1		RI DOC anticipates a cost impact associated with development and production of a DVD to be utilized for recurring training.
AR DOC			PREA education provided at diagnostic and intake. Refresher information provided in the form of a DVD.
CA DOC			Inmate education and appropriate follow-up is provided.
CO DOC			Inmate orientation provided at intake and at time of transfer. Posters are also displayed.
IN DOC			Education provided via inmate handbook and PREA brochure. A public service announcement is periodically shown throughout the facilities.
MA DOC			Inmate attend orientation on sexual abuse. Literature on PREA is provided and a Q & A session is audited by the PREA coordinator. 15-minute refresher is provided during transfer.
MO DOC			Refresher training is not currently provided but any cost will be absorbed by the department.
OR DOC			Inmates are provided education at intake and newsletters, handbooks, and posters are utilized as refresher training.

Specialized Training: Investigations (TR-4)			
Site	Upfront	Yearly	Notes
MO DOC	\$ 51		Fees associated with providing 47 investigators with training on confinement settings.
WA DOC	\$ 20		Estimate includes two-day training seminar on confinement settings.
SC DOC	\$ 5		Estimated cost to train 30 investigators through the Criminal Justice Academy.
VA DOC	\$ 2		Estimate includes PREA-specific training provided by the Department of Criminal Justice Services.
AR DOC			Investigative staff received specialized training.
CA DOC			Office of Correctional Safety provides appropriate training.
CO DOC			Training requirements are mandated by state law.
IN DOC			Correctional Peace Officer curriculum and confinement-specific training are provided.
MA DOC			A 5-day training related to PREA standards was conducted by NIC.
MN DOC			Investigative staff are provided the appropriate level of training.
NY DOC			Members of the Sex Crimes are provided the Municipal Police Training Council Peace Officer School, the Office of the Inspector General Basic Investigations School, and the 40 hour NY Police Sex Offense Seminar.
OR DOC			Investigators are currently provided training from the AG's Sexual Assault Task Force.
RI DOC			RI DOC conducts internal training through staff assigned to the Special Investigation Unit.

Site	Specialized Training: Medical and Mental Health Care (TR-5)		Notes
	Upfront	Yearly	
NY DOC	\$ 750	\$ 105	Training 400 OMH employees would take six to eight separate sessions. Training on recognizing the signs of sexual abuse would need to be developed in conjunction with OMH for this target audience. <u>Approximately 30 hours to develop curriculum.</u>
SC DOC	\$ 150		Training of approximately 575 practitioners in-house.
VA DOC	\$ 48		Estimate includes daily contractual salary of medical staff.
OR DOC	\$ 30		Approximately 200 contract staff would have to be compensated at their contract rate to attend training. Cost estimated is based on one-hour of training.
WA DOC	\$ 27		Training for practitioners on how to preserve evidence.
RI DOC			Training is part of licensing and credentialing.
MO DOC			Full and part-time mental health care practitioners receive training on how to detect and assess signs of sexual abuse through their annual training from their company.
MN DOC			Medical and mental health care staff have the requisite training that covers sexual abuse.
MA DOC			Medical and mental health care staff are required to attend specialized training for nurses on preserving evidence.
IN DOC			Medical and mental health care practitioners are trained on how to detect sexual abuse and on how to preserve the evidence.
CO DOC			Mental health and health service professionals receive specialized training on sexual assault. They are also required to attend the PREA First Responder training.
CA DOC			Practitioners are provided appropriate training through education and license processes.
AR DOC			Medical staff receives training as part of their medical studies and through medical organizations.

**Prison Cost Impact #6: Evidence Protocol and Forensic Medical Exams (RP1)**

Where applicable, advocates to accompany a victim through the medical exam process are provided by local hospitals. Typically, these services have no cost impact on the jurisdiction responsible for providing the inmate with an advocate. Of the thirteen prison systems analyzed, more than half responded that these services were made available at the hospital. Others, such as the CA DOC, have MOUs in place between 31 of its institutions and a rape crisis center.

In the case of NY DOC, hospitals would require the state to enter into a funding source contract. NY DOC would be forced to create a “fee for service” contract with every hospital in proximity to one of its facilities. The will cost the NY DOC approximately \$250K annually.

In the case of the RI DOC and SC DOC, services will be provided by an outside entity. If requested by an inmate, the RI DOC has already made available victim advocate services through Day One. SC DOC on the other hand can anticipate a cost of approximately \$8K to research and engage in a contract for these services with an outside entity.

MA DOC believes that an internal full-time victim advocate is necessary to accompany a victim through the entire process. However, because the local hospital has a rape crisis center and a well established SANE program, MA DOC is considered to be in compliance with RP1. Similarly, AR DOC has a victim response team that is responsible for working with victims internally. This team includes security, a chaplain, and mental health practitioners. AR DOC feels they can designate a member from their victim



response team on a 24-7 basis, which would include staying with the victim throughout the forensic medical exam process. This cost equates to \$6K annually. At \$842K annually, a much more significant cost impact can be expected for the IN DOC to provide an internal 0.5 FTE including overtime and benefits at each of its facilities.

In most cases, access to outside confidential support services is made available to inmates through a hotline, mail, posters, and pamphlets. Because most advocacy services provide posters and pamphlets free of charge, cost is typically limited to any contract fees associated with providing for the service, materials cost, and any rate per minute fee associated with the hotline. Upfront costs associated with providing access to support services range from \$20K to less than \$1K.

### **Prison Cost Impact #7: Gathering, Reviewing, and Reporting Sexual Abuse Data (DC1 through DC3)**

The majority of jurisdictions were found to be in compliance with DC1 – DC4, resulting in no cost impact. Of those jurisdictions not in compliance, LOE and database automation/integration were found to be the only cost drivers associated with the gathering, reviewing, and reporting of sexual abuse data. The compilation of a review team consisting of upper management officials with input from line supervisors, investigators, and practitioners, was resulting in a wide array of very subjective cost impacts. For consistency, Booz Allen has decided to standardize the cost impact associated with this assessment. Where a site determined a review team would need to be assembled, Booz Allen applied a cost estimate based on several factors outlined above in the Assumptions section of the document.

The NY DOC, WA DOC, CO DOC, and the VA DOC found that the creation of report findings and recommendations for improvement would require additional FTE support. In each instance, this additional resource will be used to collect, review, and analyze an increasing flow of sexual abuse data into the system. In order to accurately collect and report on the influx of data, it is estimated to cost the MN DOC a one-time charge of \$10K to automate its database. Similarly, the WA DOC requires an upfront cost of \$301K to make necessary improvements to its current data collection system.

The majority of systems analyzed found the gathering, reviewing, and reporting of sexual abuse data to be common practice. Where viable, the PREA Coordinator will make efforts to help in the data collection and review process. For example, the RI DOC suggests the PREA coordinator conduct audits as part of the data collection process under DC2.

### **Major Issue and Finding #8: Hiring and Promotions Decisions (PP6)**

Background checks on new hires were found to be commonplace throughout all jurisdictions studied. Similar checks on promotional candidates were found to be done less frequently, however. By limiting the number of background checks to contingency hires, as opposed to all promotional candidates, the cost impact associated with conducting background checks is lessened. Similar to the cost impact associated with assembling a review team, costs to conduct background checks have been standardized and factors outlined above in the Assumptions section. The majority of prison systems conduct background checks internally, limiting the cost impact of such an investigation to LOE. Where checks are completed by an external agency, additional fees are accumulated. At a cost of \$50 per background check, the MN DOC, which averages approximately 122 promotions annually, will have a yearly cost impact of approximately \$6K. Similarly, with an average of 235 promotions and 291 promotions annually, the WA DOC and SC DOC can anticipate a yearly cost impact of nearly \$12K and \$15K, respectively.

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Departments such as the NY DOC and the AR DOC receive automatic feeds of criminal records for all existing employees on a consistent basis. This process dissolves any need for agencies to conduct checks on promotional hires, while also keeping agency heads informed of its existing employees that are not being considered for a promotion.

Many departments make a conscious effort to contact prior institutional employers. Some, such as the NY DOC, AR DOC, and the CA DOC suggest using these resources may not result in any added benefit. NY DOC has made this effort in the past and states that the information obtained is limited to what employers consider reasonable. In addition, the AR DOC feels most employers would not answer the question as they are under strict data privacy restrictions, while CA DOC questions the legality of such a request and do not feel it would yield actionable results. Nevertheless, where this action is not currently being taken, jurisdictions feel it additional LOE is necessary. The SC DOC has estimated an additional FTE at \$43K annually to contact prior institutional employers. Similarly, the VA DOC requires one additional FTE at \$41K annually, whose resources will be used to investigate employees and potential new hires based on guidelines addressed in the standard.

#### **Prison Cost Impact #9: Audits of Standards (AU1)**

Without a clear understanding of the elements that will be included as part of an audit on the NPREC standards, jurisdictions were asked to use an audit that they currently participate in, such as the American Correctional Association (ACA) audit or an internal DOC Policy Unit audit, as a baseline for estimating a potential cost impact. To conduct an audit on the standards, Booz Allen anticipates similar cost drivers to audits currently being conducted; audit fees, LOE, and travel expenses.

Because no formal audit process has been developed, Booz Allen has standardized the cost associated with conducting an audit throughout the Prison sector. Factors included in our assumption have been described above in the Assumptions section of the document. A cost per prison facility of \$33K triennially has been determined based on an auditor's fee and an internal LOE.

#### **Prison Cost Impact #10: Screening (SC1 and SC2)**

The majority of the costs associated with screening are the result of having instruments that are not gender-specific or screening processes that are not conducted at all classification reviews. Therefore, there are upfront costs associated with modifying the screening tool and ongoing costs to cover the increased workload of conducting more screenings. Where modifications are needed, systems such as the VA DOC can expect an upfront cost impact of approximately \$50K associated with integrating the newly developed risk screening tool into their current review process. CO DOC also considered the cost impact associated with integrating modifications of the screening assessment tool into their offender management system, resulting in an upfront cost of \$176K to update its Offender Release of Information to Law Enforcement (ORILE) database. Unable to gather specifics regarding a cost impact of this standard on its offender management system, a system similar to CO DOC, Booz Allen assumed an equal impact for VA DOC.

The OR DOC only screens offenders on an as-needed basis. With an increased workload as a result of screening all offenders, they will be subject a cost impact of \$437K per year to cover five additional staff to conduct screenings.

Where a screening instrument is not currently utilized, the cost to develop an instrument and provide the necessary LOE to conduct screenings is expected to be considerable. Currently, the SC DOC uses a cell

assignment form to match cell mates. This is not considered to be a screening instrument as defined in the standard therefore SC DOC requires a new instrument and procedure to conduct the screenings. In order to develop and implement a written screening instrument throughout its facilities, the SC DOC estimates \$35K in upfront costs. In addition, SC DOC will require 17 additional caseworkers at \$665K per year to execute the screening process on all inmates in each facility.

### **Prison Cost Impact #11: Contracting with Other Entities for the Confinement of Inmates (PP2)**

Contracting for the confinement of inmates is practice seen at a few of the prisons included in this study but not all of them will incur a cost. In one instances, such as with the MA DOC, a contractual agreement has already been made with a private entity forcing it to comply with the NPREC standards, resulting in no additional costs. Booz Allen acknowledges that some contracts with private entities may be written in a way that essentially places the cost burden on the contractor but it is assumed to be rare. Contracting with public correctional institutions, on the other hand is considered different since they are subject to stricter publicly-controlled budget constraints operating without profit as a financial incentive. They have less budget flexibility to absorb higher costs and often have much looser contract requirements. CA DOC, for example, suggested that their contracted facilities (all county jails) must abide by California Code of Regulations (CCR) Title 15 with an implicate assumption that cost would not increase, However, understanding the budget difficulties in CA and elsewhere, it is reasonable to assume that each of these contracted jails, all held to the same PREA standards, will themselves incur additional costs that they could easily pass on to CA DOC in the form of higher inmate fees estimated at \$1.3Mper year assuming nearly 8K inmates contracted out to the Correctional Corporation of America, or 4.2% of their inmate population. Where formal agreements have not been reached, costs associated with modifications to existing contracts are anticipated. The IN DOC has an agreement with GEO, in Newcastle, Indiana, to house 2,400 inmates on their behalf, roughly 8.8% of their total inmate population. An annual cost of \$735K was estimated to bring contracted facilities into compliance with the NPREC standards. Similarly, the SC DOC and AR DOC, contract out for the confinement of 300 and 280 inmates, respectively. The SC DOC can expect an associated ongoing cost impact of approximately \$41K while AR DOC will see a cost impact of \$253K annually. While not considered a reasonable cost impact to our study, several jurisdictions expressed concern and a potential for exorbitant cost if contracted facilities did not agree to comply with PREA. AR DOC, for example, suggested that they would have to re-house their inmates contracted out to their county and city jails under the assumption that these entities may choose not to abide by PREA, resulting in an annual cost of \$4.9M. This study on the other hand assumes a greater likelihood that these entities will ultimately adopt the PREA standards and pass on additional and increased costs to AR DOC.

### **Prison Cost Impact #12: Contract Modifications for Outside Services (RP2 through RP4, and RE3)**

Most jurisdictions have agreements in place with outside public entities to provide emotional support and transition services. Where agreements do not exist, six out of the 13 prisons in this study, contracts need to be established and for state systems, the cost impact can be significant as demonstrated by NY DOC (\$500K per yea) and WA DOC (\$761K per yea). NY DOC's relatively large ongoing costs cover agreements for emotional services in each of the 32 counties with an institution and contracts for transition support services in all 62 NY counties. The annual cost impact at WA DOC is associated with a number of factors, the largest of which being the costs associated with contracts to provide emotional and transitional services. Despite the prevalence of service providers in WA, a recent inquiry into who

could contract with WA DOC uncovered numerous obstacles due to VOCA funding restrictions meaning WA DOC would have to pay for these services that would otherwise (as found in most places across the country) be provided free of charge

Where investigations are not conducted internally, they are conducted by the State Police (RP3). The State Police are typically bound by state statute to conduct investigations. Where necessary, a jurisdiction has the opportunity to engage or modify a MOU to ensure investigations of all PREA-related incidents are carried out. The WA DOC feels such action is necessary, having to develop agreements with law enforcement agencies throughout the state subsequent to a recent discovery that one of the largest counties in Washington will no longer investigate crimes that are not against county residents. Because there is no consistency in how counties handle investigations and no state statute enforcing local law enforcement to conduct investigations, a formal agreement with all 39 counties in the state is required with an estimated cost of \$226K per year.

Similarly, the local District Attorney typically handles criminal prosecutions of DOC inmates (RP4). In most instances, agreements or state statutes with these authorities already exist. However, this study did uncover an outlier. Similar to RP3, the WA DOC also feels that MOUs are necessary with DA Offices, based on the inconsistent manner with which prosecutors move investigations through the court system, yielding an estimated cost of \$226K per year.

In most cases, Access to Outside Confidential Support Services (RE3) is made available to inmates through a hotline, mail, posters, and pamphlets. Because most advocacy services provide posters and pamphlets free of charge, cost is typically limited to any contract fees associated with providing for the service, materials cost, and any rate per minute fee associated with the hotline. Upfront costs associated with providing access to support services range from \$20K to less than \$1K

#### **Prison Cost Impact #13: Accommodating Special Needs (PP5)**

The CO DOC reported a yearly cost of \$1K would be required in order to provide sign language interpreter services. In every other instance, each jurisdiction studied reported having multiple ways for inmates with special needs to report incidents of sexual abuse, including TTY machines for the deaf, language lines and staff for the LEP, and access to mental health care staff and sister agencies for the mentally disabled. In each instance, providing access to these services is written policy and in the case of CA DOC, court ordered.

#### **Prison Cost Impact # 14: Exhaustion of Administrative Remedies (RE2)**

Multiple prison systems included in this study currently have policies in place which allow for longer than 90 days before an inmate is determined to have exhausted his or her administrative remedies. In CO DOCs case, a level 3 Grievance Officer would need to be hired in order to meet a shortened deadline. Others such as the MO DOC, which currently has a 180-day policy, feel they could revise this policy at no additional cost to the agency.

While the argument being made by NPREC in the discussion section under RP2 has been considered, most agree that the 48-hour exhaustion of administrative remedies would have a significant impact on the grievance process and directly violate the Prison Litigation Reform Act (PLRA).

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*“No action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted.” 42 U.S.C. § 1997e(a)*

State prison systems fear this could result in a significant amount of staff time to pull together investigative reports, a legal team to draft responses, and the Attorney General’s office to defend any claims. The OR DOC states this fails to allow for time to investigate allegations and could encourage allegations that would undermine the purpose being addressed by this law. Further, it would tie up institution, law enforcement, investigatory, prosecution, and judicial resources on potentially frivolous cases instead of the substantive claims of actual survivors of sexual assault. In response, AR DOC stated this would be a huge policy issue and cause serious damage to our grievance process. Under this scenario, an inmate could file a report (verbal or written) and get much quicker access, under very different circumstances, that those articulated in the PLRA regardless whether AR DOC did all the correct things to ensure the inmate's safety. This would lead to systematic abuse. In addition, there are travel costs and alternative housing costs for those inmates that have to relocate.

### **Prison Cost Impact # 15: Duty to Investigate (IN1)**

All third party reports of sexual abuse are currently investigated throughout those DOCs analyzed as part of our study. However, each DOC individually expressed concern over providing written notification of the outcome of an investigation, including that of third party reports. A few in particular, the CO DOC, WA DOC, OR DOC, and NY DOC, suggested that notifying victims of the outcome of investigations exposes them to risk of retaliation, including physical harm. Others suggested that notification to non-victim complainants violates states law protecting the confidentiality of victims of sexual abuse.

DOCs also expressed concern over notifying victims and/or other complainants of any disciplinary or criminal sanctions. In particular, the RI DOC reported, per union policy and state law, it is not allowed to notify any disciplinary sanctions for employees.

In each instance, DOC’s reported that each investigation is carried through to completion, regardless of whether the alleged abuser or victim remains at the facility and that all allegations of sexual abuse were substantiated if supported by a preponderance of the evidence. Certain jurisdictions, such as MA DOC, suggest that due to proposed changes in grievance procedures and third-party reporting, the number of investigations conducted will increase dramatically. Because of this, MA DOC has estimated the need for eleven additional investigators at a yearly cost of approximately \$516K. OR DOC, who currently has many of the NPREC standards implemented, has seen a significant increase in workload required to carry out investigations. They have requested one-half an additional FTE on both the east and west side of the state to accommodate this increase. The resultant cost impact is \$98K annually.

### **Prison Cost Impact # 16: Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers (MM3)**

In most cases, treatment of any type, including the effects of sexual abuse, is available at any time within the system. In fact, only the WA DOC and IN DOC are not in compliance with the standard. In both cases, the WA DOC and IN DOC do not provide ongoing treatment for all abusers. The current inmate in WA DOCs Sex Offender Treatment Program costs approximately \$10K annually. To provide an average of 30 inmates with ongoing treatment is estimated to cost approximately \$293K a year. The IN DOC states that only adjudicated inmates labeled as sex offenders are required to attend the treatment program.

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Predators that have committed “lesser” acts are not currently sent to the program. Based on the standard as written, the IN DOC anticipates an increase of  $\frac{3}{4}$  its current Sex Offender Treatment Program, or \$3M annually.

**Jails**

The study reflects sixteen jail/detention sites including six from the South (Aiken County, Peumansend Creek, Norfolk City, Miami-Dade, Alachua, and Pulaski Co), two from the Northeast (Albany County and Essex County), three from the West (WA Pierce County, Sacramento County, and Denver County), and five from the Midwest (MN Hennepin and Anoka County, WI Pierce County, IN Marion County, and MO Jefferson County).

The ongoing and upfront tables highlighted with Harvey Balls represent an order of magnitude signifying a cost impact in relation to overall budget for the jails sector. The degree to which each Harvey ball is shaded indicates the magnitude of the cost impact. An empty ball represents standards that do not result in any cost impact. On the other hand, a fully-shaded ball represents a percent impact on annual operating budget that is greater than 0.50%. A quarter-shaded ball and half-shaded ball represent an overall impact on annual operating budget between 0% and 0.25% and 0.25% and 0.50%, respectively. For example, Anoka County’s ongoing cost impact as a percentage of annual operating budget for training and education is equal to 0.05% and therefore represented by a quarter-shaded Harvey ball.

Table 18: Jails Ongoing Cost Impacts as % of Annual Operating Budget

Priority		Aiken	Alachua	Albany	Anoka	Denver	Essex	Hennepin	Jefferson	Marion	Miami Dade	Norfolk City	Peumansend	Pulaski	Sacramento	Pierce (WA)	Pierce (WI)	
1	Limits to cross-gender viewing and searches	○	○	●	●	○	○	○	○	○	○	○	○	○	○	○	○	○
2	Inmate Supervision	○	○	○	○	○	○	○	●	○	●	○	○	○	○	○	○	○
3	Assessment and use of monitoring technology	○	○	○	○	○	○	○	●	●	○	○	○	○	○	○	○	○
4	Ongoing medical and mental health care	○	●	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
5	Audits of standards	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
6	Training and Education	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
7	Contracting with other entities for the confinement of inmates	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
8	Accommodating inmates with special needs	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
9	Zero tolerance of sexual abuse	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
10	Screening for risk of sexual abuse	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
11	Contract modifications for outside services	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
12	Evidence protocol and forensic medical exams	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
13	Investigations	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
14	Supplement to SC-2: Use of screening information	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
15	Hiring and promotion decisions	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
16	Gathering, reviewing, and reporting data	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
17	Exhaustion of administrative remedies	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
18	Agency protection against retaliation	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○

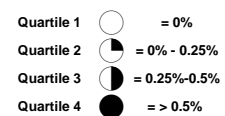
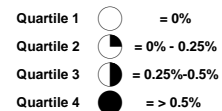




Table 19: Jails Upfront Cost Impacts as % of Annual Operating Budget

Priority	Aiken	Alachua	Albany	Aroka	Denver	Essex	Hennepin	Jefferson	Marion	Miami Dade	Norfolk City	Peumansend	Pulaski	Sacramento	Pierce (WA)	Pierce (WI)
1	○	○	◐	◐	○	○	○	○	○	○	○	●	●	◐	○	◐
2	○	○	○	○	○	○	○	◐	○	◐	○	○	○	◐	○	○
3	●	○	○	○	○	○	○	●	◐	●	○	●	○	●	○	○
4	○	◐	○	○	○	○	○	○	○	○	◐	○	○	◐	○	○
5	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
6	◐	●	◐	◐	◐	◐	◐	○	◐	◐	◐	◐	◐	●	◐	◐
7	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
8	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○
9	◐	◐	◐	◐	◐	◐	◐	◐	◐	◐	○	○	◐	◐	◐	◐
10	◐	◐	○	◐	◐	○	◐	○	◐	○	○	○	◐	◐	◐	○
11	◐	◐	○	◐	○	◐	◐	○	◐	○	○	○	○	◐	◐	○
12	○	◐	○	○	○	○	○	○	○	○	○	○	○	○	○	○
13	○	○	○	○	○	○	○	○	○	○	○	○	○	◐	○	○
14	○	○	◐	○	○	○	○	○	○	○	○	○	○	○	○	○
15	○	○	○	○	○	○	○	○	○	○	◐	○	○	○	○	○
16	○	○	○	○	○	○	○	○	○	○	○	○	○	○	◐	○
17	○	○	○	○	○	◐	○	○	○	○	○	○	○	◐	○	○
18	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○



**Jails Cost Impact #1: Limits to Cross-Gender Supervision (PP4)**

The prohibition of cross-gender pat downs presents the most significant and consistent cost impact among the jails included in this study. The most common reason for noncompliance, resulting in the greatest real cost impact, is a staff gender ratio that is out of balance with the inmate gender ratio. It is a particular challenge for many facilities where the rate of incarceration is much higher for men while hiring practices are gender neutral. Many sites have policies in place that effectively balance the male/female staff ratio and, in many places across the county, labor market factors supply proportionally more female correctional officers than female inmates. In a system with a disproportionate number of male inmates, there simply are not enough male officers to conduct pat downs.

Relative to the gender ratio of inmates, the majority of sites in this study have proportionately more female correctional officers than female inmates, resulting in females frequently conducting pat downs on male inmates as part of normal operating procedures, often times out of necessity. For example, In Peumansend Creek’s facility, 54% of the staff is female while 83% of the inmate population is male. There is concern that if this standard were implemented, they would need to implement a major

workforce realignment, moving more men into the male portion of the jail and moving female officers out of the male jail ensuring that enough male officers are available for same-gender pat downs. Specifically, this would result in an increase in 13 male officers and an equal decrease in female officers, a handful of which could be placed in the control center or in the women's unit. In addition, finding qualified male officers in rural areas, offering relatively low salaries, is often times difficult, with much of the male applicant pool screened out due to past criminal histories. Peumansend Creek feels that they would either have to lower their recruitment standards, loosening previous drug convictions and forgoing the polygraph exam or increase wages (which would in turn have to be increased for the entire staff). The cost impact to payout leave for the female staff being laid off is \$22K. Assuming an 8% wage premium to attract more qualified applicants Peumansend Creek would face an increased annual cost of \$38K the base salaries and benefits pay for the laid off female staff was the same as their male counterparts. In addition, there will be incidental costs, upwards to \$12K to cover expenses such as training, uniforms, polygraph examination, medical exams and labs, and interviewing and processing for a total upfront cost of \$233K.

Albany County expressed a similar staffing concern but in the other direction, expressing a concern that the labor market is not producing enough female candidates. This stems from a NY State Agility Test applied equally to all officers, male or female. As a result, fewer women can pass the test, resulting in a unique case where they do not have enough female officers to be available to conduct female pat downs. In order to comply, Albany County will need to institute a more concerted and aggressive recruitment of five additional female officers (those able to pass the agility test) resulting an annual cost impact of \$309K, or \$60K per person for salary and benefits. Since these are new hires, there are additional upfront operational costs of \$5K for training, office supplies, and incidentals.

Pulaski County has a similar situation with nearly a perfect gender balance between their male and female officers contrasted by a heavily weighted male inmate population. Female officers conducting cross-gender pat searches are common and part of their routine practice. Any adjustment will have a major impact on their workforce and the assigned roles and posts. In order to get their staff gender ratio in proportion with the inmate gender ratio, they would need to eliminate up to 75% of their female staff, or up to 82.5 FTEs, replacing them with male officers. Such an effort would result in a one-time severance payout of \$1.7M (assuming a 50% payout of an average salary for 82.5 FTE), followed by a multi-year strategy to hire so many new officers. Assuming the cost of the new staff is equal to the cost of the dismissed staff; the net cost impact is limited to the severance payout and the upfront costs of new hires such as recruiting, training, office supplies, communications, security, and uniform resulting in a total cost impact to Pulaski County of \$78K. It is noted that Pulaski County believes their current operating model functions very well and any modification could lead to greater risks (and potentially greater cost) since their experience tells them they have more issues of women conducting pat searches on women as opposed to men conducting pat searches on women.

Pierce County WI also has roughly a 50:50 split between their male and female officers contrasted by an 80% male inmate population. However, they are a very small jail, operating in a multi-functional county sheriff's office where the dispatchers split their time between inmate supervision and the 911 call center. At any given time, they have three people on duty always representing both genders (i.e., a duty shift is prohibited from being staffed entirely by the same gender). Pierce County believes that they have adequate staffing levels to comply with this standard under normal circumstances, but are not confident

their current operations would suffice during peak times of incarceration such as weekends, particularly when two females are on duty, leaving them with only one male officer to conduct pat downs. To mitigate this and fully comply with the standard, they would need to add one additional post with five additional staff (FTE's) members at a total annual cost of \$384K.

At Anoka County, due to the configuration and design of their jail, only one person can cover a post at a time. With a staff made up of 25% women in an environment overwhelmingly populated by male inmates, this means that women would essentially be barred from working inside the jail, limited to work in the control room, visiting room, or booking facility. Such work restrictions would potentially violate state statutes on equal employment. The best option to meet this requirement would be to increase the number of male officers and install a 24 hour male deputy rover position requiring five new staff at an annual cost of \$259K per year. In addition to providing added security, this position would be backup for same gender (male) pat downs. Since these are new hires, there are additional upfront operational costs of \$5K for training, office supplies, and incidentals.

Lastly, it is important to note that some of the jails in this study are in compliance with this standard having policies in place that prohibit cross-gender pat downs except in the case of an emergency. Examples include Aiken County, Alachua County and Jefferson County. Neither of these sites has any federal or state statutes dictating their staffing ratios nor union representation for their officers despite having gender spreads that would indicate an issue or potential cost impact. For example Aiken County has a male/female officer ratio of 76:24 and a male/female inmate ratio of 85:15, yielding a ratio spread of 9% (the difference between the male percentages) which is relatively low and closer to the gender ratio of offenders.

### **Jails Cost Impact #2: Inmate Supervision (PP3)**

A majority of the sites in this study considered themselves in compliance with this standard, most attributing their low levels of incidents of sexual abuse to their supervision models, commonly direct supervision. Only three out of the 16 sites felt they needed to hire additional staff in order to minimize the incidence of sexual abuse and work towards eliminating it altogether. The three jails that have a cost impact are Miami-Dade, Sacramento County, and Jefferson County, each of which having PP3 as one of the greatest cost impacts on their operations. Miami-Dade feels like they are noncompliant with PP3 due to insufficient workforce/security officer levels. Highlighted in a NIC study in 2006, Miami-Dade was reported to be down 600 staff members below their target, a level set to maintain adequate security. Despite hiring a few mental health care professionals in 2009, staffing levels have not rebounded and have certainly not kept pace with the increased flow of inmates. In order to meet what they consider bare, minimal standards to protect officers and inmates from all forms of violence to include sexual abuse, Miami-Dade asserts a need to hire 89 Officers, 21 Corporals, six Sergeants, and two Lieutenants with an annual cost of \$6.7M. Since these are new hires, there are additional upfront operational costs of \$112K for training, office supplies, and incidentals.

Sacramento County expressed similar staffing issues, citing a historically high inmate ratio of 63:1, something more typical of a direct supervision model and a ratio that is causing grave concerns among jail administrators. Sacramento County has witnessed a number of staff reductions that are very common throughout the public sector in California as the state grapples with unprecedented budget issues, resulting in a very tight squeeze on state funding. Over the past couple of years, there have been multiple

positions cut and several positions demoted, including an 80% cut back of the medical staff. Consequently, Sacramento County believes they are not providing enough physical supervision necessary to protect the inmates and officers from abusive behavior (to include sexual abuse). In order to return back to the level of supervision their operation was designed to handle, they would require an additional 6 deputies per shift resulting in an annual cost of \$4.4M. Since these are new hires, there are additional upfront operational costs of \$17K for training, office supplies, and incidentals.

Similarly, Jefferson County jail has witnessed a 25% reduction in their staff over the past few years, dropping from 40 officers to 30 officers. Although they have only had two sexual abuse incidents in the past two years, they feel that the risk of abuse has increased and there is much more potential for abuse than there ever has been. Coupled by an increasing inmate population, Jefferson County believe 10 - 12 additional staff are required to provide adequate supervision to mitigate violent behavior, or in their case, the potential of such behavior. Hiring these additional FTE will cost approximately \$393K annually. Since these are new hires, there are additional upfront operational costs of \$10K for training, office supplies, and incidentals.

### **Jails Cost Impact #3: Assessment and Use of Monitoring Technology (PP7)**

By and large, cost impacts for PP7 are due to an altogether absence of technical supervision or antiquated systems deemed inefficient to meet the standard. Common throughout the study for all sectors, this cost is the most variable representing significant cost impacts for many sites. For the jails sector, six out of the 16 sites have technology upgrades in flight or have a need for an upgrade of their current technology capabilities in order to comply with this standard. Aiken County, for example, employs technical supervision however, they feel it is antiquated and impractical with only 16 out of 85 cameras that even record. With a very good understanding of their technical requirements, they already have a procurement process in place to install 85 new cameras throughout the facility with a one-time cost of \$500K.

The Marion County Jail has cameras in place in portions of its facility but it does not provide complete coverage and efforts are already underway to install additional cameras. A total of \$200K has already been spent to purchase and install cameras in the common areas, supplemented by a \$75K grant from the State Criminal Alien Assistance Program (SCAAP). Despite these investments, the west side of the facility does not contain any cameras due to lack of infrastructure necessary to support the technology. This would require an estimated additional \$113K investment. They also need 3 FTE to maintain the equipment and monitor the video footage. This is estimated to cost an additional \$179K per year plus one-time operational costs for new employees estimated at \$3K.

Similarly Peumansend Creek does not have full coverage throughout its facility and is also burdened with a system that is no longer supported by its vendor, making it obsolete and preventing them from any expansion because it is based on a technology that is not interoperable with current technology. An upgraded system with ten additional cameras is estimated to cost \$400K.

Recent technical assessments at Miami-Dade have highlighted a need for additional video surveillance. With an antiquated system similar to Peumansend Creek but with a much larger facility requiring a full retro fit, this is estimated at \$25M. Although a seemingly high estimate, Miami-Dade assert that their current video surveillance system is not effective in preventing and investigating sexual abuse. Some facilities are altogether absent of any type of surveillance system and those with existing cameras do not

provide true surveillance capability because the technology is inferior. A full site assessment is still required to determine specific requirements but the cost estimate is in line with past technology investments such as a recent telecommunications upgrade costing \$14M. That effort is considered less complex and does not take into account major differences such as the physical infrastructure and equipment required for five separate sites currently in operation, two future sites and construction of a central operations, separate from control areas at individual facilities.

Essex County is the one site that has a fully funded upgrade in flight and is currently in the process of adding 396 cameras along with archiving capabilities at a cost of \$2.2M. This is not reflected as a cost impact to PREA in this study as it is considered a sunk cost since it is already funded. These investments cover the Male Release Center, (“the Farm”), and the Women in Transition (“WIT”) both having obsolete video monitoring systems.

#### **Jails Cost Impact #4: Zero Tolerance for Sexual Abuse (PP1)**

The major issue in this standard is the requirement for an agency to employ or designate a PREA coordinator to oversee the agency's efforts to comply with the NPREC standards. For most of the sites visited, this resulted in the need for at least one additional full-time staff member added to their management and operational budget requirements. One site, Peumansend Creek, already has a designated, part-time PREA Coordinator and, so long as their bed space is below 500, can retain compliance with this standard at no additional cost. The following table lists the budget requirements for an additional staff member assuming a senior level position reporting directly to the agency head. All costs are annual, fully loaded, including salary and benefits (e.g., healthcare, retirement). Operational upfront costs are also includes office furniture and supplies, office equipment, communications services, training, and other expenses above and beyond salary and fringe benefits.

Site	Upfront	Yearly	Notes
Sacramento Coun	\$ 1	\$ 199	1 FTE salary, benefits and new hire operations costs.
WA Pierce Count	\$ 1	\$ 163	1 FTE salary, benefits and new hire operations costs.
Miami-Dade	\$ 1	\$ 141	1 FTE salary, benefits and new hire operations costs.
Alachua County	\$ 1	\$ 136	1 FTE salary, benefits and new hire operations costs.
Denver County	\$ 1	\$ 124	1 FTE salary, benefits and new hire operations costs.
Albany County	\$ 1	\$ 101	1 FTE salary, benefits and new hire operations costs.
Hennepin County	\$ 1	\$ 101	1 FTE salary, benefits and new hire operations costs.
Essex County	\$ 1	\$ 93	1 FTE salary, benefits and new hire operations costs.
Marion County	\$ 1	\$ 92	1 FTE salary, benefits and new hire operations costs.
Pulaski County	\$ 1	\$ 92	1 FTE salary, benefits and new hire operations costs.
Norfolk City	\$ 1	\$ 56	1 FTE salary, benefits and new hire operations costs.
Jefferson County	\$ 1	\$ 53	1 FTE salary, benefits and new hire operations costs.
Anoka County	\$ 1	\$ 25	0.25 FTE salary, benefits and new hire operations costs.
Aiken County	\$ 1	\$ 21	0.5 FTE salary, benefits and new hire operations costs.
WI Pierce County	\$ 1	\$ 20	0.5 FTE salary, benefits and new hire operations costs.
Peumansend Cree			Superintendent chooses to be PREA Coordinator

#### **Jails Cost Impact #5: Training and Education (TR1 through TR5)**

Training and education has a significant cost impact on the majority of jails included in this study. Primary costs drivers include modifications to current curriculum and training to an expanded set of

employees, contractors, and volunteers in order to cover PREA material. Due to their smaller size relative to prisons, it is assumed in this study that Jails can leverage the PREA Coordinator to assist in curriculum development and even training delivery when feasible. This assumption was applied to each jail on a case-by-case basis depending on their size. For example, a PREA coordinator at Miami-Dade, a very large jail with five facilities, would have a much more complex set of duties than a PREA coordinator Norfolk City, a considerably smaller jail. The following tables show the cost impacts by site according to the three training standards:

Employee Training (TR-1)			
Site	Upfront	Yearly	Notes
Miami-Dade		\$ 261	Cost reflects modifications to web-based training that does not include PREA content (\$23K). Employees at Miami-Dade are granted 40 hours of training annually and all training is considered overtime. PREA training would require an additional two hours time from each employee, subject to overtime. Total cost for overtime is estimated at \$238K/year.
Albany County		\$ 115	Albany Co. provides sexual harassment training to all sworn officers in a classroom forum (and refresher training as their budget permits) but does not cover PREA specific curriculum and their administrative staff does not receive the same training. Assuming the curriculum can be obtained or developed by the PREA Coordinator, this cost reflects delivery of the additional PREA content for sworn employees and full PREA training required for administrative staff.
Denver County	\$ 132	\$ 33	The Denver Co. police provide training to all employees; however it does not cover PREA standards. Costs reflect four additional hours for each employee to cover PREA topics during initial training and one additional hour to cover PREA topics.
WI Pierce County		\$ 20	Training is provided but does not cover PREA. It is likely that WI Pierce Co could receive training through the state mandated certification training program but that is uncertain. Assuming the curriculum can be obtained or developed by the PREA Coordinator, and cannot leverage state training, this cost reflects delivery of the additional PREA content annually.
WA Pierce County	\$ 63	\$ 16	Training is provided but does not cover PREA. Assuming the curriculum can be obtained or developed by the PREA Coordinator, costs reflect four additional hours for each employee to cover PREA topics during initial training and one additional hour to cover PREA topics during refresher training.
Pulaski County	\$ 15	\$ 11	PREA training is already provided to all new sworn employees but does not cover civilian employees. Upfront cost reflects the estimated cost to teach PREA topics to the non-sworn staff (\$3K) and the sworn employees hired before PREA training was instituted. These employees are subject to overtime pay and have a training cost estimate of (\$12K). The ongoing costs reflects recurring training for these same individuals, non-sworn staff and employees hired before PREA training was instituted. Those hired after PREA training was instituted already receive periodic refresher training and that is considered a
Peumansend Creek		\$ 11	PREA training is covered for new employees but not during refresher training. Cost reflects an additional four hours of training per employee every year.
Hennepin County	\$ 48	\$ 7	Hennepin Co. provides training but it does not completely cover the PREA standards. Upfront costs reflect modifications need to be made to their training curriculum in order to make the material more comprehensive on PREA. On-going costs cover
Anoka County		\$ 4	Anoka Co. provides training but it does not completely cover the PREA standards. Assuming the curriculum can be obtained or developed by the PREA Coordinator, this cost reflects delivery of the additional PREA content annually.
Jefferson County		\$ <1	All Corrections staff is given a 40 hour, Corrections Officer Certification course during the initial few months of their employment. A section of that class is dedicated to employee conduct, criminal investigations, PREA, Missouri State Statute.
Norfolk City	\$ 1	\$ <1	PREA training is already provided to all sworn employees but does not cover 12 civilian employees. Cost reflects staff time to attend initial training and periodic refresher training. Delivery of training can be provided by PREA Coordinator at no
Aiken County	\$ 4		Training is provided to most employees but it does not cover PREA specific curriculum. It also does not cover the four administrative clerks. Additional costs cover development of PREA materials/content and instructor cost. It is assumed that the curriculum can be reused for on-going refresher training.
Alachua County			All employees are currently trained (to include sworn and civilian) on PREA topics. Method of training is a web-based module with refresher training provided annually.
Essex County			Orientation training for all employees is thorough, including 2 hours devoted to sexual abuse and PREA.
Marion County			Marion Co. jail employees receive training on sexual abuse, consistent with PREA. Training is provided in a classroom setting, a video loop, and through a handbook provided to all employees. Training is provided by staff and a 24-hour annual in
Sacramento County			Sacramento Co conducts initial PREA training (covering domestic violence and sexual assault) for all employees and a 4 hour

Site	Inmate Education (TR-3)		Notes
	Upfront	Yearly	
Pulaski County	\$ 7	\$ 7	Costs reflect modification to orientation pamphlet (reprinting and binding) to incorporate PREA material.
Norfolk City	\$ 2	\$ 2	Inmates are provided a sexual abuse orientation guide sheet which provides instructions on how to report any sexual abuse and policy on sexual abuse. The same information is included in the inmate's handbook which all inmates receive. Nevertheless, modifications are required to encompass PREA. Cost reflects development of a comprehensive PREA program with written
Hennepin County	\$ 50		Inmates do not receive any PREA education. Hennepin Co believe the most cost efficient means is via video to be broadcast throughout the jail. Costs reflect modifications to the television system, development of educational curriculum, production costs, and modification of the jail's electronic inmate management system to document and track inmate participation in these
Miami-Dade	\$ 28		Costs reflect augmentation to inmate handbook, development of PREA orientation video, and monitors in intake and booking
Sacramento County	\$ 25		Supplies and equipment cost to provide video loops and educational materials to all inmates.
Anoka County	\$ 13		Inmates do not receive any PREA education. Costs reflect revisions to orientation video to include PREA content (also done in multiple languages), redeveloping the current orientation program, developing training materials and presenting classes on
WA Pierce County	\$ 12		PREA education is not provided to inmates. Costs reflect development of materials and video.
Essex County	\$ 3		Essex Co. provides education on sexual abuse during the intake process but it does not cover PREA. Costs reflect material
Aiken County	\$ 1		All inmates receive training during their classification interview but it does not include PREA. Cost reflects production of new orientation video to include PREA information.
WI Pierce County	\$ 1		PREA education is not provided to inmates. Costs reflect development of handbook on PREA.
Alachua County			PREA education is not provided but can be covered by the PREA Coordinator at no additional cost.
Albany County			Inmates receive a handbook at orientation but it does not include sexual abuse. Albany Co estimates that modifications can be made at minimal costs with labor provided by the PREA Coordinator.
Denver County			Denver Co shows a video at booking on sexual abuse and provides a handbook with the PREA standards. They also have posters on PREA around the facility.
Jefferson County			A prisoner handbook is given to each inmate at intake. The handbook explains the zero-tolerance policy of the Jail and discusses the procedures involved in reporting incidents.
Marion County			Comprehensive education on sexual abuse is provided to all inmates at intake. Inmates are shown an orientation video and receive handbooks that cover PREA issues.
Peumansend Creek			Peumansend provides all inmates with an orientation film and handbooks which are updated on an annual basis. The average stay of an inmate is 60 days so refresher training is not necessary. Monthly newsletter and television channel includes an education on PREA (a video they obtained from DOJ).

Jurisdiction	Inmate Education (TR-3)		Notes
	Upfront	Yearly	
Pulaski Co.	\$ 7	\$ 7	Costs reflect modification to orientation pamphlet (reprinting and binding) to incorporate PREA material.
Norfolk City	\$ 2	\$ 2	Inmates are provided a sexual abuse orientation guide sheet which provides instructions on how to report any sexual abuse and policy on sexual abuse. The same information is included in the inmate's handbook which all inmates receive. Nevertheless, modifications are required to encompass PREA. Cost reflects development of a comprehensive PREA program with written material, a video education segment, and an instructor.
Hennepin Co.	\$ 50		Inmates do not receive any PREA education. Hennepin Co believe the most cost efficient means is via video to be broadcast throughout the jail. Costs reflect modifications to the television system, development of educational curriculum, production costs, and modification of the jail's electronic inmate management system to document and track inmate participation in these educational sessions.
Miami-Dade	\$ 28		Costs reflect augmentation to inmate handbook, development of PREA orientation video, and monitors in intake and booking areas.
Sacramento Co.	\$ 25		PREA education is provided to all inmates.
Anoka Co.	\$ 13		Inmates do not receive any PREA education. Costs reflect revisions to orientation video to include PREA content (also done in multiple languages), redeveloping the current orientation program, developing training materials and presenting classes on PREA to our existing inmates.
WA Pierce Co.	\$ 12		PREA education is not provided to inmates. Costs reflect development of materials and video.
Essex Co.	\$ 3		Essex Co. provides education on sexual abuse during the intake process but it does not cover PREA. Costs reflect material updates and reprinting.
Aiken Co.	\$ 1		All inmates receive training during their classification interview but it does not include PREA. Cost reflects production of new orientation video to include PREA information.
WI Pierce Co.	\$ 1		PREA education is not provided to inmates. Costs reflect development of handbook on PREA.
Alachua Co.			PREA education is not provided but can be covered by the PREA Coordinator at no additional cost.
Albany Co.			Inmates receive a handbook at orientation but it does not include sexual abuse. Albany Co estimates that modifications can be made at minimal costs with labor provided by the PREA Coordinator.
Denver Co.			Denver Co shows a video at booking on sexual abuse and provides a handbook with the PREA standards. They also have posters on PREA around the facility.
Jefferson Co.			A prisoner handbook is given to each inmate at intake. The handbook explains the zero-tolerance policy of the Jail and discusses the procedures involved in reporting incidents.
Marion Co.			Comprehensive education on sexual abuse is provided to all inmates at intake. Inmates are shown an orientation video and receive handbooks that cover PREA issues.
Peumansend Creek			Peumansend provides all inmates with an orientation film and handbooks which are updated on an annual basis. The average stay of an inmate is 60 days so refresher training is not necessary. Monthly newsletter and television channel includes an education on PREA (a video they obtained from DOJ).

Specialized training for investigations and medical and mental health care had a significant less cost impact. For most of the jails in this study, the investigators are employed by the sheriff's office that manages the jail and are accustomed to conducting investigations in confinement settings. Medical and mental health staff on the other hand typically are employed by the county health department and receive their training on sexual abuse through individual medical and professional licensure requirements. This is



done outside the jail and external to their own training operations. And for most, it is difficult to ensure the training they receive is compliant with the standard. And if it were not, particularly in rural areas, they have limited options of recourse because there simply are not many resources available in the community. Most sites did express a need for training but the costs, by and large, were relatively low, within a range of \$1K - \$5K with a few exceptions noted below. Although relatively low, all costs however are deemed quite uncertain as most sites were not aware of available curriculum and training programs.

Specific examples of Investigator training include Hennepin County's estimate at \$8K and WA Pierce County's estimate at \$11K for their investigators, Anoka County at \$13K, and Alachua with the highest estimate at \$50K while Peumansend Creek referenced an ACA course for their investigators that would cost approximately \$7K.

As for examples on training for medical and mental health staff, Hennepin County estimated \$20K for eight hours of training per nurse for 35 nurses, Albany County estimated \$6K, and Alachua County estimated \$20K for their medical staff, depending on the length of training, number of trainers and travel requirements if it was deemed the current level of training was not adequate to meet PREA standards. Similar costs were estimated for Anoka County to send their nurses to Sexual Assault Response Team (SART) training at an initial cost of \$3K. Sacramento County however, provided the highest estimate at \$300K, also assuming a training course at \$3K per person to cover their staff of 100 medical and mental health professionals. Peumansend Creek referenced a NIC course made available via internet that they could use as a one-day seminar.

#### **Jails Cost Impact #6: Evidence Protocol and Forensic Medical Exams (RP1)**

The costs associated with providing inmates a victim advocate during the medical examination are relatively low in comparison to the other issues presented by the standards. It appears to be a more of a cost driver in facilities that are located in rural locations and have fewer victim advocate services available or different attitudes about victim's rights particularly if they are incarcerated. It was found that eight out of the 16 sites currently are providing these services at local hospital, medical center or other community based groups such as local Rape Crisis or Treatment Centers or the YWCA.

As for the sites that do have a cost impact, they include sites like Peumansend Creek that contacts with the Rappahannock Council Against Sexual Assault. They charge approximately \$1K for each victim they work with. This includes crisis services, court accompaniment when victim seeks prosecution, one month of individual counseling, and written materials for counseling and support.

Other sites, on the other hand, face a serious hurdle due to the constraints on VOCA funding, whereby local service providers will not work with inmates. In Alachua County, for example, victim advocacy services are not currently being provided because they are grant funded and will not deal with inmates. Past discussion between the jail and some service providers led to a retainer fee plus a per incident cost. With such limitations, Alachua finds it easier to hire their own advocate at \$61K per year plus one-time upfront costs of \$1K for office set up and training.

Although it did not result in a cost in this study it is noteworthy that the state of South Carolina does not consider an inmate as a victim if he or she has been sexually abused, potentially further limiting services

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available throughout the state<sup>8</sup>. This means that a publicly funded hospital is not obligated to provide a medical exam free of charge in a scenario where the victim is an inmate. This law however, does not impact the one jail from South Carolina Aiken County, included in this study as the local county district court covers the fees.

### **Jails Cost Impact #7: Gathering, Reviewing, and Reporting Sexual Abuse Data (DC1 through DC3)**

Gathering, reviewing and reporting data was not found to be a relatively significant cost impact for the jail sites included in this study. Certain evidence that was examined when looking at this standard included whether or not the facility was currently reporting data (e.g., BJS survey on sexual violence), the volume of sexual abuse incidents, and the site's current reporting and review processes and procedures. There were few costs expressed in order to comply with these standards and it was found that most costs could be minimized using the PREA Coordinator whose cost is captured in standard PP1. Two out of the 16 sites felt they would need to either formalize their review process or update their policy to ensure formal documentation and analysis is conducted. The main cost drivers expressed were staff time, level of effort and formalizing the review process in an official, documented procedure.

Hennepin County, for example, does not have any review team in place for such incidents. The cost, based on a staff level of effort, to assemble a multi-disciplined team comprised of senior staff, medical and mental health care staff, and investigators for review is estimated at \$1K. WA Piece County, on the other hand does conduct a review but it is not formalized. To formally establish a team in a document procedure is estimated to cost \$500. Similarly, Sacramento County does have a review team but it is not formalized. The cost associated with the level of effort for establishing and convening a team, assuming two incidents per year, is approximately \$1K per year.

### **Jails Cost Impact #8: Hiring and Promotion Decisions (PP6)**

The primary cost driver of this standard is the requirement to conduct background checks for all promotions. All sites visited in this study conducted some sort of criminal background check on new hires but not for promotions. Since most jails were housed with or near the sheriff's office, the cost of a background check was minimal, usually done in house without a marked cost impact even with an increased frequency as a result of this standard. However, a few sites either contract out for this service or indicated a budgetary cost impact above and beyond a level of effort. Assuming \$50/criminal background check for this study<sup>9</sup>, the following table depicts the sites expressing this cost impact and the assumed average number of promotions per year.

### **Jails Cost Impact #9: Audits of Standards (AU1)**

As this is not a nationally instituted policy, requirement or service, PREA audits are not conducted anywhere in the county. Nevertheless, each site is very familiar with the auditing process whether it is state mandated audits or ACA accreditation audits. Based on the wide degree of audits across the county, we assumed a standard jail audit fee of \$25K per triennial audit per facility, equating to approximately

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<sup>8</sup> South Carolina public law 16-3-1510, SECTION 16-3-1510 (d).

<sup>9</sup> See Assumptions section on criminal background checks.

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\$8K year per facility<sup>10</sup>. The following table provides a breakdown of the costs associated with the PREA audit.

**Jails Cost Impact #10: Screening (SC1 and SC2)**

It was found that most sites currently utilized a formal screening process however the vast majority of the jails in this study felt that they would need to update their screening instruments to include PREA-related questions mostly because they fell short of meeting all the PREA criteria or were not gender-specific. For these jails, each site was at a different degree of compliance, some requiring modest modifications with little or no costs and some requiring significant modifications depending on the state of their current classification process and "gap" between that and the PREA standard. This leads to seemingly incongruent costs from site to site however, the costs reported here represent a measure of the distance each site is from the PREA standard. In addition, the modification effort is dependent on the current processes in place whether it is a paper-based, less formal screening on one spectrum or a more robust, electronic screening system on the other. A few sites appear to have a very large gap from current processes to the PREA standard, requiring not only significant modifications but additional employees to manage and execute screening altogether, with one site even requiring additional housing in anticipation of inmates not subject to separate housing prior to PREA. On this topic, it is noted that one site, WI Pierce County has a reciprocity agreement with adjacent county jails for the transfer of flagged inmates requiring separate housing when it is not available. This is a particular issue at WI Pierce County due to their relatively small size with very few options available at their facility for segregated housing. This practice was not witnessed at any other site and could be a cost minimization technique for jails requiring costly, additional facility space.

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<sup>10</sup> See Assumptions for description of audit calculation.

The following table shows the variable costs from site-to-site to meet the screening standards.

Site	Upfront	Yearly	Notes
Alachua County	\$ 2	\$ 133	Current screening process does not meet the standard. The upfront cost reflects outsourced efforts needed to validate and modified existing tools plus upfront operational costs for a new employee. On-going costs reflect the addition of one caseworker FT
WA Pierce County	\$ 1	\$ 111	Inmates are screened during intake but it does not include sexual abuse. Upfront cost reflects modification of the screening process to meet PREA standards. On-going costs reflect the addition of one caseworker FTE due to increased time involved with th
Miami-Dade	\$ 3	\$ 111	Current electronic screening process does not meet the standard. The upfront cost reflects outsourced efforts needed to validate and modified existing tools plus upfront operational costs for a new employee. On-going costs reflect an additional officer
Albany County		\$ 1	Cost reflects annual printing cost for a new form during the admission process. The development or research of the new form will be managed by the PREA Coordinator at no additional cost above the cost of this position captured above.
Pulaski County	\$ 80		Inmates are screened during intake but it does not include sexual abuse and the current instrument is not gender specific. Cost reflects modification of existing software to meet PREA standards
Hennepin County	\$ 20		Inmates are screened during intake but it does not include sexual abuse. Cost reflects modification of the screening process to meet PREA standards
Anoka County	\$ 10		Inmates are screened during intake but it does not include sexual abuse. Cost reflects modification of the screening process to meet PREA standards
Denver County	\$ 1		Inmates are screened during intake but the current tool is not gender specific. Cost reflects modification of the screening process to meet PREA standards
Sacramento County	\$ 1		Inmates are screened during intake but it does not include sexual abuse. Modifications are expected to be minimal.
Aiken County	\$ -		Cost reflects effort for Classification Lieutenant to research and format assessment tool to include PREA related information.
Essex County			Essex County performs an extensive screening process for all inmates during intake.
Jefferson County			Current screening is comprehensive and covers PREA material although it is not gender specific with separate questions. This modification can be made at no additional/determinate cost.
Marion County			Inmates are screened at intake at subsequent classification reviews to assess their risk of sexual victimization and abusiveness.
Norfolk City			There are numerous screening instruments in the Norfolk Sheriff's Office designed to identify any risks based on inmate history, mental health history, observations by personnel, and admissions by the inmate.
Peumansend Creek			Current screening is comprehensive and covers PREA material although it is not gender specific. This modification can be made at no additional/determinate cost.
WI Pierce County			Current screening is not comprehensive on PREA criteria. This modification can be made at no additional/determinate cost, mostly by leveraging state

**Jail Cost Impact #11: Contracting with Other Entities for the Confinement of Inmates (PP2)**

Marion County is the only jail to contract with a private entity for these services. As a matter of fact, they have more inmates in contracted facilities than they do in their own facility. They contract with two private facilities, Marion County Jail II (MCJII) and Liberty Hall, both of which are ACA accredited and maintain this status as part of their contractual obligation. MCJII houses 1,125 and women's unit houses 250 and both would be subject to new requirements as a result of PREA, particularly in training, reporting, and supervision. With a contractor ratio of 1.4, PP2 is the greatest ongoing cost impact to Marion County with an annual cost of \$755K.

**Jails Cost Impact #12: Contract Modifications for Outside Services (RP2 through RP4, and RE3)**

Most sites in this study have some sort of agreement in place with an external vendor or community organization to that provides emotional support and can help victims of sexual abuse transition from incarceration to the community. These partnerships however, are loosely arranged and, by and large, are not codified with an MOU or formal written agreement. Formalizing this partnership does not equate to a significant or reportable cost for most sites. On the other hand some sites do expect a cost such mostly due to administrative or legal feels to draft and formalize the agreement. These costs are all between \$500 and \$2K and impact WA Pierce, Essex, Hennepin, Alachua, and Aiken counties.

Other costs include publication and printing charges to ensure that inmates are aware of such services (RE3). Essex County, for example, provides a hotline for inmates to report sexual abuse incidents but this information is not published on posters or pamphlets, which results in additional upfront costs of \$1K for developing, printing and posting these materials. Likewise, WA Pierce County estimates \$300 for the same thing. Marion County has a similar situation but on a larger scale, estimating \$9K to develop and print out poster boards with service provider names and numbers.

### **Jails Cost Impact #13: Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers (MM3)**

Most sites in this study provide mental health care for both sexual abuse victims and abusers yet a few of them do not provide this service to abusers, resulting in additional costs. The primary cost drivers were the modification of contracts with mental health care providers as most jails do not have their own mental health care staff in house. Sites impacted by this standard include Norfolk, Sacramento, Alachua, and Miami-Dade. The estimated cost to meet this requirement for Norfolk is \$56K per year required to modify their existing contract with their mental health practitioner. With only one substantiated case of sexual abuse in the past year, Miami-Dade can by with a minimal impact, \$150, to cover additional counseling time for the abuser based on their current mental health care contract rates.

Alachua County, on the other and, expressed a concern about the number of known abusers that enter their system annually. With 17,000 bookings and a known high quantity of sexual offenders entering their system per year, they will require that at least four additional mental health care practitioners needed to provide this service at an annual cost of \$406K or roughly \$102K per staff including salary, benefits incidental costs. In addition, there are upfront operational costs of \$4K since these are new hires. Likewise, Sacramento County would need additional mental health care staff mostly because they have experience an 80% cut in this area over the past few years due funding cuts from the state. For mental health care, they consider themselves in "crisis mode" with absolutely no available resources for additional duties. Although some inmates are able to provide services by an outside entity, the Man-Alive Program, they would still need to hire six additional clinicians at a cost of \$200K each per year yielding an annual cost impact of \$1M plus upfront operational costs of nearly \$7K since these are new hires.

### **Jails Cost Impact #14: Supplement to SC2 Use of Screening Information (ID-6)**

Standard ID-6, Supplement to SC2 User of Screening Information, appears to have a unique cost impact on jails distinct from other sectors in this study, particularly is it relates to the requirement to house immigrant detainees in separate housing. Not every jail houses immigrant detainees from ICE and CBP but for the ones that do, the cost impact is either negligible or relatively significant because they either have available, designated, separate housing or they do not. For those that do not have the space, the cost of additional bed space and facility enlargements is relatively expensive. Three sites in particular indicated a cost impact related to this standard: Albany County, Marion County, Denver County, and Pulaski County Albany County does not have a contract with ICE but they do house ICE detainees and currently house them with the general population (i.e., they are not held in separate housing). Enforcing this standard would lead Albany County to refuse future detentions of immigrant detainees due the budgetary requirements of housing them separately. Although space is not an issue, they would be required to hire nine additional staff to supervise and manage this segregated inmate population at an annual cost of \$515K plus upfront costs of \$9K since these are new hires. Likewise, Pulaski County also

does not have a contract with ICE yet take in an average of 23 detainees per year with an average stay of 48 hours each. They treat their detainees just like the general inmate population and do not house them separately. Assuming a housing cost of \$56/day, this equates to approximately \$3K on an annual, ongoing basis to comply with this standard. Marion County, on the other hand does have a contract with ICE but, like the others, they also do not house their immigrant detainees separately. If the jail were at full capacity, this could require opening up a new cell block at a cost of approximately \$19K/month for an average capacity of 10 immigrants equating to \$228K per year. This cost is for physical operations and facilities only; on additional staff resources would be required. Denver County also has a contract with ICE and does not house detainees separately, despite a recent ICE audit of their facility resulting in full compliance with federal immigrant detention laws. Depending on how many immigrant detainees Denver County houses, there might not be any additional cost, particularly if that threshold does not exceed 48 detainees. However, if that count does exceed 48, Denver County would be required to open an additional housing area to include nearly five additional staff with an estimated annual cost of \$407K plus upfront operational costs of approximately \$5K since these are new hires. The probability of this is slim therefore this cost is not included in the total cost impact for this standard.

#### **Jails Cost Impact #15: Exhaustion of Administrative Remedies (RE2)**

All of the jails included in this study were compliant with adhering to the exhaustion of administrative remedies within a 90 day period.

However, there was some uncertainty about whether there would be a cost impact as a result of an inmate deemed to have exhausted his or her administrative remedies 48 hours after notifying the agency of her or her need for protection. Similar to prisons described above, it is worth mentioning that such a standard would directly violate the Prison Litigation Reform Act (PLRA).

*“No action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted.” 42 U.S.C. § 1997e(a)*

Due to the short time frame of incarceration in jails (anywhere from 10-30 days) however, most jails did not think this would impact their population or considered their population as litigious. If there were a cost impact, it would be limited to the level of effort attributable to documenting or modifying a policy such as Essex Co's estimate of \$3K or Sacramento's estimate of \$2K for such purposes. On the other hand there were four sites (Aiken, Anoka, Alachua, and Norfolk) that did indicate the possibility of potential litigation and added legal costs. Similar to the litigation costs described in the prohibition of cross-gender pat downs, these costs are considered speculative and unquantifiable in this study, however it is worth noting that such costs could be significant.

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## Juvenile

The study reflects eight juvenile sites, one from the Northeast (MA Department of Youth Services), four from the West (OR Youth Authority, ID Department of Youth Corrections, ACJCS, ID Juvenile, and CO Division of Youth Corrections), one from the Southeast (FL Department of Juvenile Justice), and two from the Midwest (IN Division of Youth Services and MO Division of Youth Services). Every site is considered a jurisdiction having authority at the state level except for ACJCS, which is a county-run facility. The ongoing and upfront tables highlighted with Harvey Balls represent an order of magnitude signifying a cost impact in relation to overall budget for the juvenile sector. The degree to which each Harvey ball is shaded indicates the magnitude of the cost impact. An empty ball represents standards that do not result in any cost impact. On the other hand, a fully-shaded ball represents a percent impact on annual operating budget that is greater than 0.50%. A quarter-shaded ball and half-shaded ball represent an overall impact on annual operating budget between 0% and 0.25% and 0.25% and 0.50%, respectively. The ongoing and upfront tables highlighted with Harvey Balls represent an order of magnitude signifying a cost impact in relation to overall budget for the *Prisons* sector. The degree to which each Harvey ball is shaded indicates the magnitude of the cost impact. An empty ball represents standards that do not result in any cost impact. On the other hand, a fully-shaded ball represents a percent impact on annual operating budget that is greater than 0.50%. A quarter-shaded ball and half-shaded ball represent an overall impact on annual operating budget between 0% and 0.25% and 0.25% and 0.50%, respectively.



Table 20: Juvenile Ongoing Cost Impacts as % of Annual Operating Budget

Priority		ACJCS	ARJA	CA DJJ	CO DYC	FL DJJ	IDJC	INDYS	MA DYS	MO DYS	OYA
1	Limits to cross-gender viewing and searches	○	○	◐	○	○	○	○	○	○	○
2	Inmate Supervision	○	○	○	●	○	○	●	○	○	○
3	Assessment and use of monitoring technology	○	◐	●	◐	◐	◐	◐	○	○	◐
4	Ongoing medical and mental health care	○	○	○	○	○	◐	●	○	○	○
5	Audits of standards	●	◐	◐	◐	◐	◐	◐	◐	◐	◐
6	Training and Education	○	○	○	◐	●	◐	○	○	◐	◐
7	Contracting with other entities for the confinement of inmates	○	○	○	●	○	●	○	○	○	○
8	Accommodating inmates with special needs	○	○	○	○	○	○	○	○	○	○
9	Zero tolerance of sexual abuse	●	◐	◐	◐	◐	◐	◐	◐	◐	◐
10	Screening for risk of sexual abuse	○	○	◐	○	○	●	○	○	○	○
11	Contract modifications for outside services	●	○	◐	○	○	◐	◐	○	○	○
12	Evidence protocol and forensic medical exams	○	○	○	○	◐	◐	◐	○	○	○
13	Investigations	○	○	○	◐	○	◐	○	◐	○	◐
14	Supplement to SC-2: Use of screening information	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
15	Hiring and promotion decisions	○	○	○	◐	◐	◐	○	○	◐	○
16	Gathering, reviewing, and reporting data	○	○	◐	◐	○	○	○	○	○	○
17	Exhaustion of administrative remedies	○	○	○	○	○	○	○	○	○	○
18	Agency protection against retaliation	○	○	○	○	○	○	○	○	○	○

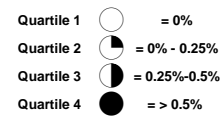


Table 21: Juvenile Upfront Cost Impacts as % of Annual Operating Budget

Priority		AC/CS	AR JA	CA DJJ	CO DYC	FL DJJ	IDJC	IN DYS	MA DYS	MO DYS	OYA
1	Limits to cross-gender viewing and searches	○	○	◐	○	○	○	○	○	○	○
2	Inmate Supervision	○	○	○	◐	○	○	◐	○	○	○
3	Assessment and use of monitoring technology	○	◐	◑	●	●	●	●	●	○	●
4	Ongoing medical and mental health care	○	○	○	○	○	○	○	○	○	○
5	Audits of standards	○	○	○	○	○	○	○	○	○	○
6	Training and Education	◑	○	◐	◐	◐	●	◐	◐	◐	◐
7	Contracting with other entities for the confinement of inmates	○	○	○	○	○	○	○	○	○	○
8	Accommodating inmates with special needs	○	○	○	○	○	○	○	○	○	○
9	Zero tolerance of sexual abuse	◑	◐	◐	◐	◐	◐	◐	◐	◐	◐
10	Screening for risk of sexual abuse	◑	○	◐	○	○	●	○	○	○	○
11	Contract modifications for outside services	◑	○	◐	○	○	◐	◐	○	◐	○
12	Evidence protocol and forensic medical exams	○	○	○	○	○	○	◐	○	○	○
13	Investigations	○	○	○	◐	○	◐	○	◐	○	◐
14	Supplement to SC-2: Use of screening information	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
15	Hiring and promotion decisions	○	○	○	○	○	○	○	○	○	○
16	Gathering, reviewing, and reporting data	○	○	◐	◐	○	○	○	○	○	○
17	Exhaustion of administrative remedies	○	○	○	○	○	◐	○	○	○	○
18	Agency protection against retaliation	○	○	○	○	○	○	○	○	○	○

Quartile 1 ○ = 0%  
 Quartile 2 ◐ = 0% - 0.25%  
 Quartile 3 ◑ = 0.25%-0.5%  
 Quartile 4 ● = > 0.5%

**Juvenile Cost Impact #1: Limits to Cross-Gender Viewing and Searches (PP4)**

Cross-gender pat downs generally do not cause as much concern in the juvenile sector as it does for prison and jails however, the major cost drivers are related to the same issue; the need to align staffing and resident gender patterns more closely. To accomplish this, some sites may need to hire gender-specific personnel (usually males).

All Juvenile corrections jurisdictions in this study prohibit cross-gender pat downs, except the FL DJJ, California DJJ and the IN DYS. The major cost drivers for the facilities that do not comply are based on workforce realignment due to the imbalance between male-female staff ratios and male-female resident ratios.

The gender ratios that adequately allow facilities to prohibit cross-gender pat downs vary considerably. This could be a result of shift assignments, the frequency that pat downs are conducted, and other functional processes and/or policies that in place. For example, the Colorado DYC, which prohibits cross-gender pat searches as a written policy and the IN DYS which states that cross-gender pat downs cannot be avoided due to male to female staffing ratios, have roughly the same male to female staffing ratio and male to female resident ratio; 57% of staff at CO DYC is male and 86% of residents are male, while at IN DYS, 60% of staff are male and 85% of residents are male. In the case of IN Division of Youth Services, only one facility (an all woman facility) has the appropriate male-female staffing ratio to avoid conducting cross-gender pat downs; staff at this facility consists of 75% female.

Both IN Division of Youth Services and the FL Department of Juvenile Justice, report that efforts to decrease the number of female staff while increasing the number of male staff would violate Federal laws, particularly, Equal Employment Opportunity Commission (EEOC) laws. The Florida DJJ states that, although issues of discriminatory hiring and shift assignments would be the main obstacles to overcome, it was determined that the agency could become compliant with very little cost impact.

### **Juvenile Cost Impact #2: Inmate Supervision (PP3)**

Most of the juvenile corrections agencies in this study reported very few substantiated sexual abuse incidents. A few agencies did report increases over the past few years, but these are believed to be related to an increase in awareness and a subsequent increase in reporting. Only the IN DYS and CO DYC reported that the number of staff is currently inadequate to prevent sexual abuse. The cost drivers associated with physical supervision are the wages, fringe benefits, and associated operating costs related to hiring personnel.

The adequacy of physical supervision is often measured by the staff to resident ratio. The National Council on Crime and Delinquency recommends a staff to resident ratio of 1:8 to effectively impact abuse. The CO DYC estimates that an additional 25 staff will be needed to reach this ratio; these additional positions are estimated to cost \$1.3M in annual wages and benefits and \$34K in operations costs per year. To meet adequate supervision, the IN DYS believes that staffing ratios at its facilities need to reach 1 staff per 10 residents. This would require 78 additional FTE's at an estimated to cost \$3.7M in wages and benefits and \$74K in operations costs.

### **Juvenile Cost Impact #3: Assessment and Use of Monitoring Technology (PP7)**

Video monitoring is a common form of technical supervision in all corrections facilities. All juvenile corrections agencies visited in Phase II of this study have at least some video monitoring in place however, all (except MO DYS, which upgraded much of its video monitoring technology two years ago) believe that some enhancements are needed. Some facilities lack video monitoring coverage in vital common areas, others lack achieving capabilities and some others have outdated equipment that is in need of upgrades or replacement.

The major cost drivers for technical supervision include the purchase and installation of equipment, maintenance, and LOE related to the monitoring of camera systems. A few costs were identified by jurisdictions that have recently installed video monitoring in their facilities or that have plans in place to do so. The MA DYS recently obtained an estimate to install video cameras at its facilities, which ranged from \$63K to \$115K per facility. In addition, the IN DYS noted that they recently purchased 108 new cameras for their female facility at a cost of \$300K for the equipment and installation; \$3K per camera.

Although the cost of equipment, on a per unit basis, is likely to be fairly consistent among facilities, the cost of installation could vary considerably. Installation costs could be impacted by the age of buildings, infrastructure issues and building designs. For example, older buildings may require more retrofitting which could lead to additional costs. Other buildings may require infrastructure upgrades to support the technology, leading to higher costs.

The FL DJJ, one of the largest juvenile systems in this study with 76 residential facilities and 25 detention centers under its jurisdiction, had the largest estimated cost for technical supervision. The FL DJJ estimated it would cost \$380K per facility to update its camera systems to provide adequate coverage; the total cost for all facilities combined is roughly \$38M. This is a relatively high cost per unit, but may be a result of high installation costs due to the issues noted above. And there is ample evidence justifying technology investments at DJJ. An incident two years ago in a Collier County, Florida juvenile detention center provides an example of the importance of adequate and updated camera technology. Portions of a lawsuit against the Collier County Sheriff's Office, which stemmed from an assault at the juvenile detention center there, were dismissed for technical reasons, as a result of poor videotape. According to [naplesnews.com](http://naplesnews.com), a male juvenile was repeatedly attacked and sexual assaulted by two other male residents between May 14 and 15, 2008. The attacks were recorded on videotape but the article notes that the report of the incident "... said a sheriff's investigator couldn't confirm all the boy's allegations due to the poor videotape quality, camera angle and because one boy covered the lens at one point."<sup>11</sup> Since the allegations could not be confirmed, as a result of the poor videotape, part of the lawsuit against the Collier County Sheriff's Office was dismissed.

The CO DYC identified the second largest cost associated with technical supervision, among the nine juvenile systems in this study. The CO DYC estimates its cost for video monitoring using facility square footage; the agency estimates that it would cost \$27 per square foot to upgrade its facilities to provide adequate coverage. The CO DYC has 10 facilities in need of upgrades, encompassing 657,526 square feet of space; the estimated cost to upgrade these facilities is roughly \$17.8M.

Other relatively large costs associated with technical supervision include \$4M for the OR YA to purchase and install new video monitoring equipment to provide complete coverage of its facilities and \$2.5M for the IN DYS to do the same. In addition, OR YA noted that at least one new FTE would be required to staff the monitoring equipment.

Four of the nine juvenile corrections agencies in the study also do not conduct annual technology need assessments and identify relatively small costs associated with these; costs ranged from \$110K for the CO DYC to \$5K for IDJC.

#### **Juvenile Cost Impact #4: Zero Tolerance of Sexual Abuse (PP1)**

The major issue in this standard is the requirement for an agency to employ or designate a PREA coordinator to oversee the agency's efforts to comply with the NPREC standards. For most of the sites visited, this resulted in the need for at least one additional full-time staff member added to their management and operational budget requirements. The following table lists the budget requirements for an additional staff member assuming a senior level position reporting directly to the agency head. All

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<sup>11</sup> [Naplesnews.com](http://Naplesnews.com), "Part of lawsuit over teen's beating in Collier juvenile center dismissed", Aisling Swift, May 27, 2010.

costs are annual, fully loaded, including salary and benefits (e.g., healthcare, retirement). Operational upfront costs, such as office furniture and supplies, office equipment, communications services, training, and other expenses above and beyond salary and fringe benefits, are also included.

Site	Upfront	Yearly	Notes
CA DJJ	\$ 1	\$ 140	1 FTE salary, benefits and new hire operations costs.
MO DYS	\$ 1	\$ 101	1 FTE salary, benefits and new hire operations costs.
OYA	\$ 1	\$ 92	1 FTE salary, benefits and new hire operations costs.
CO DYC	\$ 1	\$ 86	1 FTE salary, benefits and new hire operations costs.
FL DJJ	\$ 1	\$ 76	1 FTE salary, benefits and new hire operations costs.
IN DYS	\$ 1	\$ 72	1 FTE salary, benefits and new hire operations costs.
MA DYS	\$ 1	\$ 71	1 FTE salary, benefits and new hire operations costs.
ACJCS	\$ 1	\$ 59	0.5 FTE salary, benefits and new hire operations costs.
AR JA	\$ 1	\$ 38	0.5 FTE salary, benefits and new hire operations costs.
IDJC	\$ 1	\$ 34	0.5 FTE salary, benefits and new hire operations costs.

None of the juvenile corrections jurisdictions in this study currently have a dedicated PREA Coordinator; the IDJC has temporarily assigned PREA coordination duties to a Correctional Program Coordinator within the Quality Improvement Unit. A full-time PREA Coordinator is required for jurisdictions containing over 500 residents; jurisdictions with fewer than 500 residents only require a part-time coordinator. Of the ten juvenile corrections jurisdictions in this study, seven will require a full-time PREA Coordinator and three will require a part-time coordinator; ID DYC, ACJCS, and AR JA. Although not required by PREA standards, to adequately perform the responsibilities of the position, some of the larger jurisdictions may require a small staff to assist the PREA Coordinator or in some instances multiple coordinators. For example, the FL DJJ may need two PREA Coordinators, as the agency is divided into detention and residential divisions, both containing well over 500 residents.

The costs associated with the PREA Coordinator position consists of salary, benefits, and operational costs. The positions should be management level and likely report directly to agency Directors or departmental heads. The costs for a PREA Coordinator position, among the jurisdictions that will require a full-time position, range from \$139K to \$69K for salary and benefits. The highest cost for a PREA Coordinator is for CA DJJ, where wages are relatively high, and the lowest cost is for IDJC, where wages are relatively lower. The operational cost associated with one full-time PREA Coordinator consists of a \$1,100 one-time cost for office equipment and training and a yearly cost of \$1,450 for office supplies, communications expenses, institutional expenses and ongoing training.

#### **Juvenile Cost Impact #5: Training and Education (TR1 through TR5)**

Training and education has a moderate to significant cost impact on many Juvenile corrections agencies included in this study, particularly the training of employees. Primary costs drivers include modifications to current curriculum and training to an expanded set of employees, contractors, and volunteers in order to cover PREA material. It is assumed in this study that some of the smaller Juvenile corrections agencies can leverage the PREA Coordinator to assist in curriculum development and even training delivery when feasible. The following tables show the cost impacts by site according to the first three training standards; employee training, volunteer and contractor training, and resident education. The remaining training standards, training for investigators and training for medical and mental health staff, have a significantly less cost impact and are described in narrative.

Employee Training (TR-1)			Notes
Site	Upfront	Yearly	
FL DJJ	\$ 36	\$ 3,364	FL DJJ does not currently provide PREA training to all staff. Included are costs for two different levels of training: one for all direct care that is very in depth, and then training for the rest of the facility staff. This cost includes development cost, and wages for staff to attend the training. These costs are all due to PREA implementation: \$36,000 is development and the rest is staff time. 4,800 employees in total which will require increased training.
CO DYC	\$ 1	\$ 61	Training is provided to all employees on PREA related material. The New Hire Academy training does 1.5 hour PREA training and then weaves the PREA issues throughout the entire 40-hour week within other modules. Yearly training is 2 hours for all employees within DYC facilities. Refresher training is provided; 2 hours minimum per year. The mandates for initial and on-going training of all staff, volunteers, and contractors would require at a minimum 1.0 FTE to ensure compliance. The cost for training volunteers and contractors is included here, as noted in the chart below.
IDJC	\$ 121	\$ 40	Only direct care employees receive training on sexual abuse and PREA. The training is conducted within classrooms by agency employees. Refresher training will also need to be provided. In addition to the current training provided, the proposed training requirements in the proposed standards would require additional training and training development for all IDJC staff. The cost to develop the training would be \$28.00 per hour for 40 hours. IDJC would need to train 400 staff at a cost of \$100.00 per day for initial training. The training modules as outlined in the standards would require 3 days of training. It is estimated that refresher training would require 400 staff to be trained for 8 hours, at \$100.00 per day.
MO DYS	\$ 95	\$ 24	Training on PREA is not currently provided. It is estimated that the initial cost will be \$95K to provide an additional four hours of required training for all employees. Annual cost to provide one-hour refresher cost is estimated to be an additional \$24K.
ACJCS			ACJCS does not currently provide PREA training to all staff. Only correctional staff is trained on sexual abuse prevention, detection, and response policies and procedures for a length of one hour. Training is provided by staff and they are currently working on offering computer based training. Although training for all staff is not currently provided, the PREA coordinator would develop a PREA curriculum.
AR JA			Training on PREA is provided to all employees. In addition, refresher courses are provided. Oral presentations are given and pamphlets are provided.
CA DJJ			The CDJJ provides an initial four (4) hour training of PREA at the peace officer academy, and one (1) hour of mandatory annual. The CDJJ provides an initial four (4) hour training of PREA at the peace officer academy, and one (1) hour of refresher training.
IN DYS			Every employee receives training that includes PREA. Training consists of 1 to 2 hours in classrooms and handbooks. Annual refresher training is also provided. No cost is expected.
MA DYS			All direct care state employees and some contracted providers obtain PREA training through the DYS Basic Training 3 ½ hour PREA course. Included in the DYS Basic Training curriculum are effective communication; de-escalation; and boundaries modules. DYS also provides annual training including PREA to direct care staff and some contracted staff. Those who attend the above courses are required to sign acknowledgement forms that they have received training on this information and understand the training and policies. Currently, there are approximately 1000 state employees that receive our trainings with 4 trainers at the Training Academy. Per BAH, costs are considered sunk, as MA DYS is already in compliance.
OYA			All new OYA staff is required to attend one week of initial training. This includes two hours specific to PREA and is conducted in a classroom setting. \$500 in training costs was initially incurred to develop the training material. If the new staff has contact with offenders, they attend an additional two weeks of training. Currently there is no refresher training but this is being created. The refresher training can be delivered on an annual basis at no additional cost.

Volunteer and Contractor			Notes
Site	Upfront	Yearly	
OYA	\$ 124	\$ 30	Volunteers receive PREA training as part of the approval process to work with OYA offenders, however, contractors do not. Training for contractors is being designed. This training would be classroom and computer based. Costs provided are due to increase in contractor payment and are yearly estimates. The term contractors would include those providing services in and outside of OYA's Juvenile Facilities.
FL DJJ	\$ 7	\$ 2	Volunteers and contractors providing on-site maintenance and repair currently receive no training. These costs are for volunteers to receive one hour of training and for a flyer to be prepared and distributed to contractors providing maintenance.
MO DYS	\$ 1	\$ <1	Additional training will be required for volunteers and contractors.
ACJCS			Contractors receive PREA training, however, volunteers do not. The PREA coordinator will train volunteers to PREA training, to include refresher, is provided to all volunteers and contractors.
AR JA			CA DJJ policy requires training for all contractors and volunteers on PREA.
CA DJJ			PREA training is provided to all employees and contractors at a length of 30 minutes through classroom settings and posters. The additional FTE named in Standard TR1, above, would support in this area as well.
CO DYC			Training is provided to volunteers that have direct contact with residents. Contract providers are required to provide training to their staff. If the new standards are approved, the cost for contract providers to implement the training would be passed on to IDJC. These costs would be added into daily rates. This additional cost is included in standard PP2.
IDJC			Training is provided to all volunteers and contractors that have direct contact with residents. Volunteer and contractor training are consistent with employee training. No cost is expected.
IN DYS			Training is provided to all volunteers and contractors that have direct contact with residents. Volunteer and contractor training are consistent with employee training. No cost is expected.
MA DYS			All contracted employees that have contact with residents are provided PREA training.

Site	Inmate Education (TR-3)		Notes
	Upfront	Yearly	
FL DJJ	\$ 22	\$ 11	Education on PREA is not currently provided. The costs reflect a video for each facility as well as flyers and posters. Cost for material and video deemed to be upfront cost. 2/3 of cost has been allotted to video and 1/3 to material. Assume video cost is upfront and material cost is yearly.
IDJC	\$ 2	\$ 8	Comprehensive education on sexual abuse is not provided to residents. Current cost for developing training curriculum for POST academy is \$28.00 per hour. It is estimated that it would take approximately 80 hours to develop a curriculum. It is also estimated that it would cost \$2K annually for materials. The provision of this training would take approximately 1 hour for each juvenile coming into the system. Approximately 324 juveniles enter the system annually. The average salary and
ACJCS	\$ 1		Handbooks are provided to residents during the intake process. The handbooks contain educational information on sexual abuse. Refresher training, however, is not provided. It will cost \$1K to develop material, such as poster boards, to be used for refresher training.
AR JA			Resident education is provided and refresher training is provided by case managers, quarterly, and on DVD through monitors.
CA DJJ			CDJJ currently does provide training to youth at the point of intake, quarterly and when the youth arrives at a new facility.
CO DYC			Education on PREA to youth in their care, however, the process is more defined in some facilities than others. The training is provided through classroom and video. Refresher training is done typically on a weekly basis but the majority is conducted at intake. There would be a cost associated with printing of the posters, handbooks, and updates as a means for refresher training along with costs associated for training staff to be trainers to the youth. The additional FTE named in Standard TR1, above.
IN DYS			Comprehensive education on sexual abuse is provided to residents. This consists of a PREA video, a handbook, and other material placed throughout the facilities. Refresher training is provided periodically, including a public address message played on a weekly basis.
MA DYS			Residents receive a handbook with information on PREA standards and policies including how to report incidents through a grievance box at all locations.
MO DYS			MO DYS provides an extensive and comprehensive education program to its residents, which includes training on sexual abuse issues. The education is conducted on a continual basis, as part of the general philosophy of the agency's programming.
OYA			All offenders are provided with PREA materials upon placement in OYA custody. The distribution of these materials is tracked in the case management system and there is a monthly review of these dispersals. Offenders showing to have not received these materials are noted and a concerted effort is taken to ensure these materials are delivered. These materials consist of safety guides, contact cards and posters.

Specialized training for investigations and medical and mental health care had a significant less cost impact. For some of the Juvenile corrections agencies in this study, investigations are conducted by local or state authorities not directly employed by the jurisdiction. These authorities, usually state and local police departments, generally receive training on sexual abuse but do not receive training specific to conducting investigations in confinement settings. In other instances investigations are conducted by internal investigators and/or other state agencies, such as child welfare services. Five of the ten sites will require additional training for investigators and will accrue, in most instances, a relatively minor cost to do so.

All medical and mental health staff, on the other hand are employed directly and/or contracted by the juvenile corrections agencies in this study. The medical and mental health care staff generally receive their training on sexual abuse through individual medical and professional licensure requirements; this is done outside the juvenile facilities and external to their own training operations. In these cases it is difficult to ensure the training they receive is compliant with the standard. In a few cases however, additional training is also provided by staff employed by the juvenile corrections agency. Five of the ten sites also expressed a need for some additional training for medical and mental health staff, with varying costs, depending on the extent of the training required to meet the standard.

Examples of estimated training costs for Investigators include MA DYS's upfront cost of \$5K, IDJC's upfront cost of \$2K and yearly cost of \$5K, FL DJJ's yearly cost of \$10K, and IN DYS's upfront cost of \$25K. The highest estimated cost to train investigators was for CA DJJ; roughly \$82K to train 24 internal staff on sexual abuse and conducting investigations in confinement settings.

As for examples on training for medical and mental health staff, it is estimated that OYA's cost will be \$9K upfront and \$5K yearly, IDJC's cost will be \$3K upfront and \$6K yearly, FL DJJ's cost will be \$30K yearly, and MO DYS's will be \$2K upfront. The highest estimated cost to train medical and mental health staff was also for CA DJJ, and again is roughly \$82K to train 24 internal staff on preserving evidence of sexual abuse.



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**Juvenile Cost Impact #6: Evidence Protocol and Forensic Medical Exams (RP1)**

In most cases, victim advocacy services available to residents in juvenile corrections facilities are provided by an outside entity. In many instances the entity may be a local hospital, in coordination with the Sexual Assault Nurse Examiners (SANE), or a service provider within the community. It is estimated that two of the ten juvenile systems in this study will incur costs associated with providing a victim advocate to accompany a victim through the forensic medical exam process (RP1). The largest (and only significant) of these costs is for IN DYS, where it is estimated the providing a victim advocate during the forensic medical exam will cost \$4K in upfront costs and \$230K in yearly costs. IN DYS does not provide a victim advocate and local hospitals do not always provide one when conducting forensic medical exams. The cost is to create an internal part-time position to provide this service to residents.

**Juvenile Cost Impact #7: Gathering, Reviewing, and Reporting Sexual Abuse Data (DC1 through DC4)**

The gathering, reviewing, and reporting of sexual abuse data is a common practice among juvenile corrections jurisdictions. The majority of the juvenile corrections agencies in this study were found to be in full compliance with these standards; the only exceptions being the CA DJJ and CO DYC. Any costs associated with this standard can also be mitigated by employing a PREA Coordinator, as the efforts associated with data collection and review should fall under the responsibility of that position. In some cases an additional FTE may be required to adequately perform these duties, particularly in larger jurisdictions, with many facilities, where a PREA Coordinator may need assistance to complete all of the positions responsibilities. The major cost drivers associated with these standards are LOE costs related to the staff time required to collect, analyze and report the data. Where an additional FTE would be required to perform these duties, the cost of salary, benefits, and related operational costs would be accrued. The FTE would likely be a mid-level data analyst reporting to the PREA Coordinator; in situations where the PREA Coordinator itself did not perform these duties.

**Juvenile Cost Impact #8: Hiring and Promotion Decisions (PP6)**

Background checks on new hires are also a common practice among correctional jurisdictions, including the juvenile facilities in this study. Background checks for employees being considered for promotion (as also proposed by PREA) are however, not as common. Rather, many jurisdictions rely on periodic checks, often annual, to learn of criminal activity among its employees. Similarly, none of the juvenile corrections agencies in the study asked prior institutional employers specifically about allegations of sexual abuse that a prospective hire may have been involved in. This is not a cost factor however, since most jurisdictions contact prior employers and can ask the question without an additional cost. It should be noted however, that most jurisdictions felt that information regarding past allegations of sexual abuse will not be revealed by prior employers due to privacy issues.

The only cost driver for this standard is, thus, the cost to conduct additional criminal background checks on employees being considered for promotions. Assuming \$50/criminal background check for this study<sup>12</sup>, the following table depicts the approximate costs (rounded) for each site where costs were expressed and the assumed average number of promotions per year.

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<sup>12</sup> See Assumptions section.

**Juvenile Cost Impact #9: Audits of Standards (AU1)**

As this is not a nationally instituted policy, requirement or service, PREA audits are not conducted anywhere in the country. Nevertheless, each site is very familiar with the auditing process whether it is state mandated audits, ACA accreditation audits, or PbS audits. Based on the wide degree of audits across the county, we assumed a standard juvenile audit fee of \$17K per triennial audit per facility, equating to approximately \$6K a year per facility<sup>13</sup>. The following table provides a breakdown of the costs associated with the PREA audit.

**Juvenile Cost Impact #10: Screening (AP1 and AP2)**

The majority of juvenile corrections agencies in this study employ a screening instrument or process to identify potential victims of sexual abuse and potential sexual predators. Of the ten juvenile corrections agencies, seven employed an instrument or process to screen for the risk of sexual victimization and abusiveness that complies with standard AP1. Of the three jurisdictions that were not in compliance, two (IDJC and ACJCS) do not currently screen for the risk of being sexually victimized and being a sexual predator. The remaining jurisdiction not in compliance, CA DJJ, does screen for the risk of being sexually victimized but feels that additional questions need to be asked to be fully compliant with the intent of the standard. The following table shows the variable costs from site-to-site to meet the screening standards.

Site	Upfront	Yearly	Notes
IDJC	\$ 2,753	\$ 1,530	Residents are screened during intake regarding their needs. However, there is no specific tool to measure risk for being sexually abused or for having the potential to be sexually abusive towards others. It is estimated that the cost to develop such a tool would be \$10K. It is also estimated that it would cost \$35K to norm and
CA DJJ	\$ 14	\$ 60	Currently there are two screening questions related to victimization of sexual abuse. There is the need to develop additional screening questions to be incorporated in existing instruments to reach full compliance.
ACJCS	\$ 1		A screening process is not in place at intake that assesses the risk of residents being sexual abused and the risk of being abusive. Cost impact of implementing this process would be \$1K. Medical and mental health staff is available to speak with residents.
AR JA			There is currently a written screening instrument in place. There would be no cost to modify the tool to include PREA.
CO DYC			All youth are screened during intake and assessed on their risk of being sexually abused or having the potential to be sexually abusive. Medical and mental health staff is available to speak with residents.
FL DJJ			Residents are currently screened during intake for predator and vulnerability. The screening instrument is gender-specific. Medical and mental health staff is available to speak with residents.
IN DYS			Residents are screened during intake and again at each reassignment. The screening identifies all risks and is gender specific. Medical and mental health practitioners are available to speak with residents.
MA DYS			A risk assessment and screening are performed on each resident at intake and throughout the resident’s commitment at various stages that may be predetermined or deemed necessary due to new information received during their residency. This information is critical in establishing the history and risk presented on youth entering our care. These assessments take into account, among the other factors, the gender and risk of being abused or abusing other residents. Medical and mental health staff are available to speak to residents.
MO DYS			Residents are screened during intake and again at each reassignment; the screening identifies all risks. The assessments are not done by medical and mental health practitioners; however, residents are given an opportunity to discuss any safety concerns or sensitive issues privately with another employee, the Service Coordinator.
OYA			Residents are not screened to this standard; however, OYA has access to the state of Washington’s SAVY screening tool which assesses for aggressive and vulnerable offenders. This can be used at no cost to the agency. Medical and mental health practitioners are available to speak with residents.

<sup>13</sup> See Assumptions section.

There can also be costs associated with using the screening information to inform about housing, bed, work, education and program assignments with the goal of keeping separate those at high risk of being sexually abused from those at high risk of being sexual abusive; standard AP2. These costs could potentially be much higher than the cost to modify existing screening instruments, as there could be situations where additional capacity is needed to accomplish this. For example, it is estimated that the IDJC could accrue an upfront cost of \$2.7M and a yearly cost of \$1.5M to add 15 beds to its current facilities to adequately separate those residents that are at high risk of being sexually victimized from potential sexual predators. The need for additional beds is driven by the fact that 37.2% of its residents have a history of being sexual offenders, and thus would be categorized as a high risk. Additionally, IDJC operates at close to capacity making it difficult to separate residents within its current housing configurations.

#### **Juvenile Cost Impact #11: Contracting with Other Entities for the Confinement of Inmates (PP2)**

Contracting to private facilities for the confinement of residents is often viewed as a cost saving measure, as the public correctional entities can avoid the costs to construct its own facilities and avoid the costs of hiring direct staff. Five of the ten Juvenile corrections agencies in this study contract with other entities for the confinement of residents. The MA DYS has contracts with 37 facilities throughout the state to house its residents; MA DYS houses its residents in a total of 57 facilities. In the FL DJJ system, 84% of 76 resident facilities are contracted. The IDJC can contract with up to 19 facilities for the housing of its residents and the CO DYC contracts 48 facilities.

It is also common for correctional agencies to mandate that all contracted facilities follow the same policies and procedure as the jurisdiction places on its own facilities. In these situations, contract modifications may not be required to ensure that contracted facilities meet PREA standards, as they would be required to under contractual mandates. Contracted facilities would however, accrue a cost to bring their facilities into compliance, just as the non-contracted facilities would. If not restricted under contract, this cost is likely to be passed down to the jurisdictions providing the contract, through increased fees to operate and provide services at the contracted facilities such as CO DYC and IDJC. CO DYC will have an estimated yearly cost of \$1.6M, the vast majority of which are costs associated with the need to update the technological supervision of its contracted facilities; specifically the purchase and installation of cameras. IDJC will have increased yearly costs of \$1M. Unlike the CO DYC, these costs are not concentrated in any one standard, but rather is spread among several standards that the contracted facilities will be required to comply with. It should be noted that FL DJJ also anticipates a significant cost impact since 84% of their offenders are housed in a contracted facility. With so many offenders under contractor supervision, their increased costs are embedded throughout all their standards and not isolated solely in PP2.

#### **Juvenile Cost Impact #12: Contract Modifications for Outside Services (RP2 through RP4, and RE3)**

The costs are associated primarily with the provision of support services (RP2) by outside entities and community service providers. It is estimated that the IN DYS will accrue an annual cost of \$30K to contract with an outside entity to provide support service. ACJCS has a contract with a service provider (National Federation of Families) but it does not provide the specific services required by PREA, requiring them to look elsewhere, such as the Idaho Youth Ranch, and establishing a contract costing approximately \$50K per year to cover their 15 youth requiring such services. CA DJJ, on the other hand

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expects to incur a one-time cost of \$20K as a result of establishing a process for receiving reports from public entities and coordination of the services to residents. This will be followed by an annual cost of \$19K for transition counseling services to victims of sexual abuse.

In regards to conducting criminal investigations and prosecuting violations (RP3 and RP4, respectively), most juvenile correction jurisdictions in this study noted that State and local police investigate cases and local prosecutors, such as District Attorney's, prosecute violation. Since these entities operate under state and local statutes, MOU's would generally not be required. IDJC, on the other hand feels that MOUs would be required and if the state statute did not meet the standard, they would have to develop MOUs with each of the state's 44 counties for both investigations and prosecutions resulting in a one-time cost of \$42K (\$21K for investigations and another \$21K for prosecutions).

It is estimated that five of the ten juvenile systems in this study will incur costs associated with providing access to victim advocates (RE3). The major cost drivers for these standards are associated with developing material or updating existing material to include contact information on outside victim advocate services. The material could include posters, pamphlets, or other material that is either posted throughout the facilities or provided directly to residents. The costs to develop the material are relatively modest, estimated at \$4K for MO DYS.

#### **Juvenile Cost Impact #13: Accommodating Special Needs (PP5)**

Every juvenile corrections jurisdiction studied reported having multiple ways for residents with special needs to report incidents of sexual abuse. Methods of reporting included TTY machines for the deaf, language lines and staff for LEP residents, and access to mental health care staff and outside entities for the mentally disabled. No costs are, thus, associated with this standard.

#### **Juvenile Cost Impact #14: Investigations (IN1 - IN3)**

PREA standards propose that investigations be conducted for all allegations of sexual abuse, including third party reports, that complainants and victims be notified in writing of investigative outcomes and disciplinary sanctions, and that all reported incidents of sexual abuse are substantiated by a preponderance of the evidence. It is common practice for correctional jurisdictions to investigate all third party reports of sexual abuse, including all the juvenile corrections agencies in this study. There is the possibility however, that increased awareness related to PREA will subsequently lead to an increase in reporting, which may in some instances require the need for additional investigators. It was determined that three of the ten juvenile corrections agencies in this study are under staffed for investigators and, thus, would likely need to hire additional investigators to comply with Standard IN1; assuming the increased awareness related to PREA leads to increased reporting. It is estimated that OYA will need to hire three additional investigators at an upfront cost of \$3K and a yearly costs of \$227K. The MA DYS is estimated to need two additional investigators; \$2K in upfront costs and \$179K in yearly costs. Finally, it is estimated that IDJC will require one additional investigator to ensure all allegations of sexual abuse are investigated, the cost would consist of \$1K in upfront expenses and \$64K in yearly costs.

CO DYC relies upon their local Social Service Agency and/or law enforcement agencies to conduct all investigations of sexual abuse but does not believe they are being administered adequately. With anticipated increased sexual abuse reports as a result of PREA, CO DYC believes that the addition of an Inspector General will support a better practice and ensure case are investigated when substantiated by a preponderance of the evidence (IN3). They believe this will employ a more robust inquiry process

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ensuring investigations are conducted efficiently and effectively. CO DYC is the only site among the 49 having a cost for this standard. This cost is \$79K per year plus associated one-time upfront hiring costs.

**Juvenile Cost Impact #15: Conducting Mental and Medical Health Evaluations and Providing Care (MM3)**

All juvenile corrections agencies in this study conduct mental and medical health evaluations for sex offenders and provide some ongoing care. It is estimated that two of the ten juvenile corrections agencies would accrue a cost to provide ongoing care to sex offenders, the largest of which is a \$750K yearly cost to IN DYS. IN DYS currently provides treatment only to adjudicated sex offenders or those determined to have a need for such treatment at the time of admission to their facilities. The cost is associated with expanding the existing treatment program to all known victims of sexual abuse.

**Juvenile Cost Impact #16: Exhaustion of Administrative Remedies (RE2)**

The majority of Juvenile facilities in this study provide multiple ways for residents to confidentially report sexual abuse; these including reporting to any staff member, through grievance boxes, and to outside entities through phone calls. Only one, very minimal cost, was estimated for Standard RE1, a \$100 upfront cost and \$400 annually for IN DYS to establish a direct phone line as a means of reporting.

The Exhaustion of Administrative Remedies (RE2) is commonly part of the grievance process which all jurisdictions have in place. This process generally requires action within well within the time frame specified in the standard. Only one, very minimal, cost is associated with this standard; a \$450 upfront cost for IDJC to revise two written policies to expressly provide for the exhaustion of administrative remedies and the additional protection of juveniles requesting the protection.

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### Community Corrections

The community corrections sector includes jurisdictions that are responsible for residential care as well as programs responsible for the non-residential supervision of offenders. Non-residential supervision includes parole, probation and pre-release as applicable. The standards for non-residential community supervision are a subset of the community corrections standards. The study reflects six community corrections jurisdictions including two from the South (SC PPP and AR DCC), one from the Northeast (MA OCC), one from the West (WA CC), and two from the Midwest (IN DOR and MO PP). The ongoing and upfront tables highlighted with Harvey Balls represent an order of magnitude signifying a cost impact in relation to overall budget for the community corrections sector. The degree to which each Harvey ball is shaded indicates the magnitude of the cost impact. An empty ball represents standards that do not result in any cost impact. On the other hand, a fully-shaded ball represents a percent impact on annual operating budget that is greater than 0.50%. A quarter-shaded ball and half-shaded ball represent an overall impact on annual operating budget between 0% and 0.25% and 0.25% and 0.50%, respectively. For example, the MO PP ongoing cost impact as a percentage of annual operating budget for limits to cross-gender viewing and searches is equal to 13.18% and therefore represented by a fully-shaded Harvey ball.

Table 22: Community Corrections Ongoing Cost Impacts as % of Annual Operating Budget

Priority		AR DCC	IN DOR	MA OCC	MO PP	SC PPP	WA CC
1	Limits to cross-gender viewing and searches	●	○	○	●	○	○
2	Inmate Supervision	○	○	○	○	○	●
3	Assessment and use of monitoring technology	n/a	n/a	n/a	n/a	n/a	n/a
4	Ongoing medical and mental health care	○	○	○	○	○	○
5	Audits of standards	◐	◐	◐	◑	◐	◐
6	Training and Education	○	◐	◐	◐	◐	◐
7	Contracting with other entities for the confinement of inmates	○	○	○	◐	○	◐
8	Accommodating inmates with special needs	○	○	○	○	◐	○
9	Zero tolerance of sexual abuse	◑	◐	◐	●	◐	◐
10	Screening for risk of sexual abuse	○	○	○	○	○	○
11	Contract modifications for outside services	○	○	○	○	○	◐
12	Evidence protocol and forensic medical exams	○	○	○	◐	○	○
13	Investigations	○	○	○	○	○	○
14	Supplement to SC-2: Use of screening information	n/a	n/a	n/a	n/a	n/a	n/a
15	Hiring and promotion decisions	○	○	○	○	○	◐
16	Gathering, reviewing, and reporting data	○	○	○	○	○	◐
17	Exhaustion of administrative remedies	○	○	○	○	○	○
18	Agency protection against retaliation	○	○	○	○	○	○

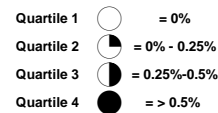


Table 23: Community Corrections Upfront Cost Impacts as % of Annual Operating Budget

Priority		AR DCC	IN DOR	MA OCC	MO PP	SC PPP	WA CC
1	Limits to cross-gender viewing and searches						
2	Inmate Supervision						
3	Assessment and use of monitoring technology	n/a	n/a	n/a	n/a	n/a	n/a
4	Ongoing medical and mental health care						
5	Audits of standards						
6	Training and Education						
7	Contracting with other entities for the confinement of inmates						
8	Accommodating inmates with special needs						
9	Zero tolerance of sexual abuse						
10	Screening for risk of sexual abuse						
11	Contract modifications for outside services						
12	Evidence protocol and forensic medical exams						
13	Investigations						
14	Supplement to SC-2: Use of screening information	n/a	n/a	n/a	n/a	n/a	n/a
15	Hiring and promotion decisions						
16	Gathering, reviewing, and reporting data						
17	Exhaustion of administrative remedies						
18	Agency protection against retaliation						

Quartile 1 = 0%  
 Quartile 2 = 0% - 0.25%  
 Quartile 3 = 0.25%-0.5%  
 Quartile 4 = > 0.5%

**Community Corrections Cost Impact #1: Zero Tolerance of Sexual Abuse (PP1)**

The major issue in this standard is the requirement for an agency to employ or designate a PREA coordinator to oversee the agency's efforts to comply with the NPREC standards. For each of the jurisdictions visited, excluding WA CC, this resulted in the need for at least one additional full-time staff member added to their management and operational budget requirements. The following table lists the budget requirements for an additional staff member assuming a senior level position reporting directly to the agency head. All costs are annual, fully loaded, including salary and benefits (e.g., healthcare, retirement). Operational upfront costs are also includes office furniture and supplies, office equipment, communications services, training, and other expenses above and beyond salary and fringe benefits.



Site	Upfront	Yearly	Notes
WA CC	\$ 1	\$ 113	1 FTE salary, benefits and new hire operations costs.
AR DCC	\$ 1	\$ 107	1 FTE salary, benefits and new hire operations costs.
SC PPP	\$ 1	\$ 78	1 FTE salary, benefits and new hire operations costs.
MA OCC	\$ 1	\$ 73	1 FTE salary, benefits and new hire operations costs.
MO PP	\$ 1	\$ 71	1 FTE salary, benefits and new hire operations costs.
IN DOR	\$ 1	\$ 33	1 FTE salary, benefits and new hire operations costs.

**Community Corrections Cost Impact #2: Limits to Cross-Gender Viewing and Searches (PP4)**

Where cross-gender pat downs are not prohibited, there are a number of cost drivers that could have a significant impact on a jurisdiction's budget. Similar to the Prison and Jail sectors, the most common reason for noncompliance, resulting in the greatest real cost impact, is a staff gender ratio that is out of balance with the offender gender ratio. It is a particular challenge for many facilities where the rate of incarceration is much higher for men while hiring practices are gender neutral. AR DCC, for example, has a higher proportion of female officers relative to male offenders (42% female officers versus 72% male offenders) resulting in many instances where female officers are the only ones available to conduct a pat down. For systems with these characteristics, the most common means to comply with the standard would be to redeploy staff among facilities (e.g., moving female officers from male facilities to female facilities) and hire more male staff in the male facilities. This will get the staffing gender ratio closer to the offender gender ratio and ensure that each and every post has the correct gender available for pat downs.

For AR DCC, this strategy results in a redeployment of female staff (moving them from male to female facilities) and hiring 50 additional male staff (ensuring each post in the male facilities has a male present) for a net impact on their budget of \$1.8M annually. Furthermore, because the local labor in pool in AR simply does not provide enough qualified male applicants, AR DCC would need to increase their average salary by 33% in order to ensure enough male applicants are available. In addition, there are operations cost for each new hire based on several common expenses including office supplies, internet and phone usage, training expenses, and public safety supplies equating to a one-time upfront cost of \$48K. Besides the challenges of hiring more males, since the community corrections facilities are distributed across the state both within rural and urban areas, it is unlikely that enough female officers would relocate voluntarily. And there are not enough positions available within the two all-female facilities to absorb such a transfer. System-wide, the current ratio of officers to offenders is .36 officers to every offender. If all female officers transferred to the two female facilities, those two facilities would have an increased ratio of .53 officers to every offender, an untenable and difficult-to-justify situation from a budgetary perspective, therefore likely resulting in staff reductions and union grievances. For example, the redistribution of employees based on gender might potentially limit an officer's career path, particularly a female, as there are fewer facilities and hence fewer growth opportunities.

AR DCC's relatively high proportion of female officers is the result of a concerted effort to increase their female staff as a direct result of federal statute. All state correctional facilities are required to hire, assign, transfer, and promote females on the same basis as males per Title VII of the Civil Rights Act of 1964<sup>14</sup>.

<sup>14</sup> United States of America v. State of Arkansas Department of Correction. US District Court for the Eastern District of Arkansas. 1995

AR DCC, therefore, would face steep resistance from assigning gender-specific roles and rebalancing their workforce or transferring all female officers to their two all-female facilities.

The prohibition of cross-gender pat downs would be difficult at MO PP as well. With a current male/female staffing ratio of 55:45 and male/female offender ratio of 89:11, there are proportionately more male offenders than male officers requiring frequent cross-gender pat searches, specifically female officers on male offenders. And since all of the Community Supervision Centers (CSC) and Community Release Centers (CRC) within MO PP serve both male and female offenders, they cannot redistribute female officers to female facilities since they do not have any. Furthermore, MO PP would run against Federal regulations making any gender related workforce adjustment potentially illegal. Therefore, the path of least resistance is obtaining additional FTE authority to hire more male officers, specifically three per shift at the CRC and one per shift at the CSC resulting in an annual cost impact of \$1.7M to cover 36 FTE including salary, expenses, and benefits. Since this is a new hire, there are upfront operational cost of \$34K to cover common expenses such as office supplies, internet and phone usage, training expenses, and public safety supplies.

Some facilities however, do not face the same challenges as AR DCC. The prohibition of cross-gender pat downs did not apply at the SC PPP since they did not have any overnight facilities. The MA OCC already prohibits cross-gender pat downs; a long-standing policy without any union or legal challenges to date. It is very likely that they are able to accommodate this prohibition because the ratio of their male officers and male offenders is relatively close, 70% and 83% respectively. This allows MA OCC to adequately staff their posts with enough male officers where pat downs are likely to occur, very distinct from AR DCC.

WA CC also has a policy in place that prohibits cross-gender pat downs. However, it was uncovered that when cross-gender pat downs are conducted, only in the case of an emergency, an incident report is required. Most officers at WA CC view these reports as a burden and choose to avoid the pat down all together. The senior administrators at WA CC noted the increased security risk this places on their staff and offenders. Although increasing the staff may alleviate such challenges, it neglects other operational and procedural changes that WA CC has not explored yet (e.g., modifying the incident report process).

Likewise, the prohibition of cross-gender pat downs did not apply at the IN DOR since they did not have any overnight facilities. However, this will impact the release centers throughout the state at a county level. For the four counties sampled in this study (out of a total of 41), three already had a policy in place prohibiting cross-gender pat downs. The fourth did not have a policy yet, but could implement one without any cost impact.

### **Community Corrections Cost Impact #3: Training and Education (TR1 through TR5)**

Training will be a high cost since most jurisdictions in this study do not currently have training curriculum in place (for employees, volunteers/contractors, or offenders) that is compliant with or covers PREA-related topics. At a minimum, this requires modest modifications to existing curriculum and additional training time to deliver the required material. Although many jurisdictions offer some sort of sexual abuse training or orientation, it is often not comprehensive enough to cover PREA and sometimes excludes administrative staff (or un-sworn officers), volunteers, or contractors. The following tables show the cost impacts by site according to the first three training standards:

Employee Training (TR-1)			Notes
Site	Upfront	Yearly	
MA OCC	\$ 112	\$ 119	MA OCC ensures employees are trained on sexual abuse but the current curriculum is not comprehensive enough to cover the topics in Appendix B. This will require modifications to their training curriculum. The on-going cost reflects refresher training to be delivered on a regular basis to 99 Community Correction staff 879 probation officers, and 138 parole officers.
IN DOR	\$ 11	\$ 11	At the IN DOR, all parole officers receive the same intake and in-service training as the DOC that includes a PREA session and an annual one hour refresher PREA class. There are no additional or anticipated costs. Officers at three of the four county work release centers (Bartholomew, Tippecanoe, and Duvall Residential Center), on the other hand, do not receive any training requiring one-time investments in curriculum development, training delivery, and travel
SC PPP	\$ 43	\$ <1	Training on sexual abuse is not provided to all employees requiring them to add curriculum to their classroom and computer based training both for new hires and on-going refresher training for the entire staff.
WA CC	\$ 27		The WA CC conducts initial PREA classroom training to all employees for two hours as a part of "CORE" initiative. Employees are also given an annual in-service training on PREA that lasts for 30 minutes. However, these current efforts, initially funded by a PREA grant do not meet all the requirements outlined in Appendix B. Most notably, training curriculum does not include how to properly conduct screenings and is not specific to the responsibilities of employees at different levels. WA DCC provides initial comprehensive sexual abuse training, compliant with the PREA standards, to all contractor and volunteers already so no additional costs are anticipated.
AR DCC			AR DCC has already implemented changes to their employee training curriculum to cover the PREA topics
MO PP			MO PP has a rigorous training curriculum developed and delivered by their own Department of Training that includes two hours on PREA. Refresher training for employees is provided, however, the content is selected by the trainee (among a menu of options) and may not necessarily include PREA; the PREA content is an option but is not mandated in the refresher training. Officials at MO PP acknowledge that this policy needs to change but do not anticipate significant costs outside of some additional printing and materials cost.

Volunteer and Contractor Training (TR-2)			Notes
Site	Upfront	Yearly	
MA OCC	\$ 11	\$ 3	MA OCC contracts with approximately 260 outside employees to staff 26 facilities throughout the state. Currently, no contracted staff receive any sexual abuse training, requiring upfront expenditures to develop curriculum and on going costs for periodic refresher training.
SC PPP	\$ 6	\$ 2	SC PPP does not provide comprehensive training on sexual abuse to its volunteers which happen to be mostly students from a local university
IN DOR	\$ 1	\$ <1	Only two of the four work release centers employ contractors or use volunteers. Those centers, Bartholomew and Duvall Residential Center, currently do not provide training. Upfront costs reflect development of training materials.
AR DCC			Volunteers and contractors already receive adequate on-line training that covers PREA material.
MO PP			Most contractors and volunteers receive the same training as employees yet there are a few exceptions such as GED teachers and other educational and job training service providers that do not receive the appropriate training. Officials at MO PP acknowledge that additional training is required but, again, do not anticipate a significant cost impact
WA CC			The WA DCC conducts sexual abuse classroom training to offenders during intake. Efforts to provide refresher training, such as posters at the work release centers are adequate for short term offenders

Inmate Education (TR-3)			Notes
Site	Upfront	Yearly	
WA CC		\$ 20	The WA CC conducts classroom PREA training for offenders during intake at work release centers and whenever an inmate is transitioned from one facility to another. The WA CC makes available posters and hotlines at work release center for offenders. Cost reflects refresher training for those offenders that have longer stays at one particular facility since nothing is currently provided.
MO PP	\$ 5	\$ 2	MO PP provides comprehensive education on sexual abuse during the intake process but only for only offenders in residential facilities and not the 74K offenders in probation and parole. To fill this gap, MO PP will provide information contained in the materials developed for the employees already provided to all new offenders in supervision. Upfront and on-going costs reflect printing and materials costs. Additionally, for the very few offenders in the program for more than one year, MO PP will develop and provide refresher training at a minimal cost of \$136 per year
SC PPP		\$ 2	SC will need to modify their offender handbook to include PREA content
MA OCC	\$ 5	\$ 1	Offender education at MA OCC is not existent. The 26 facilities operated by MA OCC are day centers where supervision and services are provided for only a small portion of the day. Upfront costs reflect the development of education materials. On going costs reflect periodic refresher education and materials/publications.
IN DOR	\$ 20		Parolees within the IN DOR system and at the county work release centers receive an orientation but do not receive PREA specific intake or refresher training. Upfront cost distribution and materials after obtaining existing orientation package and PREA brochure from IN DOC.
AR DCC			AR DCC provides classroom training, handbooks, and poster boards throughout their units for offender.

Specialized training for investigations (TR4) and medical and mental health care (TR5) had a significant less cost impact. For some of the jurisdictions in this study, the investigators are employed by the system itself and these investigators go through internal training. At SC PPP, for example, there is a staff of

three special operations personnel that conduct investigations and receive their training from the State Law Enforcement Division (SLED) training academy. This training does not cover training on sexual abuse in a community corrections setting and will therefore require modifications with a one-time cost of \$2K. Investigators that work with WA CC receive their training from WA DOC. Current training covers sexual abuse but does not include curriculum specific to the community corrections environment. This will require modifying the existing curriculum, estimated at a one-time cost of \$20K, with no additional recurring costs. Specialized training for investigators at IN DOR leverage their internal affairs office that supplies investigators that have been trained in community corrections settings. The work release centers, on the other hand rely upon local law enforcement for investigations with no means or authority to enforce specific training standards related to PREA. However it is assumed they have the appropriate training in sexual abuse crimes. Since MO PP is part of the MO DOC, they share 47 investigators serving the entire state. The investigators receive 40-80 hours of training, including training specific to conducting investigations in a confinement setting but the training is not viewed as comprehensive enough to meet this standard. The estimated cost of modifying and delivering this additional training is \$54K (to include contractor delivery and the investigators time) yet it covers both DOC and PP. MO PP's share is calculated as the proportion of their sexual abuse incidents relative to DOC, which is 6%, resulting in an upfront cost of \$3K. AR DCC's one full-time investigator receives training that covers sexual abuse topics.

On the other hand some jurisdictions such as MA OCC rely upon on local or state authorities to conduct investigations. This is done outside the system and external to their own training operations. And for most, it is difficult to ensure the training they receive is compliant with the standard. And if it were not, particularly in rural areas, they have limited options of recourse because there simply are not many resources available in the community. For MA OCC, officials assume that training is provided in the field but it is uncertain and administratively cost prohibitive to follow up with training requirements and investigative curriculum of every county in the state.

Specialized training for medical and mental health care (TR5) is another area that may result in additional costs but it is unclear who will shoulder the burden; whether or not medical and mental health care professionals receive their training as part of their routine professional licensure requirements. SC PPP does not have any medical or mental health care practitioners on staff; these services are provided by referrals through the state mental health agencies. And they do not have any means to ensure their training meets the PREA standard and it is likely that the state mental health agencies are not aware of this requirement and do not provide training. Although this may not be a cost burden to SC PPP, it will nevertheless be a cost. Similarly, there are no medical and mental health care practitioners employed by the MA OCC (TR5). In the event a day center requires medical support, MA OCC refers them to an entity or institution in the community such as a hospital that provides such service or calls an ambulance in the case of an emergency. Because they do not have a dedicated staff or even a consistent pool of medical and mental health care practitioners to draw upon, MA OCC will need to work with entities such as the state board of medicine to ensure adequate training is provided. If it is not, this will likely be a cost burden on the state as MA OCC does not pay for their services.

As for Specialized Training: Medical and Mental Health Care, WA CC has ten mental health care professionals on staff that get comprehensive PREA training, compliant with the standard. They do not however, have any medical care staff on site, referring them to medical practitioners in the community. It is assumed that these individuals receive adequate training through their professional licensure and

certification requirements. IN DOR and the four work release centers have a similar arrangement for their medical and mental health staff, relying upon local services such as hospitals and clinics with no means or authority to enforce specific training standards related to PREA. However it is assumed they have the appropriate training in sexual abuse.

MO PP does not employ medical and mental health staff at their facilities and community hospitals are utilized when medical health care is needed. It is assumed that the community medical and mental health care providers receive the training required by their licensure (TR5) and that their efforts to ensure its adequacy is an indeterminate cost. AR DCC's medical and mental health care practitioners, provided by CMS, require all staff to abide by all AR DCC's policies with CMS absorbing the added cost.

#### **Community Corrections Cost Impact #4: Audits of Standards (AU1)**

As this is not a nationally instituted policy, requirement or service, PREA audits are not conducted anywhere in the county. Nevertheless, each site is very familiar with the auditing process whether it be state mandated financial audits (SC PPP), ACA accreditation audits (SC PPP, AR DCC, WA CC, IN DOR, MO PP), or central office audits (MA OCC). Based on the wide degree of audits across the county, we assumed a standard audit fee of nearly \$17K per year per facility equating to roughly \$6K per year<sup>15</sup>. The following table provides a breakdown of the costs associated with the PREA audit.

#### **Community Corrections Cost Impact #5: Screening (SC1 and SC2)**

The Screening Standards are only required for community correction facilities so the state jurisdictions governing solely probation and parole (SC PPP and MA OCC) are exempt from this standard. Two jurisdictions, AR DCC, and MO PP conduct comprehensive screening already and do not need any modifications to meet the screening standards. WA CC, on the other hand screens every offender that enters a work release center and again when an offender is transferred, however the screening is not considered compliant with the standard and requires some modifications estimated at a one-time cost of \$11K and some process improvements, requiring additional level of effort of the screeners, estimated to cost \$54K per year. Likewise IN DOR does not have comprehensive screening in place. The probation and parole centers use a tool developed and shared with IN DOC but among the four work release centers included in this study, not a single one conducts any screening whatsoever. Such a tool could be developed independently however, since the probation and parole centers within IN DOR are able to use the screening instrument from IN DOC, it is reasonable to assume that the work centers could have access to this as well. Therefore, there is no cost associated for the work centers and the execution of the screening tool (SC2) would have minimal impacts on the centers. The one work center that is compliant, Clark County, conducts a comprehensive gender-specific screening process of all offenders at intake.

#### **Community Corrections Cost Impact #6: Inmate Supervision (PP3)**

Physical supervision (Standard PP3) was not seen as an issue for most of the Community Corrections jurisdictions. It was deemed not applicable at the SC PPP since they did not have any overnight facilities. The AR DCC felt that, overall, their physical supervision was sufficient to minimize the incidents of sexual abuse and current data corroborated this position as there have been relatively few reported incident of sexual abuse in the past three years. In 2007, the AR DCC reported one incident in their Community Corrections facility. In 2008, they reported one incident in Probation and Parole and in 2009

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<sup>15</sup> See Assumptions section for audit calculation.

they reported one incident in Community Corrections and two in Probation and Parole. The only exception where they might have to add staff is in their Omega Unit where they have open dorms that house technical violators, increasing the probability of sexual abuse. However, since there are not more actual reports linked to this unit, they are not able to justify additional resources at this time.

The MA OCC has had no incidents or allegations of sexual abuse over the past three years. As a result, administrative officials believe that current levels of staffing and physical supervision are sufficient. The work release centers at IN DOR each have not experienced any incidents or allegations of sexual abuse over the past three years therefore having no justification for increased supervision. And MO PP has only seen one substantiated case of sexual abuse in the past three years and the agency feels that staffing levels are adequate to prevent sexual abuse incidents.

The WA CC, on the other hand has seen an increase in reported incidents of sexual abuse, but not necessarily an increase in substantiated cases. This is likely due to recent efforts to better educate and train offenders on reporting policies, making it easier for offenders to make claims, most of which are found to be unsubstantiated after investigations. Nevertheless, administrators at WA CC believe that additional correctional officers are required to address the increased reports in the event this signals any underlying causes of heightened risk factors associated with sexual abuse. One additional officer at each of the 13 work release centers, at an annual cost of \$66K, appears to be a reasonable assumption to address the increased reporting, yielding an annual cost of \$884K. In addition, there are some one-time costs associated with hiring additional staff yielding an additional expense of \$16K

#### **Community Corrections Cost Impact #7: Contracting with Other Entities for the Confinement of Inmates (PP2)**

Three jurisdictions, IN DOR, WA CC, and MO PP, each have contracted facilities under their jurisdiction. IN DOR reported two contracted facilities managed by their Duvall Residential Center. As these are very small operations with close and integrated management by Duval administrators, they do not anticipate any required contract modifications and/or cost increases. WA CC and MO PP both contract out for the confinement of offenders and it is assumed that the contracted facilities will bear a cost to comply with the PREA standards, similar to the state-owned facilities. WA CC contracts with Pioneer Housing Services and Progress House Association for 13 out of the 15 work release centers, or 93% of their residential work release population of 688 offenders. These contracts would need to be modified to include language related to PREA compliance, resulting in an annual cost of \$34K. MO PP contracts out with five facilities, covering 1.3% of their total offender population with an estimated cost of compliance of \$23K per year.

#### **Community Corrections Cost Impact #8: Contract Modifications for Outside Services (RP2 through RP4, and RE3)**

All of the jurisdictions have relationships with outside public entities and community service providers (RP2), although this standard does not apply to SC PP since they are only probation and parole. However, none of the jurisdictions included in this study have formal MOUs or agreements in place. AR CC, MA OCC, and MO PP do not believe that entering into agreements or MOUs will result in any cost to their operations. Whereas one work release center at IN DOR anticipates a minimal cost impact of \$100 to set up an MOU with a local service provide. However, WA CC has run into a number of challenges as they relate to VOCA funding and its prohibition on working with the inmate population. Past attempts at contracting with Community Sexual Assault Programs (CSAPs) for free victim advocacy

services have been unsuccessful. As a result, they will likely incur a cost for these services. Since WA CC and WA DOC are an integrated system, they will be able to share this cost likely resulting in some economies of scale savings. Nevertheless, as a whole, the integrated systems is looking at \$840K per year in contracts with victim advocacy groups throughout the state. As a percentage of their ADP, WA CC's share of that equates to \$79K per year.

All jurisdictions but one work very closely with their local law enforcement and prosecution agencies that conduct investigations and prosecutions codified through state statute so there's no need to enter into agreements or establish MOUs (RP3 and RP4). The one exception is WA CC where local authorities are not always interested in immediately conducting investigations and prosecutions. As a matter of fact, one of the largest counties in the state has provided written notification to WA DOC to that they will not investigate crimes that are not against county residents, assuming inmates are not resident. There is no statewide consistency in how counties handle investigations or how prosecutors move them through the courts. Without the state enforcing this, WA CC will need to establish MOUs with all 39 counties. As this impacts WA CC and WA DOC equally, efforts and associated cost of each will be distributed proportionately. The estimated, annual cost for this is \$250K to cover legal fees and level of effort to establish MOUs with each of the 39 counties. WA CC's share of this cost, as a percentage of its ADP, is \$47K.

It is estimated that three of the six community correction jurisdictions in this study will incur costs associated with providing access to victim advocates (RE3). The major cost drivers for these standards are associated with developing material or updating existing material to include contact information on outside victim advocate services. The material could include posters, pamphlets, or other material that is either posted throughout the facilities or provided directly to residents. The costs to develop the material are relatively modest, \$1K for IN DOR, \$3K for MO PP, and \$4K for WA CC.

#### **Community Corrections Cost Impact #9: Accommodating Special Needs (PP5)**

The only jurisdictions reporting noncompliance with this standard are SC PP and WA CC. All other jurisdictions provide a myriad of services such as interpreters, language telephone lines for nearly every language, internet translation, university foreign language students, TTY machines for the deaf, and mental health staff for the mentally challenged. Most of these services are already implemented or free of charge yielding no additional cost. However, SC PP does not have any interpreters available and few community resources available. They face the prospect of having to hire a contractor for these services at \$55/hour assuming 20 hours per year or \$1K per year. WA CC, on the other hand, has a number of translation services but most of their pamphlets and booklets are only in English and Spanish. With a very diverse population, they need to publish these in Chinese, Cambodian, Korean, Russian, Laotian, and Vietnamese with an estimated cost of \$1.5K.

#### **Community Corrections Cost Impact #10: Gathering, Reviewing and Reporting Data (DC1 through DC3)**

Most of the Community Corrections jurisdictions conduct sexual abuse incident reviews (DC1) following similar procedures as any incident review. SC PP, for example, has a formal complaint form and it goes to the special investigative unit for a review. This includes a full review of the site, the environment, and corrective actions. AR DCC has a review team that includes an investigator, the deputy director, the director, and the state police. Their review does consider whether incidents were motivated by racial or other group dynamics at the facility and they do include recommendations for improvement. IN DOR has

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a Prison Rape Oversight Group (PROG) in place, which reviews all parole sexual abuse incidents. The work release centers submit all reports to the IN DOR for their review. MO PP does not have a current policy in place yet feel that all substantiated cases of sexual abuse would be evaluated by a multi-disciplinary review team with a minimal workload increase but at no extra cost. Likewise MA OCC does not have a team that reviews sexual abuse incidents but can institute one at no additional cost. The WA CC, on the other hand passes all allegations through an investigation process and into an investigative review board but they lack a site specific review board at each facility. A policy has been created to begin this procedure, yet nothing has officially begun. The estimated annual cost of this enhanced procedure is \$1.5K based on their frequency of reported sexual abuse incidents.

On data collection (DC2) four of the jurisdictions already fill out the BJS Survey on Sexual Violence (SC PP, AR DCC, WA CC, and MO PP). This is considered to meet the compliance requirements of the standard. MA OCC does not prepare any annual reports on sexual abuse data but this could be assumed as a responsibility of the PREA Coordinator whose cost is captured in PP1. IN DOR does prepare a report but it is not the BJS report. Like MA OCC, this additional responsibility could be assumed by the PREA Coordinator.

On data review for corrective action (DC3), most jurisdictions have a procedure in place or if they do not, this is a responsibility that can be fulfilled by the PREA Coordinator. SC PP, for example, does not have a formal review of sexual abuse data but they do conduct an annual review of all operational policies. Adding a review of PREA policies to include sexual abuse data would be a role of the PREA Coordinator and the cost captured in that salary. AR DCC conducts annual reviews on all policies to include an analysis of data trends, statistics, and critical elements of all incidents. MA OCC does not have a policy in place to conduct reviews but could be a responsibility of the PREA Coordinator. IN DOR conducts its review through its PROG while the MO PP is developing a process to review and analyze all sexual abuse cases. Due to the relative infrequency of incidents (one in the last three years), this will not be a large effort and could be easily assumed by the PREA Coordinator. Finally, WA CC uses a newly deployed data tracking system called Sierra that uses sexual abuse data to assess the effectiveness of current procedure. However it does not include the consideration of racial dynamics. Modifying this system to meet the standard is estimated to cost \$50K upfront.



**Lockups**

The study reflects four Lockup facilities including two from the West (WA Seattle Police Department and CA Rocklin Police Department), one from the Northeast (MA Middleton Police Department), and one from the Midwest (CO Denver County Pre-Arrestment facility). The ongoing and upfront tables highlighted with Harvey Balls represent an order of magnitude signifying a cost impact in relation to overall budget for the *Prisons* sector. The degree to which each Harvey ball is shaded indicates the magnitude of the cost impact. An empty ball represents standards that do not result in any cost impact. On the other hand, a fully-shaded ball represents a percent impact on annual operating budget that is greater than 0.50%. A quarter-shaded ball and half-shaded ball represent an overall impact on annual operating budget between 0% and 0.25% and 0.25% and 0.50%, respectively. For example, Middleton PD’s ongoing cost impact as a percentage of annual operating budget for training and education is equal to 0.29% and therefore represented by a half-shaded Harvey ball.

Table 25: Lockups Ongoing Cost Impacts as % of Annual Operating Budget

Priority		DCA	MIDDLETON	ROCKLIN	SEATTLE
1	Limits to cross-gender viewing and searches	○	○	●	●
2	Inmate Supervision	○	○	○	○
3	Assessment and use of monitoring technology	○	○	○	○
4	Ongoing medical and mental health care	○	○	○	○
5	Audits of standards	◐	◐	◐	◐
6	Training and Education	◑	◑	◑	○
7	Contracting with other entities for the confinement of inmates	○	○	○	○
8	Accommodating inmates with special needs	○	○	◐	○
9	Zero tolerance of sexual abuse	◑	●	●	◐
10	Screening for risk of sexual abuse	○	●	○	○
11	Contract modifications for outside services	○	○	○	○
12	Evidence protocol and forensic medical exams	○	○	○	○
13	Investigations	○	○	○	○
14	Supplement to SC-2: Use of screening information	n/a	n/a	n/a	n/a
15	Hiring and promotion decisions	◐	○	◐	○
16	Gathering, reviewing, and reporting data	○	○	○	○
17	Exhaustion of administrative remedies	○	○	○	○
18	Agency protection against retaliation	○	○	○	○

Table 24: Lockups Upfront Cost Impacts as % of Annual Operating Budget

Priority		DCA	MIDDLETON	ROCKLIN	SEATTLE
1	Limits to cross-gender viewing and searches	○	○	◐	◐
2	Inmate Supervision	○	○	○	○
3	Assessment and use of monitoring technology	○	○	○	○
4	Ongoing medical and mental health care	○	○	○	○
5	Audits of standards	○	○	○	○
6	Training and Education	◑	◑	◑	◑
7	Contracting with other entities for the confinement of inmates	○	○	○	○
8	Accommodating inmates with special needs	○	○	○	○
9	Zero tolerance of sexual abuse	◑	◑	◑	◑
10	Screening for risk of sexual abuse	○	○	○	○
11	Contract modifications for outside services	○	○	○	○
12	Evidence protocol and forensic medical exams	○	○	○	○
13	Investigations	○	○	○	○
14	Supplement to SC-2: Use of screening information	n/a	n/a	n/a	n/a
15	Hiring and promotion decisions	○	○	○	○
16	Gathering, reviewing, and reporting data	○	○	◐	○
17	Exhaustion of administrative remedies	○	○	○	○
18	Agency protection against retaliation	○	○	○	○

Quartile 1 ○ = 0%  
 Quartile 2 ◐ = 0% - 0.25%  
 Quartile 3 ◑ = 0.25%-0.5%  
 Quartile 4 ● = > 0.5%

**Lockups Cost Impact #1: Limits to Cross-Gender Viewing and Searches (PP4<sup>1</sup>)**

Similar to other sectors, lockups express great difficulty with prohibiting cross-gender pat downs. This standard results in a relatively high cost impact for three of the four facilities in this study but each one is

<sup>1</sup> Lockups refer to this as PP5 but to maintain consistency throughout the document, Limits to Cross-Gender Viewing and Searches is referred to as PP4

incompliant. The only exception is due to an anomaly whereby the lockup and the local jail are merging and can share resources to cover for any shortages as a result of new PREA policies regarding pat downs. Police departments view this standard as contradictory to existing case law, which upholds the rights of officers to conduct cross-gender pat downs in the field with most officers assuming that those rights and procedures apply to the holding facility as well. Consequently, hiring additional female officers was the preferred method to become compliant with this standard notably because they simply do not have enough female officers on staff available for same gender pat downs. These additional female officers would be required to staff the lockup facilities 24/7, allowing for one male and female officer to conduct pat down searches.

The Rocklin PD currently has one, predominately male, on-duty police officer per shift in charge of the temporary holding cells. Pat downs are conducted in the field immediately following an arrest, but may also be conducted within the lockup facility if deemed necessary. Male officers conducting pat downs on females use the back of their hands and unobtrusively conduct the pat down in accordance with the department's standard operating procedures, nevertheless, this is still noncompliant with the standard. With the occasional female detainee and few available female officers, the Rocklin PD estimates a need for 5.5 additional female officers to staff the lockup facility 24/7 at \$125K annual salary plus benefits, or a total annual cost of \$698K. This would allow for a female officer to always be on duty with a male officer at the lockup facility.

The Seattle PD does not have full time staff occupying their lockup facilities. They are typically closed unless an officer has personally opened the facility to stage a detainee. Therefore the only officer with the detainee (for the approximately 30 minutes while the officer fills out paperwork and makes necessary phone calls) is the field officer that made the arrest. Therefore, if that officer is a male and the detainee is a female, and a pat down needs to be conducted, it is typically that male officer that conducts the pat down. A male officer may request a female officer to conduct pat down searches of female detainees when and only if, one is available or nearby, however there are many cases where one is not. This practice is supported by case law in Washington State, allowing officers in the field to conduct cross-gender pat downs, and because custody of the detainee is not transferred while in the lockup, it is applied while in the temporary holding cell. To become compliant with this standard, the Seattle PD would be required to hire a substantial number of female officers. The department currently has approximately 1,305 sworn officers, with only 188 (14%) of those being female. The Seattle PD believes the best course of action to meet the requirements of this NPREC standard is to staff the five precinct facilities, on a 24/7 basis, with a female officer. This would require a minimum of 25 full time employees at a cost of \$3M per year plus a one-time cost of \$24K for new hire operational expenses.

The Middleton PD is fully compliant with this standard, and does not requiring any additional resources to prohibit cross-gender searches. This is due to a unique community-based program called the "Matrons," a group of women in the community trained by local police on monitoring inmates and conducting pat downs. The Middleton PD houses up to 20 female inmates in transition from the courts for several hours every afternoon.

The DCPA facility allows female officers to conduct cross-gender pat downs on male inmates but does prohibit male officers from cross-gender pat searches. In order to meet the PREA standard, DCPA will need to realign their workforce, redeploying their female officers out of the male facility. Initially this will result in a shortage of male officers suggesting a cost impact. However, since the Denver County Jail and DCPA are merging under one roof, it is Booz Allen's assertion that there are male resources from

Denver County Jail to cover for the open positions in the pre-arraignment facility. This is clearly a unique case where meeting this standard does not result in a cost impact.

**Lockups Cost Impact #2: Zero Tolerance of Sexual Abuse (PP1)**

According to the NPREC standards for lockups, the PREA Coordinator position can be a full or part time position. Due to the size of each of the facilities in the study, it is assumed that all positions will be part time. The following table lists the budget requirements for this role assuming a senior level position reporting directly to the agency head. All costs are annual, fully loaded, including salary and benefits (e.g., healthcare, retirement) and training. Operational upfront costs also include office furniture and supplies, office equipment, communications services, training, and other expenses above and beyond salary and fringe benefits.

Site	Upfront	Yearly	Notes
Rocklin PD	\$ 1	\$ 63	0.5 FTE salary, benefits and new hire operations costs.
DCPA	\$ 1	\$ 57	0.5 FTE salary, benefits and new hire operations costs.
Middleton PD	\$ 1	\$ 53	0.5 FTE salary, benefits and new hire operations costs.
Seattle PD	\$ -	\$ 5	Handled by the Audit, Accreditation, and Policy department at minimal cost.

**Lockups Cost Impact #3: Employee Training (TR1 - TR2)**

Lockup facilities do not currently conduct training in accordance with the NPREC standards outlined in Appendix B. Each site provided a different method for conducting this training as described below.

Employee Training (TR-1)			
Site	Upfront	Yearly	Notes
DCPA	\$ 64	\$ 16	The Denver Co PA provides sexual abuse training, however it does not meet the requirements of the NPREC standards. Upfront cost reflects delivery of an initial four hour classroom session while on-going cost reflects a one hour in-service training session.
Middleton PD	\$ 4	\$ 4	At the Middleton PD, curriculum material would need to be developed to comply with NPREC standards, and a yearly refresher course would also need to be instituted at a cost of \$4K. A total of 27 staff members would be subject to this training along with the matrons, which would cost a total of \$4K per year.
Seattle PD	\$ 4		Existing training curriculum at the Seattle PD does not meet the requirements of the NPREC standards. Upfront cost reflects development of a video loop on PREA, which would serve as initial and refresher training.
Rocklin PD	\$ 3		The Rocklin PD currently conducts initial training and annual in-service training using a hired instructor, however these sessions do not meet the requirements of the NPREC standards. Cost reflects annual one-hour instructor provided training on PREA topics.

Site	Volunteer and Contractor Training (TR-2)		Notes
	Upfront	Yearly	
Rocklin PD	\$ 3	\$ 1	Rocklin PD must negotiate contract with Lexipol to develop and monitor additional policy.
Middleton PD	\$ <1	\$ <1	Middleton PD must develop material to provide contractors and volunteers.
DCPA			
Seattle PD			

**Lockups Cost Impact #4: Data Collection (DC2)**

There are no facilities in this study that currently have a process in place for documenting and reporting incidents of sexual abuse. In addition, there is not a Bureau of Justice Statistics (BJS) survey on sexual violence tailored to police lockups. The DCPA however, completes this survey in coordination with the Denver County Jail. Nevertheless, Booz Allen assumes that this responsibility can be fulfilled by the PREA Coordinator position at no additional cost. The only cost impact related to data collection was found at Rocklin PD where they would have to update their internal records management system to allow data to be aggregated and reported with an estimated upfront cost of \$6K.

**Lockups Cost Impact #5: Audits of Standards (AU1)**

As this is not a nationally instituted policy, requirement or service, PREA audits are not conducted anywhere in the county. Nevertheless, each site is very familiar with the auditing process such as Commission on Accreditation for Law Enforcement Agencies (CALEA), ACA, or ICE. Based on the wide degree of audits across the county, we assumed a standard audit fee of \$3K per year per site<sup>1</sup>.

**Lockups Cost Impact #6: Accommodating Special Needs (PP6)**

Only one site, Rocklin PD, cited a cost impact related to accommodating special needs. Despite having an AT&T language line available, the influx and frequency of non-native English speakers, or LEP, in central California, particularly Spanish speaking, is very prevalent and Rocklin PD does not have enough bilingual staff available to meet language demands in a real-time interaction. Consequently, Rocklin PD would like to incentivize the hiring of bilingual staff through a 5% increase in salary for bilingual staff, which would equate to \$38K additional salary cost per year.

**Lockups Cost Impact #7: Hiring and Promotion Decisions (PP7)**

The primary cost driver of this standard is the requirement to conduct background checks for all promotions. All facilities visited in this study conducted some sort of criminal background check on new hires but not for promotions. At the Rocklin PD, for example, extensive background checks are completed on all new hires but not for promotions. The Rocklin PD hires a consultant to conduct background checks at \$50 per check for an average of two promotions per year, resulting in an annual cost impact of \$100. Initial and annual background checks are completed on all staff at DCPA but not for each promotion. With approximately eight promotions per year, and at \$50/check, this equates to an annual cost impact of \$400 for additional criminal history checks.

<sup>1</sup> See assumptions section for calculations

## Appendix B: Site by Site Characteristics and Cost by State

### Prisons

#### Arkansas Department of Corrections (AR DOC)

Sector	Prisons
Title	AR DOC
Total Facilities	21
Percent PREA Compliant	68%
Total Staff	3,230
Percent Male Staff	67%
Percent Female Staff	33%
Capacity	12,953
Percent Male Offenders	92%
Percent Female Offenders	8%
ADP	13,150
ADP/Capacity Percentage	102%
ACA Accredited?	Yes
Cost of care / day	\$60.19
Unionized?	No
2008 Confirmed Incidents	12
2009 Confirmed Incidents	N/A
Annual Operating Budget	\$ 291,589,687

AR DOC, located in Pine Bluff, AR, oversees 21 correctional facilities, which include 6 minimum security, 3 medium, 3 maximum, 1 super max facility, and 9 multi-level security facilities. With a rated capacity of close to 13,000 and an ADP of 13,150, AR DOC is over capacity.

AR DOC is 68% compliant with the NPREC standards. In 2004 the AR DOC received a PREA grant, which funded training and inmate supervision compliance. It is estimated that the AR DOC will have a total upfront cost of \$286K and an annual cost of \$12.5M, to reach full compliance.

AR DOC does not permit female staff to conduct **cross-gender searches** on male inmates. AR DOC proposed doubling staff to have both genders present at each post (24/7). State statute does not permit terminating female staff. While the Booz Allen team felt it necessary to document their suggested plan of action, we determined the cost to be unreasonable.

Ninety seven percent of AR DOC’s estimated cost for PREA compliance is attributable to increased **inmate supervision**. It

was estimated to cost \$11.8M for 300 staff to conduct additional rounds in older facilities with double cells. This cost also includes an increased salary to attract qualified male applicants. Booz Allen has estimated \$285K upfront operations costs for new hires.

Booz Allen estimated a PREA **triennial audit** to cost \$227K, covering 21 facilities.

AR DOC **contracts for the confinement** of 280 inmates in county and city jails. Booz Allen estimates \$252K to be a percentage of the total yearly cost estimate based on the number of contracted inmates. Further, AR DOC houses a small number of inmates at the AR Law Enforcement Training Academy.

According to the standard PP1, **zero tolerance of sexual abuse**, AR DOC would require 1FTE to serve as PREA Coordinator at an annual cost of \$121K. AR DOC also stated that one position for the entire state would not be adequate. Currently, the AR DOC has thirteen full time, and nine part time employees, supporting ACA accreditation.

AR DOC would need to develop and implement a **contract with an outside service provider** at \$72K for emotional support services (RP2). They currently have agreements with local hospitals for some support, yet not enough to meet the NPREC requirements.

AR DOC does not conduct background checks for **promotion decisions**. AR DOC has 1,000 promotions per year. Booz Allen estimates the yearly maintenance cost of these additional promotions to cost \$50K.

**Cost Impacts**

- Limits to Cross-Gender Viewing and Searches (PP4)
- Inmate Supervision (PP3)
- Audits of Standards (AU1) Audits of Standards (AU1)
- Contracting for the Confinement of Inmates (PP2) Contracting for the Confinement of Inmates (PP2)
- Zero Tolerance of Sexual Abuse (PP1) Zero Tolerance of Sexual Abuse (PP1)
- Contract Modifications and/or Policy Updates (RP2 - RP4 and RE3)
- Hiring and Promotion Decisions (PP6)

Arkansas Department of Corrections			Cost Impact		Explanation
Percent of Annual Operating Budget			0.1%	4.3%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		68%	\$ 286,092	\$ 12,520,312	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 121	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	N		\$ 253	Booz Allen estimates the cost to be a percentage of total yearly based on number of contracted inmates = 280
PP-3	Inmate supervision	N	\$ 285	\$ 11,800	300 additional staff to increase additional rounds. Upfront and yearly operations cost associated with new hires
PP-4	Limits to cross-gender viewing and searches	N			Only meet this by having an officer of both genders at each post (restricting the opposite gendered officer's ability to secure certain areas would violate Title VII)
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N		\$ 50	Per Booz Allen, the fee associated with criminal background check assumed to be \$50. Fee includes access to government sources and an internal LOE. AR DOC has 1000 promotions
PP-7	Assessment and use of monitoring technology	Y			
RP-1	Evidence protocol and forensic medical exams	N		\$ 6	Designate a member from their victim response team to provide services 24/7
RP-2	Agreements with outside public entities and community service providers	N		\$ 72	Cost \$72K to develop and implement an MOU for victim advocate services
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	Y			
TR-2	Volunteer and contractor training	Y			
TR-3	Inmate education	Y			
TR-4	Specialized training: Investigations	Y			
TR-5	Specialized training: Medical and mental health care	Y			
SC-1	Screening for risk of victimization and abusiveness	Y			
SC-2	Use of screening information	Y			
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	N			48hr exhaustion of administrative remedies is viewed as a major policy issue. Cost estimates for compliance are speculative
RE-3	Inmate access to outside confidential support services	N			Verified that a Rape Crisis number could be provided at the units
RE-4	Third-party reporting	N			Do not notify 3rd party or victim of outcome due to confidentiality requirements
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	N			Not a specified period as according to standard, could be done without a cost.
IN-1	Duty to investigate	N			Don't state outcomes of investigations regarding disciplinary action against others. New policy can be implemented at no additional cost
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	Y			
MM-1	Medical and Mental Health Screenings - history of sexual abuse	Y			
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 227	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
ID-6	Supplement to SC-2	Y			

**California Department of Corrections (CA DOC)**

Sector	Prisons
Title	CA DOC
Total Facilities	33
Percent PREA Compliant	76%
Total Staff	25,161
Percent Male Staff	83%
Percent Female Staff	17%
Capacity	152,736
Percent Male Offenders	94%
Percent Female Offenders	6%
ADP	152,736
ADP/Capacity Percentage	100%
ACA Accredited?	No
Cost of care / day	\$136.11
Unionized?	Yes
2008 Confirmed Incidents	12
2009 Confirmed Incidents	6
Annual Operating Budget	\$ 5,000,000,000

CA DOC, located in Sacramento, CA, oversees 100 facilities housing 170,361 inmates. CA DOC also has juvenile and adult parole under its jurisdiction. However, for the purposes of this study only the 33 prison facilities are included. The cost impact of the NPREC standards on the Division of Juvenile Justice (CA DJJ) is included under a separate site summary. CA DOC is overcrowded with the highest inmate-to-officer ratio in the country. CA DOC is under federal receivership and a federal court order to reduce the inmate-to-officer ratio. There is political will to reduce overcrowding but little support for doing so by releasing prisoners. This is despite a recent order to release 40,000 non-violent inmates.

CA DOC is currently 76% compliant with the NPREC standards. It is estimated that the CA DOC will have a total upfront cost of \$8.8M and an annual cost of \$30.4M, to reach full compliance.

To eliminate **cross-gender pat searches** in female facilities, an estimated 504 additional female staff would need to be hired at an annual cost of \$26.3M and an upfront operations cost of \$479K. CA DOC currently has 40% male officers in female facilities. Nearly all CA DOC staff is unionized, having fought for females to have equal opportunities in male facilities. CA DOC has gender-specific posts or Bona Fide Occupational Qualifications (BFOQs). The bargaining unit, as part of their negotiated union contract with the California Correctional Peace Officer Association (CCPOA), does address and allow gender-specific posts. As a result, Correctional Officers can bid their posts - up to 70% of the positions are eligible to be bid.

Three institutions in CA DOC are equipped with **monitoring technology** from a PREA grant, while there is very little video surveillance in the other 30 facilities. It is an old system with old buildings that are hard to retrofit with video surveillance technology due to lead abatement and asbestos issues that make camera installation both difficult and costly. It is estimated to cost \$8.3M to upgrade 33 facilities with Assessment and Use of Monitoring Technology, and \$2.4M in annual costs for 33 additional Program Technicians to monitor the technology.

CA DOC contracts for the housing of 7,772 inmates. Booz Allen estimates an annual cost of \$1.3M to comply with NPREC standard PP2. This estimate is a percentage of total yearly cost based on number of contracted inmates.

Booz Allen estimated a PREA **triennial audit** to annually cost \$356K, covering 33 facilities.

According to the standard PP1, **zero tolerance of sexual abuse**, CA DOC would require 1FTE to serve as PREA Coordinator at an annual cost of \$121K.

Although not included as a cost estimate, CA DOC believes a “PREA unit” to be a better strategy for compliance, when dealing with such a large system. This unit would consist of several staff members at a much higher cost.

Booz Allen estimates \$3K yearly cost of a review team to **gather, review and report data** on sexual abuse. Cost to conduct one-hour review with five officials was based on the number of confirmed sexual abuse incidents.

**Cost Impacts**

- Limits to Cross-Gender Viewing and Searches (PP4)
- Assessment and Use of Monitoring Technology (PP7)
- Contracting for the Confinement of Inmates (PP2)
- Audits of Standards (AU1)
- Zero Tolerance of Sexual Abuse (PP1)
- Gathering, Reviewing and Reporting Data (DC1 - DC4)



California Department of Corrections			Cost Impact		Explanation
Percent of Annual Operating Budget			0.1%	0.3%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		76%	\$ 8,761,242	\$ 30,428,099	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 115	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	N		\$ 1,300	Booz Allen estimates the cost to be a percentage of total yearly based on number of contracted inmates = 7,772
PP-3	Inmate supervision	N			Work force realignment will suffice at no additional cost
PP-4	Limits to cross-gender viewing and searches	N	\$ 479	\$ 26,300	504 additional female FTE's
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N			Background checks for promotions would result in an increase of LOE not a cost increase
PP-7	Assessment and use of monitoring technology	N	\$ 8,300	\$ 2,400	\$8.25M upfront cost to upgrade video monitoring in 33 facilities. \$1.5M annual cost to hire 33 program technicians to monitor equipment. \$825K annual cost to perform system maintenance and conduct assessments.
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	Y			
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	Y			
TR-2	Volunteer and contractor training	Y			
TR-3	Inmate education	Y			
TR-4	Specialized training: Investigations	Y			
TR-5	Specialized training: Medical and mental health care	Y			
SC-1	Screening for risk of victimization and abusiveness	Y			
SC-2	Use of screening information	Y			
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	N			48hr exhaustion of administrative remedies is viewed as a major policy issue. Cost estimates for compliance are speculative
RE-3	Inmate access to outside confidential support services	Y			
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	N			State Law prevents communicating the outcomes of disciplinary actions on a staff member. There are safety concerns with notifying a victim of sexual abuse with the outcome of an investigation; however, the outcome is provided upon request.
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	Y			
MM-1	Medical and Mental Health Screenings - history of sexual abuse	Y			
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	N		\$ 3	Booz Allen estimates a review team of upper management officials to consist of 4 senior-level staff and 1 junior analyst. Cost to conduct one-hour review with these 5 officials was based on the number of confirmed sexual abuse incidents.
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 356	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage



**Colorado Department of Corrections (CO DOC)**

Sector	Prisons
Title	CO DOC
Total Facilities	24
Percent PREA Compliant	41%
Total Staff	3,485
Percent Male Staff	74%
Percent Female Staff	26%
Capacity	14,807
Percent Male Offenders	91%
Percent Female Offenders	9%
ADP	14,413
ADP/Capacity Percentage	97%
ACA Accredited?	Yes
Cost of care / day	\$88.60
Unionized?	No
2008 Confirmed Incidents	12
2009 Confirmed Incidents	N/A
Annual Operating Budget	\$ 752,969,584

The CO DOC, located in Denver, CO, has a total of 24 facilities. The CO DOC is responsible for managing and operating 19 state operated prisons and monitors five privately owned facilities. The facilities are designed to supervise offenders in five custody levels: minimum; minimum restrictive; medium; close; and administrative segregation. With an ADP of 14,413, CO DOC operates at 97% of their capacity.

CO DOC is currently 41% compliant with the NPREC standards. It is estimated that the CO DOC will have a total upfront cost of \$3.5M and an annual cost of \$2.9M, to reach full compliance.

An increase in the **use of monitoring technology** was the most significant cost estimated. Based upon the number of cameras in each facility, the appropriate number of monitors, DVR, wiring and installation were factored in for a total upfront cost of \$2.7M and an annual cost of \$2.3M for support staff. Currently, there is not a process in place for upper

management officials to review critical incidents, assess problem areas and take corrective action.

Prohibiting **cross-gender pat searches** presents the second largest cost impact. An upfront cost of \$650K in moving expenses was estimated to relocate 130 female staff in male facilities to female facilities and likewise move 130 males to fill these vacancies. This would help balance the staff/inmate gender ratio in female facilities. Moving expenses are estimated at \$5K per staff member.

Booz Allen estimated a PREA **triennial audit** to annually cost \$259K, covering 24 facilities.

An upfront cost of \$176K was estimated to modify the current **screening** instrument to be gender-specific.

Booz Allen estimated the 713 additional background checks for additional background checks when making **promotion decisions** to cost \$80K. Cost includes access to government sources and internal LOE.

In order to meet the NPREC requirements for the **exhaustion of administrative remedies**, CO DOC will incur an annual cost of \$72K. This cost estimate is for a full time grievance officer to meet the demands of a 48hr timeline.

To establish a **contract with an outside service provider**, a community coordinator would need to be hired at \$60K. This position is necessary to help process referrals and work with the CCASA in coordinating emotional support services.

Lastly, an annual cost of \$58K was estimated in order to hire a staff member to **gather, review and report sexual abuse data**. This position would develop forms, procedures, and implement a data review process. Additionally, Booz Allen estimates \$27K yearly cost of a review team to gather, review and report data on sexual abuse. Cost to conduct one-hour review with five officials was based on the number of confirmed sexual abuse incidents.

**Cost Impacts**

- Assessment and Use of Monitoring Technology (PP7)
- Limits to Cross-Gender Viewing and Searches (PP4)
- Audits of Standards (AU1)
- Screening for Risk of Sexual Abuse (SC1 and SC2)
- Hiring and Promotion Decisions (PP6)
- Exhaustion of Administrative Remedies (RE2)
- Contract Modifications and/or Policy Updates (RP2 - RP4 and RE3)
- Gathering, Reviewing and Reporting Data (DC1 - DC4)

Colorado Department of Corrections			Cost Impact		Explanation
Percent of Annual Operating Budget			0.5%	0.4%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		41%	\$ 3,504,834	\$ 2,878,765	
PP-1	Zero tolerance of sexual abuse	N		\$ 9	Salary increase to cover additional responsibilities of existing PREA Coordinator
PP-2	Contracting with other entities for the confinement of inmates	Y			
PP-3	Inmate supervision	N			Additional security staff will be needed .Cost included in PP-7.
PP-4	Limits to cross-gender viewing and searches	N	\$ 650		Moving expense to move 130 female staff from male facilities to female facilities. Move 130 males to vacated slots left by females.
PP-5	Accommodating inmate with special needs	N		\$ 1	Cost for sign language interpretative services
PP-6	Hiring and promotion decisions	N	\$ 1	\$ 80	Per Booz Allen, fee associated with criminal background check assumed to be \$50. Fee includes access to government sources and an internal LOE. CO DOC has 713 promotions
PP-7	Assessment and use of monitoring technology	N	\$ 2,700	\$ 2,300	\$2.6M in cameras and monitoring. \$2.3M for 51 staff to monitor technology
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	N		\$ 60	Cost to provide inmates with confidential emotional support services hotline. Requires 1FTE to coordinate this with Citizen Advocate Office.
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	N			Will work towards developing an MOU with each District Attorney's office
TR-1	Employee training	Y			
TR-2	Volunteer and contractor training	Y			
TR-3	Inmate education	Y			
TR-4	Specialized training: Investigations	N			Cost to train additional investigators who are currently not trained to PREA
TR-5	Specialized training: Medical and mental health care	Y			
SC-1	Screening for risk of victimization and abusiveness	N	\$ 176		Cost for hiring a programmer to modify instrument to be gender specific.
SC-2	Use of screening information	Y			
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	N	\$ 1	\$ 72	48hr exhaustion of administrative remedies is viewed as a major policy issue. Cost estimates for compliance are speculative. Annual cost to hire a grievance officer
RE-3	Inmate access to outside confidential support services	N	\$ 1		Cost to inform inmates of new material with contact information on support services
RE-4	Third-party reporting	N			CO DOC does not notify third party/s of criminal sanctions
OR-1	Staff and facility head reporting duties	N			Doesn't report incidents involving a victim less than 18 years old any differently
OR-2	Reporting to other confinement facilities	N			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	N			Does not monitor the conduct of inmates that have reported sexual abuse
IN-1	Duty to investigate	N			Does not provide written notification on the outcome of investigations. No cost.
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	N			Sanctions do not include interventions designed to address and correct any underlying reasons or motivations for abuse
MM-1	Medical and Mental Health Screenings - history of sexual abuse	N			Medical and mental health practitioners do not perform the screening, this is done by classification and assessment programmers
MM-2	Access to emergency medical and mental health services	N			Need for emergency medical treatment isn't determined by medical and mental health practitioners.
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	N			Doesn't provide evaluations for offenders.
DC-1	Sexual abuse incident reviews	N	\$ 1	\$ 27	Booz Allen estimates a review team of upper management officials to consist of 4 senior-level staff and 1 junior analyst. Cost to conduct one-hour review with these 5 officials was based on the number of confirmed sexual abuse incidents.
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	N		\$ 58	One FTE would be required to generate data, review, and compile reports.
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 259	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage

**Indiana Department of Corrections (IN DOC)**

Sector	Prisons
Title	IN DOC
Total Facilities	21
Percent PREA Compliant	66%
Total Staff	3,693
Percent Male Staff	70%
Percent Female Staff	30%
Capacity	26,343
Percent Male Offenders	91%
Percent Female Offenders	9%
ADP	20,698
ADP/Capacity Percentage	79%
ACA Accredited?	Yes
Cost of care / day	\$53.96
Unionized?	No
2008 Confirmed Incidents	9
2009 Confirmed Incidents	N/A
Annual Operating Budget	\$ 621,000,000

The IN DOC, located in Indianapolis, IN, operates 21 prison facilities, ranging from Level 1 (minimum security) to Level 4 (maximum security). IN DOC has an ADP of 20,698 inmates, or 79% of its maximum capacity.

IN DOC is currently 66% compliant with the NPREC standards. It is estimated that IN DOC will have a total upfront cost of \$20M and an annual cost of \$5.3M, to reach full compliance.

Severance pay of \$15M for IN DOC was due to the prohibition of **cross-gender pat searches**. The IN DOC would need to terminate 639 female officers, which could not be absorbed into other custody positions. Equally, 639 male officers need to be hired. However, Booz Allen considers the salary swap to be a negligible cost. State law in Indiana prohibits hiring discrimination on the basis of gender.

While the IN DOC considers current staffing levels adequate to prevent sexual abuse, significant improvements in **Assessment and Use of Monitoring Technology**. An upfront

cost of \$5M was estimated for cameras, archiving equipment, and installation cost. An annual cost of \$450K was estimated for ongoing maintenance of the equipment, to include an increased LOE. Currently, existing video monitoring lacks necessary supervision, leaving areas unmonitored or partially monitored.

An annual cost of \$3M was estimated for **ongoing medical and mental health care**. At IN DOC, only adjudicated inmates labeled as sex offenders are required to attend the sex offender program. Those that may have committed “lesser” offenses and not classified as a sex offender by the courts, and are not referred to the program for help. The cost estimate is based on 75% more qualified candidates.

A victim advocate is not currently provided by the department for **evidence protocol and forensic medical exams**. A part time internal victim advocate was estimated to be the most cost effective method to comply with this NPREC standard. The creation of a 0.5 FTE at each facility amounted to \$840K yearly and \$11.K in upfront costs. Additionally, \$10K was estimated to develop posters and pamphlets displaying victim advocate services.

IN DOC **contracts for the housing of 2,400 inmates** with GEO. Booz Allen estimates an annual cost of \$735K to comply with NPREC standard PP2. This estimate is a percentage of total yearly cost based on number of contracted inmates.

**Cost Impacts**

- Limits to Cross-Gender Viewing and Searches (PP4)
- Assessment and Use of Monitoring Technology (PP7)
- Ongoing Medical and Mental Health Care (MM-3)
- Evidence Protocol and Forensic Medical Exams (RP1) Evidence Protocol and Forensic Medical Exams (RP1)
- Audits of Standards (AU1)
- Zero Tolerance of Sexual Abuse (PP1)

Booz Allen estimated a PREA **triennial audit** to annually cost \$227K, covering 21 facilities.

According to the NPREC standard PP1, **zero tolerance of sexual abuse**, IN DOC would require 1FTE to serve as the PREA Coordinator at an annual cost of \$72K.

IN DOC expressed concern over being able to develop an implement a contract with an **outside service provider**. They feel there are not enough community service providers in Indiana to meet the NPREC requirements. Nonetheless, an annual cost of \$40K was estimated to provide 20 inmates with 20 contract hours.

Indiana Department of Corrections			Cost Impact		Explanation
Percent of Annual Operating Budget			3.2%	0.9%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		66%	\$ 20,055,143	\$ 5,365,290	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 72	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	N		\$ 735	Booz Allen estimates the cost to be a percentage of total yearly based on number of contracted inmates = 2,400
PP-3	Inmate supervision	Y			
PP-4	Limits to cross-gender viewing and searches	N	\$ 15,000		Potential to displace 639 female officers that could not be absorbed into other custody positions. Cost is attributable to estimated severance pay
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N			Prior institutional employers are contacted. Questions regarding sexual abuse are not asked. Could be accomplished at no additional cost and without legal ramifications.
PP-7	Assessment and use of monitoring technology	N	\$ 5,000	\$ 450	Upgrades and additional equipment are required. Annual maintenance is required.
RP-1	Evidence protocol and forensic medical exams	N	\$ 11	\$ 842	Internal victim advocate at 0.5 FTE at each facility.
RP-2	Agreements with outside public entities and community service providers	N		\$ 40	Approximately 20 contract hours for 20 inmates annually.
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	Y			
TR-2	Volunteer and contractor training	Y			
TR-3	Inmate education	Y			
TR-4	Specialized training: Investigations	Y			
TR-5	Specialized training: Medical and mental health care	Y			
SC-1	Screening for risk of victimization and abusiveness	Y			
SC-2	Use of screening information	Y			
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	N			48hr exhaustion of administrative remedies is viewed as a major policy issue. Cost estimates for compliance are speculative
RE-3	Inmate access to outside confidential support services	N	\$ 10		Cost to update existing PREA material with contacts for victim advocate services
RE-4	Third-party reporting	N			The outcome of an investigation is not permitted to be released.
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	N			The outcome of an investigation is not permitted to be released.
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	Y			
MM-1	Medical and Mental Health Screenings - history of sexual abuse	N			Intake specialists are not medical/mental health practitioners.
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	N		\$ 3,000	Cost of including all sex offenders (not just adjudicated) in the the sex offender program
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 227	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
ID-6	Supplement to SC-2	Y			

**Massachusetts Department of Correction (MA DOC)**

Sector	Prisons
Title	MA DOC
<b>Total Facilities</b>	18
<b>Percent PREA Compliant</b>	85%
<b>Total Staff</b>	4,342
<b>Percent Male Staff</b>	88%
<b>Percent Female Staff</b>	12%
<b>Capacity</b>	12,508
<b>Percent Male Offenders</b>	92%
<b>Percent Female Offenders</b>	8%
<b>ADP</b>	12,508
<b>ADP/Capacity Percentage</b>	100%
<b>ACA Accredited?</b>	Yes
<b>Cost of care / day</b>	\$124.28
<b>Unionized?</b>	Yes
<b>2008 Confirmed Incidents</b>	33
<b>2009 Confirmed Incidents</b>	15
<b>Annual Operating Budget</b>	\$ 514,626,570

MA DOC, located in Concord, MA, has a total of 18 facilities; 16 prisons, one prerelease center, and one facility for pregnant woman. The average daily population of the facilities is 12,508, operating at 100% of their capacity.

MA DOC is 85% compliant with the NPREC standards. It is estimated that MA DOC will have a total upfront cost of \$4.3M and an annual cost of \$710K, to reach full compliance.

The largest cost estimate is attributed the enhancement and **use of monitoring technology**. An upfront cost of \$2.3M was estimated for the purchase of 1,147 cameras and installation. All facilities are equipped with technology however, many facilities need upgrades.

An upfront cost of \$2M in severance pay was estimated to prohibit **cross-gender pat searches**. MA DOC polled each facility to determine how many female staff had direct contact with male inmates on each shift. It was determined that 69 female officers would need to be terminated.

An annual cost of \$516K was estimated meet the requirements of NPREC standard IN-1: **Duty to investigate**. These costs are associated with hiring 11 investigators to meet the increased requirements of grievance regulations and third party reporting.

Booz Allen estimated a PREA **triennial audit** to annually cost \$194K, covering 18 facilities.

**Cost Impacts**

- Assessment and Use of Monitoring Technology (PP7)
- Limits to Cross-Gender Viewing and Searches (PP4)
- Investigations (IN1 and IN3)
- Audits of Standards (AU1)

Massachusetts Department of Corrections			Cost Impact		Explanation
Percent of Annual Operating Budget			0.8%	0.1%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		85%	\$ 4,277,988	\$ 709,902	
PP-1	Zero tolerance of sexual abuse	Y			
PP-2	Contracting with other entities for the confinement of inmates	Y			
PP-3	Inmate supervision	Y			
PP-4	Limits to cross-gender viewing and searches	N	\$ 2,000		69 additional male FTE's at \$55,304 each
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	Y			
PP-7	Assessment and use of monitoring technology	N	\$ 2,300		Purchase and installation of 1,147 cameras at \$2,000 each
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	N			MA DOC has in-house council that can draft MOU's at no additional cost
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	Y			
TR-2	Volunteer and contractor training	Y			
TR-3	Inmate education	Y			
TR-4	Specialized training: Investigations	Y			
TR-5	Specialized training: Medical and mental health care	Y			
SC-1	Screening for risk of victimization and abusiveness	Y			
SC-2	Use of screening information	Y			
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	N			48hr exhaustion of administrative remedies is viewed as a major policy issue. Cost estimates for compliance are speculative
RE-3	Inmate access to outside confidential support services	Y			
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	N	\$ 10	\$ 516	Cost for 11 FTE investigators
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	Y			
MM-1	Medical and Mental Health Screenings - history of sexual abuse	Y			
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 194	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
ID-6	Supplement to SC-2	Y			

**Minnesota Department of Corrections (MN DOC)**

Sector	Prisons
Title	MN DOC
Total Facilities	10
Percent PREA Compliant	71%
Total Staff	2,115
Percent Male Staff	77%
Percent Female Staff	23%
Capacity	9,617
Percent Male Offenders	94%
Percent Female Offenders	6%
ADP	9,619
ADP/Capacity Percentage	100%
ACA Accredited?	No
Cost of care / day	\$89.24
Unionized?	Yes
2008 Confirmed Incidents	2
2009 Confirmed Incidents	2
Annual Operating Budget	\$ 469,954,000

Located in St. Paul, the MN DOC is a service and regulatory agency, with a broad scope of activities and responsibilities. The department currently operates ten correctional facilities including eight for adults and two for juveniles. This study focuses on the adult prison facilities. MN DOC has a five-level classification structure ranging from level 1 minimum custody, to level 5 maximum custody. The one female facility houses multiple security levels. Adult prison ADP is 9,619 inmates, operating at 100% capacity.

MN DOC is 71% compliant with the NPREC standards. It is estimated that MN DOC will have a total upfront cost of \$11K and an annual cost of \$433K, to reach full compliance.

The greatest issue expressed dealt with the prohibition of **cross-gender pat searches**. Although cost estimates could not be made, the MN DOC found this standard to conflict with existing state legislation.

MN DOC stated that adequate **use of monitoring technology** was in place however, to be fully compliant, an annual

assessment of the equipment would need to be conducted. An annual security audit of all facilities would result in an annual cost of \$135K.

Booz Allen estimated a PREA **triennial audit** to annually cost \$108K, covering 10 facilities.

According to the NPREC standard PP1, **zero tolerance of sexual abuse**, MN DOC would require 1FTE to serve as the PREA Coordinator at an annual cost of \$106K.

An annual cost of \$75K was estimated to provide refresher **training/education** for inmates. Currently, refresher material is provided to inmates being transferred between institutions. This cost estimate educates all inmates once every three years.

**Cost Impacts**

- Limits to Cross-Gender Viewing and Searches (PP4)
- Assessment and Use of Monitoring Technology (PP7)
- Audits of Standards (AU1)
- Zero Tolerance of Sexual Abuse (PP1)
- Training and Education (TR1 - TR5)



Minnesota Department of Corrections			Cost Impact		Explanation
Percent of Annual Operating Budget			0.0%	0.1%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		71%	\$ 11,092	\$ 432,535	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 106	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	Y			
PP-3	Inmate supervision	Y			
PP-4	Limits to cross-gender viewing and searches	N			Speculative litigation costs associated with compliance have been removed
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N		\$ 6	Per Booz Allen, fee associated with criminal background check assumed to be \$50. Fee includes access to government sources and an internal LOE. MN DOC has 122 promotions
PP-7	Assessment and use of monitoring technology	N		\$ 135	Cost of providing ANNUAL security audits in all facilities
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	Y			
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N		\$ 2	Annual cost to develop PREA material
TR-2	Volunteer and contractor training	Y			
TR-3	Inmate education	N		\$ 75	Cost of refresher training for inmates
TR-4	Specialized training: Investigations	Y			
TR-5	Specialized training: Medical and mental health care	Y			
SC-1	Screening for risk of victimization and abusiveness	Y			
SC-2	Use of screening information	Y			
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	N			48hr exhaustion of administrative remedies is viewed as a major policy issue. Cost estimates for compliance are speculative
RE-3	Inmate access to outside confidential support services	N			Working to identify alternative advocacy groups for all facilities at no additional cost
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	N			Prohibited by state law from notifying victims of investigative outcomes for inmate-on-inmate crimes. No additional costs anticipated
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	Y			
MM-1	Medical and Mental Health Screenings - history of sexual abuse	N			Do not obtain informed consent from inmates before reporting info about prior sexual victimization that didn't occur in institutional setting. No additional cost for compliance
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	N	\$ 10		There will be a one time LOE for automating database
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 108	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
ID-6	Supplement to SC-2	Y			



**Missouri Department of Corrections (MO DOC)**

Sector	Prisons
Title	MO DOC
Total Facilities	21
Percent PREA Compliant	49%
Total Staff	7,913
Percent Male Staff	70%
Percent Female Staff	30%
Capacity	31,319
Percent Male Offenders	91%
Percent Female Offenders	9%
ADP	30,578
ADP/Capacity Percentage	98%
ACA Accredited?	No
Cost of care / day	\$45.09
Unionized?	Yes
2008 Confirmed Incidents	15
2009 Confirmed Incidents	26
Annual Operating Budget	\$ 466,690,803

MO DOC, located in Jefferson City, MO, manages 21 facilities. MO DOC has developed an inmate classification system to enhance safety and security for all staff, offenders, and visitors at an institution. The classification system is based on several factors including: length of sentence, type of crime, and an offender’s individual needs for specialized programs and services. Organizationally, the MO DOC is integrated with the MO PP and many resources are and can be shared.

MO DOC is 49% compliant with the NPREC standards. It is estimated that MO DOC will have a total upfront cost \$3.2M and an annual cost of \$63.9M, to reach full compliance.

The lack of adequate **inmate supervision** was the largest cost driver. Based on a recent analysis of custodial staffing relative to post requirements, MO DOC is operating at critically low levels. Over the past few years, the number of officers has decreased by roughly 750 while the number of inmates has increased. MO DOC requires 20% more officers than current

levels to supervise dormitories/housing and unit staff. An annual cost of \$44.3M was estimated for 924 additional staff. Since this is the addition of new staff members, there are additional \$878K in upfront costs to cover hiring, training, and office equipment. These positions are in addition to those added for standard PP4.

MODOC does not prohibit **cross-gender pat searches**. Although they have a staffing gender ratio close to their inmate gender ratio, current procedures do not allow gender-specific posts with the exception of toileting and showering (which displaces more female officers to areas where pat downs occur). MO DOC believes that restricting females from pat downs would be a threat to security as pat downs are routine process and conducted at uncertain places and uncertain times. MO DOC would not be able to reduce the number of female officers or restrict duties due to labor management and binding union agreements. The only means to address this standard would be to hire more male officers. An annual cost of \$18.3M was estimated to hire 381 additional male staff. Since this is the addition of new staff members, there are additional \$326K in upfront costs to cover hiring, training, and office equipment.

MO DOC has increased their **use of monitoring technology** over the past few years with the funding from two PREA grants used to purchase additional cameras. However, the MO DOC did not receive enough funding to cover all identified areas. There were an additional 1,352 sites that were identified but did not receive camera coverage. An upfront cost of \$1.9M was estimated for cameras and DVRs to cover the additional locations, for a total 1,352 cameras.

MO DOC has an internal classification process to determine housing decisions and it identifies those prone to victimization and predators. However, their **screening** process is not gender-specific. A yearly cost of \$804K is estimated in order to meet the NPREC requirements. This cost includes the additional labor hours to modify the existing classification process and administer the instrument. The new process was estimated to take one additional hour per assessment. Currently, there are 20,000 intake assessments and 30,000 annual assessments.

Booz Allen estimated a PREA **triennial audit** to annually cost \$227K, covering 22 facilities.

**Cost Impacts**

- Inmate Supervision (PP3)
- Limits to Cross-Gender Viewing and Searches (PP4)
- Assessment and Use of Monitoring Technology (PP7)
- Screening for Risk of Sexual Abuse (SC1 and SC2)
- Triennial Auditing ( AU1)
- Training and Education ((TR1 through TR5)
- Zero Tolerance of Sexual Abuse (PP1)
- Contract Modifications for Outside Services (RP2 - RP4 and RE3)
- Gathering, Reviewing and Reporting Data (DC1 - DC4)

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At orientation, all MO DOC inmates are provided **training and education** and a handbook on sexual abuse. Refresher training however, is not provided and would add an estimated \$226K annually to their current operations. Costs to modify their policy mandating PREA refresher training will result in additional training delivery costs and staff time. It will require two additional hours of training for 7,913 staff plus the cost for the trainers. Training will be conducted by DOC staff trainers. This refresher training cost includes the development of a video for closed circuit TV and/or leveraging training content and curriculum from the NIC. All state investigators receive 40 to 80 hours of training, including training specific to conducting investigations in a confinement setting. They do not however, receive comprehensive training on sexual abuse which can be added at an upfront cost of \$51K.

According to the NPREC standard PP1, **zero tolerance of sexual abuse**, MO DOC would require 1 FTE to serve as the PREA Coordinator at an annual cost of \$79K. However, if MO DOC were to leverage their current unified model, they would employ a hybrid approach with one central PREA Coordinator supported by two part time assistants; one for prisons and one for probation and parole.

An upfront \$20K for **contract Modifications for Outside Services** was estimate to post victim advocate information throughout the facilities, also displayed on the closed circuit TV.

Lastly, Booz Allen estimates a \$4K yearly cost of a review team to **gather, review and report data** on sexual abuse. Cost to conduct one-hour review with five officials was based on the number of confirmed sexual abuse incidents.

Missouri Department of Corrections			Cost Impact		Explanation
Percent of Annual Operating Budget			0.7%	13.7%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		49%	\$ 3,226,771	\$ 63,866,691	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 79	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	Y			
PP-3	Inmate supervision	N	\$ 878	\$ 44,300	20% increase in staffing levels to officers than current levels = 914 new hires
PP-4	Limits to cross-gender viewing and searches	N	\$ 362	\$ 18,300	381 new male staff required to fill existing female posts
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N			Agency does not ask sexual abuse questions of prior employers but can do so at no additional cost
PP-7	Assessment and use of monitoring technology	N	\$ 1,900		Requires staff to monitor existing cameras and needs camera in other areas
RP-1	Evidence protocol and forensic medical exams	N			Internal victim advocate can provide this service at no additional cost
RP-2	Agreements with outside public entities and community service providers	N			Costs associated with entering into such an agreement will probably be part of the duties assigned to the full-time PREA Coordinator.
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N		\$ 226	Cost to develop and implement refresher training for employees
TR-2	Volunteer and contractor training	N			No cost to update existing PREA training for volunteers and contactors
TR-3	Inmate education	N			Refresher training is not provided, but associated costs are absorbable to the department
TR-4	Specialized training: Investigations	N	\$ 51		Cost to send investigators to an outside training class
TR-5	Specialized training: Medical and mental health care	Y			
SC-1	Screening for risk of victimization and abusiveness	N			Currently updating screening process. (sunk cost not included)
SC-2	Use of screening information	N		\$ 804	LOE associated with additional assessment and intake (hrs/per caseworker)
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	N			48hr exhaustion of administrative remedies is viewed as a major policy issue. Cost estimates for compliance are speculative
RE-3	Inmate access to outside confidential support services	N	\$ 20		Cost to develop Closed Circuit Television (CCT) PREA video loop and cost to develop PREA posters
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	N			Requires policy change with no additional cost
IN-2	Criminal and administrative agency investigations	N			Additional training is needed. Cost reflected in TR-4
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	Y			
MM-1	Medical and Mental Health Screenings - history of sexual abuse	Y			
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	N			Revise policy at no additional cost
DC-1	Sexual abuse incident reviews	N		\$ 4	Booz Allen estimates a review team of upper management officials to consist of 4 senior-level staff and 1 junior analyst. Cost to conduct one-hour review with these 5 officials was based on the number of confirmed sexual abuse incidents.
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	N			MO DOC does not have a formalized process but could make modifications at no additional cost
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 227	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
ID-6	Supplement to SC-2	Y			

**New York State Department of Correctional Services (NY DOC)**

Sector	Prisons
Title	NY DOC
Total Facilities	67
Percent PREA Compliant	54%
Total Staff	32,986
Percent Male Staff	75%
Percent Female Staff	25%
Capacity	66,079
Percent Male Offenders	95%
Percent Female Offenders	5%
ADP	60,217
ADP/Capacity Percentage	91%
ACA Accredited?	Yes
Cost of care / day	\$152.38
Unionized?	Yes
2008 Confirmed Incidents	22
2009 Confirmed Incidents	14
Annual Operating Budget	\$ 3,449,781,521

NY DOC, located in Albany, New York, is responsible for the confinement and rehabilitation of approximately 60,217 inmates held at 67 state correctional facilities—with 14 minimum security (L2), 36 medium security (L-3), 16 maximum security (L-4) and 1 Drug Treatment Center. NY DOC has a rated capacity of 66,079, making it the second largest prison system in Phase II.

NY DOC is 54% compliant with the NPREC standards. It is estimated that NY DOC will have a total upfront cost of \$628M and an annual cost of \$44M, to reach full compliance.

The NPREC standard PP7, on Assessment and Use of Monitoring Technology, proved to be 99% of the total upfront cost. The estimated cost to comply would be \$621M plus an annual maintenance of \$1.8M. NY DOC requires the installation of full coverage video surveillance systems in 35 facilities and increased coverage in four female facilities.

The prohibition of **cross-gender pat searches** accounted for 77% of the total annual cost estimate. NY DOC would be required to increase the number of CO staffing at female correctional facilities by 50% (an additional 620 COs at \$53K new hire salary, including retirement and benefits) for a yearly cost of \$33.9M and an upfront cost of \$589K. This standard will result in additional gender-specific posts however, the ability to create such posts has been severely constrained by the courts. Even overstaffing by 50%, it is unlikely that NY DOC could recruit and retain a sufficient number of female COs facilities. NY DOC states compliance would also be in violation of Federal statute.

**Training and education** requirements weigh heavily on the state when expanded across all programs. NY DOC requires new curriculum to be developed along with additional staff time. This resulted in a large upfront cost of \$4.5M and a total yearly training cost of \$115K. These costs include training for 21,000 employees and an additional 6,000 civilian staff, 200 contracted primary care providers, 87 new counselors, and 400 OMH employees. An average of 25 hours was estimated to develop and modify current training to ensure all staff, volunteers and contractors were covered on NPREC.

**Cost Impacts**

- Assessment and Use of Monitoring Technology (PP7)
- Limits to Cross-Gender Viewing and Searches (PP4)
- Training and Education ((TR1 through TR5)
- Triennial Auditing ( AU1)
- Contract Modifications and/or Policy Updates (RP2 - RP4 and RE3)
- Agency Protection Against Retaliation (OR-5)
- Evidence Protocol and Forensic Medical Exams (RP1)
- Gathering, Reviewing and Reporting Data (DC1 - DC4)
- Zero Tolerance of Sexual Abuse (PP1)

Booz Allen estimated a PREA **triennial audit** to annually cost \$724K, covering 67 facilities.

NY DOC would need to develop and implement a **contract with an outside service provider** in 34 counties, and for transitional services in 62 counties, at an upfront cost of \$500K.

To comply with NPREC standard OR-5, **agency protection against retaliation**, would result in an upfront cost \$500K. This cost is associated with a computerized system to permit Central Office monitoring of inmate victims and witnesses.

NY DOC does not provide inmates’ access to a victim advocate for **evidence protocol and forensic medical exams**. NY DOC would need to create a “fee for service” contract with every hospital in the area for each facility. An annual cost of \$250K was estimated based upon reimbursement at standard Medicaid rates.

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NYS DOC does not currently **gather, review and report data**, as per the requirements of the NPREC standards. This would require the addition of research staff at a yearly cost of \$81K.

According to the NPREC standard PP1, **zero tolerance of sexual abuse**, NY DOC would require 1FTE to serve as the PREA Coordinator at an annual cost of \$71K. However, due to their large size, NY DOC expressed they would need more than one Zero tolerance of sexual abuse. They suggested one Deputy Commissioner, one Assistant Commissioner, two field PREA auditors, and one clerical position, as a PREA unit, capable of meeting the NPREC requirements for such a large system.

New York State Department of Correctional Services			Cost Impact		
Percent of Annual Operating Budget			18.2%	1.1%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	Explanation
		54%	\$ 627,095,704	\$ 37,411,110	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 71	Salary + benefits of 1 FTE at senior-level salary
PP-2	Inmates	Y			
PP-3	Inmate supervision	Y			
PP-4	Limits to cross-gender viewing and searches	N	\$ 589	\$ 33,900	Increase number of correctional officers at female facilities by 50%
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	Y			
PP-7	Assessment and use of monitoring technology	N	\$ 621,500	\$ 1,800	Full video coverage in 35 facilities, increased coverage in 4 female facilities
RP-1	Evidence protocol and forensic medical exams	N		\$ 250	Would need to create a "fee for service" contract w/every hospital in the area of every facility. Cost based upon reimbursement at standard Medicaid rates
RP-2	Agreements with outside public entities and community service providers	N		\$ 500	Need to contract for emotional support services in 34 counties where DOC has prisons. Need to contract for transitional services in all 62 counties
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	N	\$ -		Approx. 5 hours of staff time to develop document plus 1 hour of executive review.
TR-1	Employee training	N	\$ 3,700		4 hour PREA training above 40 hour training program. OT costs for 21,000 employees and additional 6,000 civilian staff. 20 hours to update existing training
TR-2	Volunteer and contractor training	N	\$ 42	\$ 10	Require 4 hrs of training for 200 contract primary care providers and annual costs. Would take approx. 10 hrs to modify existing training for volunteers.
TR-3	Inmate education	N	\$ 13		Need 1 additional counselor at each facility, 5 additional counselors at 4 reception centers. Total 87 new counselors (salary and benefits). 30 hrs to develop training.
TR-4	Specialized training: Investigations	Y			
TR-5	Specialized training: Medical and mental health care	N	\$ 750	\$ 105	Require 4 hour training of DOCS medical staff using video-conference system, Training 400 OMH employees take 6-8 separate sessions and 30 hours to develop
SC-1	Screening for risk of victimization and abusiveness	Y			
SC-2	Use of screening information	Y			
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	N			48hr exhaustion of administrative remedies is viewed as a major policy issue. Cost estimates for compliance are speculative
RE-3	Inmate access to outside confidential support services	N			Toll-free numbers to inmate phone system to permit free calls to victim advocate
RE-4	Third-party reporting	N			Notification to non-victim complainants is contrary to state law
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	N			DOC policy requires that received allegations are reported to the Office of the Inspector General. DOC centralizes all sexual abuse investigations. Allegations received about abuse at another agency's facility would typically be forwarded to facility head.
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	N	\$ 500		Computerized system to allow central office to monitor inmate victims and witnesses
IN-1	Duty to investigate	N			Notification to non-victim complainants is contrary to state law
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	Y			
MM-1	Medical and Mental Health Screenings - history of sexual abuse	N			Would be covered through training.
MM-2	Access to emergency medical and mental health services	Y			
MM-3	victims and abusers	Y			
DC-1	Sexual abuse incident reviews	N	\$ 1	\$ 81	Booz Allen estimates a review team of upper management officials to consist of 4 senior-level staff and 1 junior analyst. Cost to conduct one-hour review with these 5 officials was based on the number of confirmed sexual abuse incidents. Cost of 1 FTE to prepare report for facility head = \$80K
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			

**Oregon Department of Corrections (OR DOC)**

Sector	Prisons
Title	OR DOC
Total Facilities	14
Percent PREA Compliant	80%
Total Staff	3,829
Percent Male Staff	69%
Percent Female Staff	31%
Capacity	14,711
Percent Male Offenders	91%
Percent Female Offenders	9%
ADP	13,823
ADP/Capacity Percentage	94%
ACA Accredited?	No
Cost of care / day	\$84.46
Unionized?	Yes
2008 Confirmed Incidents	7
2009 Confirmed Incidents	5
Annual Operating Budget	\$ 550,167,137

OR DOC, located in Salem, OR has custody of offenders sentenced to prison for more than 12 months. In addition to adult prisons, OR DOC provides oversight and funding for the community corrections activities of Oregon’s 36 counties. It has seven major divisions. For the purposes of this study, cost estimates are for adult prisons.

OR DOC is 80% compliant with the NPREC standards. It is estimated that OR DOC will have a total upfront cost of \$258K and an annual cost of \$774K, to reach full compliance.

Although no cost was provided, existing state statutes allow female staff to conduct **cross-gender pat searches** on male inmates.

In order to become compliant with the NPREC requirements on **screening**, the OR DOC would need one additional counselor at the five largest facilities to handle the workload increase, resulting in an annual cost of \$437K. The OR DOC would like to see this standard changed, so that counselor as

part of their counselor caseload management (CCM) could refer inmates for screening when they meet the criteria in the standard. Cost estimates would be less if screening was allowed to be conducted in this method.

The majority of the upfront cost estimates are a result of **monitoring technology**. OR DOC has video monitoring in place, however there is a camera upgrade plan for one institution that would require an upfront cost of \$220K. Currently, each institution is responsible for assessing the technology of their facility, but no centralized process exists. An annual salary cost of 1FTE of \$86K was estimated to formalize an assessment process of video monitoring. This position would work with IT to develop a “Lifecycle Replacement” policy for security electronics.

Booz Allen estimated a PREA **triennial audit** to annually cost \$151K, covering 14 facilities.

An annual cost of \$98K was estimated meet the requirements of NPREC standard IN-1: **Duty to investigate**. OR DOC expressed a security concern with notifying victims in writing of investigative outcomes, with the potential of making the victim vulnerable. Inmates can find out the status of their case by contacting one of the SART members. A 0.5PTE would be needed both on the East and West side of the state to accommodate the increase workload of investigators.

In order to provide PREA **training** for the 200 contracted employees an upfront cost of \$30K was estimated. This cost is based on a one hour training session provided at a cost of \$150/hour.

Booz Allen estimates a \$1K yearly cost of a review team to **gather, review and report data** on sexual abuse. Cost to conduct one-hour review with five officials was based on the number of confirmed sexual abuse incidents.

**Cost Impacts**

- Limits to Cross-Gender Viewing and Searches (PP4)
- Screening for Risk of Sexual Abuse (SC1 and SC2)
- Assessment and Use of Monitoring Technology (PP7)
- Audits of Standards (AU1)
- Investigations (IN1 and IN3)
- Training and Education (TR1 - TR5)
- Gathering, Reviewing and Reporting Data (DC1 - DC4)

Oregon Department of Corrections			Cost Impact		Explanation
Percent of Annual Operating Budget			0.0%	0.0%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		80%	\$ 257,502	\$ 773,937	
PP-1	Zero tolerance of sexual abuse	Y			
PP-2	Contracting with other entities for the confinement of inmates	Y			
PP-3	Inmate supervision	Y			
PP-4	Limits to cross-gender viewing and searches	N			Existing state law allow female correctional officers to conduct pat downs
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	Y			
PP-7	Assessment and use of monitoring technology	N	\$ 221	\$ 86	Camera upgrades at 1 facility. Costis for purchase and installation of cameras and annual technology assessments.
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	Y			
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	Y			
TR-2	Volunteer and contractor training	Y			
TR-3	Inmate education	Y			
TR-4	Specialized training: Investigations	Y			
TR-5	Specialized training: Medical and mental health care	N	\$ 30		200 contracted staff will require training to comply with this standard.
SC-1	Screening for risk of victimization and abusiveness	N	\$ 5	\$ 437	Current screening instrument is not gender specific. 5 FTE's (one each at the five largest facilities) are required to meet the work load increase
SC-2	Use of screening information	Y			
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	N			48hr exhaustion of administrative remedies is viewed as a major policy issue. Cost estimates for compliance are speculative
RE-3	Inmate access to outside confidential support services	Y			
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	N	\$ 1	\$ 98	Do not notify victims or complainants in writing. 0.5FTE would be required in the eastern and western regions of the state
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	Y			
MM-1	Medical and Mental Health Screenings - history of sexual abuse	Y			
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	N		\$ 1	Booz Allen estimates a review team of upper management officials to consist of 4 senior-level staff and 1 junior analyst. Cost to conduct one-hour review with these 5 officials was based on the number of confirmed sexual abuse incidents.
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 151	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage



**Rhode Island Department of Corrections (RI DOC)**

Sector	Prisons
Title	RI DOC
Total Facilities	8
Percent PREA Compliant	68%
Total Staff	1,332
Percent Male Staff	79%
Percent Female Staff	21%
Capacity	4,251
Percent Male Offenders	92%
Percent Female Offenders	8%
ADP	3,438
ADP/Capacity Percentage	81%
ACA Accredited?	No
Cost of care / day	\$112.58
Unionized?	Yes
2008 Confirmed Incidents	-
2009 Confirmed Incidents	3
Annual Operating Budget	\$ 177,390,562

RI DOC, located in Cranston, Rhode Island, operates a unified correctional system, whereby all pretrial detainees and all sentenced offenders (regardless of sentence length or crime) are under its jurisdiction. Rhode Island is one of six states that have unified systems, incorporating the jail and state prison into one Department. RI DOC has eight housing facilities on the Pastore Government Center Complex in Cranston – 5 for adult male offenders and 2 for female offenders, with two minimum security, three medium security, and three maximum. It employs 1,332 staff with an ADP of 3,438 inmates.

RI DOC is 68% compliant with the NPREC standards. It is estimated that RI DOC will have a total upfront cost of \$803K and an annual cost of \$265K, to reach full compliance.

Enhancements in the **use of monitoring technology** resulted in the most significant cost impact. An upfront cost of \$800K included 244 cameras in minimum security facilities that do

not have video monitoring.

According to the NPREC standard PP1, **zero tolerance of sexual abuse**, RI DOC would require 1FTE to serve as the PREA Coordinator at an annual cost of \$145K.

Booz Allen estimated a PREA **triennial audit** to annually cost \$86K, covering 8 facilities.

Upgrading the existing employee **training** module was estimated to annually cost \$29K. This update targets non uniform employees that do not receive the same training as sworn officers.

RI DOC does not conduct background checks for candidates being considered for **promotion**. RI DOC has 80 promotions per year. Booz Allen estimates the yearly maintenance cost of these additional promotions to cost \$4K.

**Cost Impacts**

- Assessment and Use of Monitoring Technology (PP7)
- Zero Tolerance of Sexual Abuse (PP1)
- Audits of Standards (AU1)
- Training and Education (TR1 - TR5)
- Hiring and Promotion Decisions (PP6)

Rhode Island Department of Corrections			Cost Impact		Explanation
Percent of Annual Operating Budget			0.5%	0.1%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		68%	\$ 802,627	\$ 264,604	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 145	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	Y			
PP-3	Inmate supervision	Y			
PP-4	Limits to cross-gender viewing and searches	Y			
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N		\$ 4	Per Booz Allen, fee associated with criminal background check assumed to be \$50. Fee includes access to government sources and an internal LOE. RI DOC has 80 promotions
PP-7	Assessment and use of monitoring technology	N	\$ 800		Cost for cameras, cost of installation, and on-going maintenance costs (staffing)
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	Y			
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N		\$ 29	Cost estimate of upgrading training module for non-uniform employees
TR-2	Volunteer and contractor training	Y			
TR-3	Inmate education	N	\$ -		Copy of the video to DVD (cost of outside vendor) ,copies made for each facility, and cost of programmer(1 hour time). Negligible cost impact
TR-4	Specialized training: Investigations	Y			
TR-5	Specialized training: Medical and mental health care	Y			
SC-1	Screening for risk of victimization and abusiveness	N	\$ 1		Update screening instrument. Programmer cost p/hr \$49.93
SC-2	Use of screening information	Y			
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	N			48hr exhaustion of administrative remedies is viewed as a major policy issue. Cost estimates for compliance are speculative
RE-3	Inmate access to outside confidential support services	Y			
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	N			Required to report to Department Children, Youth and Families in cases first degree sexual assault (penetration) or attempted first degree sexual assault. No cost impact
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	N			First responder training to be incorporated into employee training
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	N			Utilizes Stress Team for staff. Inmates have direct access to Adult Counselors assigned to respective facilities and/or RIDOC Social Workers
IN-1	Duty to investigate	N			RI state law and union prohibition does not permit the notification of disciplinary actions taken upon an employee
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	N			Policy does not specifically state termination for such activity
DI-2	Disciplinary sanctions for inmates	Y			
MM-1	Medical and Mental Health Screenings - history of sexual abuse	Y			
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 86	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage

**South Carolina Department of Corrections (SC DOC)**

Sector	Prisons
Title	SC DOC
Total Facilities	29
Percent PREA Compliant	49%
Total Staff	5,212
Percent Male Staff	54%
Percent Female Staff	46%
Capacity	24,081
Percent Male Offenders	93%
Percent Female Offenders	7%
ADP	24,141
ADP/Capacity Percentage	100%
ACA Accredited?	No
Cost of care / day	N/A
Unionized?	Yes
2008 Confirmed Incidents	8
2009 Confirmed Incidents	N/A
Annual Operating Budget	\$ 311,971,609

SC DOC, located in Columbia, SC oversees 28 correctional facilities. Of these facilities, six are pre-release centers and one is female. The SC DOC’s ADP is 24,081, which is nearly 100% of the system’s capacity. The SC DOC experienced significant deficits in last year’s budget, which led to layoffs and the closing of one prison.

SC DOC is 49% compliant with the NPREC standards. However 99% of all costs are associated with the below major issues. It is estimated that SC DOC will have a total upfront cost of \$4.3M and an annual cost of \$3.3M, to reach full compliance.

In South Carolina, existing state statutes and governing hiring practices allow female staff to conduct **cross-gender searches** on male inmates. A cost was not estimated for this standard due to speculative litigation.

SC DOC has a limited number of facilities equipped with video monitoring, and many of the existing systems are

outdated. An upfront estimate of \$4M was determined in order to enhance **Assessment and Use of Monitoring Technology** in 17 facilities. This estimate includes the cost of cameras, equipment, and installation. Additionally, 3 FTEs per facility are required to monitor the equipment for an annual cost of \$2.1M. SC DOC stated that this upfront investment in Assessment and Use of Monitoring Technology eliminates the need for \$50M estimated for inmate supervision.

An annual cost of \$665K was estimated to improve the existing **screening** process. This cost estimate includes one additional case worker at 17 facilities to handle the increased work load. Additionally, an upfront cost of \$35K was estimated to upgrade the existing screening instrument.

Booz Allen estimated a PREA **triennial audit** to annually cost \$324K, covering 29 prisons and the headquarters facility.

The SC DOC has 575 medical and mental health care staff that would need to be **trained** in accordance with the NPREC requirements. An upfront cost of \$150K was estimated to develop the curriculum, print materials, and pay over time hours. An annual cost of \$14K was estimated for in house staff to conduct inmate education training.

According to the NPREC standard PP1, **zero tolerance of sexual abuse**, SC DOC would require 1FTE to serve as the PREA Coordinator at an annual cost of \$91K.

SC DOC does not conduct background checks for **promotion** decisions. SC DOC has 291 promotions per year. Booz Allen estimates the yearly maintenance cost of these additional promotions to cost \$14K. In addition, 1.25FTEs were estimated to fulfill the increased LOE at \$43K.

SC DOC **contracts for the housing of 300 inmates**. Booz Allen estimates an annual cost of \$41K to comply with NPREC standard PP2. This estimate is a percentage of total yearly cost based on number of contracted inmates.

**Cost Impacts**

- Limits to Cross-Gender Viewing and Searches (PP4)
- Assessment and Use of Monitoring Technology (PP7)
- Screening for Risk of Sexual Abuse (SC1 and SC2)
- Audits of Standards (AU1)
- Training and Education (TR1 - TR5)
- Zero Tolerance of Sexual Abuse (PP1)
- Hiring and Promotion Decisions (PP6)
- Contracting for the Confinement of Inmates (PP2)

South Carolina Department of Corrections			Cost Impact		Explanation
Percent of Annual Operating Budget			1.4%	1.1%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		49%	\$ 4,272,690	\$ 3,321,598	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 91	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	N		\$ 41	Booz Allen estimates the cost to be a percentage of total yearly based on number of contracted inmates = 300
PP-3	Inmate supervision	N			No cost estimate. Supervision costs are found in PP-7
PP-4	Limits to cross-gender viewing and searches	N			Per Booz Allen, litigation costs have been excluded.
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N	\$ 1	\$ 58	Due to standardization of background check cost, Booz Allen assumes 1.0 FTE of 1.25FTE provided for contacting prior institutional employers.
PP-7	Assessment and use of monitoring technology	N	\$ 4,000	\$ 2,100	Cost for new cameras, equipment and installation. Also cost for 1 additional FTE per facility to monitor the video recording equipment.
RP-1	Evidence protocol and forensic medical exams	N	\$ 8		Modification of existing medical contract to provide the necessary advocate support
RP-2	Agreements with outside public entities and community service providers	N	\$ 4		Cost to develop an MOU to establish services with an outside agency.
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	N			
TR-1	Employee training	Y			
TR-2	Volunteer and contractor training	Y			
TR-3	Inmate education	N		\$ 14	Cost for one caseworker and one CO for 20 minutes/wk per 17 institutions
TR-4	Specialized training: Investigations	N	\$ 5		Cost to develop materials (30 individuals)
TR-5	Specialized training: Medical and mental health care	N	\$ 150		Cost to develop materials (575 individuals)
SC-1	Screening for risk of victimization and abusiveness	N	\$ 35		Cost to develop screening tool
SC-2	Use of screening information	N	\$ 19	\$ 665	Cost for one case worker at 17 facilities. Cost of upfront new hire costs
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	N			48hr exhaustion of administrative remedies is viewed as a major policy issue. Cost estimates for compliance are speculative
RE-3	Inmate access to outside confidential support services	N			Cost to establish a toll-free number with an advocacy group expressed in RP-1
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	N			Need to formalize process at no additional cost
IN-1	Duty to investigate	N			Need to notify victims in writing, no cost estimate
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	Y			
MM-1	Medical and Mental Health Screenings - history of sexual abuse	N			Do not obtain informed consent forms before the inmates report past events of sexual abuse before incarceration.
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	N		\$ 1	Booz Allen estimates a review team of upper management officials to consist of 4 senior-level staff and 1 junior analyst. Cost to conduct one-hour review with these 5 officials was based on the number of confirmed sexual abuse incidents.
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 324	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
ID-6	Supplement to SC-2	Y			

**Washington Department of Corrections (WA DOC)**

Sector	Prisons
Title	WA DOC
Total Facilities	13
Percent PREA Compliant	51%
Total Staff	5,212
Percent Male Staff	78%
Percent Female Staff	22%
Capacity	16,756
Percent Male Offenders	92%
Percent Female Offenders	8%
ADP	15,513
ADP/Capacity Percentage	93%
ACA Accredited?	No
Cost of care / day	\$102
Unionized?	Yes
2008 Confirmed Incidents	47
2009 Confirmed Incidents	49
Annual Operating Budget	\$ 477,094,900

WA DOC, located in Tumwater, WA, oversees both the prison system and community corrections. For the purpose of this study, Booz Allen separates cost estimates of the WA DOC from the WA CC. The cost estimates for the WA CC are found in a separate site summary. Last year WA DOC had 14 prisons under its jurisdiction, including 11 male facilities and three female facilities. However, due to budget cuts, WA DOC has closed a female facility as of May 2010.

WA DOC is 51% compliant with the NPREC standards. It is estimated that WA DOC will have a total upfront cost of \$3.2M and an annual cost of \$12.3M, to reach full compliance.

In Washington, existing state statutes and governing hiring practices allow female staff to conduct **cross-gender searches** on male inmates. A cost was not estimated for this standard due to speculative litigation. Further, due to a recent Teamsters suit against the Department, WA DOC anticipates any staffing changes to result in further scrutiny.

Enhanced **inmate supervision** accounted for the largest cost impact. WA DOC is short-staffed due to budget cuts. An annual cost of \$10.5M, for 165.5 FTEs, was estimated to eliminate self-relieving posts. Additionally, an upfront cost of \$157K associated with new hires was estimated, which includes training, incidentals and office equipment.

An upfront cost of \$2.6M was estimated to enhance **monitoring technology**. WA DOC has outdated video monitoring equipment in every facility. In the event of sexual abuse incident, current technology cannot identify the perpetrator. The cost estimate includes \$900K for additional cameras and \$1.7K for upgrading and standardizing video storage and equipment.

WA DOC has recently learned that **contracting with an outside service provider** for emotional support services is now possible, so long as the provider does not receive VOCA funding. An annual cost of \$761K was estimated to establish and maintain MOUs with outside victim advocate service providers. Additionally, two upfront costs of \$226K were estimated to develop and implement an MOU with 39 county law enforcement agencies ensuring investigator support, and 39 county District Attorney offices ensuring prosecutor support. This also yielded an upfront cost of \$4K to post victim advocate information throughout the facilities.

**Cost Impacts**

- Limits to Cross-Gender Viewing and Searches (PP4)
- Inmate Supervision (PP3)
- Assessment and Use of Monitoring Technology (PP7)
- Contract Modifications and/or Policy Updates (RP2 - RP4 and RE3)
- Gathering, Reviewing and Reporting Data (DC1 - DC4)
- Ongoing Medical and Mental Health Care (MM-3)
- Audits of Standards (AU1)
- Training and Education (TR1 - TR5)
- Screening for Risk of Sexual Abuse (SC1 and SC2)

An upfront cost of \$301K was estimated to assist with **gathering, reviewing and reporting of sexual abuse data**. This cost estimate is to implement a new database that can meet the requirements of the NPREC standards. WA DOC will also require 1FTE senior office assistant at \$44K, for an annual cost of \$46K to monitor this database.

At WA DOC, abusers of sexual abuse do not receive **ongoing medical and mental health treatment**. An annual cost of \$293K was estimated to implement a new treatment program. The per offender cost of the current program is \$9.7K per year, which was used to estimate the new program cost.

Booz Allen estimated a PREA **triennial audit** to annually cost \$140K, covering 13 facilities.

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WA DOC provides annual and refresher **training** for all employees, contractors and volunteers. PREA training is provided to inmates during intake. To become fully compliant with the NPREC training standards, WA DOC will need to provide inmate refresher education. This training was estimated to annually cost \$20K for increased staff LOE and material development. WA DOC provides in depth training to investigators, yet not in confinement settings. A two day training session for investigators was estimated to cost \$20K, which included the development of a new curriculum and LOE. Medical and mental health care staff receive sexual abuse training, but does not cover the procedures for preserving physical evidence. An upfront cost of \$27K was estimated for LOE and curriculum development.

The WA DOC does not **screen** inmates during subsequent classification reviews. A policy change and a modification to the current written screening instrument are required, to include gender differences. An upfront cost of \$9K was estimated to modify the screening instrument and train staff on the new tool. Additionally, updating WA DOC's information management system to store and analyze additional screening questions was estimated to cost \$46K, which included the cost to train personnel on the modifications.

WA DOC does not conduct background checks for **promotion decisions**. WA DOC has 235 promotions per year. Booz Allen estimates the yearly maintenance cost of these additional promotions to cost \$12K.

Washington Department of Corrections			Cost Impact		Explanation
Percent of Annual Operating Budget			0.7%	2.6%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		51%	\$ 3,206,094	\$ 12,255,442	
PP-1	Zero tolerance of sexual abuse	Y			
PP-2	Contracting with other entities for the confinement of inmates	Y			
PP-3	Inmate supervision	N	\$ 157	\$ 10,500	Staffing cost to eliminate self relieving posts.
PP-4	Limits to cross-gender viewing and searches	N			
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N		\$ 12	Per Booz Allen, fee associated with criminal background check assumed to be \$50. Fee includes access to government sources and an internal LOE. WA DOC has 235 promotions
PP-7	Assessment and use of monitoring technology	N	\$ 2,600		Cost for additional cameras and for upgrading and standardizing video storage and equipment.
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	N		\$ 761	Cost to develop an MOU to establish and maintain services with an outside victim advocacy agency.
RP-3	Agreements with outside law enforcement agencies	N		\$ 226	Develop MOUs with all 39 county law enforcement offices.
RP-4	Agreements with the prosecuting authority	N		\$ 226	Develop MOUs with 39 county District Attorney's office
TR-1	Employee training	Y			
TR-2	Volunteer and contractor training	Y			
TR-3	Inmate education	N		\$ 20	Cost for training materials.
TR-4	Specialized training: Investigations	N	\$ 20		Curriculum development, materials, and student hours for two days of training.
TR-5	Specialized training: Medical and mental health care	N	\$ 27		Curriculum development, materials, and student hours for two days of training.
SC-1	Screening for risk of victimization and abusiveness	N	\$ 9		Would require a policy change and modifications to current tool to make gender specific.
SC-2	Use of screening information	N	\$ 46		Cost to complete upgrades to information system and train staff..
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	N			48hr exhaustion of administrative remedies is viewed as a major policy issue. Cost estimates for compliance are speculative
RE-3	Inmate access to outside confidential support services	N	\$ 4		Required to publish posters and brochures in 8 languages
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	N			
IN-1	Duty to investigate	Y			
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	N			
MM-1	Medical and Mental Health Screenings - history of sexual abuse	Y			
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	N		\$ 293	Implement mental health treatment for abusers and victims of sexual abuse
DC-1	Sexual abuse incident reviews	N			
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	N	\$ 301	\$ 46	Cost for database improvements, and one FTE to monitor new database
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 140	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
ID-6	Supplement to SC-2	Y			



**Virginia Department of Corrections (VA DOC)**

Sector	Prisons
Title	VA DOC
Total Facilities	49
Percent PREA Compliant	55%
Total Staff	6,328
Percent Male Staff	63%
Percent Female Staff	37%
Capacity	32,224
Percent Male Offenders	92%
Percent Female Offenders	8%
ADP	30,691
ADP/Capacity Percentage	95%
ACA Accredited?	Yes
Cost of care / day	\$67.58
Unionized?	No
2008 Confirmed Incidents	16
2009 Confirmed Incidents	N/A
Annual Operating Budget	\$ 995,149,159

VA DOC, located in Richmond, VA, manages 28 prisons, eight field units, six work release centers, four diversion centers, and three detention centers. The VA DOC, with an ADP of 30,691 is one of the larger systems included in this study.

VA DOC is 54% compliant with the NPREC standards. It is estimated that VA DOC will have a total upfront cost of \$31M and an annual cost of \$16.5M, to reach full compliance.

Enhancements **monitoring technology** resulted in the most significant cost impact. All facilities have Rapid Eye cameras installed however, coverage and clarity in dormitory or pod style prisons is not adequate. An upfront cost of \$30.1M was estimated to double the number of existing cameras at each facility. An annual cost of \$7.9M was estimated for 1FTE at each facility to monitor the additional cameras. Also, a cost of \$250K was estimated for the yearly maintenance of the new equipment.

VA DOC constantly assesses **inmate supervision** and security procedures throughout its facilities. In fact, through such assessments, VA DOC has found that staffing issues occur most when people are late to work or no-shows. An additional 16FTEs at each facility were estimated to ensure adequate supervision, resulting in an annual cost of \$4.9M. Additionally, an upfront cost of \$91K associated with new hires was estimated, which includes training, incidentals and office equipment.

**Cross-gender pat searches** are currently only prohibited at female facilities. With over 90% male inmates, limitations on cross-gender searches present operations and security issues. One solution for male facilities is to hire 50 male staff at an annual cost of \$2.6M. VA DOC expressed difficulty in attracting qualified male applicants in rural locations. VA DOC believes that prohibiting Limits to Cross-Gender Viewing and Searches conflicts with state law and governing hiring practices. In addition, \$48K in new hire costs was estimated as an upfront cost.

Booz Allen estimated a PREA **triennial audit** to annually cost \$302K, covering 28 prison facilities.

An upfront cost of \$500K was estimated to **train** volunteers, contractors and inmates. The cost estimate includes increased LOE and curriculum development. An annual cost of \$63K was estimated as 25% of initial training impact, to refresher training. An additional \$50K was estimated to ensure investigators are trained in confinement settings and that medical and mental health contractors, including part-time associates, are trained in accordance to the NPREC requirements.

While a **screening** tool has been implemented throughout the VA DOC, modification will need to be made to include gender-specific questions. Booz Allen estimates an upfront cost of \$174K to modify the existing instrument, along with \$50K to implement the new screening process.

According to the NPREC standard PP1, **zero tolerance of sexual abuse**, VA DOC would require 1FTE to serve as the PREA Coordinator at an annual cost of \$112K.

In order to **gather, review and report sexual abuse data**, an annual cost of \$72K was estimated to hire 1FTE to fulfill the increased LOE.

**Cost Impacts**

- Assessment and Use of Monitoring Technology (PP7)
- Inmate Supervision (PP3)
- Limits to Cross-Gender Viewing and Searches (PP4)
- Audits of Standards (AU1)
- Training and Education (TR1 - TR5)
- Screening for Risk of Sexual Abuse (SC1 and SC2)
- Zero Tolerance of Sexual Abuse (PP1)
- Gathering, Reviewing and Reporting Data (DC1 - DC4)
- Hiring and Promotion Decisions (PP6)



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VA DOC conducts background checks for **promotion decisions**. However, the increased LOE associated with contacting prior institutional employers was determined to best met with an additional investigator at an annual cost of \$41K.

Virginia Department of Corrections			Cost Impact		Explanation
Percent of Annual Operating Budget			3.1%	1.6%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		54%	\$ 30,997,776	\$ 16,245,959	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 112	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	N			Cost impact has been provided under TR-2 and TR-3
PP-3	Inmate supervision	N	\$ 91	\$ 4,900	To provide sufficient LOE, add a 24/7 post to each of 3 dormitory housing units in 6 dormitory facilities for each facility
PP-4	Limits to cross-gender viewing and searches	N	\$ 48	\$ 2,600	With 60% of security force female, 50 additional FTE's (BFOQs) males are required
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N	\$ 1	\$ 41	Cost of \$40K- salary and benefits for investigator position
PP-7	Assessment and use of monitoring technology	N	\$ 30,100	\$ 8,100	Cost to double number of cameras plus one additional 24/7 post to each facility, and additional maintenance costs
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	N			A formal agreement is not in place but can be achieved at insignificant cost
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	Y			
TR-2	Volunteer and contractor training	N	\$ 250	\$ 63	Train staff at its contracted jail facilities
TR-3	Inmate education	N	\$ 250		Train inmates at contracted jail facilities
TR-4	Specialized training: Investigations	N	\$ 2		Investigators are not specifically trained on PREA. Cost to attend Department of Criminal Justice Services (DCJS) training.
TR-5	Specialized training: Medical and mental health care	N	\$ 48		Training hours of staff including PT medical and mental health support.
SC-1	Screening for risk of victimization and abusiveness	N	\$ 176		Assessment modification and update of offender management system
SC-2	Use of screening information	Y	\$ 50		Integration of a risk screening tool into existing information system.
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	N			48hr exhaustion of administrative remedies is viewed as a major policy issue. Cost estimates for compliance are speculative
RE-3	Inmate access to outside confidential support services	N			RCASA will allow VA DOC to use their hotline free of charge
RE-4	Third-party reporting	N			Third-party individuals are not informed in writing
OR-1	Staff and facility head reporting duties	N			There is no special report given to victims under the age of 18 years
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	N			Disciplinary actions and results of investigations cannot be released
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	Y			
MM-1	Medical and Mental Health Screenings - history of sexual abuse	Y			
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	N	\$ 1	\$ 72	One additional staff member (including salary and benefits) would be necessary to analyze data, evaluate and update current training
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 302	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
ID-6	Supplement to SC-2	Y			

**Jails**

**Aiken County Detention Center (Aiken County)**

Sector	Jails
Title	Aiken County
Total Facilities	1
Percent PREA Compliant	59%
Total Staff	75
Percent Male Staff	75%
Percent Female Staff	25%
Capacity	317
Percent Male Offenders	85%
Percent Female Offenders	15%
ADP	394
ADP/Capacity Percentage	124%
ACA Accredited?	No
Cost of care / day	\$45.00
Unionized?	No
2008 Confirmed Incidents	-
2009 Confirmed Incidents	-
Annual Operating Budget	\$ 5,000,000

Aiken County, located in Aiken, S.C., is a large jail, with an ADP to Capacity ratio of 124%. The facility is relatively new, opening in 2002, and employing 75 staff. Aiken County operates a direct supervision model and has had no confirmed incidents of sexual abuse the past three years.

Aiken County is 59% compliant with the NPREC standards. It is estimated that Aiken County will have a total upfront cost of \$507K and an annual cost of \$29K, to reach full compliance.

Standard PP7, **Assessment and Use of Monitoring Technology**, amounted to 99% of the total upfront cost. An upfront cost of \$500K was estimated to upgrade the close circuit TV system, purchase and install 16 cameras and DVRs.

According to the standard PP1, **zero tolerance of sexual abuse**, Aiken County would require 0.5PTE to serve as the PREA Coordinator at an annual cost of \$21K.

Booz Allen estimated a PREA **triennial audit** to annually cost \$8K.

The development of a **training** curriculum and employee labor hours to attend a four hour session was estimated to cost \$4K. An upfront cost of \$1K was estimated to cover additional LOE of volunteers and contractors to attend this training. Lastly, an upfront cost of \$1K was estimated to develop a PREA new orientation video for inmates, to also be shown as refresher training on the close circuit TV.

**Cost Impacts**

- Assessment and Use of Monitoring Technology (PP7)
- Zero Tolerance of Sexual Abuse (PP1)
- Audits of Standards (AU1)
- Training and Education (TR1 - TR5)

Aiken County Detention Center			Cost Impact		Explanation
Percent of Annual Operating Budget			10.1%	0.6%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		59%	\$ 507,383	\$ 29,188	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 21	.5 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	Y			
PP-3	Inmate supervision	Y			
PP-4	Limits to cross-gender viewing and searches	Y			
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N			Changes to current procedure can be completed at no additional cost
PP-7	Assessment and use of monitoring technology	N	\$ 500		Current CCTV equipment is antiquated. Additional cameras and DVR equipment are necessary to enhance capabilities of supervision.
RP-1	Evidence protocol and forensic medical exams	N		\$ -	Internal victim advocate cost of \$100 per incident. No existing incidents
RP-2	Agreements with outside public entities and community service providers	N	\$ 1		Cost to develop MOU with the Cumbee Center.
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N	\$ 4		Cost of salaries for all employees to attend a 4 hour session, and cost of training supplies. Per Booz Allen, cost associated with development of training material is responsibility of PREA Coordinator.
TR-2	Volunteer and contractor training	N	\$ 1	\$ -	Cost of additional labor hours for volunteers and contractors
TR-3	Inmate education	N	\$ 1		Production of new orientation video to include PREA-specific curriculum
TR-4	Specialized training: Investigations	N			Training does not currently include confinement settings. Cost would be minimal.
TR-5	Specialized training: Medical and mental health care	N			Would be ensured through medical services contract
SC-1	Screening for risk of victimization and abusiveness	N	\$ -		Labor cost for Classification Lieutenant to research and format assessment tool.
SC-2	Use of screening information	N			Information can be uploaded into JMS at no additional cost
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	N			48hr exhaustion of administrative remedies is viewed as a major policy issue. Cost estimates for compliance are speculative
RE-3	Inmate access to outside confidential support services	N	\$ 1		Materials cost including printing to provide outside access to services.
RE-4	Third-party reporting	N			Third-parties are currently not notified of the results of an investigation, but can be at no additional cost
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	N			No policy is in place for this, but can be created at a negligible cost
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	Y			
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	Y			
MM-1	Medical and Mental Health Screenings - history of sexual abuse	Y			
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 8	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
ID-6	Supplement to SC-2	Y			

**Alachua County Jail (Alachua County)**

Sector	Jails
Title	Alachua County
Total Facilities	1
Percent PREA Compliant	49%
Total Staff	240
Percent Male Staff	71%
Percent Female Staff	29%
Capacity	1,148
Percent Male Offenders	87%
Percent Female Offenders	13%
ADP	904
ADP/Capacity Percentage	79%
ACA Accredited?	No
Cost of care / day	\$84.00
Unionized?	No
2008 Confirmed Incidents	-
2009 Confirmed Incidents	-
Annual Operating Budget	\$ 26,703,372

Alachua County, located in Florida, was built in 1994 and is considered a large jail, with 314,000 square feet, and a capacity of 1,148. Alachua County incarcerates both male and female inmates for up to one year.

Alachua County is 49% compliant with the NPREC standards. It is estimated that Alachua County will have a total upfront cost of \$205K and an annual cost of \$797K, to reach full compliance.

At Alachua County, abusers of sexual abuse do not receive **ongoing medical and mental health treatment**. An annual cost of \$406K was estimated for the addition of 4 health care practitioners. This cost is associated with the high percentage of victims of sexual abuse (17,000 bookings per year), along with an unknown number of abusers of sexual abuse. Alachua County expressed concern that NPREC standard MM-3, was cost prohibitive and incongruent with how many jails struggle

for contracted medical support, let alone develop a sexual abuse program. They argue that this standard was written with prisons in mind.

The NPREC requirements for **training and education** would have a substantial cost impact on Alachua County Vendor developed training was estimated to cost \$100K, which also included the additional labor hours of staff. An annual cost of \$25K was estimated to provide refresher training as a part of the annual training cycle. Alachua County has approximately 75 contract employees and hundreds of volunteers, with new employees and volunteers being hired or cleared to volunteer regularly. Additionally, an upfront cost of \$70K to train its Criminal Investigations Division (CID) in confinement settings and to train six contracted medical and mental health practitioners.

According to the standard PP1, **zero tolerance of sexual abuse**, Alachua County would require 1FTE to serve as PREA Coordinator at an annual cost of \$136K.

A substantial increase in LOE will be required to meet NPREC requirements on **screening**. Based on the current volume of inmates classified and reclassified, one additional case worker will be needed at an annual cost of \$76K. Alachua County believes an increase in LOE will result from the new screening criteria. The increased LOE to make informed housing decisions was estimated at an annual cost of \$56K.

An annual cost of \$61K was estimated for 1FTE to serve as the internal victim advocate for **evidence protocol and forensic medical exams**. Costs also include anticipated travel expenses. In addition, \$25K was estimated to develop victim advocate posters and pamphlets, and cover additional LOE with distributing these materials.

Increased LOE associated with the 48 hour **exhaustion of administrative remedies** requirement was determined to cost \$25K. This cost estimate is a result of Alachua County housing federal prisoners, who will likely exercise exhaustion of administrative remedies more frequently.

Booz Allen estimated a PREA **triennial audit** to annually cost \$8K.

**Cost Impacts**

- Ongoing Medical and Mental Health Care (MM-3)
- Training and Education (TR1 - TR5)
- Zero Tolerance of Sexual Abuse (PP1)
- Screening for Risk of Sexual Abuse ( SC1 and SC2)
- Evidence Protocol and Forensic Medical Exams (RP1)
- Exhaustion of Administrative Remedies (RE2)
- Audits of Standards (AU1)
- Contract Modifications and/or Policy Updates (RP2 - RP4 and RE3)

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Lastly, an upfront cost of \$1K was estimated to **contract with an outside provider** of emotional support services. While Booz Allen acknowledges certain restrictions, specifically with VOCA funding, advocacy groups are allowed to use funding from alternate sources to work with inmates.

Alachua County Jail			Cost Impact		Explanation
Percent of Annual Operating Budget			0.8%	3.0%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		49%	\$ 204,786	\$ 796,923	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 136	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	Y			
PP-3	Inmate supervision	Y			
PP-4	Limits to cross-gender viewing and searches	Y			
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N		\$ 2	Per Booz Allen, fee associated with criminal background check assumed to be \$50. Fee includes access to government sources and an internal LOE. Alachua Co. has 40 promotions
PP-7	Assessment and use of monitoring technology	Y			
RP-1	Evidence protocol and forensic medical exams	N	\$ 1	\$ 61	One FTE to serve as victim advocate. Additional transportation and security fees incurred
RP-2	Agreements with outside public entities and community service providers	N	\$ 1		Cost associated with developing and implementing an MOU
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	Y			
TR-2	Volunteer and contractor training	N	\$ 100	\$ 25	Cost to train contractors and volunteers
TR-3	Inmate education	N			PREA Coordinator can conduct this training
TR-4	Specialized training: Investigations	N	\$ 50		Cost to train the Criminal Investigations Division
TR-5	Specialized training: Medical and mental health care	N	\$ 20		Cost to provide training to 6 contracted practitioners
SC-1	Screening for risk of victimization and abusiveness	N	\$ 1	\$ 76	One FTE to conduct increased screening LOE
SC-2	Use of screening information	N	\$ 1	\$ 56	Increased LOE associated with making informed decisions based on new criteria.
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	N		\$ 25	Increased LOE for the 48hr requirement because Federal prisoners are housed at facility.
RE-3	Inmate access to outside confidential support services	N	\$ 25		Cost to print material and LOE associated with distribution to inmates.
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	N			Medical staff are not required to advise inmates of their duty to report. No cost impact
OR-2	Reporting to other confinement facilities	N			Local law enforcement reports all incidents, not facility head. No cost impact
OR-3	Staff first responder duties	N			Staff responders are not required to instruct the victim to preserve physical evidence. No cost impact
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	N			Agency does not monitor, for at least 90 days, conduct and/or treatment of staff or inmates. No cost impact
IN-1	Duty to investigate	N			Victims are notified by State Attorney of outcomes, but not third parties. No cost impact
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	N			Sanctions do not include interventions. No cost impact
MM-1	Medical and Mental Health Screenings - history of sexual abuse	Y			
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	N	\$ 4	\$ 406	4 additional practitioners to provide ongoing treatment. (17,000 inmates annually booked)
DC-1	Sexual abuse incident reviews	N			A review team is not currently in place. No cost to implement.
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 8	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
ID-6	Supplement to SC-2	Y			

**Albany County Jail (Albany County)**

Sector	Jails
Title	Albany County
Total Facilities	1
Percent PREA Compliant	61%
Total Staff	353
Percent Male Staff	94%
Percent Female Staff	6%
Capacity	963
Percent Male Offenders	85%
Percent Female Offenders	15%
ADP	700
ADP/Capacity Percentage	73%
ACA Accredited?	No
Cost of care / day	\$166.40
Unionized?	Yes
2008 Confirmed Incidents	-
2009 Confirmed Incidents	-
Annual Operating Budget	\$43,348,512

Albany County, located in Albany, New York, is one of the largest County Correctional Facilities in the state. The facility has a capacity of 963 beds, providing custody for local, state and federal prisoners. During the past year, over 7,000 prisoners were admitted to the facility.

Albany County is 61% compliant with the NPREC standards. It is estimated that Albany County will have a total upfront cost of \$19.4K and an annual cost of \$1M, to reach full compliance.

A large portion of the total upfront costs are a result of the NPREC standard **ID-6: Supplement to SC2: Use of Screening Information**. Albany County contracts with ICE for the housing of inmates. They do not house them separately, which is noncompliant with the standard. An annual cost of \$515K and an upfront cost of \$9K were estimated to hire nine additional staff to monitor ICE inmates separately from the general jail population. Albany County stated that if this standard with enacted, they would opt out of the ICE contract, because the revenue generated is not enough to cover costs.

The prohibition of **cross-gender pat searches** was the second largest cost driver, with an annual cost of \$309K and an upfront cost of \$5K. Albany County does not prohibit Limits to Cross-Gender Viewing and Searches, requiring five additional female staff at \$60K.

The NPREC requirement for **training and education** would result in an annual cost of \$122K. This cost includes modifications to the current curriculum and over time for officers and civilians. Training was estimated to cost \$50K for every four hours of training for sworn officers, \$65K for civilians and \$5K for volunteers. An annual cost of \$1K was estimated for conducting refresher training.

According to the standard PP1, **zero tolerance of sexual abuse**, Albany County would require 1FTE to serve as PREA Coordinator at an annual cost of \$101K.

Booz Allen estimated a PREA **triennial audit** to cost an annual \$8K.

**Cost Impacts**

- Immigrant Detainees (ID-6)
- Limits to Cross-Gender Viewing and Searches (PP4)
- Training and Education (TR1 - TR5)
- Zero Tolerance of Sexual Abuse (PP1)
- Audits of Standards (AU1)



Albany County Jail			Cost Impact		Explanation
Percent of Annual Operating Budget			0.0%	2.4%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		61%	\$ 19,392	\$ 1,056,987	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 101	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	Y			
PP-3	Inmate supervision	Y			
PP-4	Limits to cross-gender viewing and searches	N	\$ 5	\$ 309	5 additional female FTE's at \$60K salary plus benefits.
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N		\$ -	Per Booz Allen, fee associated with criminal background check assumed to be \$50. Fee includes access to government sources and an internal LOE. Albany Co. has 5 promotions
PP-7	Assessment and use of monitoring technology	Y			
RP-1	Evidence protocol and forensic medical exams	N			Victim advocate services available at negligible cost
RP-2	Agreements with outside public entities and community service providers	N			Can be provided by local hospital or the Center of Law and Justice (provides transitional services)
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N		\$ 115	4 hrs of training for civilian staff and 4 hours for sworn officers
TR-2	Volunteer and contractor training	N	\$ 5	\$ 1	Cost to train volunteers for 4 hours
TR-3	Inmate education	N			PREA Coordinator position can modify handbooks and conduct training
TR-4	Specialized training: Investigations	Y			
TR-5	Specialized training: Medical and mental health care	N		\$ 6	Cost to train Medical and Mental Health staff
SC-1	Screening for risk of victimization and abusiveness	N		\$ 1	Annual printing cost for the new form during the admission process.
SC-2	Use of screening information	Y			
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Inmate access to outside confidential support services	Y			
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	N			Any incident would have resulted in a call (not writing) to the head of other facility, providing him/her with all pertinent info on allegation. No cost impact
OR-3	Staff first responder duties	N			Currently does not provide this training, but this will be included in a training program at no additional cost
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	N			Releasing investigative outcomes to third parties is prohibited by state law. Could result in union issues
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	N			Do not provide intervention programs at the correctional facility. No cost impact
MM-1	Medical and Mental Health Screenings - history of sexual abuse	Y			
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 8	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
ID-6	Supplement to SC-2	N	\$ 9	\$ 515	Additional staff necessary if ICE inmates were required to be housed separately.

**Anoka County Jail (Anoka County)**

Sector	Jails
Title	Anoka County
Total Facilities	1
Percent PREA Compliant	49%
Total Staff	76
Percent Male Staff	75%
Percent Female Staff	25%
Capacity	248
Percent Male Offenders	78%
Percent Female Offenders	22%
ADP	199
ADP/Capacity Percentage	80%
ACA Accredited?	No
Cost of care / day	\$105.47
Unionized?	Yes
2008 Confirmed Incidents	-
2009 Confirmed Incidents	-
Annual Operating Budget	\$ 8,527,460

Anoka County, located in Andover, MN, is the primary intake and booking facility for all law enforcement agencies. The facility has a capacity of 248, an ADP of 199 and employs 76 staff members. Although the jail detains women, they are only kept in the facility for 12 hours or less before being transferred. As such, 99% of available bed space is dedicated to male inmates.

Anoka County is compliant with 49% of the NPREC standards. It is estimated that Anoka County will have a total upfront cost of \$52K and an annual cost of \$312K, to reach full compliance.

The prohibition of **cross-gender pat searches** accounted for 85% of the total annual cost. An annual cost of \$259K was estimated to hire five male FTEs. Due to the configuration and design of the jail, only staff member can cover a post at a time. These additional positions will enable a 24 hour post dedicated exclusively for conducting pat downs on male

inmates.

The NPREC standards on **training and education** would require an upfront cost of \$29K. Employee training was estimated to cost \$4K, which included staff labor hours and curriculum development. Inmate education was estimated to cost \$13K for materials, while the Zero tolerance of sexual abuse position was assumed by Booz Allen to be the instructor of this session. An upfront cost of \$13K was identified to develop investigator training that is specific to confinement settings. Developing and implementing training for medical and mental health care staff was estimated to cost \$3K upfront and \$1K for refresher. Costs include OT of staff, materials, and new programs to ensure that medical staff and investigators are covered on NPREC.

According to the standard PP1, **zero tolerance of sexual abuse**, Anoka County would require a 0.5PTE to serve as PREA Coordinator at an annual cost of \$25K.

Anoka County’s inmates are **screened** during intake, but not regarding sexual abuse. An upfront cost of \$10K was estimated to modify and implement a new screening process.

An annual cost of \$8K was estimated to **accommodate special needs** in accordance with the NPREC requirements. Cost estimates include purchasing equipment for the deaf and disabled, an increased use of interpreters and translation technology, and increased staff LOE for security of special needs inmates.

Booz Allen estimated a PREA **triennial audit** to cost an annual \$8K.

An \$8K annual cost was associated with the 48 hour **exhaustion of administrative remedies** requirement. In response to a higher volume of inmates needing to get to court, the cost estimate is for the travel and overtime of two deputies.

An upfront cost of \$5K was a result of NPREC standard **DI-2: Disciplinary sanctions for inmates**. The cost estimate was to develop an intervention program designed to address and correct underlying reasons or

**Cost Impacts**

- Limits to Cross-Gender Viewing and Searches (PP4)
- Training and Education (TR1 - TR5)
- Zero Tolerance of Sexual Abuse (PP1)
- Screening for Risk of Sexual Abuse ( SC1 and SC2)
- Accommodating Special Needs ( PP5)
- Triennial Auditing ( AU1)
- Exhaustion of Administrative Remedies (RE2)
- Disciplinary Sanctions for Inmates (DI-2)
- Contract Modifications for Outside Services (RP2-RP4 and RE-3)

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motivation behind the sexual abuse incident.

An upfront cost of \$4K was estimated to develop and distribute posters and pamphlets for victim advocate **outside services**. Anoka County is presently looking into non-profit groups, (such as a national crisis line), and determine if a partnership is a possibility. Also, Anoka County is developing a relationship with the Alexandra House, however there is a potential conflict of interest if they use their services. If the Alexandra House is representing a sexual abuse victim and the perpetrator of that abuse is in custody at Anoka County, the abuser might be able to harass his/her victims because they will have direct access to their services. That said, Anoka County will first set up internal victim advocate services.

Anoka County Jail			Cost Impact		Explanation
Percent of Annual Operating Budget			0.6%	3.7%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		49%	\$ 51,719	\$ 312,403	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 25	.5 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	Y			
PP-3	Inmate supervision	Y			
PP-4	Limits to cross-gender viewing and searches	N	\$ 5	\$ 259	Create one 24-hour male deputy post specifically for inmate pat searches and 5 additional male deputies
PP-5	Accommodating inmate with special needs	N		\$ 8	Purchase of additional equipment for deaf and disabled inmates. Increased use of on-site interpreters, use of translation technology, and staff time to provide security.
PP-6	Hiring and promotion decisions	N			There are few promotions. No additional costs are anticipated.
PP-7	Assessment and use of monitoring technology	Y			
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	N			Will use current contracted mental health provider to fulfill this requirement
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N		\$ 4	Develop and hold annual classroom training on PREA. Per Booz Allen assumes 2/3 of range to be staff salary and 1/3 to be material cost.
TR-2	Volunteer and contractor training	N	\$ -	\$ -	Expanded training- 500 Brochures annually - minimal cost
TR-3	Inmate education	N	\$ 13		Cost of materials. PREA coordinator can handle training responsibilities.
TR-4	Specialized training: Investigations	N	\$ 13		Investigators do receive training, more training required to fully comply
TR-5	Specialized training: Medical and mental health care	N	\$ 3	\$ 1	Upfront cost for SART training. Annual Refresher Training
SC-1	Screening for risk of victimization and abusiveness	N	\$ 10		Does all intake screenings electronically for record retention purposes. Cost to modify existing jail software.
SC-2	Use of screening information	Y			
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	N		\$ 8	Personnel costs associated with accompanying inmates to court.
RE-3	Inmate access to outside confidential support services	N	\$ 4		Set up advocacy program with Alexandra House. Includes developing and distribution of posters, pamphlets and other notices w/i jail facility.
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	N			Captain or designee would contact the facility in question, not facility head
OR-3	Staff first responder duties	N			Policy updates. No additional cost
OR-4	Coordinated response	N			Policy updates. No additional cost
OR-5	Agency protection against retaliation	N			Needs to be added to policy. No additional cost
IN-1	Duty to investigate	Y			
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	N	\$ 5		Labor hours to develop a program for disciplinary action
MM-1	Medical and Mental Health Screenings - history of sexual abuse	N			Current health care, mental health and classification screening tools are not in compliance, but can be at no additional cost
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	N			Policy updates. No additional cost
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 8	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
ID-6	Supplement to SC-2	Y			

**Denver County Jail (Denver County)**

Sector	Jails
Title	Denver County
Total Facilities	1
Percent PREA Compliant	84%
Total Staff	302
Percent Male Staff	78%
Percent Female Staff	22%
Capacity	1,634
Percent Male Offenders	81%
Percent Female Offenders	19%
ADP	2,118
ADP/Capacity Percentage	130%
ACA Accredited?	Yes
Cost of care / day	\$66.40
Unionized?	Yes
2008 Confirmed Incidents	4
2009 Confirmed Incidents	3
Annual Operating Budget	\$ 44,098,530

Denver County, located in Denver, CO is under the jurisdiction of the Denver Sheriff’s Department, which also operates the Denver County Pre-arraignment Detention Center (DCPA)<sup>1</sup>. The DCPA is found within the lockup sector of the site summaries. Denver County is classified as a large jail, with a total capacity of 1,634. The jail is overcrowded, operating at 122% capacity.

Denver County is 88% compliant with the NPREC standards. It is estimated that Denver County will have a total upfront cost of \$134K and an annual cost of \$166K, to reach full compliance. Several cost estimates were not provided by Denver County; however Booz Allen estimated several responses based on discussions at the site visit meeting and comparable data provided by the DCPA.

The **training** costs estimates for Denver County resulted in an upfront cost of \$132K and an annual cost of \$33K. Denver County can not remove any of the existing 40 hours of

mandatory training. All pre-service personnel would be provided with an additional four hours of PREA training. A one-hour refresher session would be also be conducted for all personnel during annual in-service training.

According to the standard PP1, **zero tolerance of sexual abuse**, Denver County would require 1FTE to serve as PREA Coordinator at an annual cost of \$124K.

Booz Allen estimated a PREA **triennial audit** to cost an annual \$8K.

Lastly, a \$1K upfront cost was estimated to modify the current **screening** process. Inmates are currently screened during classification, however the screening instrument is not gender-specific. The screening tool will require some additional modifications.

**Cost Impacts**

- Training and Education ( TR1 through TR5)
- Zero Tolerance of Sexual Abuse (PP1)
- Audits of Standards (AU1)
- Screening for Risk of Sexual Abuse ( SC1 and SC2)

<sup>1</sup> The two facilities are merging under one roof but will still be operated independently.

Denver County Jail			Cost Impact		Explanation
Percent of Annual Operating Budget			0.3%	0.4%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		84%	\$ 134,172	\$ 165,945	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 124	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	Y			
PP-3	Inmate supervision	Y			
PP-4	Limits to cross-gender viewing and searches	Y			
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N		\$ -	Per Booz Allen, fee associated with criminal background check assumed to be \$50. Fee includes access to government sources and an internal LOE. Denver County has 3 promotions
PP-7	Assessment and use of monitoring technology	Y			
<b>RP*</b>	<b>Response Planning</b>				
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	Y			
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
<b>TR*</b>	<b>Training and Education</b>				
TR-1	Employee training	N	\$ 132	\$ 33	Cost to train 302 staff at \$548.14 each to NPREC standards; includes refresher training
TR-2	Volunteer and contractor training	Y			
TR-3	Inmate education	Y			
TR-4	Specialized training: Investigations	Y			
TR-5	Specialized training: Medical and mental health care	Y			
<b>SC*</b>	<b>Screening for Risk of Sexual Victimization and</b>				
SC-1	Screening for risk of victimization and abusiveness	N	\$ 1		Cost to modify existing screening instrument to comply; primarily involves staff time
SC-2	Use of screening information	Y			
<b>RE*</b>	<b>Reporting</b>				
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Inmate access to outside confidential support services	Y			
RE-4	Third-party reporting	Y			
<b>OR*</b>	<b>Official Response Following an Inmate Report</b>				
OR-1	Staff and facility head reporting duties				Site did not provide response
OR-2	Reporting to other confinement facilities				Site did not provide response
OR-3	Staff first responder duties				Site did not provide response
OR-4	Coordinated response				Site did not provide response
OR-5	Agency protection against retaliation				Site did not provide response
<b>IN*</b>	<b>Investigations</b>				
IN-1	Duty to investigate	Y			
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
<b>DI*</b>	<b>Discipline</b>				
DI-1	Disciplinary sanctions for staff				Site did not provide response
DI-2	Disciplinary sanctions for inmates				Site did not provide response
<b>MM*</b>	<b>Medical and Mental Health Care</b>				
MM-1	Medical and Mental Health Screenings - history of sexual abuse				Site did not provide response
MM-2	Access to emergency medical and mental health services				Site did not provide response
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
<b>DC*</b>	<b>Data Collection and Review</b>				
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
<b>AU*</b>	<b>Audits</b>				
AU-1	Audits of standards	N		\$ 8	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
<b>ID*</b>	<b>Supplemental Standards</b>				
ID-6	Supplement to SC-2	Y			

**Essex County Jail (Essex County)**

Sector	Jails
Title	Essex County
Total Facilities	1
Percent PREA Compliant	70%
Total Staff	291
Percent Male Staff	83%
Percent Female Staff	17%
Capacity	990
Percent Male Offenders	100%
Percent Female Offenders	0%
ADP	1,300
ADP/Capacity Percentage	131%
ACA Accredited?	Yes
Cost of care / day	
Unionized?	
2008 Confirmed Incidents	-
2009 Confirmed Incidents	-
Annual Operating Budget	\$ 35,055,517

Essex County, located in Middleton, MA is classified as a large jail. The jail is part of the Essex County House of Corrections, which also has a small minimum security facility for Women in Transition (WIT). The House of Corrections also has a pre-release center that houses 350 offenders. This study does not include the two adjacent community corrections facilities, focusing entirely on the all male jail. Essex County houses sentenced county inmates, pre-trial county inmates, a few federal inmates, and sentenced state inmates. The average sentence for a county inmate is nine months. Essex County books over 8,000 inmates per year.

Essex County is 70% compliant with the NPREC standards. It is estimated that Essex County will have a total upfront cost of \$11K and an annual cost of \$101K, to reach full compliance.

According to the standard PP1, **zero tolerance of sexual abuse**, Essex County would require 1FTE to serve as PREA

Coordinator at an annual cost of \$93K.

An upfront cost of \$9K was estimated for **training and education**. This cost includes \$2.5K for the development of PREA material for inmates, \$3.5K to train investigators in confinement settings, and \$1.5K to update training for medical and mental health care staff.

Booz Allen estimated a PREA **triennial audit** to cost an annual \$8K.

Lastly, Essex County estimated \$3K to develop a new policy that includes the 48hr **exhaustion of administrative remedies** requirement.

**Cost Impacts**

- Zero Tolerance of Sexual Abuse (PP1)
- Training and Education (TR1 - TR5)
- Audits of Standards (AU1)
- Exhaustion of Administrative Remedies (RE2)

Essex County Jail			Cost Impact		Explanation
Percent of Annual Operating Budget			0.000373465	0.002885822	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		70%	\$ 13,092	\$ 101,164	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 93	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	Y			
PP-3	Inmate supervision	Y			
PP-4	Limits to cross-gender viewing and searches	N			Does not currently prohibit cross gender pat downs, the facility feels it can develop a cost effective solution through staffing realignments.
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N			Background checks for staff being considered for promotion are not currently conducted. Can be completed at no additional cost
PP-7	Assessment and use of monitoring technology	Y			
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	N	\$ 1		Cost to develop an MOU with an outside entity
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	Y			
TR-2	Volunteer and contractor training	Y			
TR-3	Inmate education	N	\$ 3		Cost of refresher training
TR-4	Specialized training: Investigations	N	\$ 4		Cost represents staff time to provide training for investigators
TR-5	Specialized training: Medical and mental health care	N	\$ 2		Additional training material for medical and mental health care staff
SC-1	Screening for risk of victimization and abusiveness	Y			
SC-2	Use of screening information	Y			
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	N	\$ 3		Cost to modify current policy to meet 48hr exhaustion of administrative remedies
RE-3	Inmate access to outside confidential support services	N	\$ 1		Cost for materials such as posters or pamphlets displaying contact information for outside support services
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	Y			
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff				
DI-2	Disciplinary sanctions for inmates	Y			
MM-1	Medical and Mental Health Screenings - history of sexual abuse	Y			
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	N			Does not have a formal process for a review team. No cost associated
DC-2	Data Collection	N			Does not complete the BJS survey. Per Booz Allen, PREA coordinator can handle responsibilities of data collection/review.
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 8	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
ID-6	Supplement to SC-2	Y			



**Hennepin County Jail (Hennepin County)**

Sector	Jails
Title	Hennepin County
Total Facilities	1
Percent PREA Compliant	56%
Total Staff	246
Percent Male Staff	78%
Percent Female Staff	23%
Capacity	839
Percent Male Offenders	91%
Percent Female Offenders	8%
ADP	694
ADP/Capacity Percentage	83%
ACA Accredited?	Yes
Cost of care / day	\$116.88
Unionized?	Yes
2008 Confirmed Incidents	3
2009 Confirmed Incidents	1
Annual Operating Budget	\$ 35,702,816

Hennepin County located in Minneapolis, MN operates the largest pre-trial detention facility state. The jail has consistently earned the distinction of being accredited by ACA for maintaining the high standards of inmate custody and care.

Hennepin County is 56% compliant with the NPREC standards. It is estimated that Hennepin County will have a total upfront cost of \$148K and an annual cost of \$118K, to reach full compliance.

**Training and education** is estimated to cost \$126K in upfront costs and \$7K annually. Employee training is estimated at \$48K initial and \$7K refresher for the Zero tolerance of sexual abuse to develop and implement a training curriculum. Inmate education was estimated to cost \$50K, which develops and implements a PREA video loop to be regularly displayed in common areas. An upfront cost of \$8K

was estimated to train investigators in confinement settings. The 35 nurses on staff can be specifically trained on preserving evidence of sexual abuse for \$20K.

According to the standard PP1, **zero tolerance of sexual abuse**, Hennepin County would require 1FTE to serve as PREA Coordinator at an annual cost of \$101K. Hennepin County expressed concern over the intent of this standard, believing it to be an unnecessary and impractical use of resources. They believe a senior level employee could oversee PREA in addition to other duties.

An upfront cost of \$20K was estimated in order to execute and revise a new **screening instrument** in the electronic jail management system.

Booz Allen estimated a PREA **triennial audit** to cost an annual \$8K.

An upfront cost of \$2K was estimated to **contract with an outside provider** of emotional support services. Hennepin County has an existing relationship with HCMC, however it is unlikely that they would provide the services outlined in the NPREC standards.

Booz Allen estimates a \$1K yearly cost of a review team to **gather, review and report data** on sexual abuse. Cost to conduct one-hour review with five officials was based on the number of confirmed sexual abuse incidents.

**Cost Impacts**

- Training and Education (TR1 - TR5)
- Zero Tolerance of Sexual Abuse (PP1)
- Screening for Risk of Sexual Abuse (SC1 and SC2)
- Audits of Standards (AU1)
- Contract Modifications and/or Policy Updates (RP2 - RP4 and RE3)
- Gathering, Reviewing and Reporting Data (DC1 - DC4)

Hennepin County Jail			Cost Impact		Explanation
Percent of Annual Operating Budget			0.4%	0.3%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		56%	\$ 147,692	\$ 118,375	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 101	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	Y			
PP-3	Inmate supervision	Y			
PP-4	Limits to cross-gender viewing and searches	N			Accommodations through reassignments of shifts ; no costs associated.
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N		\$ 1	Per Booz Allen, fee associated with criminal background check assumed to be \$50. Fee includes access to government sources and an internal LOE. Hennepin Co. has 25 promotions
PP-7	Assessment and use of monitoring technology	N			Hennepin CO. does not currently conduct yearly assessments of technology needs, can be done at no additional cost
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	N	\$ 2		Costs associated with drafting an MOU.
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N	\$ 48	\$ 7	Cost for PREA Coordinator to conduct initial and refresher training to employees
TR-2	Volunteer and contractor training	Y			
TR-3	Inmate education	N	\$ 50		Cost to develop PREA video loop and deliver training
TR-4	Specialized training: Investigations	N	\$ 8		Cost to train investigators
TR-5	Specialized training: Medical and mental health care	N	\$ 20		Cost to train 35 nurses
SC-1	Screening for risk of victimization and abusiveness	N	\$ 20		Cost to revise the screening instrument in the electronic jail management system
SC-2	Use of screening information	Y			
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Inmate access to outside confidential support services	Y			
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	N			Policy update, no additional cost
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	N			Policy update, no additional cost
IN-1	Duty to investigate	N			Does not notify victims in writing. Can comply without cost impact
IN-2	Criminal and administrative agency investigations	N			Cost assumed to be included under TR-4.
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	N			Policy update, no additional cost
MM-1	Medical and Mental Health Screenings - history of sexual abuse	Y			
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	N		\$ 1	Booz Allen estimates a review team of upper management officials to consist of 4 senior-level staff and 1 junior analyst. Cost to conduct one-hour review with these 5 officials was based on the number of confirmed sexual abuse incidents
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	N			Policy update, no additional cost
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 8	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
ID-6	Supplement to SC-2	Y			

**Jefferson County Jail (Jefferson County)**

Sector	Jails
Title	Jefferson County
Total Facilities	1
Percent PREA Compliant	53%
Total Staff	30
Percent Male Staff	70%
Percent Female Staff	30%
Capacity	335
Percent Male Offenders	80%
Percent Female Offenders	20%
ADP	245
ADP/Capacity Percentage	73%
ACA Accredited?	No
Cost of care / day	\$35.00
Unionized?	No
2008 Confirmed Incidents	1
2009 Confirmed Incidents	1
Annual Operating Budget	\$ 13,000,000

Jefferson County, located in Hillsboro, MO, sits along the Mississippi River just south of St. Louis. Jefferson County serves a rural population in the State of Missouri with over 225,000 people covering 660 square miles. Jefferson County is a 260-bed facility with the original section (110 beds) built in 1991 and a new section completed in 2009 with an additional 150 beds.

Jefferson County is 53% compliant the NPREC standards. It is estimated that Jefferson County will have a total upfront cost of \$175K and an annual cost of \$598K, to reach full compliance.

Jefferson County has been forced to reduce staffing by 25% in the past few years due to budget constraints at the local and state level. As a result, they see a heightened requirement for **inmate supervision**. Although there have been only two sexual abuse incidents in the past two years, they see this

reduction in force as a security risk to both the inmates and the officers, heightening the potential for destabilizing activities to include sexual assault. An estimated annual cost of \$393K will hire 11 additional staff. Booz Allen estimates an upfront cost of \$10K for operations costs associated with new hires.

The new portion of the jail is fully equipped with modern surveillance technology, however the old jail currently has no **monitoring technology**. Jefferson County has already conducted a needs assessment and determined that the old jail requires 36 cameras at a cost of \$164K to include installation and purchase. Additionally, four staff members are required to monitor the technology at an annual cost of \$143K.

According to the standard PP1, **zero tolerance of sexual abuse**, Jefferson County would require 1FTE to serve as PREA Coordinator at an annual cost of \$53K.

Booz Allen estimated a PREA **triennial audit** to cost an annual \$8K.

**Cost Impacts**

- Inmate Supervision (PP3)
- Assessment and Use of Monitoring Technology (PP7)
- Zero Tolerance of Sexual Abuse (PP1)
- Audits of Standards (AU1)

Jefferson County Jail			Cost Impact		Explanation
Percent of Annual Operating Budget			0.013487846	0.045975183	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		53%	\$ 175,342	\$ 597,677	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 53	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	Y			
PP-3	Inmate supervision	N	\$ 10	\$ 393	11 additional FTE's to adequately supervise inmates. Upfront new hire costs
PP-4	Limits to cross-gender viewing and searches	Y			
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N			Prior institutional employers are contacted. Questions regarding sexual abuse are not asked. Could be accomplished at no additional cost
PP-7	Assessment and use of monitoring technology	N	\$ 164	\$ 143	Old jail does not have any video monitoring technology. Costs cover 36 cameras (upfront) and 4 FTEs to monitor footage.
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	N			Can develop MOUs, if needed, at no additional cost
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N		\$ -	Current training does not include refresher training. Minimal cost impact
TR-2	Volunteer and contractor training	N			PREA Coordinator can conduct training
TR-3	Inmate education	N			PREA Coordinator can conduct training
TR-4	Specialized training: Investigations	N			Investigators are not trained specifically in conducting investigations in confinement settings. Cost not provided
TR-5	Specialized training: Medical and mental health care	N			HPL can provide at no additional cost
SC-1	Screening for risk of victimization and abusiveness	N			Screening instrument is gender specific but Jefferson Co will need to develop a new policy that separates the questions more directly. Cost not provided
SC-2	Use of screening information	Y			
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Inmate access to outside confidential support services	N			Need to publish names of service providers in inmate handbook. Cost not provided
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties				
OR-2	Reporting to other confinement facilities				
OR-3	Staff first responder duties				
OR-4	Coordinated response				
OR-5	Agency protection against retaliation				
IN-1	Duty to investigate	N			Specific criminal sanctions cannot be revealed to the victim or complainants under State law. Cost not provided
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff				
DI-2	Disciplinary sanctions for inmates				
MM-1	Medical and Mental Health Screenings - history of sexual abuse				
MM-2	Access to emergency medical and mental health services				
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	N			Confer with medical and mental health care services. No cost impact
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 8	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
ID-6	Supplement to SC-2	Y			

**Marion County Jail (Marion County)**

Sector	Jails
Title	Marion County
Total Facilities	1
Percent PREA Compliant	59%
Total Staff	461
Percent Male Staff	72%
Percent Female Staff	28%
Capacity	1,135
Percent Male Offenders	70%
Percent Female Offenders	30%
ADP	958
ADP/Capacity Percentage	84%
ACA Accredited?	No
Cost of care / day	\$35.00
Unionized?	Yes
2008 Confirmed Incidents	-
2009 Confirmed Incidents	-
Annual Operating Budget	\$ 29,000,000

Marion County, is located in Indianapolis, IN, and is the largest jail in the state of Indiana, with 1,135 beds.

Marion County is 59% compliant with the NPREC standards. It is estimated that Marion County will have a total upfront cost of \$130K and an annual cost of \$1.3M, to reach full compliance.

Marion County contracts with two private facilities for the **confinement of inmates**, the MCJ II and Liberty Hall. Both facilities are ACA accredited, maintaining this status as part of their contractual obligation. MCJ2 houses 1,125 and women’s unit houses 250. Booz Allen estimates an annual cost of \$775K to comply with NPREC standard PP2. This estimate is a percentage of total yearly cost based on number of contracted inmates.

Enhancements in Assessment and Use of Monitoring Technology are estimated to cost \$116K for 50 additional

cameras, recorders, monitors and installation. An annual cost of \$179K will hire three FTEs to monitor the technology.

Marion County contracts with ICE for the housing of **immigrant detainees (ID6)**, yet does not house them separately from the general population. Marion County requires an additional cell block specifically for housing immigrant detainees. A cost of \$19K per month has been estimated to house an average of 10 detainees, equating to \$228K annually.

According to the standard PP1, **zero tolerance of sexual abuse**, Marion County would require 1FTE to serve as PREA Coordinator at an annual cost of \$92K.

An upfront cost of \$9K was estimated to develop posters that inform inmates of available **victim advocate** services.

Booz Allen estimated a PREA **triennial audit** to cost an annual \$8K.

Marion County does not conduct background checks for **promotion decisions**. Marion County has 100 promotions per year. Booz Allen estimates the yearly maintenance cost of these additional promotions to cost \$5K.

An upfront cost of \$2K was estimated to establish **training** curriculum for volunteers. In addition, an upfront cost of \$2K was estimated to train investigators in confinement settings.

**Cost Impacts**

- Contracting for the Confinement of Inmates (PP2)
- Assessment and Use of Monitoring Technology (PP7)
- Supplement to SC-2: Use of Screening Information (ID-6)
- Zero Tolerance of Sexual Abuse (PP1)
- Victim Advocacy (RP1 and RE-3)
- Audits of Standards (AU1)
- Hiring and Promotion Decisions (PP6)
- Training and Education (TR1 - TR5)

Marion County Jail			Cost Impact		Explanation
Percent of Annual Operating Budget			0.4%	4.4%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		59%	\$ 129,517	\$ 1,268,588	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 92	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	N		\$ 755	Booz Allen estimates the cost to be a percentage of total yearly based on number of contracted inmates = 1,375
PP-3	Inmate supervision	Y			
PP-4	Limits to cross-gender viewing and searches	N			Cross-gender pat downs are currently not prohibited in the case of females patting down males. Can comply at no additional cost
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N		\$ 5	Per Booz Allen, fee associated with criminal background check assumed to be \$50. Fee includes access to government sources and an internal LOE. Marion Co. has 100 promotions
PP-7	Assessment and use of monitoring technology	N	\$ 116	\$ 179	50 additional cameras and associated recording equipment and 3 FTEs to monitor surveillance
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	N			No MOU's have been established with outside entities or offices. Can be done at no additional cost
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	Y			
TR-2	Volunteer and contractor training	N	\$ 2	\$ 1	Volunteer training on PREA curriculum.
TR-3	Inmate education	N			Refresher training will require a video loop and signs, can be done at minimal cost
TR-4	Specialized training: Investigations	N	\$ 2		Training cost includes tuition, transportation, and food.
TR-5	Specialized training: Medical and mental health care	Y			
SC-1	Screening for risk of victimization and abusiveness	Y			
SC-2	Use of screening information	Y			
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Inmate access to outside confidential support services	N	\$ 9		Development of poster boards with the agency name and phone number.
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	N			Victims and other complainants are not notified in writing of investigative outcomes. Can be completed at no additional cost
IN-2	Criminal and administrative agency investigations	N			Specialized training for investigators is not currently being conducted. No cost impact
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	Y			
MM-1	Medical and Mental Health Screenings - history of sexual abuse	N			Practitioners do not obtain informed consent from inmates before reporting information. No cost impact
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	N			A formal process to review incidents is currently not in place. No cost impact
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	N			Sexual abuse data is not currently reviewed and analyzed. No cost impact
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 8	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
ID-6	Supplement to SC-2	N		\$ 228	Cost to open a new cell block for ICE detainees based off of increased cost of care per day.

**Miami-Dade County Corrections and Rehabilitation Department (Miami-Dade)**

Sector	Jails
Title	Miami-Dade
Total Facilities	5
Percent PREA Compliant	63%
Total Staff	1,932
Percent Male Staff	48%
Percent Female Staff	52%
Capacity	5,845
Percent Male Offenders	93%
Percent Female Offenders	7%
ADP	6,299
ADP/Capacity Percentage	108%
ACA Accredited?	Yes
Cost of care / day	\$134.27
Unionized?	Yes
2008 Confirmed Incidents	-
2009 Confirmed Incidents	1
Annual Operating Budget	\$ 326,000,000

Miami-Dade is comprised of five correctional facilities, and two programs. The largest of which is the Metro West Detention Center, which houses over 3,000 inmates. Over the past three years, 50 cases of sexual abuse have been investigated with only one confirmed.

Miami-Dade is 63% compliant with the NPREC standards. It is estimated that Miami-Dade will have a total upfront cost of \$25.1M and an annual cost of \$7.3M, to reach full compliance.

Based on the last technical assessment, an upfront cost of \$25M was estimated to enhance **monitoring technology**. This cost breaks down to 16,667 cameras at \$1.5K per camera plus installation.

An annual cost of \$6.7M was estimated to increase **inmate supervision**, based on filling current staffing vacancies. These required positions amount to an additional 89 COs, 21

corporals, and two lieutenants. Booz Allen estimates \$112K in upfront operations costs associated with the new hires.

An annual cost of \$261K was estimated to **train** 2,200 employees for two hours, which includes the cost of implementing refresher training. An upfront cost of \$28K was estimated to update inmate handbooks and install monitors to display PREA information.

Miami-Dade would be required to modify its existing **screening** instrument at an upfront cost of \$3K. In addition, an additional FTE would be required to facilitate the new screening process at an annual cost of \$31K. At Miami-Dade, 20 high risk sexual offenders are identified each month. Normally, these high risk offenders would be housed with another inmate. However, in order to separate them for approximately 30 days, an annual cost of \$80K was estimated, which accounts for the increased cost of care per day in separated pods.

According to the standard PP1, **zero tolerance of sexual abuse**, Miami-Dade would require 1FTE to serve as PREA Coordinator at an annual cost of \$92K.

Booz Allen estimated a PREA **triennial audit** to cost an annual \$41K, covering all five facilities.

Miami-Dade does not conduct background checks **promotion decisions**. Miami-Dade has 40 promotions per year. Booz Allen estimates the yearly maintenance cost of these additional promotions to cost \$2K.

**Cost Impacts**

- Assessment and Use of Monitoring Technology (PP7)
- Inmate Supervision (PP3)
- Training and Education (TR1 - TR5)
- Screening for Risk of Sexual Abuse (SC1 and SC2)
- Zero Tolerance of Sexual Abuse (PP1)
- Audits of Standards (AU1)
- Hiring and Promotion Decisions (PP6)

Miami-Dade Corrections and Rehabilitation			Cost Impact		Explanation
Percent of Annual Operating Budget			7.7%	2.2%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		63%	\$ 25,144,372	\$ 7,281,125	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 141	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	Y			
PP-3	Inmate supervision	N	\$ 112	\$ 6,700	118 additional FTE's to adequately provide supervision of inmates.
PP-4	Limits to cross-gender viewing and searches	Y			
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N		\$ 2	Per Booz Allen, fee associated with criminal background check assumed to be \$50. Fee includes access to government sources and an internal LOE. Miami-Dade has 40- promotions
PP-7	Assessment and use of monitoring technology	N	\$ 25,000		16,667 new cameras at \$1.5K each
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	Y			
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N		\$ 261	Labor hours to train 2,203 staff, includes refresher training.
TR-2	Volunteer and contractor training	N			Per Booz Allen, PREA coordinator can handle training, cost covered under PP-1
TR-3	Inmate education	N	\$ 28		Cost to update inmate handbooks
TR-4	Specialized training: Investigations	N			Costs for this training were not provided
TR-5	Specialized training: Medical and mental health care	Y			
SC-1	Screening for risk of victimization and abusiveness	N	\$ 3	\$ 31	Modification and updates to screening instrument to reflect standard. One FTE to facilitate efforts.
SC-2	Use of screening information	N		\$ 80	Cost to house 20 inmates separately
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Inmate access to outside confidential support services	Y			
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	N			Policy update, no cost impact
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	Y			
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	Y			
MM-1	Medical and Mental Health Screenings - history of sexual abuse	N			Policy update, no cost impact
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	N		\$ -	Ongoing care based on 1 incident annually. Minimal cost impact
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	N			Report does not currently include year-over-year analysis. No cost impact
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 41	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
ID-6	Supplement to SC-2	Y			



**Norfolk City Jail (Norfolk City)**

Sector	Jails
Title	Norfolk City
Total Facilities	1
Percent PREA Compliant	61%
Total Staff	373
Percent Male Staff	76%
Percent Female Staff	24%
Capacity	833
Percent Male Offenders	90%
Percent Female Offenders	10%
ADP	1,524
ADP/Capacity Percentage	183%
ACA Accredited?	No
Cost of care / day	\$51.25
Unionized?	No
2008 Confirmed Incidents	-
2009 Confirmed Incidents	2
Annual Operating Budget	\$ 34,095,629

Norfolk City, located in Norfolk, VA, is classified as a large jail facility with a rated capacity of 833 beds. At the time of our meeting, the ADP was more than 500 inmates over capacity. The 2009 ACA directory on jails describes the Norfolk City Jail as having “temporary holding/lockup” supervision. While on site, Booz Allen learned this area was a few dedicated cells within the facility dedicated to booking.

Norfolk City is 61% compliant with the NPREC standards. It is estimated that Norfolk City will have a total upfront cost of \$20K and an annual cost of \$124K, to reach full compliance.

According to the standard PP1, **zero tolerance of sexual abuse**, Norfolk City would require 1FTE to serve as PREA Coordinator at an annual cost of \$56K.

An annual cost of \$56K was estimated to hire an additional medical care FTE to assist in conducting **ongoing medical and mental health care** for abusers and victims of sexual

abuse.

An annual cost of \$18K and an upfront cost of \$3K were required to meet the NPREC **training** requirements. Norfolk City has 12 civilian staff to be trained, at \$20 an hour for 4 hours, resulting in a \$1K upfront cost. The upfront cost estimate for hiring three vendors to provide PREA training to contractors and volunteers was estimated at \$5K. Inmate education could be provided by the Zero tolerance of sexual abuse, yet would require \$2K for materials. Specialized training for investigators and medical health care staff were both estimated to cost \$5K.

Booz Allen estimated a PREA **triennial audit** to cost an annual \$8K.

**Cost Impacts**

- Zero Tolerance of Sexual Abuse (PP1)
- Ongoing Medical and Mental Health Care (MM-3)
- Training and Education (TR1 - TR5)
- Audits of Standards (AU1)

Norfolk City Jail			Cost Impact		Explanation
Percent of Annual Operating Budget			0.1%	0.4%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		61%	\$ 20,311	\$ 124,047	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 56	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	Y			
PP-3	Inmate supervision	Y			
PP-4	Limits to cross-gender viewing and searches	N			Male/female staffing levels would need to be adjusted by 10%, reducing the number of female deputies in excess of 40 FTEs. Hoping to come into compliance through attrition over time. No cost impact
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N	\$ 1		Cost to modify contracts to ensure that a contractor is contacting previous employers
PP-7	Assessment and use of monitoring technology	Y			
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	N			Norfolk City can enter into an agreement at no additional cost
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N	\$ 1	\$ -	12 civilian staff are currently not trained, initial training of 4 hours and recurring training of 1 hour once every 2 years.
TR-2	Volunteer and contractor training	N	\$ 5	\$ 1	Modification of existing training to 3 contracts
TR-3	Inmate education	N	\$ 2	\$ 2	Cost to develop training video and materials
TR-4	Specialized training: Investigations	N	\$ 5		Training of investigators in confinement settings
TR-5	Specialized training: Medical and mental health care	N	\$ 5		Modification of existing training to medical contracts
SC-1	Screening for risk of victimization and abusiveness	Y			
SC-2	Use of screening information	Y			
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Inmate access to outside confidential support services	N			Advocate made available through medical contract negotiations, outside access provided.
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	N			No requirement in policy that directs the Sheriff to report incidents involving victims less than 18 years of age to any designated state or local agency. No cost impact
OR-2	Reporting to other confinement facilities	N			Any such incident results in a telephone call (not writing) to the head of the other facility. No cost impact
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	Y			
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	N			The hearing officer can only request voluntary participation by the inmate in any suggested treatment or program. Without court order, cannot require attendance. No cost impact
MM-1	Medical and Mental Health Screenings - history of sexual abuse	N			No informed consent obtained from inmates who admits to prior non-institutional sexual victimization. No cost impact
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	N	\$ 1	\$ 56	One additional FTE to provide medical/mental health care as necessary
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 8	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage

**Peumansend Creek Regional Jail (Peumansend Creek)**

Sector	Jails
Title	Peumansend Creek
Total Facilities	1
Percent PREA Compliant	73%
Total Staff	112
Percent Male Staff	46%
Percent Female Staff	54%
Capacity	336
Percent Male Offenders	83%
Percent Female Offenders	17%
ADP	288
ADP/Capacity Percentage	86%
ACA Accredited?	Yes
Cost of care / day	\$83.14
Unionized?	No
2008 Confirmed Incidents	-
2009 Confirmed Incidents	-
Annual Operating Budget	\$ 9,382,283

Peumansend Creek, located in Bowling Green, VA, is classified as a large jail facility with a rated capacity of 336 beds. Faced with overcrowding, the counties of Arlington, Loudoun, Caroline, and Prince William, along with the cities of Alexandria and Richmond, agreed to build an institution whose prime purpose is to offer programs and services, assisting with transitioning inmates into society. Each participating jurisdiction listed above, transports non-violent able-bodied offenders to the Peumansend Creek facility.

Peumansend Creek is 73% compliant with the NPREC standards. It is estimated that Peumansend Creek will have a total upfront cost of \$642K and an annual cost of \$58K, to reach full compliance.

Enhancements **monitoring technology** accounted for a significant amount of the total upfront cost. An estimated \$400K purchased and installed ten new cameras. Existing equipment at Peumansend Creek is outdated and incompatible with new systems.

Prohibiting **cross-gender pat searches** would result in the termination of 13 female employees. Otherwise, female staff would be limited to the female housing unit, female work crew, and a female intake/transportation post. Further, Peumansend Creek would be challenged to identify 13 qualified male applicants. The cost impact of this standard is \$233K in severance pay for the terminated employees and \$38K in annual operations cost associated with new hires

Conducting refresher **training** for employees was estimated to cost an annual \$11K. The cost includes a four hour classroom session, written materials, and a lecture presentation. Investigators can be trained at a five day AJA training course that is specific to confinement settings. LOE cost associated with training medical and mental health care staff was estimated to cost \$1K upfront.

Booz Allen estimated a PREA **triennial audit** to cost an annual \$8K.

The Rappahannock Council Against Sexual Assault (RCASA) will charge a small fee to provide victim advocate **outside services** at \$1K annually.

**Cost Impacts**

- Assessment and Use of Monitoring Technology (PP7)
- Limits to Cross-Gender Viewing and Searches (PP4)
- Training and Education (TR1 - TR5)
- Audits of Standards (AU1)
- Contract Modifications for Outside Services (RP2 - RP4 and RE3)

Peumansend Creek Regional Jail			Cost Impact		Explanation
Percent of Annual Operating Budget			6.8%	0.6%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		73%	\$ 641,581	\$ 58,219	
PP-1	Zero tolerance of sexual abuse	Y			
PP-2	Contracting with other entities for the confinement of inmates	Y			
PP-3	Inmate supervision	Y			
PP-4	Limits to cross-gender viewing and searches	N	\$ 233	\$ 38	Cost for severance for 13 female staff being terminated
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N			Does not currently conduct background checks on staff being considered for promotion. At 2 promotions a year, this can be done at no cost.
PP-7	Assessment and use of monitoring technology	N	\$ 400		Upgraded surveillance system with 10 additional cameras.
RP-1	Evidence protocol and forensic medical exams	N		\$ 1	The Rappahannock Council Against Sexual Assault (RCASA) will charge a small fee to provide this service.
RP-2	Agreements with outside public entities and community service providers	N			No additional cost to enter into an MOU with the RCASA
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N		\$ 11	Cost for 4 hours of refresher training for all staff.
TR-2	Volunteer and contractor training	Y	\$ -		Cost of printing of the Volunteer Handbooks and printing of the Contractor Handbooks.
TR-3	Inmate education	Y			
TR-4	Specialized training: Investigations	N	\$ 7		AJA 5-day course of training
TR-5	Specialized training: Medical and mental health care	N	\$ 1		Labor hours for medical staff to attend training
SC-1	Screening for risk of victimization and abusiveness	Y			
SC-2	Use of screening information	Y			
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Inmate access to outside confidential support services	Y			
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	Y			
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	N			No intervention program in place. No cost impact
MM-1	Medical and Mental Health Screenings - history of sexual abuse	N			No program in place to refer inmates for treatment. No cost impact
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 8	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
ID-6	Supplement to SC-2	Y			

**Pulaski County Regional Detention Center (Pulaski County)**

Sector	Jails
Title	Pulaski County
Total Facilities	1
Percent PREA Compliant	54%
Total Staff	256
Percent Male Staff	48%
Percent Female Staff	52%
Capacity	980
Percent Male Offenders	88%
Percent Female Offenders	12%
ADP	979
ADP/Capacity Percentage	100%
ACA Accredited?	No
Cost of care / day	\$34.38
Unionized?	No
2008 Confirmed Incidents	-
2009 Confirmed Incidents	1
Annual Operating Budget	\$ 21,643,319

Pulaski County, located in Little Rock, AR, opened in 1994 and is the largest county detention facility in Arkansas, housing more than 979 inmates. The jail is the only long-term detention facility in Pulaski County supporting 12 law enforcement agencies and 33 state and local courts. The jail is direct supervision with only one confirmed incident in the past three years.

Pulaski County is 54% compliant with the NPREC standards. It is estimated that Pulaski County will have a total upfront cost of \$1.9M and an annual cost of \$123K, to reach full compliance.

Pulaski County does not prohibit **cross-gender pat searches** and would have to undergo dramatic workforce adjustments if this standard were enforced. Reducing the frequency of pat downs is was determined to be a security risk. Alternatively, Pulaski County can relocate staff to alternate posts, moving

female officers away from posts requiring pat downs. Pulaski County states that more grievance reports from a male-on-male pat down than a female-on-male pat down. As a result, having more men pat down men might lead to more problems of sexual abuse, not fewer. In order to comply with the standard, Pulaski County would be forced to terminate 82.5 female officers resulting in \$1.8M in severance pay.

According to the standard PP1, **zero tolerance of sexual abuse**, Pulaski County would require 1FTE to serve as PREA Coordinator at an annual cost of \$92K.

To modify the current **screening** tool and existing software to include gender-specific questions and a question on domestic battery, Pulaski County would incur an upfront cost of \$80K.

An upfront cost of \$30K was estimated to provide **training** for employees, volunteers, contractors and inmates. An annual cost of \$20K was required to conduct refresher training.

Booz Allen estimated a PREA **triennial audit** to cost an annual \$8K.

Pulaski County contracts with ICE to house **immigrant detainees (ID6)**. On average, Pulaski County has 23 ICE inmates in custody. An annual cost of \$3K was estimated to house these inmates separately from the general population.

**Cost Impacts**

- Limits to Cross-Gender Viewing and Searches (PP4)
- Zero Tolerance of Sexual Abuse (PP1)
- Screening for Risk of Sexual Abuse (SC1 and SC2)
- Training and Education (TR1 - TR5)
- Audits of Standards (AU1)
- Supplement to SC-2: Use of Screening Information (ID6)

Pulaski County Jail			Cost Impact		Explanation
Percent of Annual Operating Budget			8.7%	0.6%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		54%	\$ 1,873,719	\$ 123,479	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 92	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	Y			
PP-3	Inmate supervision	Y			
PP-4	Limits to cross-gender viewing and searches	N	\$ 1,800		Severance pay for 82.5 female FTE's
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N		\$ -	There are few promotions. No additional costs are anticipated
PP-7	Assessment and use of monitoring technology	Y			
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	N			Access to a rape crisis facility in area that could provide a victim advocate at no cost
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N	\$ 15	\$ 11	Cost to conduct initial and refresher training
TR-2	Volunteer and contractor training	N	\$ 9	\$ 2	Cost to train volunteers
TR-3	Inmate education	N	\$ 7	\$ 7	Does orientation on rules and regulations but doesn't cover sexual abuse, nor do they provide any refresher education.
TR-4	Specialized training: Investigations	N	\$ -		Sexual abuse is part of their criminal training, however it doesn't necessarily cover investigations in a confinement setting.
TR-5	Specialized training: Medical and mental health care	N	\$ -		Assumes that the medical and mental health care staff receive training through their standards boards and licensing requirements.
SC-1	Screening for risk of victimization and abusiveness	N	\$ 80		Modifications to current screening tool
SC-2	Use of screening information	Y			
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Inmate access to outside confidential support services	Y			
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	N			
OR-2	Reporting to other confinement facilities	N			
OR-3	Staff first responder duties	N			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	N			
IN-1	Duty to investigate	N			cost impact
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	N			
MM-1	Medical and Mental Health Screenings - history of sexual abuse	N			Information on prior abuse is not shared with the administration. No cost impact
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 8	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
ID-6	Supplement to SC-2	N		\$ 3	Had 12 ICE detainees in 2008, 43 in 2009, and 15 in 2010. Or an average of 23 per year at a unit cost of \$56 an inmate for up to 48 business hours.

**Sacramento County Jail (Sacramento County)**

Sector	Jails
Title	Sacramento County
Total Facilities	2
Percent PREA Compliant	56%
Total Staff	606
Percent Male Staff	
Percent Female Staff	
Capacity	4,057
Percent Male Offenders	88%
Percent Female Offenders	12%
ADP	4,042
ADP/Capacity Percentage	100%
ACA Accredited?	No
Cost of care / day	\$77.17
Unionized?	Yes
2008 Confirmed Incidents	2
2009 Confirmed Incidents	2
Annual Operating Budget	\$ 64,007,412

Sacramento County, located in Sacramento, CA, is comprised of two jails in the county, the Main Jail and the Rio Coses Correctional Center (RCCC). The RCCC is the primary custody facility for inmates sentenced to the County Jail from the Sacramento County Courts. An increasing percentage of inmates are pre-sentence, housed at RCCC to maintain the population at the Main Jail. In addition, the RCCC houses inmates en route to other jurisdictions, federal prisoners under a contract with the U.S. Bureau of Prisons, and reciprocal prisoners from other counties. RCCC is the primary reception point for parole violators who are being held pending revocation hearings and the central transportation point for all defendants sentenced to State Prison.

Sacramento County is 56% compliant with the NPREC standards. It is estimated that Sacramento County will have a total upfront cost of \$1M and an annual cost of \$6M, to reach full compliance.

Sacramento County has undergone significant staff reductions over the past few years due to budget constraints. As a result, they see a heightened requirement for **inmate supervision**. The jail is considered overcrowded with inmates double bunking in cells not designed for such purposes and the staff to inmate ratio has climbed to 63:1. The Sacramento County has recently undergone a 80% reduction of the medical staff, which means that available officers are required to escort inmates to the hospital for emergency treatment, yet remove them from supervisory duty. Compounding this issue, future budget cuts are in the works and Sacramento County anticipates losing additional staff as the State of California faces a monumental budget crisis with major budget cuts being passed down to the county level. Although sexual abuse incidents over the past year have not been alarmingly high, the reduction in staff has led to deficit in inmate supervision. An estimated \$4.4M would increase each shift by six officers. An upfront cost of \$17K is for one-time costs associated with the new hires.

Current medical and psychiatric staffing levels in the Sacramento County jail facilities are not sufficient to provide **ongoing medical and mental health care** to all known users of sexual abuse. Meeting such a requirement would require hiring dedicated personnel on a 24/7 basis. It is estimated that six clinical FTE’s would be required in order to meet NPREC standards. At an average cost per clinician of \$200K, an annual cost of \$1M and upfront cost of \$7K will be incurred.

Although **monitoring technology** is sufficient at the RCCC, the coverage at the main jail is inadequate with many areas that do not have cameras, including 14 floors of confinement space. A current draft RFP, waiting for funding, estimates a cost of \$684K in upfront costs.

An upfront cost of \$328 K and an annual cost of \$1K were estimated in order for Sacramento County to meet the **training** requirements. The costs include training for inmates and volunteers, along with the 100 medical practitioners.

According to the standard PP1, **zero tolerance of sexual abuse**, Sacramento County would require 1FTE to serve as PREA Coordinator at an annual cost of \$199K.

Recently Sacramento County has had several incidents in the facility where inmates witnessed crimes, identifying another inmate. The **duty to investigate** all crimes can be completed with the addition of 1FTE assigned to the

**Cost Impacts**

- Inmate Supervision (PP3)
- Ongoing Medical and Mental Health Care (MM-3)
- Assessment and Use of Monitoring Technology (PP7)
- Training and Education (TR1 - TR5)
- Zero Tolerance of Sexual Abuse (PP1)
- Investigations (IN1 and IN3)
- Audits of Standards (AU1)
- Contract Modifications for Outside Services (RP2 - RP4 and RE3)

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facility at an annual cost of \$182K. This would allow for every incident to be investigated as well as notification of investigative outcomes.

Booz Allen estimated a PREA **triennial audit** to cost an annual \$16K, covering the two facilities.

An upfront cost of \$5K was estimated to develop and distribute victim advocate materials for **outside services**.



Sacramento County Jail			Cost Impact		Explanation
Percent of Annual Operating Budget			1.6%	9.3%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		56%	\$ 1,047,073	\$ 5,971,312	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 199	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	Y			
PP-3	Inmate supervision	N	\$ 17	\$ 4,400	Increase of 6 deputies per shift at the Main Jail
PP-4	Limits to cross-gender viewing and searches	N	\$ 2		Cost for time to complete the word processing, time associated with review and approval of a policy as well as implementation on the Sheriff's Department intra-net Website.
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N		\$ 3	Per Booz Allen, fee associated with criminal background check assumed to be \$50. Fee includes access to government sources and an internal LOE. Sacramento Co. has 63 promotions
PP-7	Assessment and use of monitoring technology	N	\$ 684		Current coverage at the main jail is inadequate, with many areas that do not have cameras, including 14 floors of confinement space. 200 cameras
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	N			Women Escaping A Violent Environment (WEAVE) assists. Do not have an MOU and do not document attempts to establish an MOU with WEAVE. Costs are unknown.
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	Y			
TR-2	Volunteer and contractor training	N	\$ 3	\$ 1	Current training for volunteers does not cover sexual abuse.
TR-3	Inmate education	N	\$ 25		Inmates only receive orientation but not a comprehensive education.
TR-4	Specialized training: Investigations	Y			
TR-5	Specialized training: Medical and mental health care	N	\$ 300		Cost of training for 100 medical practitioners
SC-1	Screening for risk of victimization and abusiveness	N	\$ 1		Modification to screening instrument to make it gender specific
SC-2	Use of screening information	Y			
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	N	\$ 2		Policy update for 48hr requirement
RE-3	Inmate access to outside confidential support services	Y	\$ 5		Staff time to prepare an MOU; create and distribute informational materials; and to pay for services of an advocate, as needed.
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	N	\$ 1	\$ 182	Investigation of all crimes can be completed with an additional body assigned to the facility.
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	N			
MM-1	Medical and Mental Health Screenings - history of sexual abuse	N			All suspected abuse is referred to licensed mental health personnel within facility.
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	N	\$ 7	\$ 1,000	Addition of 6 clinical FTE's
DC-1	Sexual abuse incident reviews	N		\$ 1	Cost of materials and 3 attendees on review team
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	N			Requires a simple process modification at no additional cost
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 16	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
ID-6	Supplement to SC-2	Y			

**Washington Pierce County Jail (WA Pierce County)**

Sector	Jails
Title	WA Pierce County
Total Facilities	2
Percent PREA Compliant	56%
Total Staff	316
Percent Male Staff	77%
Percent Female Staff	23%
Capacity	1,730
Percent Male Offenders	86%
Percent Female Offenders	14%
ADP	1,261
ADP/Capacity Percentage	73%
ACA Accredited?	No
Cost of care / day	\$82.00
Unionized?	Yes
2008 Confirmed Incidents	-
2009 Confirmed Incidents	2
Annual Operating Budget	\$ 48,589,260

Note: the 2 confirmed incidents in 2009 are pending review

The second largest cost driver was a result of improvements to the **screening** process, resulting in an annual cost of \$111K. Booz Allen estimates the need for one additional FTE to facilitate the new screening process.

Booz Allen estimated a PREA **triennial audit** to cost an annual \$16K, covering the two facilities.

WA Pierce County, located in Tumwater, WA, is medium/maximum security and consists of two facilities, the New Jail and the Main Jail, confining over 1261 inmates.

WA Pierce County is 56% compliant with the standards. It is estimated that WA Pierce County will have a total upfront cost of \$101K and an annual cost of \$301K, to reach full compliance.

According to the standard PP1, **zero tolerance of sexual abuse**, WA Pierce County would require 1FTE to serve as PREA Coordinator at an annual cost of \$163K.

An upfront cost of \$97K was estimated and an annual cost of \$16K in order to meet the NPREC training requirements. Costs include **training** for 316 uniformed staff, 1,200 contracted employees, a video loop for inmate education, investigator training, and medical and mental health care training.

**Cost Impacts**

- Zero Tolerance of Sexual Abuse (PP1)
- Training and Education (TR1 - TR5)
- Screening for Risk of Sexual Abuse (SC1 and SC2)
- Audits of Standards (AU1)

WA Pierce County Jail			Cost Impact		Explanation
Percent of Annual Operating Budget			0.2%	0.6%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		56%	\$ 101,034	\$ 309,385	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 163	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	Y			
PP-3	Inmate supervision	Y			
PP-4	Limits to cross-gender viewing and searches	Y			
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	Y			
PP-7	Assessment and use of monitoring technology	N		\$ 2	Labor hours to conduct annual needs assessment of video monitoring
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	N	\$ 1		Cost to develop and implement an MOU for victim advocate services
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N	\$ 63	\$ 16	4 hour initial training session and for a 1 hour in-service refresher
TR-2	Volunteer and contractor training	N	\$ 1	\$ -	Initial training of volunteers and contractors
TR-3	Inmate education	N	\$ 12		Cost to develop PREA pamphlets and develop PREA video loop to be shown on Closed Circuit TV
TR-4	Specialized training: Investigations	N	\$ 11		Cost to conduct investigator training in a confinement setting
TR-5	Specialized training: Medical and mental health care	N	\$ 10		Cost to provide medical and mental health care staff with dedicated sexual abuse training
SC-1	Screening for risk of victimization and abusiveness	N	\$ 1	\$ 111	1 additional FTE to assist with the screening process
SC-2	Use of screening information	N			Minimal cost to improve the use the additional screening information
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Inmate access to outside confidential support services	N	\$ -		Minimal cost to develop and print posters displaying a victim advocate hotline
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	N			Would need policy change, no cost impact
OR-2	Reporting to other confinement facilities	N			Would need policy change, no cost impact
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	Y			
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	N			Would need policy change
MM-1	Medical and Mental Health Screenings - history of sexual abuse	N			Cost is captured in SC-1
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	N		\$ -	Minimal cost to assemble review team based on low number of incidents
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	N	\$ -		Minimal cost to improve review process
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 16	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
ID-6	Supplement to SC-2	Y			

**Wisconsin Pierce County Jail (WI Pierce County)**

Sector	Jails
Title	WI Pierce County
Total Facilities	1
Percent PREA Compliant	66%
Total Staff	15
Percent Male Staff	47%
Percent Female Staff	53%
Capacity	29
Percent Male Offenders	80%
Percent Female Offenders	20%
ADP	52
ADP/Capacity Percentage	179%
ACA Accredited?	No
Cost of care / day	\$62.00
Unionized?	Yes
2008 Confirmed Incidents	-
2009 Confirmed Incidents	-
Annual Operating Budget	\$ 2,100,100

WI Pierce County is a full- service jail facility located in Ellsworth, Wisconsin. They are a small jail responsible for the confinement of 52 inmates, with a rated capacity of only 29, and a staff count of 15. WI Pierce County is also the location for the dispatchers unit. Staff split their time between inmate supervision and dispatching 911 calls. WI Pierce County voluntarily caps off their population and operates under a direct supervision model.

WI Pierce County is 66% compliant with the NPREC standards. It is estimated that WI Pierce County will have a total upfront cost of \$11K and an annual cost of \$433K, to reach full compliance.

The proposed prohibition of **cross-gender pat searches** would result in an annual cost of \$384K and an upfront cost of \$5K. WI Pierce County has about a 50/50 split between male/female staff accompanied by an 80% male inmate

population. To eliminate cross-gender pat downs, WI Pierce County would need five additional FTEs to occupy one post 24/7.

WI Pierce County will need to enhance their sexual abuse **training and education** since it currently does not cover administrative staff or volunteers. A total annual cost of \$21K was estimated to meet this requirement and an upfront cost of \$6K. Costs include the development of a video loop, along with in-house classroom based training.

According to the standard PP1, **zero tolerance of sexual abuse**, WI Pierce County would require 0.5PTE to serve as PREA Coordinator at an annual cost of \$20K.

Booz Allen estimated a PREA **triennial audit** to cost an annual \$8K.

**Cost Impacts**

- Limits to Cross-Gender Viewing and Searches (PP4)
- Training and Education (TR1 - TR5)
- Zero Tolerance of Sexual Abuse (PP1)
- Audits of Standards (AU1)

WI Pierce County Jail			Cost Impact		Explanation
Percent of Annual Operating Budget			0.5%	20.6%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		66%	\$ 10,796	\$ 432,713	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 20	.5 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of inmates	Y			
PP-3	Inmate supervision	Y			
PP-4	Limits to cross-gender viewing and searches	N	\$ 5	\$ 384	One additional post with 5 FTE's (including benefits)
PP-5	Accommodating inmate with special needs	Y			
PP-6	Hiring and promotion decisions	N			Prior institutional employers are contacted. Questions regarding sexual abuse are not asked. Could be accomplished at no additional cost and without legal ramifications
PP-7	Assessment and use of monitoring technology	Y			
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	N			Cost to draft MOU's would be dependent on the Office of Corporation Counsel.
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N		\$ 20	Program run in-house; \$20K in personnel costs to train all county employees
TR-2	Volunteer and contractor training	N	\$ 5	\$ 1	Cost to develop a video based training program.
TR-3	Inmate education	N	\$ 1		Cost to develop handbooks
TR-4	Specialized training: Investigations	N			Cost covered under TR-1 through in-house training
TR-5	Specialized training: Medical and mental health care	N			Cost covered under TR-1 through in-house training
SC-1	Screening for risk of victimization and abusiveness	N			Inmates are screened during intake, but this does not cover PREA standards. No cost impact
SC-2	Use of screening information	N			Need to implement new questions into housing model. No cost impact
RE-1	Inmate reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Inmate access to outside confidential support services	N			Cost included in TR-3
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	Y			
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for inmates	Y			
MM-1	Medical and Mental Health Screenings - history of sexual abuse	Y			
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	N			Wi Pierce Co. does not fill out BJS survey, can be done by PREA Coordinator. Cost covered under PP-1
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 8	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage
ID-6	Supplement to SC-2	Y			

Juvenile

Ada County Juvenile (ACJCS)

Sector	Juvenile
Title	ACJCS
Total Facilities	1
Percent PREA Compliant	68%
Total Staff	30
Percent Male Staff	67%
Percent Female Staff	33%
Capacity	71
Percent Male Offenders	N/A
Percent Female Offenders	N/A
ADP	34
ADP/Capacity Percentage	48%
ACA Accredited?	No
Cost of care / day	N/A
Unionized?	No
2008 Confirmed Incidents	-
2009 Confirmed Incidents	1
Annual Operating Budget	\$ 282,000

ACJCS, located in Boise, Idaho, has several branch offices, and a 71-bed detention facility (2 pods, 3 wings, 1 dorm and observation rooms). As mandated by the 1995 Juvenile Corrections Act, ACJCS practices the Balanced Approach to juvenile services. The Balanced Approach requires that court staff give equal consideration to methods for holding a juvenile accountable, assessing and implementing ways to ensure protection of the community, and assisting a young person to develop pro-social skills.

ACJCS is 68% compliant with the NPREC standards. It is estimated that ACJCS will have a total upfront cost of \$4K and an annual cost of \$115K, to reach full compliance.

According to the standard PP1, **zero tolerance of sexual abuse**, ACJCS would require 0.5PTE to serve as PREA Coordinator at an annual cost of \$59K.

The majority of remaining annual cost is associated with **contract modifications** and the development of MOU's. ACJCS currently has an MOU in place with the National

Federation of Families to provide some victim advocate services, but it may not meet the requirements of the NPREC standards. An agreement with an advocacy group may need to be established to provide some of the services. ACJCS is exploring this option with Idaho Youth Ranch, a local non-profit agency, to provide a reintegration specialist at a cost of \$25 per day per youth. ACJCS currently has about 15 youth that would meet this criterion, for a total annual cost of \$50K.

Booz Allen estimated a PREA **triennial audit** to cost \$6K annually.

**Cost Impacts**

- Zero Tolerance of Sexual Abuse (PP1)
- Contract Modifications and/or Policy Updates (RP2 - RP4 and RE3)
- Audits of Standards (AU1)

Ada County Juvenile			Cost Impact		Explanation
Percent of Annual Operating Budget			1.5%	40.8%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		68%	\$ 4,092	\$ 115,127	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 59	.5 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of residents	Y			
PP-3	Resident supervision	Y			
PP-4	Limits to cross-gender viewing and searches	Y			
PP-5	Accommodating resident with special needs	Y			
PP-6	Hiring and promotion decisions	N			Do not currently contact prior institutional employers but can do so at no additional cost.
PP-7	Assessment and use of monitoring technology	Y			
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	N		\$ 50	Will use Idaho Youth Ranch, a local non-profit agency, to provide a reintegration specialist for about 15 youth that would meet this criteria.
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N			PREA coordinator would develop a PREA curriculum for all staff. Cost covered under PP-1
TR-2	Volunteer and contractor training	N			Contractors receive PREA training, however, volunteers do not. PREA coordinator will train volunteers to PREA standards.
TR-3	Resident education	N	\$ 1		Refresher training not provided. Cost <\$1K to develop material
TR-4	Specialized training: Investigations	Y			
TR-5	Specialized training: Medical and mental health care	Y			
AP-1	Obtaining information about residents	N	\$ 1		Screening process is not in place at intake that assesses the risk of residents being sexual abused and the risk of being abusive. Cost impact of implementing.
AP-2	Placement of residents in housing, bed, program, education, and work assignments	N			Involve a change in practice, at no additional cost
RE-1	Resident reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Resident access to outside support services and legal representation	N	\$ 1		Residents are not provided access to outside victim advocate services. Cost <\$1K to develop material and implement policy.
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	N			The agency would become compliant through PREA training
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	N			Victims and other complainants are currently not notified in writing of investigation outcomes. Investigations are facilitated by the prosecutor's office at no cost.
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Interventions for residents who engage in sexual abuse	Y			
MM-1	Medical and mental health intake screenings	Y			
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	N			The BJS survey is not completed, could become part of PREA Coordinator duties.
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 6	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage

**Arkansas Juvenile Assessment (AR JA)**

Sector	Juvenile
Title	AR JA
Total Facilities	8
Percent PREA Compliant	85%
Total Staff	392
Percent Male Staff	59%
Percent Female Staff	41%
Capacity	347
Percent Male Offenders	86%
Percent Female Offenders	15%
ADP	296
ADP/Capacity Percentage	85%
ACA Accredited?	Yes
Cost of care / day	\$156.00
Unionized?	No
2008 Confirmed Incidents	-
2009 Confirmed Incidents	-
Annual Operating Budget	\$ 58,800,000

The remaining upfront cost is associated with the use of monitoring technology. A yearly cost of \$6K was estimated to install cameras to cover blind spots and areas not currently within range. A \$1K annual cost is also associated with camera maintenance.

Located in Little Rock, AR, AR JA is under the Division of Youth Services, as part of the Arkansas Department of Human Services. AR JA has privatized all eight of their facilities (residential treatment and correctional) with multiple year private contracts. All of the facilities are non-union and all are ACA accredited. With a rated capacity of 347 and an ADP of 296, AR JA operates at 85% capacity.

AR JA is 85% compliant with the NPREC standards. It is estimated that the AR JA will have a total upfront cost of \$7K and an annual cost of \$85K, to reach full compliance.

Fifty three percent of AR JA’s annual cost is attributable to the PREA triennial audit. Booz Allen estimated a triennial audit to cost \$45K annually, covering 8 facilities.

The majority of the remaining total yearly cost is associated with zero tolerance of sexual abuse and the need for a part-time PREA Coordinator position at an annual cost of \$38K.

**Cost Impacts**

- Audits of Standards (AU1)
- Zero Tolerance of Sexual Abuse (PP1)
- Assessment and Use of Monitoring Technology (PP7)



Arkansas Juvenile Assessment			Cost Impact		Explanation
Percent of Annual Operating Budget			0.0%	0.1%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		85%	\$ 6,546	\$ 84,659	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 38	.5 FTE at senior-level salary
PP-2	Contracting with facilities for the confinement of residents	Y			
PP-3	Resident supervision	Y			
PP-4	Limits to cross-gender viewing and searches	Y			
PP-5	Accommodating residents with special needs	Y			
PP-6	Hiring and promotion decisions	N			Do not currently contact prior institutional employers but can do so at no additional cost.
PP-7	Assessment and use of monitoring technology	N	\$ 6	\$ 1	Cost to install and cover blind spots and areas not currently configured in the available technology's range and yearly maintenance.
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	Y			
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	Y			
TR-2	Volunteer and contractor training	Y			
TR-3	Resident education	Y			
TR-4	Specialized training: Investigations	Y			
TR-5	Specialized training: Medical and mental health care	Y			
AP-1	Obtaining information about residents	N			Cost to modify tool to include PREA standard is null.
AP-2	Placement of residents in housing, bed, program, education, and work assignments	N			Assigned staff would be responsible for any increase in classification review at no additional cost.
RE-1	Residents reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Resident access to outside support services and legal representation	Y			
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	Y			
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Interventions for residents who engage in sexual abuse	Y			
MM-1	Medical and mental health intake screenings	Y			
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 45	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage

**California Division of Juvenile Justice (CA DJJ)**

Sector	Juvenile
Title	CA DJJ
Total Facilities	6
Percent PREA Compliant	68%
Total Staff	2,551
Percent Male Staff	62%
Percent Female Staff	38%
Capacity	4,585
Percent Male Offenders	93%
Percent Female Offenders	7%
ADP	1,408
ADP/Capacity Percentage	31%
ACA Accredited?	No
Cost of care / day	\$544.43
Unionized?	Yes
2008 Confirmed Incidents	7
2009 Confirmed Incidents	N/A
Annual Operating Budget	\$ 326,075,000

The CA DJJ, located in Sacramento, CA, operates six juvenile detention facilities and falls under the jurisdiction of the CA DOC. For the purposes of this study, the cost impacts of the NPREC standards are measured separately from the adult prison system. The CA DJJ receives its youthful offender population from both juvenile and superior court referrals. The CA DJJ provides training and treatment for these youths and carries out its responsibilities through three divisions: the Division of Juvenile Facilities, the Division of Juvenile Programs, and the Division of Juvenile Parole Services. With a rated capacity of 4,585 and an ADP of 1,408, CA DJJ operates at 31% capacity.

CA DJJ is 68% compliant with the NPREC standards. It is estimated that CA DJJ will have a total upfront cost of \$1.2M and an annual cost of \$3.1M, to reach full compliance.

Seventy one percent of CA DJJ’s annual cost and seventy five percent of its upfront cost are attributable to **monitoring technology**. The CA DJJ facilities have outdated cameras,

which no longer can identify a perpetrator. It is estimated that 120 new cameras in each facility and 12 additional FTEs for monitoring would be required have adequate video monitoring in place. The cost to purchase, install, and maintain the cameras, and to employ the additional FTE’s is estimated to cost \$2.2M annually and \$904K upfront.

Currently, the CA DJJ permits female staff to conduct **cross-gender pat searches**. It is estimated to cost \$680K annually and \$85K upfront to prohibit cross-gender pat downs. These costs include the addition of four new posts along with the time associated to rewrite policies by the HR staff.

According to standard PP1, **zero tolerance of sexual abuse**, CA DJJ would require one FTE to serve as PREA Coordinator at an annual cost of \$140K.

CA DJJ will also be required to provide specialized **training** to investigators and medical and mental health care providers. Upfront costs of \$82K each are estimated to train investigators in confinement settings and to train medical and mental health care staff on preservation of forensic evidence. These costs included tuition, materials development, labor hours and travel.

To be in compliance with the NPREC **screening** standards, CA DJJ would be required to develop a new screening instrument, implement a screening process at all classification reviews, and to make housing, bed and program assignments. This would cost \$60K annually and \$14K upfront.

**Cost Impacts**

- Assessment and Use of Monitoring Technology (PP7)
- Cross Gender Pat Downs (PP4)
- Zero Tolerance of Sexual Abuse (PP1)
- Training and Education (TR1 - TR5)
- Screening (SC1, SC2)
- Audits of Standards (AU1)
- Victim Advocate (RE-3)
- Gathering, Reviewing, and Reporting Data (DC1 through DC4)
- Contract Modifications for Outside Services (RP2 - RP4 and RE3)

Booz Allen estimated a PREA **triennial audit** to cost \$34K annually, covering 6 facilities.

CA DJJ will also need to implement **contract modifications** or develop and MOU with an outside service provider for emotional support services. This cost estimated to cost \$20K upfront and \$19K annually.

CA DJJ also does not currently have a formal process for **gathering, reviewing and reporting** sexual abuse data. An upfront cost of \$15K was estimated to purchase a server necessary to store data for an additional three years along with an annual cost of \$5K to formalize a review team process and document corrective actions.

California Department of Juvenile Justice			Cost Impact		Explanation
Percent of Annual Operating Budget			0.4%	1.0%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		68%	\$ 1,206,800	\$ 3,100,931	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 140	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with facilities for the confinement of residents	Y			
PP-3	Resident supervision	Y			
PP-4	Limits to cross-gender viewing and searches	N	\$ 85	\$ 680	Cost for policy writing, 4 additional posts, staffing negotiations, and court expert's to review policy
PP-5	Accommodating residents with special needs	Y			
PP-6	Hiring and promotion decisions	Y			
PP-7	Assessment and use of monitoring technology	N	\$ 904	\$ 2,200	12 FTEs to monitor video monitoring, 600 cameras (120 at each facility)
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	N	\$ 20	\$ 19	Cost to develop an MOU with an outside agency, develop a process for receiving reports from a public entity, and for transition services
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	Y			
TR-2	Volunteer and contractor training	Y			
TR-3	Resident education	Y			
TR-4	Specialized training: Investigations	N	\$ 82		Cost for investigator training specific to confinement settings, (includes tuition, travel, labor hours).
TR-5	Specialized training: Medical and mental health care	N	\$ 82		Implement sexual abuse training specific for medical staff (includes tuition, materials development, travel, labor hours).
AP-1	Obtaining information about residents	Y	\$ 14		Cost to develop a new written screening instrument.
AP-2	Placement of residents in housing, bed, program, education, and work assignments	Y		\$ 60	Labor hour cost involved to implement new process at intake and reclassifications
RE-1	Residents reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Resident access to outside support services and legal representation	N	\$ 4		Cost to train staff on victim advocate responsibilities, PREA materials, hotline installation
RE-4	Third-party reporting	N			Explanation found in IN-1
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	N			There is no 90-day policy in place for staff. Could be accomplished at no additional cost.
IN-1	Duty to investigate	N			Victims and families are not notified to the extent of the standard according to Article 14_31140.4.10
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Interventions for residents who engage in sexual abuse	Y			
MM-1	Medical and mental health intake screenings	Y			
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	N		\$ 5	Cost to develop an incident review report and labor hours for incident review team.
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	N	\$ 15		Cost to purchase server, and maintenance fees.
AU-1	Audits of standards	N		\$ 34	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage

**Colorado Division of Youth Corrections (CO DYC)**

Sector	Juvenile
Title	CO DYC
Total Facilities	11
Percent PREA Compliant	63%
Total Staff	1,004
Percent Male Staff	57%
Percent Female Staff	43%
Capacity	1,708
Percent Male Offenders	86%
Percent Female Offenders	14%
ADP	1,628
ADP/Capacity Percentage	95%
ACA Accredited?	No
Cost of care / day	\$231.86
Unionized?	Yes
2008 Confirmed Incidents	14
2009 Confirmed Incidents	N/A
Annual Operating Budget	\$ 40,421,663

CO DYC is located in Denver, CO and manages state operated and privately contracted residential facilities. CO DYC is also responsible for community alternative programs that treat youth between 10-21 years who have demonstrated delinquent behavior.

CO DYC is 63% compliant with the NPREC standards. It is estimated that CO DYC will have a total upfront cost of \$17.8M and an annual cost of \$3.4M, to reach full compliance.

CO DYC has 10 State operated facilities in need of enhancements in **monitoring technology**. CO DYC believes that monitoring technology is only one small piece in the prevention of sexual abuse and not necessarily a tool that eliminates sexual abuse incidents. Nonetheless, an upfront cost of \$17.8M was estimated to upgrade these 10 facilities. Additionally, an annual cost of \$192K was estimated to conduct annual assessments of monitoring equipment.

CO DYC **contracts for the housing of 747.5 residents**. Booz

Allen estimates an annual cost of \$1.6M to comply with NPREC standard PP2. This estimate is a percentage of total yearly cost based on number of contracted inmates.

An increase in **inmate supervision** was determined necessary to increase the number of staff to resident ratio, aiming for 1:8. An additional 24.8 FTEs would bring the shift relief factor from 4.2 to 5.2. These positions amount to \$1.3M in annual salaries and an upfront cost for new hires of \$24K.

According to the standard PP1, **zero tolerance of sexual abuse**, CO DYC would require 1FTE to serve as PREA Coordinator at an annual cost of \$86K.

**Investigations** at CO DYC are typically conducted through local law enforcement, the Social Security’s office, or the District Attorney’s Office. CO DYC has not been content with these services. An in-house Inspector General was decided as one option to meet the requirements of this standard. The annual cost of this position was estimated to be \$79K.

An additional FTE at \$72K was estimated to **gather, review and report** sexual abuse data for CO DYC’s contracted facilities.

An additional FTE \$61K was estimated to develop the curriculum and instruct employee **training**.

Booz Allen estimated a PREA **triennial audit** to cost \$62K annually, covering 11 facilities.

**Cost Impacts**

- Assessment and Use of Monitoring Technology (PP7)
- Contracting for the confinement of residents (PP2)
- Inmate Supervision (PP3)
- Zero Tolerance of Sexual Abuse (PP1)
- Investigations (IN1 and IN3)
- Gathering, Reviewing, and Reporting Data (DC1 through DC4)
- Training and Education (TR1 - TR5)
- Audits of Standards (AU1)

Colorado Department of Youth Corrections			Cost Impact		Explanation
Percent of Annual Operating Budget			44.0%	8.4%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		63%	\$ 17,780,988	\$ 3,382,508	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 86	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with facilities for the confinement of residents	N		\$ 1,600	Booz Allen estimates the cost to be a percentage of total yearly based on number of contracted inmates = 747.5
PP-3	Resident supervision	N	\$ 24	\$ 1,300	24.8 FTE's to bring to a 5.2 shift relief factor, numbers would result in the balance of a staffing analysis generated by Voorhis Associates, Inc.
PP-4	Limits to cross-gender viewing and searches	Y			
PP-5	Accommodating residents with special needs	Y			
PP-6	Hiring and promotion decisions	N		\$ 3	Per Booz Allen, the fee associated with criminal background check assumed to be \$50. Fee includes access to government sources and an internal LOE. CO DYC has 53 promotions
PP-7	Assessment and use of monitoring technology	N	\$ 17,800	\$ 192	Cost to oversee yearly maintenance, upgrade, and feasibility of the monitoring equipment.
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	Y			
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N	\$ 1	\$ 61	One FTE necessary for training of employees, on-going site training at the facilities, and the quality assurance process (audit) at each facility.
TR-2	Volunteer and contractor training	N			Cost covered in TR-1
TR-3	Resident education	N			Cost covered in TR-2
TR-4	Specialized training: Investigations	Y			
TR-5	Specialized training: Medical and mental health care	N			Do not conduct their own investigations so training agenda is absent. No costs are associated.
AP-1	Obtaining information about residents	Y			
AP-2	Placement of residents in housing, bed, program, education, and work assignments	Y			
RE-1	Residents reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Resident access to outside support services and legal representation	N			National hotline or community based service would be added to current handbook at a nominal cost.
RE-4	Third-party reporting	N			Calls the local County Department of Social Services for investigation.
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	N			Policy update, no cost impact
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	Y			
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	N	\$ 1	\$ 79	An Inspector General FTE would need to be hired to ensure that proper investigations would take place as standard outlines.
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Interventions for residents who engage in sexual abuse	Y			
MM-1	Medical and mental health intake screenings	Y			
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	N	\$ 1	\$ 72	Cost to gather data from contracted facilities for annual reporting.
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 62	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage

**Florida Department of Juvenile Justice (FL DJJ)**

Sector	Juvenile
Title	FL DJJ
Total Facilities	101
Percent PREA Compliant	40%
Total Staff	5,301
Percent Male Staff	N/A
Percent Female Staff	N/A
Capacity	6,442
Percent Male Offenders	N/A
Percent Female Offenders	N/A
ADP	5,635
ADP/Capacity Percentage	87%
ACA Accredited?	No
Cost of care / day	\$113.47
Unionized?	Yes
2008 Confirmed Incidents	12
2009 Confirmed Incidents	8
Annual Operating Budget	\$ 385,018,181

FL DJJ, located in Tallahassee, FL, runs five distinct operations including probation, detention, prevention, executive direction, and residential. This study focuses on detention and residential. Detention and residential operations account for more than 60% of FL DJJ’s annual operating budget. There are currently 76 residential facilities, 84% of which contract out their direct care, and 25 detention facilities.

FL DJJ is 40% compliant with NPREC standards. It is estimated that FL DJJ will have a total upfront cost of \$38.1M and an annual cost of \$3.7M to reach full compliance.

The vast majority of FL DJJ’s upfront costs for PREA compliance are attributable to **monitoring technology**. Currently, 50% of all residential facilities have some form of Assessment and Use of Monitoring Technology, while all detention facilities have some video monitoring, much of it is deemed inadequate. In order to properly provide adequate Assessment and Use of Monitoring Technology across its 101 facilities, it is estimated that FL DJJ will require \$38M in

upfront costs. In addition, \$86K per year will be required to perform annual technical assessments of each facility.

The NPREC standards on **training and education** will require FL DJJ to provide in-depth training to direct care employees and high-level training to remaining staff. In total, development and staff time for 4,800 employees equates to \$36K in upfront curriculum development costs and \$3.4M in staff labor hours. An additional one hour of training will be provided to volunteers, at an annual cost of \$2K, while materials will be provided to the remaining contractors at an upfront cost of \$7K. Resident education is currently limited to posters and pamphlets because the average length of stay is only 11 days. FL DJJ anticipates developing a PREA video loop for each facility at an upfront cost of \$22K. Recurring training, through the distribution of flyers and posters, is estimated to cost \$11K annually. Inspectors from the Office of the Attorney General will be required to receive specialized training on conducting investigations in confinement settings. This training is estimated to cost \$10K annually. Training medical and mental health care staff on preserving forensic evidence of sexual abuse was estimated to cost \$30K annually.

Booz Allen estimated a PREA **triennial audit** to cost of \$574K annually, covering 101 facilities.

According to standard PP1, **zero tolerance of sexual abuse**, FL DJJ would require 1FTE to serve as PREA Coordinator at an annual cost of \$76K.

**Cost Impacts**

- Assessment and Use of Monitoring Technology (PP7)
- Training and Education (TR1 - TR5)
- Audits of Standards (AU1)
- Zero Tolerance of Sexual Abuse (PP1)

Florida Department of Juvenile Justice			Cost Impact		Explanation
Percent of Annual Operating Budget			9.9%	1.1%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		40%	\$ 38,066,292	\$ 4,165,161	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 76	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with facilities for the confinement of residents	N			Contracts have not been amended to include PREA language. No cost impact
PP-3	Resident supervision	Y			
PP-4	Limits to cross-gender viewing and searches	N			Not current practice but can be implemented with no additional cost.
PP-5	Accommodating residents with special needs	Y			
PP-6	Hiring and promotion decisions	N		\$ 8	Per Booz Allen, the fee associated with criminal background check assumed to be \$50. Fee includes access to government sources and an internal LOE. FL DJJ has 166 promotions
PP-7	Assessment and use of monitoring technology	N	\$ 38,000	\$ 86	Cost to update equipment across 100 detention/residential facilities and technology assessment cost on an annual basis at 100 facilities.
RP-1	Evidence protocol and forensic medical exams	N		\$ 4	Exam cost of an estimated 8 incidents annually.
RP-2	Agreements with outside public entities and community service providers	N			No formal agreement has been implemented.
RP-3	Agreements with outside law enforcement agencies	N			Law enforcement has the legal authority to conduct investigations.
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N	\$ 36	\$ 3,400	In-depth direct care training and high-level training for rest of staff. In total, development cost and staff time for 4,800 employees to attend training.
TR-2	Volunteer and contractor training	N	\$ 7	\$ 2	One hour training for volunteers and material cost to produce flyers to be distributed to contractors.
TR-3	Resident education	N	\$ 22	\$ 11	Costs reflect a video for each facility (upfront) as well as flyers and posters to be distributed annually.
TR-4	Specialized training: Investigations	N		\$ 10	Specialized training for Office of the Inspector General
TR-5	Specialized training: Medical and mental health care	N		\$ 30	Training to medical and mental health practitioners on evidence preservation.
AP-1	Obtaining information about residents	Y			
AP-2	Placement of residents in housing, bed, program, education, and work assignments	Y			
RE-1	Residents reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Resident access to outside support services and legal representation	Y			
RE-4	Third-party reporting	N			No notification in writing is provided to the third-party.
OR-1	Staff and facility head reporting duties	N			A "need to know" policy has not been implemented.
OR-2	Reporting to other confinement facilities	N			Programs report allegations to a central communications center, not in writing to the facility director.
OR-3	Staff first responder duties	N			Staff are not trained on evidence preservation.
OR-4	Coordinated response	N			Staff are not appropriately trained to adhere to the standard as written.
OR-5	Agency protection against retaliation	N			There is no 90-day policy in place.
IN-1	Duty to investigate	N			Victims and families are not notified to the extent of the standard.
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Interventions for residents who engage in sexual abuse	N			Programs do not apply discipline or sanctions.
MM-1	Medical and mental health intake screenings	Y			
MM-2	Access to emergency medical and mental health services	N			Payments for medical services for incarcerated youth are not able to be paid from victims crimes fund.
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	N			A team could be assembled at no cost to review incidents.
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 574	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage



**Idaho Department of Juvenile Corrections (IDJC)**

Sector	Juvenile
Title	IDJC
Total Facilities	3
Percent PREA Compliant	38%
Total Staff	105
Percent Male Staff	55%
Percent Female Staff	45%
Capacity	268
Percent Male Offenders	89%
Percent Female Offenders	11%
ADP	268
ADP/Capacity Percentage	100%
ACA Accredited?	Yes
Cost of care / day	\$201.47
Unionized?	No
2008 Confirmed Incidents	10
2009 Confirmed Incidents	11
Annual Operating Budget	\$ 21,364,200

Located in Boise, Idaho, IDJC has regionalized state services for committed juveniles, aiming to keep residents close to parents and loved ones who can even take part in the treatment. All three facilities provide a full complement of services for 268 youth who range from 10 to 20 years of age (including the new co-occurring unit). IDJC averages about 300 juveniles in custody, approximately 70% of the residents are in state facilities, the remaining 30% are with contracted providers.

IDJC is 38% compliant with the NPREC standards. It is estimated that IDJC will have a total upfront cost of \$3.1M and an annual cost of \$2.8M, to reach full compliance.

IDJC does not have a **screening** instrument to determine abuser/victim characteristics. An upfront cost of \$45K was estimated to develop a new screening instrument. Administering this tool was estimated to annually cost \$24K. Current numbers state that 37.2% of IDJC offenders have a history of sexual offending. IDJC currently estimates that an average of 128 juvenile offenders fit in this category. IDJC

expressed concern over the attempt to use screening information, yet without the housing space to follow through. Currently, there are only 113 treatment beds, 15 less than needed. A 15 bed expansion was determined to be the best course of action for protecting these offenders. IDJC estimates \$180.5K as the cost per bed on which to base an expansion. A 15 bed expansion would cost \$2.7M in upfront building costs. Further, housing residents separately is expected to annually cost \$1.5M.

IDJC **contracts for the housing** of 134 offenders with 19 other facilities. Booz Allen estimates an annual cost of \$1M to comply with NPREC standard PP2. This estimate is a percentage of total yearly cost based on number of contracted inmates.

Enhanced **monitoring technology** and that their archiving capabilities are limited. To ensure that IDJC’s Assessment and Use of Monitoring Technology systems would be adequate, they would need to replace DVR servers that do not incorporate a RAID storage array, additional cameras would need to be installed where no cameras currently exist, and all old BNC (analog) cameras would need to be replaced with IP cameras. It should be noted that the cost impact estimate does not include the cost for IDJC residential contract providers to update and install new systems. These costs would be added into daily rates and passed on to IDJC. They feel that it is impossible to determine the additional costs to them in the short time frame allowed for this study. However, 33% of all services provided by IDJC are contract provided. An estimate of 33% of the total cost would be appropriate. An upfront cost of \$174K and an annual cost of \$5K were estimated to meet the standard.

To enhance **training and education**, an estimated upfront cost of \$129K and an annual cost of \$60K would be incurred to meet this requirement. These costs include the development and production of materials needed. The majority of these estimates are for training employees, while the remainder is for residents, investigators and medical/mental health care staff. IDJC estimates that 33% of all services provided are provided by contractors.

**Cost Impacts**

- Screening for Risk of Sexual Abuse (SC1 and SC2)
- Contracting for the Confinement of Inmates (PP2)
- Assessment and Use of Monitoring Technology (PP7)
- Training and Education (TR1 - TR5)
- Investigations (IN1 and IN3)
- Ongoing Medical and Mental Health Care (MM-3)
- Zero Tolerance of Sexual Abuse (PP1)
- Audits of Standards (AU1)



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An annual cost of \$64K is estimated to hire an internal **investigator** to ensure that incidents are investigated by trained, qualified staff.

Currently residents are not placed in sex offender specific programs and/or are not receiving **ongoing medical and mental health treatment**. It is estimated that the 15 juveniles with a history of sexually abusive behavior, would need a minimum of one hour per week of treatment, at a cost of \$75 per hour, resulting in an annual cost of \$59K.

According to the standard PP1, **zero tolerance of sexual abuse**, IDJC would require 0.5PTE to serve as PREA Coordinator at an annual cost of \$34K.

Booz Allen estimated a PREA **triennial audit** to cost \$17K annually, covering 3 facilities.

Idaho Department of Juvenile Corrections			Cost Impact		Explanation
Percent of Annual Operating Budget			14.5%	13.1%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		38%	\$ 3,106,180	\$ 2,795,652	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 34	.5 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of residents	N		\$ 1,000	Booz Allen estimates the cost to be a percentage of total yearly based on number of contracted inmates = 134
PP-3	Resident supervision	Y			
PP-4	Limits to cross-gender viewing and searches	Y			
PP-5	Accommodating residents with special needs	Y			
PP-6	Hiring and promotion decisions	N		\$ 1	Per Booz Allen, the fee associated with criminal background check assumed to be \$50. Fee includes access to government sources and an internal LOE. IDJC has 50 promotions
PP-7	Assessment and use of monitoring technology	N	\$ 174	\$ 5	Cost to replace DVR servers that don't incorporate RAID storage array. Additional cameras installed where no cameras exist. Old BNC cameras replaced as well
RP-1	Evidence protocol and forensic medical exams	N		\$ 1	Cost for victim advocate. If each incident investigated by IDJC in 2009 required a victim advocate for 1.5 hours, would need 37.5 hours services.
RP-2	Agreements with outside public entities and community service providers	N	\$ 4		Cost to develop an initial MOU for entities and subsequent MOUs with other entities for similar services.
RP-3	Agreements with outside law enforcement agencies	N	\$ 21	\$ 8	Attempt to enter into MOUs with the law enforcement agencies, in each of Idaho's 44 counties, responsible for conducting such investigations.
RP-4	Agreements with the prosecuting authority	N	\$ 21		Cost to develop an initial MOU and subsequent MOUs of similar nature.
TR-1	Employee training	N	\$ 121	\$ 40	Cost to develop training for 40 hours. Need to train 400 staff for initial training, require 3 days of training. Refresher training would require 400 staff
TR-2	Volunteer and contractor training	Y			
TR-3	Resident education	N	\$ 2	\$ 8	Cost of materials.
TR-4	Specialized training: Investigations	N	\$ 2	\$ 5	One internal investigator to ensure incidents are investigated by trained staff
TR-5	Specialized training: Medical and mental health care	N	\$ 3	\$ 6	Cost for materials, 4 hours of training for mental health practitioners, and 6 hours for medical practitioners.
AP-1	Obtaining information about residents	N	\$ 45	\$ 24	Cost to develop a tool and to norm and validate the tool and LOE at 30 minutes during intake.
AP-2	Placement of residents in housing, bed, program, education, and work assignments	N	\$ 2,700	\$ 1,500	Screening information isn't collected on residents that are potentially at high risk of being sexually abused. Cost to implement would require 15 additional beds.
RE-1	Resident reporting	Y			
RE-2	Exhaustion of administrative remedies	N	\$ -		Revise existing 2 policies.
RE-3	Resident access to outside support services and legal r	N	\$ -		Cost of services and materials - 8 hours of services per month.
RE-4	Third-party reporting	N	\$ 2		1 internal investigator
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	N			Policy update, no cost impact
OR-3	Staff first responder duties	N			Policy update, no cost impact
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	N			Policy update, no cost impact
IN-1	Duty to investigate	N	\$ 1	\$ 64	Do not notify victims in writing. Cost to add at 1 internal investigator.
IN-2	Criminal and administrative agency investigations	N			Full time investigator who would over see the process. Cost covered in TR-5.
IN-3	Evidence standard for administrative investigations	N			Per Booz Allen, cost provided in IN-1 for additional investigator will also be responsible for compliance with IN-3.
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Interventions for residents who engage in sexual abuse	Y			
MM-1	Medical and Mental Health Screenings - history of sexual abuse	Y			
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	N		\$ 59	Residents are not placed in sex offender specific program and not receiving ongoing treatment, 15 residents would need a minimum of 1 hour a week of treatment.
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			

**Indiana Division of Youth Services (IN DYS)**

Sector	Juvenile
Title	IN DYS
Total Facilities	7
Percent PREA Compliant	63%
Total Staff	483
Percent Male Staff	60%
Percent Female Staff	40%
Capacity	1,151
Percent Male Offenders	85%
Percent Female Offenders	15%
ADP	805
ADP/Capacity Percentage	70%
ACA Accredited?	Yes
Cost of care / day	\$173.02
Unionized?	No
2008 Confirmed Incidents	5
2009 Confirmed Incidents	N/A
Annual Operating Budget	\$ 61,291,377

IN DYS operates seven juvenile correctional facilities and is a division within IN DOC. IN DYS has adopted the Balanced and Restorative Justice Model from the Office of Juvenile Justice and Delinquency Prevention as the foundation and core beliefs in providing juvenile justice services. In 2007 there were two confirmed incidents of sexual abuse compared to five in 2008. The increase is believed to be due to an increase in reporting due to greater awareness. While not confirmed, an estimated 40 to 50 allegations of sexual abuse were reported among the seven facilities last year.

IN DYS is currently 63% compliant with the NPREC standards. It is estimated that IN DYS will have a total upfront cost of \$2.6M and an annual cost of \$5M, to reach full compliance.

In order to provide adequate **inmate supervision** of residents, the agency feels that a significant amount of additional staff would be needed to eliminate sexual abuse incidents. In many instances the staff to resident ratio is as low as 1:24. This ratio

does not adequately provide inmate supervision of inmates. In order to increase the staff to resident ratio to 1:10, a yearly cost impact of \$3.7M for an additional 75 COs and three Internal Affairs Officers. Booz Allen estimated an upfront cost of \$74K for these new hires.

IN DYS feels many of their facilities will require an upgrade in **monitoring technology** in order to adequately provide supervision of the residents. The female facility is currently in process of receiving 108 new cameras at cost of \$300K, or \$2.8K per camera. IN DYS believes that while cameras may not prevent incidents from occurring, they are very important in the investigation process. An upfront cost of \$2.5M to purchase and install cameras with archiving capability. Upfront costs at Pendleton Juvenile alone are estimated at \$1.1M. An annual cost of \$140K annually has been provided to for ongoing maintenance.

Medical and/or mental health treatment is currently only provided to an adjudicated sex offender or those determined to have a need for such therapy at admission. IN DYS anticipates a significant cost to provide **ongoing medical and mental health care**. An annual cost of \$750K, or ¾ of their full sex offender treatment program has been estimated to meet the requirements of the standard.

Currently a victim advocate is not available to the residents at the local hospitals during a medical exam. An annual cost of \$230K and an upfront cost of \$4K was estimated for a part time internal victim advocate, plus overtime, at each facility to accompany the victim through the **forensic medical exam**.

According to the standard PP1, **zero tolerance of sexual abuse**, IN DYS would require 1FTE to serve as PREA Coordinator at an annual cost of \$72K.

Booz Allen estimated a PREA **triennial audit** to cost \$40K annually, covering 7 facilities.

In order to ensure that appropriate transitional services are provided an annual cost of \$30K was estimated to develop a **contract for transition services**. The cost is estimated to be \$200 per day for 30 days. There were 5 kids in the previous year that required such services.

**Cost Impacts**

- Inmate Supervision (PP3)
- Assessment and Use of Monitoring Technology (PP7)
- Ongoing Medical and Mental Health Care (MM-3)
- Evidence Protocol and Forensic Medical Exams (RP1)
- Zero Tolerance of Sexual Abuse (PP1)
- Audits of Standards (AU1)
- Contract Modifications for Outside Services (RP2 - RP4 and RE3)
- Training and Education (TR1 - TR5)

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Lastly a one-time **training** cost of \$25K will result from ensuring Correctional Peace Officer curriculum and confinement specific training materials are provided to investigators.

Indiana Division of Youth Services			Cost Impact		Explanation
Percent of Annual Operating Budget			4.3%	8.1%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		63%	\$ 2,607,116	\$ 4,965,066	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 72	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with facilities for the confinement of residents	Y			
PP-3	Resident supervision	N	\$ 74	\$ 3,700	78 additional FTE's, includes salaries plus benefits
PP-4	Limits to cross-gender viewing and searches	N			Per Booz Allen, litigation costs will not be included in cost figures.
PP-5	Accommodating residents with special needs	Y			
PP-6	Hiring and promotion decisions	N			Prior institutional employers are contacted. Questions regarding sexual abuse are not asked. Could be accomplished at no additional cost and without legal ramifications
PP-7	Assessment and use of monitoring technology	N	\$ 2,500	\$ 140	Additional monitoring technology at 6 facilities and annual maintenance cost.
RP-1	Evidence protocol and forensic medical exams	N	\$ 4	\$ 230	0.5 FTE at each facility to provide in-house advocate services
RP-2	Agreements with outside public entities and community service providers	N		\$ 30	Cost to provide appropriate transitional services of residents through an outside entity or office.
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	Y			
TR-2	Volunteer and contractor training	Y			
TR-3	Resident education	Y			
TR-4	Specialized training: Investigations	N	\$ 25		Cost for external investigators, Correctional Peace Officers curriculum and confinement-specific training material.
TR-5	Specialized training: Medical and mental health care	Y			
AP-1	Obtaining information about residents	Y			
AP-2	Placement of residents in housing, bed, program, education, and work assignments	Y			
RE-1	Residents reporting	N	\$ -	\$ -	Direct line from a facility to an outside entity
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Resident access to outside support services and legal representation	N	\$ 3		Update PREA information material with new contacts. Legal Division states In DYS is only allowed to relay that the matter has been looked into
RE-4	Third-party reporting	N			
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	N			Legal Division states In DYS is only allowed to relay that the matter has been looked into
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Interventions for residents who engage in sexual abuse	Y			
MM-1	Medical and mental health intake screenings	N			General intake personnel are not qualified to question residents about prior sexual victimization and abusiveness
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	N		\$ 750	Cost to provide on-going care and treatment of inmates.
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 40	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage

**Massachusetts Department of Youth Services (MA DYS)**

Sector	Juvenile
Title	MA DYS
Total Facilities	57
Percent PREA Compliant	88%
Total Staff	777
Percent Male Staff	78%
Percent Female Staff	22%
Capacity	1,030
Percent Male Offenders	86%
Percent Female Offenders	14%
ADP	814
ADP/Capacity Percentage	79%
ACA Accredited?	Yes
Cost of care / day	\$250.00
Unionized?	Yes
2008 Confirmed Incidents	4
2009 Confirmed Incidents	5
Annual Operating Budget	\$ 158,000,000

MA DYS, located in Boston, MA, operates 86 programs with 57 facilities, ranging from staff secure group homes to highly secure locked units. There are 29 programs to service youth who live in the community (residing with a parent, guardian, foster parent or in an independent living program). Of their 57 facilities, 37 are contracted.

MA DYS is currently 88% compliant with the NPREC standards. It is estimated that MA DYS will have a total upfront cost of \$933K and an annual cost of \$574K, to reach full compliance.

The largest cost estimated, which attributes to 99% of the total upfront cost, is a result of enhanced **monitoring technology**. Currently, state facilities have video monitoring in place, however some private contract facilities do not. Of the 57 secure residential program locations, only about 20 locations have video monitoring. In 2006, consultants came to MA DYS to estimate the cost of installing or upgrading video surveillance.

The cost for the analysis alone was \$10K, which covered approximately 20 locations. Based on this analysis, one building that housed three to four programs had an estimated cost of approximately \$63K to upgrade video monitoring. A larger campus that housed more than four programs had a cost of over \$115K. Based on these assessments, an estimate was determined of \$25K per program. Therefore, to equip the remaining 37 programs, an upfront cost of 925K was estimated.

Booz Allen estimated a PREA **triennial audit** to cost \$324K annually, covering 57 facilities.

In order to ensure that **investigations** are conducted appropriately, an annual cost of \$178K and an upfront cost of \$2K were estimated. These costs are associated with hiring two investigators in anticipation of increased reports to investigate.

According to the standard PP1, **zero tolerance of sexual abuse**, MA DYS would require 1FTE to serve as PREA Coordinator at an annual cost of \$71K.

Lastly, \$5K was estimated to **train** investigators in confinement settings.

**Cost Impacts**

- Assessment and Use of Monitoring Technology (PP7)
- Audits of Standards (AU1)
- Investigations (IN1 and IN3)
- Zero Tolerance of Sexual Abuse (PP1)
- Training and Education (TR1 - TR5)

Massachusetts Department of Youth Services			Cost Impact		Explanation
Percent of Annual Operating Budget			0.6%	0.4%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		88%	\$ 932,992	\$ 573,570	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 71	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with facilities for the confinement of residents	Y			
PP-3	Resident supervision	Y			
PP-4	Limits to cross-gender viewing and searches	Y			
PP-5	Accommodating residents with special needs	Y			
PP-6	Hiring and promotion decisions	Y			
PP-7	Assessment and use of monitoring technology	N	\$ 925		Cost to upgrade cameras at 37 facilities, \$25K per facility
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	Y			
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	Y			
TR-2	Volunteer and contractor training	Y			
TR-3	Resident education	Y			
TR-4	Specialized training: Investigations	N	\$ 5		Cost to train 2 investigators, at \$2.5K each
TR-5	Specialized training: Medical and mental health care	Y			
AP-1	Obtaining information about residents	Y			
AP-2	Placement of residents in housing, bed, program, education, and work assignments	Y			
RE-1	Residents reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Resident access to outside support services and legal representation	Y			
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	N	\$ 2	\$ 178	LOE to send notification letters
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Interventions for residents who engage in sexual abuse	Y			
MM-1	Medical and mental health intake screenings	Y			
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 324	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage

**Missouri Division of Youth Services (MO DYS)**

Sector	Juvenile
Title	MO DYS
Total Facilities	32
Percent PREA Compliant	78%
Total Staff	921
Percent Male Staff	48%
Percent Female Staff	52%
Capacity	801
Percent Male Offenders	87%
Percent Female Offenders	13%
ADP	767
ADP/Capacity Percentage	96%
ACA Accredited?	N
Cost of care / day	\$126.12
Unionized?	Y
2008 Confirmed Incidents	2
2009 Confirmed Incidents	N/A
Annual Operating Budget	\$ 60,000,000

MO DYS, located in Jefferson City, MO, operates residential care facilities, community-based residential programs (group homes under 24-hour supervision), moderately structured facilities, and secure care. All facilities are direct supervision where residents are under physical surveillance 24 hours/day.

MO DYS is currently 68% compliant with the NPREC standards. It is estimated that MO DYS will have a total upfront cost of \$103K and an annual cost of \$310K, to reach full compliance.

Booz Allen estimated a PREA **triennial audit** to cost \$182K annually, covering 32 facilities.

According to the standard PP1, **zero tolerance of sexual abuse**, MO DYS would require 1FTE to serve as PREA Coordinator at an annual cost of \$101K. MO DYS however, does not feel that a stand-alone PREA Coordinator is required for their operating model and philosophy whereby many of the PREA Coordinator duties and roles are performed by all

management and supervision staff.

To ensure that all employees are trained according to the NPREC requirements an upfront cost of \$95K and an annual cost of \$24K would be incurred. These costs include providing an additional four hours of **training** and one hour for refresher material. Smaller upfront costs of \$1K and \$2K were estimated to ensure training for contractors and volunteers and medical/mental health care practitioners.

**Cost Impacts**

- Audits of Standards (AU1)
- Zero Tolerance of Sexual Abuse (PP1)
- Training and Education (TR1 - TR5)



Missouri Division of Youth Services			Cost Impact		Explanation
Percent of Annual Operating Budget			0.2%	0.5%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		78%	\$ 102,792	\$ 310,312	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 101	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with facilities for the confinement of residents	Y			
PP-3	Resident supervision	Y			
PP-4	Limits to cross-gender viewing and searches	Y			
PP-5	Accommodating residents with special needs	Y			
PP-6	Hiring and promotion decisions	N		\$ 3	Per Booz Allen, the fee associated with criminal background check assumed to be \$50. Fee includes access to government sources and an internal LOE. MO DYS has 60 promotions
PP-7	Assessment and use of monitoring technology	Y			
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	N			MOU not in place for these services, can be done at minimal costs
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	Y	\$ 95	\$ 24	Additional 4 hours of required training for all employees and annual cost to provide 1 hour refresher cost
TR-2	Volunteer and contractor training	N	\$ 1	\$ -	Additional 2 hours of required training to all volunteers and contractors.
TR-3	Resident education	Y			
TR-4	Specialized training: Investigations	Y			
TR-5	Specialized training: Medical and mental health care	N	\$ 2		Initial 4 hours of additional training for medical and mental health professionals.
AP-1	Obtaining information about residents	Y			
AP-2	Placement of residents in housing, bed, program, education, and work assignments	Y			
RE-1	Residents reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Resident access to outside support services and legal representation	N	\$ 4		Cost to obtain available materials from MO Dept of Social Services and place them throughout the facilities.
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	N			Policy update, no cost impact
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	Y			
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Interventions for residents who engage in sexual abuse	Y			
MM-1	Medical and mental health intake screenings	N			Policy update, no cost impact
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 182	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage

**Oregon Youth Authority (OYA)**

Sector	Juvenile
Title	OYA
Total Facilities	11
Percent PREA Compliant	63%
Total Staff	1,101
Percent Male Staff	62%
Percent Female Staff	38%
Capacity	900
Percent Male Offenders	89%
Percent Female Offenders	11%
ADP	890
ADP/Capacity Percentage	99%
ACA Accredited?	Yes
Cost of care / day	\$219.00
Unionized?	Yes
2008 Confirmed Incidents	26
2009 Confirmed Incidents	6
Annual Operating Budget	\$ 79,833,022

OYA, located in Salem, OR, incarcerates youth who cannot safely live in the community, and provides supervision and treatment opportunities to offenders in all 36 counties. OYA exercises legal and physical custody over youth offenders who commit offenses between the ages of 12 and 18 and have been committed by the courts. Offenders may remain in OYA's legal and physical custody up to age 25.

OYA is currently 63% compliant with the NPREC standards. It is estimated that OYA will have a total upfront cost of \$4.1M and an annual cost of \$473K, to reach full compliance.

An upfront cost of \$4M and an annual cost of \$58K were estimated for the enhancement of the **monitoring technology**. Video equipment was recently purchased using federal grant money. However, additional cameras are required to monitor many uncovered areas. An additional FTE at \$58K will also be required to monitor the cameras.

In order to ensure that **investigations** are conducted effectively, an annual cost of \$227K and an upfront cost of \$3K were estimated. These costs are associated with hiring three investigators in anticipation of more sexual abuse reports as a result of PREA.

An upfront cost of \$129K and an annual cost of \$35K were estimate for enhanced **training**. Costs are for ensuring that contractors and medical/mental health care practitioners receive training via classroom and web based programs.

According to the standard PP1, **zero tolerance of sexual abuse**, OYA would require 1FTE to serve as PREA Coordinator at an annual cost of \$92K.

Booz Allen estimated a PREA **triennial audit** to cost \$62K annually, covering 11 facilities.

**Cost Impacts**

- Assessment and Use of Monitoring Technology (PP7)
- Investigations (IN1 and IN3)
- Training and Education (TR1 - TR5)
- Zero Tolerance of Sexual Abuse (PP1)
- Audits of Standards (AU1)

Oregon Youth Authority			Cost Impact		Explanation
Percent of Annual Operating Budget			5.2%	0.6%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		63%	\$ 4,138,287	\$ 473,209	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 92	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting with facilities for the confinement of residents	Y			
PP-3	Resident supervision	Y			
PP-4	Limits to cross-gender viewing and searches	Y			
PP-5	Accommodating residents with special needs	Y			
PP-6	Hiring and promotion decisions	Y			
PP-7	Assessment and use of monitoring technology	N	\$ 4,000	\$ 58	Cost of purchasing and installing cameras and 1 FTE to support the additional monitoring.
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	Y			
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N			Currently developing a refresher training program and can be provided at no additional cost.
TR-2	Volunteer and contractor training	N	\$ 124	\$ 30	Cost for the development of classroom based training and for developing a computer based module for contractors
TR-3	Resident education	Y			
TR-4	Specialized training: Investigations	N			A training program is currently under development. No cost impact
TR-5	Specialized training: Medical and mental health care	N	\$ 9	\$ 5	Cost to provide medical care staff with training
AP-1	Obtaining information about residents	N			Residents are not screened to this standard. OYA has access to the State of WA SAVY screening tool and believes this can be used at no additional cost.
AP-2	Placement of residents in housing, bed, program, education, and work assignments	N			The WA SAVY screening tool can be used to comply at no additional cost.
RE-1	Residents reporting	N			Will use phone systems that will permit the reporting of sexual abuse without staff assistance, can be provided at no additional cost.
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Resident access to outside support services and legal representation	N			Access to outside victim advocate services is not readily available. Have identified providers and no additional cost
RE-4	Third-party reporting	N			Currently under-staffed for investigators, cost covered under IN-1.
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	N			Does not track the conduct and treatment of offenders.
IN-1	Duty to investigate	N	\$ 3	\$ 227	3 FTE investigators
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Interventions for residents who engage in sexual abuse	Y			
MM-1	Medical and mental health intake screenings	N			It is mandatory for all staff to report sexual abuse, independent of whether or not there is consent.
MM-2	Access to emergency medical and mental health services	Y			
MM-3	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 62	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage

Community Corrections

AR Department of Community Corrections (AR DCC)

Sector	Community Corrections
Title	AR DCC
Total Facilities	6
Percent PREA Compliant	66%
Total Staff	577
Percent Male Staff	58%
Percent Female Staff	42%
Capacity	1,615
Percent Male Offenders	72%
Percent Female Offenders	28%
ADP	1,566
ADP/Capacity Percentage	97%
ACA Accredited?	Yes
Cost of care / day	\$53.01
Unionized?	No
2008 Confirmed Incidents	1
2009 Confirmed Incidents	3
Annual Operating Budget	\$ 31,249,659

AR DCC, located in Little Rock, AR, operates two major components -- probation and parole community supervision services and residential services, both of which are supported by the central administration and are included in this report. For probation and parole, there are 52 probation and parole offices serving 75 Arkansas counties and 5 Day Reporting Centers. For residential services, AR DCC operates six community-based residential centers, three of which house technical violator programs.

AR DCC is currently 66% compliant with the NPREC standards. It is estimated that AR DCC will have a total upfront cost of \$49K and an annual cost of \$2M, to reach full compliance.

The greatest cost impact to AR DCC as a result of the NPREC standards is the prohibition of **cross-gender pat searches**. Without violating state statute, the only means to comply with this standard would be to redeploy staff among the six facilities (e.g., moving female officers from male facilities to

female facilities) and hire more male staff in the male facilities to get the staffing gender ratio closer to the offender gender ratio. This strategy results in a redeployment of 12 female staff and a net impact on their budget of \$1.8M for 50 additional male staff. In order to ensure enough male applicants are available, AR DCC assumes an average 33% increase in salaries because the local labor pool simply does not provide enough qualified male applicants. In addition, there are a couple one-time costs associated with hiring additional staff, that result in an upfront cost of \$48K.

According to the standard PP1, **zero tolerance of sexual abuse**, Marion County would require 1FTE to serve as PREA Coordinator at an annual cost of \$107K.

Booz Allen estimated a PREA **triennial audit** to cost \$40K annually, covering 6 facilities.

**Cost Impacts**

- Limits to Cross-Gender Viewing and Searches (PP4)
- Zero Tolerance of Sexual Abuse (PP1)
- Audits of Standards (AU1)

Arkansas Department of Community Corrections			Cost Impact		Explanation
Percent of Annual Operating Budget			0.2%	6.4%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		66%	\$ 48,592	\$ 1,996,503	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 107	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting to house or supervise defendants/offenders under community corrections authority	Y			
PP-3	Defendant/offender supervision	Y			
PP-4	Limits to cross-gender viewing and searches	N	\$ 48	\$ 1,800	Per Booz Allen, 12 staff replacement at Central Arkansas Center will be offset by 11 staff at Southeast Center . Additional 50 FTE's needed
PP-5	Accommodating defendants/offenders with special needs	Y			
PP-6	Hiring and promotion decisions	N			Prior institutional employers are contacted. Questions regarding sexual abuse are not asked. Could be accomplished at no additional cost and without legal ramifications
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	N			Costs associated with entering into such an agreement will probably be part of the duties assigned to the full-time PREA Coordinator.
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N			Requires minimal training modifications with no cost impact
TR-2	Volunteer and contractor training	N			Requires minimal training modifications with no cost impact
TR-3	Defendant/offender education	Y			
TR-4	Specialized training: Investigations	Y			
TR-5	Specialized training: Medical and mental health care	Y			
SC-1	Screening for risk of victimization and abusiveness	N			Screening instrument requires modest changes with no cost impact
SC-2	Use of screening information	Y			
RE-1	Defendant/offender reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Defendant/offender access to outside confidential support services	N			Contacts made with the local Rape Crisis Center found they were willing to provide these services at no cost to AR DCC
RE-4	Third-party reporting	N			Do not notify 3rd party or victim of outcome in writing. Policy could be amended at no additional cost
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	N			Policy could be changed to require this monitoring
IN-1	Duty to investigate	N			State police provide written notice of outcomes but it does not include disciplinary or criminal sanctions. No cost impact associated
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for defendants/offenders	Y			
MM-1	Access to emergency medical and mental health services	Y			
MM-2	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	N			Cost is captured in PREA Coordinators salary under PP-1
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 40	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage

**Indiana Division of Re-entry (IN DOR)**

Sector	Community Corrections
Title	IN DOR
Total Facilities	NA
Percent PREA Compliant	48%
Total Staff	644
Percent Male Staff	44%
Percent Female Staff	56%
Capacity	31,549
Percent Male Offenders	80%
Percent Female Offenders	20%
ADP	31,522
ADP/Capacity Percentage	100%
ACA Accredited?	No
Cost of care / day	\$3.15
Unionized?	No
2008 Confirmed Incidents	-
2009 Confirmed Incidents	1
Annual Operating Budget	\$ 40,868,000

IN DOR, located in Indianapolis, IN, is a division of IN DOC and serves as a pass through of financial support to the county run work release centers, and also manages the division of parole services. In Indiana, 77 out of 92 counties participate in community corrections. Programs offered by county community corrections include work release centers, day reporting centers, home detention, and other diversion programs. Of the 77 participating counties, 41 operate work release centers. Probation services in Indiana are not a responsibility of IN DOR, they are a function of the judicial branch of the state government. For this study, cost estimates were provided from the division of parole services and four work release centers. The work release centers represented Marion County, Bartholomew County, Tippecanoe County, and Clark County.

IN DOR is currently 48% compliant with the NPREC standards. It is estimated that IN DOR will have a total upfront cost of \$33K and an annual cost of \$50K, to reach full

compliance.

An upfront cost of \$11K and annual cost of \$11K were estimated to ensure employee **training** for the four work release centers, which includes the instructor’s travel, LOE, and materials. An upfront cost of \$1K was estimated to provide volunteer training at the work release centers and an upfront cost of \$20K was estimated to modify the offender handbook. Parole agents within IN DOR get the same intake and in-service training as IN DOC, which is a two hour initial PREA session and a one hour refresher class, no additional cost.

According to the standard PP1, **zero tolerance of sexual abuse**, IN DOR would require 1FTE to serve as PREA Coordinator at an annual cost of \$33K. This position would ensure the PREA compliance of the county run work release centers and parole services.

Booz Allen estimated a PREA **triennial audit** to cost \$6K annually.

**Cost Impacts**

- Training and Education (TR1 - TR5)
- Zero Tolerance of Sexual Abuse (PP1)
- Audits of Standards (AU1)

Indiana Division of Re-entry			Cost Impact		Explanation
Percent of Annual Operating Budget			0.1%	0.1%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		48%	\$ 33,192	\$ 50,252	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 33	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting to house or supervise defendants/offenders under community corrections authority	N			
PP-3	Defendant/offender supervision	Y			
PP-4	Limits to cross-gender viewing and searches	Y			
PP-5	Accommodating defendants/offenders with special needs	Y			
PP-6	Hiring and promotion decisions	Y			
RP-1	Evidence protocol and forensic medical exams	N			Booz Allen assumes Work Release centers can implement this process under the guidance of the IN DOC at no additional cost
RP-2	Agreements with outside public entities and community service providers	N			Do not have any agreements in place, could be referred to Life Springs or another mental health agency of their choosing at no additional cost
RP-3	Agreements with outside law enforcement agencies	N	\$ -		Minimal cost to develop an MOU with State Police
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N	\$ 11	\$ 11	Cost includes materials and yearly fee for instructor time and travel
TR-2	Volunteer and contractor training	N	\$ 1	\$ -	Cost to provide training at work release centers
TR-3	Defendant/offender education	N	\$ 20		Cost to develop and modify offender handbook
TR-4	Specialized training: Investigations	Y			
TR-5	Specialized training: Medical and mental health care	Y			
SC-1	Screening for risk of victimization and abusiveness	N			Booz Allen assumes Work Release centers can use the instrument from the IN DOC at no additional cost
SC-2	Use of screening information	N			Booz Allen assumes Work Release centers can implement this process under the guidance of the IN DOC at no additional cost
RE-1	Defendant/offender reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Defendant/offender access to outside confidential support services	N	\$ 1		Cost to provide posters and pamphlets on victim advocate services
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties				Cost and compliance not provided from Work Release Centers
OR-2	Reporting to other confinement facilities				Cost and compliance not provided from Work Release Centers
OR-3	Staff first responder duties				Cost and compliance not provided from Work Release Centers
OR-4	Coordinated response				Cost and compliance not provided from Work Release Centers
OR-5	Agency protection against retaliation				Cost and compliance not provided from Work Release Centers
IN-1	Duty to investigate	Y			
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff				Cost and compliance not provided from Work Release Centers
DI-2	Disciplinary sanctions for defendants/offenders				Cost and compliance not provided from Work Release Centers
MM-1	Access to emergency medical and mental health services	Y			
MM-2	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	N			Due to low level of incidents could develop a team at no additional cost
DC-2	Data Collection	N			Very few incidents, however, if needed to report to Board of Directors could do so at no additional cost
DC-3	Data review for corrective action	N			Have not had sufficient data to analyze due to low number of incidents
DC-4	Data storage, publication, and destruction	N			Do not have any data, however it would be printed out and kept in a locked cabinet behind a locked door.
AU-1	Audits of standards	N		\$ 6	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage

**Massachusetts Office of Community Corrections (MA OCC)**

Sector	Community Corrections
Title	MA OCC
Total Facilities	21
Percent PREA Compliant	74%
Total Staff	275
Percent Male Staff	70%
Percent Female Staff	30%
Capacity	1,500
Percent Male Offenders	83%
Percent Female Offenders	17%
ADP	1,220
ADP/Capacity Percentage	81%
ACA Accredited?	
Cost of care / day	
Unionized?	
2008 Confirmed Incidents	0
2009 Confirmed Incidents	0
Annual Operating Budget	\$ 159,971,922

MA OCC, located in Braintree, MA, is responsible for the oversight of 26 contracted Community Correction Centers. In the early 1990's the Commonwealth of Massachusetts began an initiative to provide more effective and efficient criminal justice sentencing and specifically address prison overcrowding. As a result, the Office of Community Corrections was established in 1996 by virtue of Massachusetts General Law chapter 211F. MA OCC is a division of the Office of the Commissioner of Probation, responsible for the oversight and funding of the CCCs. MA OCC, does not confine inmates, is not institutional in nature, and does not have legal custody of offenders. For the purposes of this study, Booz Allen is only capturing the cost impact on MA OCC's 21 CCCs.

MA OCC is currently 74% compliant with the NPREC standards. It is estimated that MA OCC will have a total upfront cost of \$129K and an annual cost of \$119K, to reach full compliance.

Booz Allen estimated an upfront cost of \$128K and an annual cost of \$123K were determined to meet the NPREC standards on **training**.

Booz Allen estimated a PREA **triennial audit** to cost \$119K annually, covering 26 facilities.

According to the standard PP1, **zero tolerance of sexual abuse**, MA OCC would require 1FTE to serve as PREA Coordinator at an annual cost of \$73K.

**Cost Impacts**

- Training and Education (TR1 - TR5)
- Audits of Standards (AU1)
- Zero Tolerance of Sexual Abuse (PP1)



Massachusetts Office of Community Corrections			Cost Impact		Explanation
Percent of Annual Operating Budget			0.1%	0.2%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		74%	\$ 129,441	\$ 315,165	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 73	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting to house or supervise defendants/offenders under community corrections authority	Y			
PP-3	Defendant/offender supervision	Y			
PP-4	Limits to cross-gender viewing and searches	Y			
PP-5	Accommodating defendants/offenders with special needs	Y			
PP-6	Hiring and promotion decisions	N			MA OCC has very few promotions, can be completed at no additional cost
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	Y			
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N	\$ 112	\$ 119	Cost of updating materials and additional staff time to implement training.
TR-2	Volunteer and contractor training	N	\$ 11	\$ 3	Cost to update materials and implement training for volunteers
TR-3	Defendant/offender education	N	\$ 5	\$ 1	Cost of training materials and staff time
TR-4	Specialized training: Investigations	Y			
TR-5	Specialized training: Medical and mental health care	Y			
SC-1	Screening for risk of victimization and abusiveness	Y			
SC-2	Use of screening information	Y			
RE-1	Defendant/offender reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Defendant/offender access to outside confidential support services	Y			
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	Y			
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for defendants/offenders	Y			
MM-1	Access to emergency medical and mental health services	Y			
MM-2	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	N			Incidents are infrequent and therefore there is no cost.
DC-2	Data Collection	N			Incidents are infrequent and therefore there is no cost.
DC-3	Data review for corrective action	N			Incidents are infrequent and therefore there is no cost.
DC-4	Data storage, publication, and destruction	N			Incidents are infrequent and therefore there is no cost.
AU-1	Audits of standards	N		\$ 119	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage

**Missouri Division of Parole and Probation (MO PP)**

Sector	Community Corrections
Title	MO PP
Total Facilities	8
Percent PREA Compliant	61%
Total Staff	288
Percent Male Staff	55%
Percent Female Staff	24%
Capacity	1,110
Percent Male Offenders	89%
Percent Female Offenders	12%
ADP	914
ADP/Capacity Percentage	82%
ACA Accredited?	No
Cost of care / day	\$40.07
Unionized?	Yes
2008 Confirmed Incidents	-
2009 Confirmed Incidents	-
Annual Operating Budget	\$ 12,565,316

MO PP, located in Jefferson City, MO, oversees all aspects of Community Release/Supervision Centers and community based programs such as electronic monitoring; contract residential facilities; outpatient substance abuse treatment; mental health treatment; employment services; cognitive skills development classes, sex offender treatment and registration, and day reporting centers. Organizationally, MO PP is integrated with MO DOC and many resources are and can be shared.

MO PP is currently 61% compliant with the NPREC standards. It is estimated that MO PP will have a total upfront cost of \$46K and an annual cost of \$1.8M, to reach full compliance.

MO PP currently does not prohibit **cross-gender pat searches**. In order to comply, additional male staff would need to be hired to balance the staff to offender gender ratio. MO PP is hesitant to conduct work force realignment or replace female staff due to EEOC issues stemming from gender-

specific posts and/or discriminatory practices. However, all of the Community Supervision Centers (CSC) and Community Release Centers (CRC) serve both male and female offenders. MO PP would require additional FTE authority (three per shift at the CRC and one per shift at the CSC). An annual cost of \$1.7M and an upfront cost of \$34K are estimated for an additional 36 FTE's.

According to the standard PP1, **zero tolerance of sexual abuse**, MO PP would require 1FTE to serve as PREA Coordinator at an annual cost of \$71K. Leveraging their current unified model however, they suggest a hybrid approach with one central Zero tolerance of sexual abuse supported by two part time assistants; one for prisons and one for probation and parole.

Booz Allen estimated a PREA **triennial audit** to cost \$45K annually, covering 8 facilities.

MO PP **contracts for the confinement** of 244 offenders with five facilities. Booz Allen estimates an annual cost of \$23K to comply with NPREC standard PP2. This estimate is a percentage of total yearly cost based on number of contracted inmates.

Comprehensive **training and education** on sexual abuse is provided to offenders during the intake process at residential facilities only, excluding probation and parole. Extending this training to all offenders in probation and parole is estimated to cost \$2K per year and an upfront cost of \$5K. Integrated with MO DOC, all state investigators receive 40 to 80 hours of training, including training specific to conducting investigations in a confinement setting. They do not however, receive comprehensive training on sexual abuse which can be added at an annual cost of \$3K.

**Cost Impacts**

- Limits to Cross-Gender Viewing and Searches (PP4)
- Zero Tolerance of Sexual Abuse (PP1)
- Audits of Standards (AU1)
- Contracting for the Confinement of Inmates (PP2)
- Training and Education (TR1 - TR5)
- Contract Modifications for Outside Services (RP2 - RP4 and RE3)

An upfront cost of \$3K was estimated to identify and post information for victim advocate **outside services**.

Missouri Division of Parole and Probation			Cost Impact		Explanation
Percent of Annual Operating Budget			0.4%	14.3%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		61%	\$ 46,670	\$ 1,796,099	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 71	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting to house or supervise defendants/offenders under community corrections authority	N		\$ 23	Booz Allen estimates the cost to be a percentage of total yearly based on number of contracted inmates = 244
PP-3	Defendant/offender supervision	Y			
PP-4	Limits to cross-gender viewing and searches	N	\$ 34	\$ 1,700	Cost to hire an additional 36 Male FTE's to supplement current staff
PP-5	Accommodating defendants/offenders with special needs	Y			
PP-6	Hiring and promotion decisions	N			Prior institutional employers are contacted. Questions regarding sexual abuse are not asked. Could be accomplished at no additional cost and without legal ramifications
RP-1	Evidence protocol and forensic medical exams	N		\$ -	Cost for an agency employee not assigned to the facility
RP-2	Agreements with outside public entities and community service providers	N			Costs associated with entering into such an agreement will probably be part of the duties assigned to the full-time PREA Coordinator.
RP-3	Agreements with outside law enforcement agencies	N			Criminal investigations are conducted internally by MO DOC investigators. No cost is expected.
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N			PREA content is an option but not mandated in refresher training. Would be no additional cost to agency
TR-2	Volunteer and contractor training	N			No cost associated, contractors are spread throughout the state and many receive no direct compensation from the agency
TR-3	Defendant/offender education	N	\$ 5	\$ 2	Training does not cover offenders in Probation & Parole
TR-4	Specialized training: Investigations	N	\$ 3		Sexual abuse training is not comprehensive enough for investigators
TR-5	Specialized training: Medical and mental health care	Y			
SC-1	Screening for risk of victimization and abusiveness	Y			
SC-2	Use of screening information	Y			
RE-1	Defendant/offender reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Defendant/offender access to outside confidential support services	N	\$ 3		Cost to provide a victim advocate to offenders.
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	Y			
IN-2	Criminal and administrative agency investigations	N			Additional training is needed. Cost reflected in TR-4
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for defendants/offenders	Y			
MM-1	Access to emergency medical and mental health services	Y			
MM-2	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	N			Policy modification to include multi-disciplined team, at no additional cost
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 45	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage

**South Carolina Department of Probation, Parole and Pardon Services (SC PPP)**

Sector	Community Corrections
Title	SC PPP
Total Facilities	NA
Percent PREA Compliant	63%
Total Staff	644
Percent Male Staff	44%
Percent Female Staff	56%
Capacity	31,549
Percent Male Offenders	80%
Percent Female Offenders	20%
ADP	31,522
ADP/Capacity Percentage	100%
ACA Accredited?	No
Cost of care / day	\$3.15
Unionized?	No
2008 Confirmed Incidents	-
2009 Confirmed Incidents	1
Annual Operating Budget	\$ 40,868,000

SC PPP, located in Columbia, SC, is composed of three divisions. The Field Operations Division supervises offenders through 46 county offices and four satellite offices. The Administrative Services Division is responsible for oversight of training compliance, professional development, fiscal and materials management, budget services, and information technology systems and services. The Legal Services Division addresses all legal matters, interprets policies, and advises management on issues that have legal implications to the Department. SC PPP oversees 31,552 offenders with 644 probation and parole officers.

SC PPP is currently 66% compliant with the NPREC standards. It is estimated that SC PPP will have a total upfront cost of \$53K and an annual cost of \$88K, to reach full compliance.

According to the standard PP1, **zero tolerance of sexual abuse**, SC PPP would require 1FTE to serve as PREA Coordinator at an annual cost of \$78K.

An upfront cost of \$43K was estimated to implement **training** for 768 employees. This estimate includes the cost of external trainers, travel, and material development. Similarly, it would cost \$6K to conduct training for volunteers and \$2K for specialized investigator training in upfront costs. Updates to the offender handbook which would serve as informative and refresher training for offenders, were estimated to cost \$2K annually.

Booz Allen estimated a PREA **triennial audit** to cost \$6K annually.

**Cost Impacts**

- Zero Tolerance of Sexual Abuse (PP1)
- Training and Education (TR1 - TR5)
- Audits of Standards (AU1)

South Carolina Probation, Parole and Pardon Services			Cost Impact		Explanation
Percent of Annual Operating Budget			0.1%	0.2%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		63%	\$ 52,655	\$ 88,170	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 78	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting to house or supervise defendants/offenders under community corrections authority	N			SC PPP will develop contract language to comply with PREA standards at no additional cost
PP-3	Defendant/offender supervision	Y			
PP-4	Limits to cross-gender viewing and searches	Y			
PP-5	Accommodating defendants/offenders with special needs	N		\$ 1	Cost to contract out for interpretive services when needed.
PP-6	Hiring and promotion decisions	Y			
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	Y			
RP-3	Agreements with outside law enforcement agencies	Y			
RP-4	Agreements with the prosecuting authority	Y			
TR-1	Employee training	N	\$ 43	\$ -	Cost to develop and implement training for 768 employees, including a one time upfront cost of hiring an independent consultant to conduct the training
TR-2	Volunteer and contractor training	N	\$ 6	\$ 2	Cost to develop and implement training for volunteers, including a one time upfront cost of hiring an independent consultant to conduct the training
TR-3	Defendant/offender education	N		\$ 2	Cost to modify existing offender handbook
TR-4	Specialized training: Investigations	N	\$ 2		Cost to develop and implement training for investigators, including a one time upfront cost of hiring an independent consultant to conduct the training
TR-5	Specialized training: Medical and mental health care	Y			
SC-1	Screening for risk of victimization and abusiveness	Y			
SC-2	Use of screening information	Y			
RE-1	Defendant/offender reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Defendant/offender access to outside confidential support services	Y			
RE-4	Third-party reporting	N			Cost to modifying existing offender handbook. Cost is covered under TR-3
OR-1	Staff and facility head reporting duties	N			Section 44-23-1150 of the SC Code already mandates zero tolerance towards all forms of sexual abuse. No cost impact to update policy
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	N			Plans to modify existing policies to the extent necessary to comply with PREA standards, at no additional cost
IN-1	Duty to investigate	Y			
IN-2	Criminal and administrative agency investigations	N			Cost for developing this training is covered under TR-4
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for defendants/offenders	Y			
MM-1	Access to emergency medical and mental health services	Y			
MM-2	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	N			Cost is captured in PREA Coordinators salary under PP-1
DC-3	Data review for corrective action	N			Cost is captured in PREA Coordinators salary under PP-1
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 6	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage

**Washington Department of Corrections- Community Corrections (WA CC)**

Sector	Community Corrections
Title	WA CC
Total Facilities	162 field offices
Percent PREA Compliant	47%
Total Staff	967
Percent Male Staff	54%
Percent Female Staff	46%
Capacity	19,293
Percent Male Offenders	84%
Percent Female Offenders	16%
ADP	NA
ADP/Capacity Percentage	NA
ACA Accredited?	Yes
Cost of care / day	\$15.00
Unionized?	Yes
2008 Confirmed Incidents	6
2009 Confirmed Incidents	3
Annual Operating Budget	\$ 114,651,997

WA CC, located in Tumwater, Washington, is an agency within the Department of Corrections. The WA CC oversees 162 field offices who manage the 19,293 offenders. WA CC transitions offenders into society through community based supervision, not using parole. For the purposes of this study, Booz Allen has captured the costs for the WA CC separately from the WA DOC.

WA CC is currently 50% compliant with the NPREC standards. It is estimated that WA CC will have a total upfront cost of \$183K and an annual cost of \$1.3M, to reach full compliance.

An annual cost of \$884K was estimated for one additional FTE at 13 work release centers to increase **inmate supervision**.

WA CC has recently learned that **contracting with an outside service provider** is now possible, so long as the provider does not receive VOCA funding. An annual cost \$79K was estimated to establish and maintain MOUs with outside victim advocate service providers. An annual cost of \$24K was

estimated to develop and maintain MOUs with the 39 county local law enforcement agencies to ensure investigations were conducted. In addition, an annual cost of \$24K was estimated to develop an MOU with these counties to ensure all substantiated cases of sexual abuses were prosecuted.

According to the standard PP1, **zero tolerance of sexual abuse**, WA CC. would require 1FTE to serve as PREA Coordinator at an annual cost of \$113K.

Booz Allen estimated a PREA **triennial audit** to cost \$85K annually, covering 15 work release centers.

In order to ensure compliance with the NPREC **training** standards, an upfront cost of \$27K was estimated for updating materials and additional LOE to implement training for employees. An annual cost of \$20K was estimated to update training materials for contractors and volunteers. Also, a two day training session for investigators in confinement settings was estimated to cost \$20K, which included the development of a new curriculum and staff time.

WA CC **screens** offenders during intake and for all transfers but not during every classification review. Upfront costs of \$11K and \$54K were estimated to develop an instrument and train custody staff on how to screen and interpret along with an upgrade to the information system.

WA CC **gathers, reviews and reports on sexual abuse** however, they do not consider racial dynamics. An upfront cost of \$50K was estimated to update the Sierra database to include this variable and an annual cost of \$1K to create a review team of upper management officials.

**Cost Impacts**

- Inmate Supervision (PP3)
- Contract Modifications and/or Policy Updates (RP2 - RP4 and RE3)
- Zero Tolerance of Sexual Abuse (PP1)
- Audits of Standards (AU1)
- Training and Education (TR1 - TR5)
- Screening for Risk of Sexual Abuse (SC1 and SC2)
- Gathering, Reviewing and Reporting Data (DC1 - DC4)

Washington Community Corrections			Cost Impact		Explanation
Percent of Annual Operating Budget			0.2%	1.1%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		47%	\$ 183,465	\$ 1,266,896	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 113	Salary + benefits of 1 FTE at senior-level salary
PP-2	Contracting to house or supervise defendants/offenders under community corrections authority	N		\$ 34	Contracts for 13 out of the 15 work release centers. Booz Allen estimates the cost to be a percentage of total yearly based on number of contracted offenders = 688
PP-3	Defendant/offender supervision	N	\$ 16	\$ 884	1 FTE for each of the 13 work release centers
PP-4	Limits to cross-gender viewing and searches	Y			
PP-5	Accommodating defendants/offenders with special needs	N	\$ 2		Cost to translate posters and brochures into multiple languages
PP-6	Hiring and promotion decisions	N		\$ 3	Per Booz Allen, the fee associated with criminal background check assumed to be \$50. Fee includes access to government sources and an internal LOE. WA CC has 62 promotions
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside public entities and community service providers	N		\$ 79	Cost to develop an MOU to establish and maintain services with an outside victim advocacy agency.
RP-3	Agreements with outside law enforcement agencies	N		\$ 24	MOUs with the 39 county local law enforcement agencies.
RP-4	Agreements with the prosecuting authority	N		\$ 24	MOUs with the 39 county District Attorney's office
TR-1	Employee training	N	\$ 27		Cost of updating materials and additional staff time to implement training.
TR-2	Volunteer and contractor training	N			Required to update materials, at no additional cost
TR-3	Defendant/offender education	N		\$ 20	Cost of training materials and staff time.
TR-4	Specialized training: Investigations	N	\$ 20		Curriculum development, materials, and labor hours for two days of training.
TR-5	Specialized training: Medical and mental health care	Y			
SC-1	Screening for risk of victimization and abusiveness	N	\$ 11		Cost to develop instrument and train custody staff on how to screen and interpret
SC-2	Use of screening information	N	\$ 54		Cost to complete upgrades to information system and train staff
RE-1	Defendant/offender reporting	Y			
RE-2	Exhaustion of administrative remedies	N			Grievance process lasts for 90 days, could not meet the 48 hour requirement
RE-3	Defendant/offender access to outside confidential support services	N	\$ 4		Cost to publish posters and brochures
RE-4	Third-party reporting	Y			
OR-1	Staff and facility head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	N			Agency does not monitor inmates after a sexual abuse incident.
IN-1	Duty to investigate	Y			
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Disciplinary sanctions for defendants/offenders	N			Policy update, no cost impact
MM-1	Access to emergency medical and mental health services	Y			
MM-2	Ongoing medical and mental health care for sexual abuse victims and abusers	Y			
DC-1	Sexual abuse incident reviews	Y		\$ 1	Booz Allen estimates a review team of upper management officials to consist of 4 senior-level staff and 1 junior analyst. Cost to conduct one-hour review with these 5 officials was based on the number of confirmed sexual abuse incidents.
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	N	\$ 50		Cost for updating database to include racial dynamics
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 85	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage

**Lockups**

**Denver County Pre-Arrestment Facility (DCPA)**

Sector	Lockups
Title	DCPA
Total Facilities	1
Percent PREA Compliant	73%
Total Staff	145
Percent Male Staff	71%
Percent Female Staff	29%
Capacity	158
Percent Male Offenders	86%
Percent Female Offenders	15%
ADP	231
ADP/Capacity Percentage	146%
ACA Accredited?	No
Cost of care / day	\$66.40
Unionized?	Yes
2008 Confirmed Incidents	2
2009 Confirmed Incidents	-
Annual Operating Budget	\$19,484,534.00

DCPA, located in Denver County, operates under the Denver Sheriff’s Department, which also has the Denver County Jail in its jurisdiction. The DCPA is a short term holding facility that does not share the administration or operations of the Denver County Jail. However, the two facilities are merging and DCPA will be physically housed in conjunction with Denver County Jail.

DCPA is currently 68% compliant with the NPREC standards. It is estimated that DCPA will have a total upfront cost of \$71K and an annual cost of \$445K, to reach full compliance.

An upfront cost of \$64K and an annual cost of \$16K were estimated for DCPA to add PREA **training** on top of the facilities mandatory 40 hours of training. All pre-service personnel would be provided with 4 hours of PREA training, and a one hour annual refresher course. Volunteers would receive written information pertaining to PREA.

According to the

standard PP1, **zero tolerance of sexual abuse**, Marion County would require 0.5PTE to serve as PREA Coordinator at an annual cost of \$57K.

Booz Allen estimated a PREA triennial **audit** to cost \$3K annually.

**Cost Impacts**

- Limits to Cross-Gender Viewing and Searches (PP4) Training and Education (TR1 - TR5)
- Zero Tolerance of Sexual Abuse (PP1)



Denver County Pre-arraignment Detention Facility			Cost Impact		Explanation
Percent of Annual Operating Budget			0.3%	0.4%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		73%	\$ 64,677	\$ 76,698	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 57	.5 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of detainees	Y			
PP-3	Detainee supervision	Y			
PP-4	Heightened protection for vulnerable detainees	Y			
PP-5	Limits to cross-gender viewing and searches	N			Booz Allen believes this standard can be met by redeploying female staff at Jail to the Lockup, at no additional cost
PP-6	Accommodating detainees with special needs	Y			
PP-7	Hiring and promotion decisions	N		\$ -	Per Booz Allen, the fee associated with criminal background check assumed to be \$50. Fee includes access to government sources and an internal LOE. DCPA has 8 promotions
PP-8	Assessment and use of monitoring technology	Y			
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside law enforcement agencies	Y			
RP-3	Agreements with the prosecuting authority	Y			
TR-1	Employee and volunteer training	N	\$ 64	\$ 16	Cost for updating training to cover PREA material and consist of staff time for both initial training and refresher training
TR-2	Detainee, attorney, contractor, and inmate worker notification of the agency's zero-tolerance policy	Y			
TR-3	Specialized training: Investigations	Y			
RE-1	Detainee reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Third-party reporting	Y			
OR-1	Staff and agency head reporting duties	N			Facility head is not required to report an incident involving a victim under 18 years of age to the designated State or local services agency
OR-2	Reporting to other confinement facilities	N			Information will be forwarded to other facility, however, do not ensure investigation is completed by other facility or agency.
OR-3	Staff first responder duties	N			Policy update, no cost impact
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	N			Do not notify complainant in writing of the investigation outcomes, this however, would be done by the Denver County Police Dept. at no additional cost
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Referrals for prosecution for detainee-on-detainee sexual abuse.	Y			
MM-1	Access to emergency medical and mental health services	Y			
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 3	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage

**Middleton Police Department Lockup (Middleton PD)**

Sector	Lockups
Title	Middleton PD
Total Facilities	1
Percent PREA Compliant	63%
Total Staff	27
Percent Male Staff	89%
Percent Female Staff	11%
Capacity	12
Percent Male Offenders	100%
Percent Female Offenders	0%
ADP	2
ADP/Capacity Percentage	17%
ACA Accredited?	No
Cost of care / day	
Unionized?	
2008 Confirmed Incidents	-
2009 Confirmed Incidents	-
Annual Operating Budget	\$ 1,400,000

Middleton PD, located in Essex County, MA, is a relatively small police department with only 13 full time staff officers. The department has three temporary holding cells, one of which is primarily dedicated to housing female inmates in transition from the local courts. The high percentage of female detainees has led the department to develop the matron program, which trains women from the community to conduct pat down searches and provide oversight. This program allows male officers to continue their responsibilities in the field, while also avoiding conducting cross-gender pat down searches. With an ADP of only two, Middleton PD operates at 17% of their capacity.

The Middleton PD is currently 63% compliant with the NPREC standards. It is estimated that Middleton PD will have a total upfront cost of \$5K and an annual cost of \$81K, to reach full compliance.

According to the standard PP1, **zero tolerance of sexual abuse**, Middleton PD would require 0.5PTE to serve as PREA

Coordinator at an annual cost of \$53K.

Middleton PD believes that the NPREC **Screening Standards** would add an extra hour for each booking, which would keep the arresting officer from his field duties. An annual cost of \$20K was estimated to increase based on the number of arrests/ bookings and the number of hours of coverage.

In order to meet the **training** requirements, an estimated upfront of \$4K and an annual cost of \$4K were determined. This cost estimate is to train 27 staff and the contracted matrons.

Booz Allen estimated a PREA **triennial audit** to cost \$3K annually.

**Cost Impacts**

- Zero Tolerance of Sexual Abuse (PP1)
- Screening for Risk of Sexual Abuse (SC1 and SC2)
- Training and Education (TR1 - TR5)
- Audits of Standards (AU1)

Middleton Police Department			Cost Impact		Explanation
Percent of Annual Operating Budget			0.4%	5.8%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		63%	\$ 5,342	\$ 80,668	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 53	.5 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of detainees	Y			
PP-3	Detainee supervision	Y			
PP-4	Heightened protection for vulnerable detainees	N		\$ 20	Additional time for booking would result in \$20K needed to backfill for officers not in the field.
PP-5	Limits to cross-gender viewing and searches	Y			
PP-6	Accommodating detainees with special needs	N			Would contract with the local hospital, no cost associated
PP-7	Hiring and promotion decisions	Y			
PP-8	Assessment and use of monitoring technology	Y			
RP-1	Evidence protocol and forensic medical exams	N			Local hospital would provide these services through the SANE program at no additional cost.
RP-2	Agreements with outside law enforcement agencies	Y			
RP-3	Agreements with the prosecuting authority	Y			
TR-1	Employee and volunteer training	N	\$ 4	\$ 4	Cost associated with training of 27 staff members and matrons, when hired to help with supervision.
TR-2	Detainee, attorney, contractor, and inmate worker notification of the agency's zero-tolerance policy	N	\$ -	\$ -	Not currently being performed, can be done at minimal costs to print materials
TR-3	Specialized training: Investigations	N			No additional cost to print materials
RE-1	Detainee reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Third-party reporting	Y			
OR-1	Staff and agency head reporting duties				Cost or compliance for this standard was not provided
OR-2	Reporting to other confinement facilities				Cost or compliance for this standard was not provided
OR-3	Staff first responder duties				Cost or compliance for this standard was not provided
OR-4	Coordinated response				Cost or compliance for this standard was not provided
OR-5	Agency protection against retaliation				Cost or compliance for this standard was not provided
IN-1	Duty to investigate	Y			
IN-2	Criminal and administrative agency investigations				Cost or compliance for this standard was not provided
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff				Cost or compliance for this standard was not provided
DI-2	Referrals for prosecution for detainee-on-detainee sexual abuse.				Cost or compliance for this standard was not provided
MM-1	Access to emergency medical and mental health services				Cost or compliance for this standard was not provided
DC-1	Sexual abuse incident reviews	N			No incidents reported, cost associated with the data review team is null.
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 3	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage

**Rocklin Police Department (Rocklin PD)**

Sector	Lockups
Title	Rocklin PD
Total Facilities	1
Percent PREA Compliant	73%
Total Staff	49
Percent Male Staff	88%
Percent Female Staff	12%
Capacity	10
Percent Male Offenders	50%
Percent Female Offenders	50%
ADP	4
ADP/Capacity Percentage	42%
ACA Accredited?	N/A
Cost of care / day	\$0.00
Unionized?	No
2008 Confirmed Incidents	-
2009 Confirmed Incidents	-
Annual Operating Budget	\$ 12,034,245

Rocklin PD, located in Rocklin, CA , has a population 55,000 in north central California about 20 miles east of Sacramento in Placer County. Among a number of units and specialties (including uniformed patrol, traffic enforcement, investigations, canines, school resource officers, crime prevention, dispatch, records, evidence, and animal control), Rocklin PD also operates a lockup facility for temporary detainees before being transferred to the county jail or released. Of the 49 full time officers, the lock up is managed by shift supervisors with one dedicated jail sergeant.

Rocklin PD is currently 73% compliant with the NPREC standards. It is estimated that Rocklin PD will have a total upfront cost of \$19K and an annual cost of \$802K, to reach full compliance.

Rocklin PD would require six additional female FTEs and a workforce realignment to eliminate **cross-gender pat searches** in order to ensure a female officer is on staff 24/7, available for pat downs when needed. The current policy at

Rocklin PD states that if staff is available Limits to Cross-Gender Viewing and Searches are prohibited however, prohibiting Limits to Cross-Gender Viewing and Searches is not an official policy. A workforce realignment and gender-specific hiring may result in EEOC issues and labor negotiations particularly senior level staff that is not as willing to change their work schedules. An upfront cost of \$6K and an annual cost of \$760K were estimated as a result of the six new FTE female positions.

According to the standard PP1, **zero tolerance of sexual abuse**, Marion County would require 0.5PTE to serve as PREA Coordinator at an annual cost of \$63K.

Although located in a multi-lingual region of the country, particularly Spanish speaking, Rocklin PD does not have adequate interpretation facilities. In order to better **accommodate inmates with special needs**, they propose to incentivize their current staff to become bilingual with a 5% salary increase. Assuming this would be applied to six staff members, an annual cost of \$38K is estimated

As part of its **gathering, reporting and reviewing** of sexual abuse data efforts, Rocklin PD does not prepare any annual reports. In order to track this data (if it existed), Rocklin PD would have to update their internal records management system at an estimated, one-time, cost of \$6K. This would provide the functionality to aggregate and report on sexual abuse incidents.

Rocklin PD currently conducts initial **training** and annual in-service training using a hired instructor but it does not cover PREA standards. In order to accommodate additional training material, the training provider will likely charge extra to include the PREA standards. The estimated cost of this is \$3K upfront is to cover training for new employees and annual refresher training for all current employees to include training for investigators. There will also be an additional one-time cost of \$3K to update current policies on Rocklin's zero tolerance policy and notification.

**Cost Impacts**

- Limits to Cross-Gender Viewing and Searches (PP4)
- Zero Tolerance of Sexual Abuse (PP1)
- Accommodating Special Needs (PP5)
- Gathering, Reviewing and Reporting Data (DC1 - DC4)
- Training and Education (TR1 - TR5)
- Audits of Standards (AU1)

Booz Allen estimated a PREA **triennial audit** to cost \$3K annually.

Rocklin Police Department			Cost Impact		Explanation
Percent of Annual Operating Budget			0.2%	6.7%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		73%	\$ 18,982	\$ 801,670	
PP-1	Zero tolerance of sexual abuse	N	\$ 1	\$ 63	.5 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of detainees	Y			
PP-3	Detainee supervision	Y			
PP-4	Heightened protection for vulnerable detainees	Y			
PP-5	Limits to cross-gender viewing and searches	N	\$ 6	\$ 698	6 female FTEs to monitor lockup facility 24/7 (.5 of the FTE cost is for PREA Coordinator).
PP-6	Accommodating detainees with special needs	N		\$ 38	Cost for a 5% salary increase for 6 staff members to incentivize them to become bilingual.
PP-7	Hiring and promotion decisions	N		\$ -	Per Booz Allen, the fee associated with criminal background check assumed to be \$50. Fee includes access to government sources and an internal LOE. Rocklin PD has 2 promotions
PP-8	Assessment and use of monitoring technology	Y			
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside law enforcement agencies	Y			
RP-3	Agreements with the prosecuting authority	Y			
TR-1	Employee and volunteer training	N	\$ 3		Cost to provide training for 58 sworn positions and for an additional 1 hour of training.
TR-2	Detainee, attorney, contractor, and inmate worker notification of the agency's zero-tolerance policy	N	\$ 3	\$ 1	Need to renegotiate contract with Lexipol to develop and monitor this additional policy
TR-3	Specialized training: Investigations	N			Additional training would be covered under TR-1.
RE-1	Detainee reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Third-party reporting	Y			
OR-1	Staff and agency head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	Y			
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Referrals for prosecution for detainee-on-detainee sexual abuse.	Y			
MM-1	Access to emergency medical and mental health services	Y			
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	N	\$ 6		Cost to update internal records management system to provide the functionality to aggregate and report on sexual abuse incidents.
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 3	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage

**Seattle Police Department Lockup (Seattle PD)**

Sector	Lockups
Title	Seattle PD
Total Facilities	5
Percent PREA Compliant	82%
Total Staff	1,305
Percent Male Staff	86%
Percent Female Staff	14%
Capacity	N/A
Percent Male Offenders	N/A
Percent Female Offenders	N/A
ADP	N/A
ADP/Capacity Percentage	N/A
ACA Accredited?	No
Cost of care / day	N/A
Unionized?	N/A
2008 Confirmed Incidents	-
2009 Confirmed Incidents	-
Annual Operating Budget	\$ 246,000,000

\*Total Staff is the entire Seattle PD

Seattle PD, located in downtown Seattle, WA, oversees the administration of five precincts. Booz Allen met with the Audit, Accreditation and Policy Section of the department. Four of the Seattle PD precincts have lockup facilities that are unique in comparison to other Lockup facilities. These facilities are open 24 hours a day, yet are not manned by a full time officer. Once a police officer has made an arrest on the street, the detainee is taken to the Lockup facility and placed in a temporary holding cell for approximately 30 minutes. The arresting officer then completes necessary paperwork and phone calls before coordinating transportation of the detainee to the local Jail. The East and South precincts have three holding cells, while the North has four. The West precinct has 6 holding cells and two glass observation cells used for individuals on suicide watch. The holding cells are a responsibility of the precincts however the Audit, Accreditation and Policy Section of the Department would oversee the precincts compliance with NPREC standards.

Seattle PD is currently 82% compliant with the NPREC standards. It is estimated that Seattle PD will have a total

upfront cost of \$28K and an annual cost of \$3M, to reach full compliance.

The largest cost and concern was a result of prohibiting **cross-gender pat searches**. This practice is viewed to go against existing state statues that allow police officers to conduct pat downs in the field. At Seattle PD, police officers do not transfer responsibility of the detainee to another officer at the Lockup facility, which would indicate that existing state statues are upheld. To become fully compliant with this standard Seattle PD would be required to hire a substantial number of female officers. Seattle PD currently has about 1,310 sworn officers, with only 188 (14%) of those being female. The cost is prohibitive, but even if male and female officers were in equal numbers, which would take many years to accomplish, it would not eliminate cross-gender search situations. One option for Seattle PD to become fully compliant with the standard is to staff the five precinct facilities on a 24/7 basis with a female officer, which would require a minimum of 25 full time employees at a cost of approximately \$3M per year and \$24K upfront.

Further, fulling standard PP1, **zero tolerance of sexual abuse**, the PREA Coordinator responsibilities would be a function of Audit, Accreditation and Policy section. Labor hours involved in this responsibility are seen to be minimal at \$5K per year, not requiring a full or part time position.

Seattle PD would also need to develop a **training** video for employees, which was estimated to cost \$34K.

Booz Allen estimated a PREA **triennial audit** to cost \$3K annually.

**Cost Impacts**

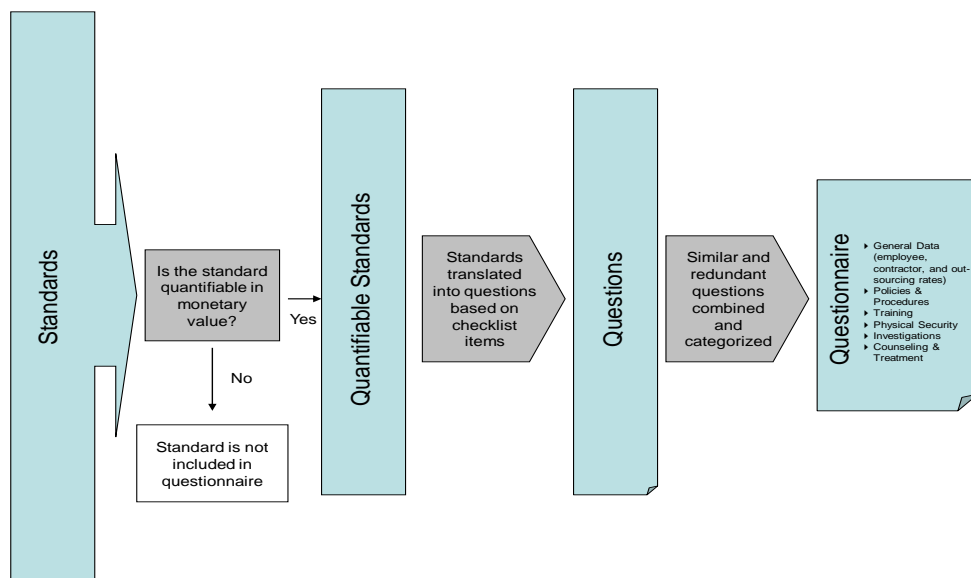
- Limits to Cross-Gender Viewing and Searches (PP4)
- Zero Tolerance of Sexual Abuse (PP1)
- Training and Education (TR1 - TR5)
- Audits of Standards (AU1)

Seattle Police Department Lockup			Cost Impact		Explanation
Percent of Annual Operating Budget			0.0%	1.2%	
ID	Standard Addressed	Compliant?	Upfront	Yearly Maintenance	
		82%	\$ 27,523	\$ 3,050,982	
PP-1	Zero tolerance of sexual abuse	N	\$ -	\$ 5	.5 FTE at senior-level salary
PP-2	Contracting with other entities for the confinement of detainees	Y			
PP-3	Detainee supervision	Y			
PP-4	Heightened protection for vulnerable detainees	Y			
PP-5	Limits to cross-gender viewing and searches	N	\$ 24	\$ 3,000	25 female FTEs to staff the 5 lockup facilities (24/7).
PP-6	Accommodating detainees with special needs	Y			
PP-7	Hiring and promotion decisions	N			Background checks for promotion are not conducted and would be in violation of labor agreements.
PP-8	Assessment and use of monitoring technology	Y			
RP-1	Evidence protocol and forensic medical exams	Y			
RP-2	Agreements with outside law enforcement agencies	Y			
RP-3	Agreements with the prosecuting authority	Y			
TR-1	Employee and volunteer training	N	\$ 4		Cost to develop a 30 minute video on sexual abuse.
TR-2	Detainee, attorney, contractor, and inmate worker notification of the agency's zero-tolerance policy	Y			
TR-3	Specialized training: Investigations	Y			
RE-1	Detainee reporting	Y			
RE-2	Exhaustion of administrative remedies	Y			
RE-3	Third-party reporting	Y			
OR-1	Staff and agency head reporting duties	Y			
OR-2	Reporting to other confinement facilities	Y			
OR-3	Staff first responder duties	Y			
OR-4	Coordinated response	Y			
OR-5	Agency protection against retaliation	Y			
IN-1	Duty to investigate	N			Investigative units are responsible for communicating status of report. There is no cost to update this process for PREA compliance.
IN-2	Criminal and administrative agency investigations	Y			
IN-3	Evidence standard for administrative investigations	Y			
DI-1	Disciplinary sanctions for staff	Y			
DI-2	Referrals for prosecution for detainee-on-detainee sexual abuse.	Y			
MM-1	Access to emergency medical and mental health services	Y			
DC-1	Sexual abuse incident reviews	Y			
DC-2	Data Collection	Y			
DC-3	Data review for corrective action	Y			
DC-4	Data storage, publication, and destruction	Y			
AU-1	Audits of standards	N		\$ 3	Booz Allen assumes a PREA audit will consist of an auditor's fee and a certain internal LOE to support the audit process. Assumed an auditor's fee will include 4-person audit team labor, meals and incidentals, hotel, air fare, and mileage

## Appendix C - Approach to Questionnaire Development and Data Gathering

The objective of the questionnaire development was to winnow down the entire list of standards into a manageable list of questions that could be addressed in a limited amount of time, approximately two hours per site visit. The lead-in questions (to be provided in advance of the interview along with a summarized list of all the standards) were phrased to be as objective as possible with yes/no responses, followed up with more detailed questions requiring a qualitative response depending on the previous answer. The intent was to initiate internal discussions at the site prior to the actual face-to-face site visit where the Booz Allen team further discussed the qualitative responses, interpretations and final responses.

The following diagram provides an illustration of the steps taken to pare down the exhaustive list of standards and myriad of potential costs into a manageable list of questions that are respectful of the interviewee's time. Starting with the full set of standards, the team 1) determined on a case-by-case basis if the standard would result in a cost, 2) analyzed what data would be necessary to estimate the cost, 3) drafted lead-in questions to determine whether the site is compliant with the standard, 4) assessed whether there were similar standards that could be addressed with one question and organized the questions into similar cost categories, and finally 5) developed follow-up questions to gather quantitative data and a qualitative justification to estimate costs. These follow-up questions were based on the required data we need to estimate a cost and their response to the lead-in questions.



The questionnaires were sent to the participating sites approximately 2 weeks in advance, providing ample time to become familiar with the questions. Accompanying the questions was also a demographic form to be filled out and returned to Booz Allen prior to the meeting. This form, when completed, described the site size and complexity in terms of number of staff and offenders, gender ratios, operating budget, number of contracted facilities, and if the workforce is unionized or not. It provided the interview team with additional background material that could be discovered on the Internet. The sites were encouraged to fill out the questionnaire prior to our visit but there were only a handful that had the time to accomplish this.



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The interviews were limited to two-hours. This was sometimes followed by a tour of the facility if the interview took place at a jail, as opposed to the general administrative offices of a state prison system. The discussions were lively and participants were very engaged. They were also very knowledgeable of PREA, requiring little to no background of the history of PREA and the purpose of our visit. With the ultimate objective to obtain cost data, it was infrequent to have final answers at the conclusion of the site visit. Sites were, more often than not, required to gather additional data and documentation based on our discussion, providing us with final answers two to three weeks after our visit. To facilitate this process, Booz Allen provided the sites with typed meeting minutes and an additional data gathering template with clear instructions where additional data were needed. This form, seen in Appendix E – Data Reports, is divided into two parts, the first part focusing on the interview questions pre-populated with data gathered at the site visit and the second part focusing on standards that, by and large (as determined by our Phase I study) do not have a cost impact. This second part of the data report captured two critical pieces of information, 1) the site's compliance on standards that were not discussed during the meeting and 2) it provided an opportunity for a site to alert Booz Allen if there actually was a cost associated with any of these standards. On only one occasion, a site provided an additional cost for part two, confirming our finding from Phase I that this particular set of standards did not have a cost impact.

The retrieval of the filled out data forms was inevitably followed by a prolonged communication and a series of data validation and questions and answers to ensure data were an accurate portrayal, based on reasonable assumptions, of a site's operations. All answers were vetted within team, accounting methodologies were scrutinized, and responses were validated and compared with other sites to determine commonalities or anomalies.

## Appendix D – Questionnaires

### Adult Prisons and Jails

#### Prison Rape Elimination Act (PREA) Cost Impact Analysis

Office of Justice Programs / Department of Justice

Site Visit Discussion Questionnaire

Version: Adult Prisons & Jails

During this study led by Booz Allen Hamilton, several standards published by the National Prison Rape Elimination Commission (NPREC) have led to increased attention and discussion whereas others have less of an impact. The objective of this data gathering effort is to quantify, in monetary terms, the impact of the standards that may result in the greatest impact on your operations, policies, and procedures. Responses gathered will inform the Attorney General of the Department of Justice as he makes a final decision on the implementation of guidelines and regulations due to be published in the summer of 2010. Please note that the data we gather will not be held to an expectation of confidentiality and that by contract, information will be provided to the Office of Justice Programs by name of organization.

The list below highlights twelve major topics followed by four minor topics as they relate to cost impacts or difficulties with implementing the NPREC standards.

#### **Major Topic #1: Cross-gender Pat Down Searches**

**Questions:**

- ✓ Except in the case of an emergency, does your jurisdiction/facility prohibit cross-gender pat downs?
  - If not, what are the major reasons? Such as:
    - A labor market that drives hiring opportunities?
    - State or Federal mandates for equal opportunity employment?
    - Union concerns?
  - How would male/female staffing levels need to be altered to prohibit cross-gender pat downs searches?
  - Would you consider adjusting your pat down policy to comply with this standard? Specifically how?
  - Are there other policies that you could employ to comply with this standard? How would you do this and what are the risks?

Limits to cross-gender viewing and searches (PP-4):  
 Except in the case of emergency, the facility prohibits cross-gender strip and visual body cavity searches. Except in the case of emergency or other extraordinary or unforeseen circumstances, the facility restricts nonmedical staff from viewing inmates of the opposite gender who are nude or performing bodily functions and similarly restricts cross-gender pat down searches. Medical practitioners conduct examinations of transgender individuals to determine their genital status only in private settings and only when an individual's genital status is unknown.

**Notes:**

**Major Topic #2: Inmate/Resident Supervision - Physical Supervision**

**Questions:**

- ✓ Over the past few years have you seen a variation or significant increase in the number of sexual abuse allegations made, either inmate-on-inmate or staff-on-inmate?
  - Are you able to provide historical data regarding sexual abuse statistics prevalent in your jurisdiction/facility (e.g., BJSs Survey on Sexual Violence, Form SSV-IA)?
    - Does your historical data suggest a decrease, increase, or flat rate of sexual abuse incidents?
    - If a problem is/was evident, what is the best method for reducing sexual abuse incidents in your facility?
    - Please explain how you would go about implementing these changes.

Inmate supervision (PP-3): Security staff provides the inmate supervision necessary to protect inmates from sexual abuse. The upper management officials responsible for reviewing critical incidents must examine areas in the facility where sexual abuse has occurred to assess whether physical barriers may have enabled the abuse, the adequacy of staffing levels in those areas during different shifts, and the need for monitoring technology to supplement security staff supervision (DC-1). When problems or needs are identified, the jurisdiction/facility takes corrective action (DC-3).

**Notes:**

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**Major Topic #3: Inmate/Resident Supervision - Technical Supervision**

**Questions:**

- ✓ Does your jurisdiction/facility currently have video monitoring in place?
  - If so, do you believe your jurisdiction/facility is adequately suited to reduce sexual abuse incidents?
  - Please explain its coverage, review and archiving.
  - If it is not considered sufficient, what cost would you estimate for this technology?
- ✓ Do you employ other methods of technology supervision (e.g., Radio Frequency Identification bracelets)?
- ✓ Do you annually assess the feasibility of your currently technology, including developing a plan for securing new technology?
  - If not, do you anticipate a cost associated with conducting this assessment?

Assessment and Use of Monitoring Technology (PP-7): The agency uses video monitoring systems and other cost-effective and appropriate technology to supplement its sexual abuse prevention, detection, and response efforts. The agency assesses, at least annually, the feasibility of and need for new or additional monitoring technology and develops a plan for securing such technology.

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**Major Topic #4: PREA Coordinator**

**Questions:**

- ✓ Does your jurisdiction/facility have a PREA Coordinator to develop, implement, and oversee efforts to comply with the PREA standards?
  - Note: A PREA coordinator is a full-time position in the governing body of the State prison systems and agencies that operate large jails (more than 500 inmates) but may be a part-

Zero tolerance of sexual abuse (PP-1): The agency has a written policy mandating zero tolerance toward all forms of sexual abuse and enforces that policy by ensuring all of its facilities comply with the PREA standards. The agency employs or designates a PREA coordinator to develop, implement, and oversee agency efforts to comply with the PREA standards.

time position in jurisdictions that operate medium (101-500 inmates) and small jails (100 inmates or fewer).

- Have you considered the cost of the PREA coordinator including base salary plus benefits?

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**Major Topic #5: Training and Education**

**Questions:**

- ✓ Do you provide training to *all employees* on sexual abuse prevention, detection, and response policies and procedures; the PREA standards; and relevant Federal, State, and local law?
  - What are the means of training? Class-room/ Computer based? What is the length?
  - Who provides the training? Employees or contractors?
- ✓ Do you provide periodic refresher information to all employees?
  - How frequently do you provide refresher training?

Employee training (TR-1): The agency trains all employees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures; the PREA standards; and relevant Federal, State, and local law. The agency trains all employees to communicate effectively and professionally with all inmates. Additionally, the agency trains all employees on an inmate’s right to be free from sexual abuse, the right of inmates and employees to be free from retaliation for reporting sexual abuse, the dynamics of sexual abuse in confinement, and the common reactions of sexual abuse victims. Current employees are educated as soon as possible following the agency’s adoption of the PREA standards, and the agency provides periodic refresher information to all employees to ensure that they know the agency’s most current sexual abuse policies and procedures. The agency maintains written documentation showing employee signatures verifying that employees understand the training they have received.

**Notes:**

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**Questions:**

- ✓ Do you provide training to *all volunteers and contractors* who have contact with inmates on sexual abuse prevention, detection, and response policies and procedures; the PREA standards; and relevant Federal, State, and local law?
  - What are the means of training? Class-room/ Computer based? What is the length?
  - Who provides the training? Employees or contractors?

Volunteer and contractor training (TR-2): The agency ensures that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency’s sexual abuse prevention, detection, and response policies and procedures; the PREA standards; and relevant Federal, State, and local law. The level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with inmates, but all volunteers and contractors who have contact with inmates must be notified of the agency’s zero-tolerance policy regarding sexual abuse. Volunteers must also be trained in how to report sexual abuse. The agency maintains written documentation showing volunteer and contractor signatures verifying that they understand the training they have received.

✓ **Notes:**

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**Questions:**

- ✓ Following the intake process, do you *provide* comprehensive education to inmates on sexual abuse?
  - What are the means of training? Classroom/ Computer based?
  - Who provides the training? Employees or contractors?
  - Is the training accessible to inmates with disabilities?
- ✓ Do you provide periodic refresher information to all inmates?
  - What are the means? (e.g., poster boards, handbooks, closed circuit TV)
  - How frequently do you provide refresher training?

Inmate education (TR-3): During the intake process, staff informs inmates of the agency’s zero-tolerance policy regarding sexual abuse and how to report incidents or suspicions of sexual abuse. Within a reasonably brief period of time following the intake process, the agency provides comprehensive education to inmates regarding their right to be free from sexual abuse and to be free from retaliation for reporting abuse, the dynamics of sexual abuse in confinement, the common reactions of sexual abuse victims, and agency sexual abuse response policies and procedures. Current inmates are educated as soon as possible following the agency’s adoption of the PREA standards, and the agency provides periodic refresher information to all inmates to ensure that they know the agency’s most current sexual abuse policies and procedures. The agency provides inmate education in formats accessible to all inmates, including those who are LEP, deaf, visually impaired, or otherwise disabled as well as inmates who have limited reading skills. The agency maintains written documentation of inmate participation in these education sessions.

**Notes:**

**Questions:**

- ✓ Do you *ensure* sexual abuse training has been provided to investigators specifically conducting investigations in confinement settings?
  - Where do they get their training?
  - How do you ensure the training meets the PREA standard?

Specialized training: Investigations (TR-4): In addition to the general training provided to all employees (TR-1), the agency ensures that agency investigators conducting sexual abuse investigations have received comprehensive and up-to-date training in conducting such investigations in confinement settings. Specialized training must include techniques for interviewing sexual abuse victims, proper use of Miranda- and Garrity-type warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. The agency maintains written documentation that investigators have completed the required specialized training in conducting sexual abuse investigations.

**Notes:**

**Questions:**

- ✓ Do you *ensure* your full and part-time medical and mental health care practitioners have been trained on how to detect and assess signs of sexual abuse and that all medical practitioners are trained on how to preserve physical evidence of sexual abuse?
  - Where do they get their training?
  - How do you ensure the training meets the PREA standard?

Specialized training: Medical and mental health care (TR-5): The agency ensures that all full- and part-time medical and mental health care practitioners working in its facilities have been trained in how to detect and assess signs of sexual abuse and that all medical practitioners are trained in how to preserve physical evidence of sexual abuse. All medical and mental health care practitioners must be trained in how to respond effectively and professionally to victims of sexual abuse and how and to whom to report allegations or suspicions of sexual abuse. The agency maintains documentation that medical and mental health practitioners have received this specialized training.

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**Major Topic #6: Victim Advocacy**

**Questions:**

- ✓ Do you provide a victim advocate to accompany the victim through the forensic medical exam process?
  - Who would provide this service? A current employee or outside entity?

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Evidence protocol and forensic medical exams (RP-1): The agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. The protocol must be adapted from or otherwise based on the 2004 U.S. Department of Justice’s Office on Violence Against Women publication “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents,” subsequent updated editions, or similarly comprehensive and authoritative protocols developed after 2004. As part of the agency’s evidence collection protocol, all victims of inmate-on-inmate sexually abusive penetration or staff-on-inmate sexually abusive penetration are provided access to forensic medical exams performed by qualified forensic medical examiners. Forensic medical exams are provided free of charge to the victim. **The facility makes available a victim advocate to accompany the victim through the forensic medical exam process.**

**Questions:**

- ✓ Are inmates provided access to outside victim advocate services?
  - Are there posters or pamphlets with this information around the facility/jurisdiction?
  - Who provides this outside victim advocacy support?
  - Do these services ensure entities receive and immediately forward inmate reports of sexual abuse to facility heads, provide inmates with confidential emotional support services, and help victims of sexual abuse during their transition from incarceration to the community?
  - Is there a fee borne by you for these services or is it provided by the state, county or other non-profit service (state-level sexual assault coalition or its local affiliates)?

Inmate access to outside confidential support services (RE-3): In addition to providing on-site mental health care services, the facility provides inmates with **access to outside victim advocates for emotional support services related to sexual abuse**. The facility provides such access by giving inmates the current mailing addresses and telephone numbers, including toll-free hotline numbers, of local, State, and/or national victim advocacy or rape crisis organizations and enabling reasonable communication between inmates and these organizations. The facility ensures that communications with such advocates are private, confidential, and privileged, to the extent allowable by Federal, State, and local law. The facility informs inmates, prior to giving them access, of the extent to which such communications will be private, confidential, and/or privileged.

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**Major Topic #7: Gathering, Reviewing, and Reporting Sexual Abuse Data**

**Questions:**

- ✓ Do you have a review team to evaluate each incident of sexual abuse?
  - Do you prepare a report for each sexual abuse incident?
  - Does the report consider whether incidents were motivated by racial or other group dynamics at the facility?
  - Does this report include recommendations for improvement?

Sexual abuse incident reviews (DC-1): The facility treats all instances of sexual abuse as critical incidents to be examined by a team of upper management officials, with input from line supervisors, investigators, and medical/mental health practitioners. The review team evaluates each incident of sexual abuse to identify any policy, training, or other issues related to the incident that indicate a need to change policy or practice to better prevent, detect, and/or respond to incidents of sexual abuse. The review team also considers whether incidents were motivated by racial or other group dynamics at the facility. When incidents are determined to be motivated by racial or other group dynamics, upper management officials immediately notify the agency head and begin taking steps to rectify those underlying problems. The sexual abuse incident review takes place at the conclusion of every sexual abuse investigation, unless the allegation was determined to be unfounded. The review team prepares a report of its findings and recommendations for improvement and submits it to the facility head.

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**Questions:**

- ✓ Do you prepare an annual report on aggregated sexual abuse data using a standardized instrument and set of definitions (e.g., BJS survey on sexual violence)?
  - Does it include contracted facilities?

Data collection (DC-2): The agency collects accurate, uniform data for every reported incident of sexual abuse using a standardized instrument and set of definitions. The agency aggregates the incident-based sexual abuse data at least annually. The incident-based data collected includes, at a minimum, the data necessary to answer all questions from the most recent version of the BJS Survey on Sexual Violence. Data are obtained from multiple sources, including reports, investigation files, and sexual abuse incident reviews. The agency also obtains incident-based and aggregated data from every facility with which it contracts for the confinement of its inmates.

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**Questions:**

- ✓ Do you review, analyze, and use all sexual abuse data to assess and improve the effectiveness of your sexual abuse prevention, detection, and response policies, practices, and training?
  - Does this review identify problem areas (including any racial dynamics, underlying patterns of sexual abuse, issues with particular physical locations or times of day), and take corrective action on an ongoing basis?
- ✓ Do you compare data from your annual report to data from the previous year?
  - Do you provide an assessment of your progress?
- ✓ Is your annual data available to the public or on line?

Data review for corrective action (DC-3): The agency reviews, analyzes, and uses all sexual abuse data, including incident-based and aggregated data, to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training. Using these data, the agency identifies problem areas, including any racial dynamics underpinning patterns of sexual abuse, takes corrective action on an ongoing basis, and, at least annually, prepares a report of its findings and corrective actions for each facility as well as the agency as a whole. The annual report also includes a comparison of the current year’s data and corrective actions with those from prior years and provides an assessment of the agency’s progress in addressing sexual abuse. The agency’s report is approved by the agency head, submitted to the appropriate legislative body, and made readily available to the public through its Web site or, if it does not have one, through other means. 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 it must indicate the nature of the material redacted.

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**Questions:**

- ✓ Is your sexual abuse data properly stored, securely retained, and protected?
  - What medium (electronic or paper) and where is it stored?
  - Unless otherwise authorized by local or state law, do you retain it for at least 10 years?

Data storage, publication, and destruction (DC-4): The agency ensures that the collected sexual abuse data are properly stored, securely retained, and protected. The agency makes all aggregated sexual abuse data, from facilities under its direct control and those with which it contracts, readily available to the public at least annually through its Web site or, if it does not have one, through other means. Before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers from the data. The agency maintains sexual abuse data for at least 10 years after the date of its initial collection unless Federal, State, or local law allows for the disposal of official information in less than 10 years.

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**Major Topic #8: Background Checks for Hiring and Promotions**

**Questions:**

- ✓ Do you and your contractors contact all prior institutional employers for information on substantiated allegations of sexual abuse?
- ✓ Do you and your contractors run criminal background checks for all applicants and employees being

Hiring and promotion decisions (PP-6): The agency does not hire or promote anyone who has engaged in sexual abuse in an institutional setting or who has engaged in sexual activity in the community facilitated by force, the threat of force, or coercion. Consistent with Federal, State, and local law, the **agency makes its best effort to contact all prior institutional employers for information on substantiated allegations of sexual abuse; must run criminal background checks for all applicants and employees being considered for promotion;** and must examine and carefully weigh any history of criminal activity at work or in the community, including convictions for domestic violence, stalking, and sex offenses. The agency also asks all applicants and employees directly about previous misconduct during interviews and reviews.



considered for promotion?

**Notes:**  
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**Major Topic #9: Triennial Auditing of the NPREC standards**

**Questions:**

- ✓ What types of audits and/or accreditations do you undergo on a periodic basis?
  - Would any of these be similar to what you would expect for a PREA audit?

Audits of standards (AU-1): The public agency ensures that all of its facilities, including contract facilities, are audited to measure compliance with the PREA standards. Audits must be conducted at least every three years by independent and qualified auditors. The public or contracted agency allows the auditor to enter and tour facilities, review documents, and interview staff and inmates, as deemed appropriate by the auditor, to conduct comprehensive audits. The public agency ensures that the report of the auditor’s findings and the public or contracted agency’s plan for corrective action (DC-3) are published on the appropriate agency’s Web site if it has one or are otherwise made readily available to the public.

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**Major Topic #10: Screening for Risk of Sexual Victimization and Abusiveness**

**Questions:**

- ✓ Are all inmates screened during intake (and at all subsequent classification reviews) to assess their risk of being sexually abused by other inmates or having the potential to be sexually abusive towards other inmates?
- ✓ Do you have a written screening instrument tailored to the gender of the population being screened?

Screening for risk of victimization and abusiveness (SC-1): All inmates are screened during intake, during the initial classification process, and at all subsequent classification reviews to assess their risk of being sexually abused by other inmates or sexually abusive toward other inmates. Employees must conduct this screening using a written screening instrument tailored to the gender of the population being screened. Although additional factors may be considered, particularly to account for emerging research and the agency’s own data analysis, screening instruments must contain the criteria described below. All screening instruments must be made available to the public upon request.

- At a minimum, employees use the following criteria to screen male inmates for risk of victimization: mental or physical disability, young age, slight build, first incarceration in prison or jail, nonviolent history, prior convictions for sex offenses against an adult or child, sexual orientation of gay or bisexual, gender nonconformance (e.g., transgender or intersex identity), prior sexual victimization, and the inmate’s own perception of vulnerability.
- At a minimum, employees use the following criteria to screen male inmates for risk of being sexually abusive: prior acts of sexual abuse and prior convictions for violent offenses.
- At a minimum, employees use the following criteria to screen female inmates for risk of sexual victimization: prior sexual victimization and the inmate’s own perception of vulnerability.

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**Questions:**

- ✓ Do you use the screening information to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive?
  - If yes, please explain.

Use of screening information (SC-2): Employees use information from the risk screening (SC-1) to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. The facility makes individualized determinations about how to ensure the safety of each inmate. Lesbian, gay, bisexual, transgender, or other gender-nonconforming inmates are not placed in particular facilities, units, or wings solely on the basis of their sexual orientation, genital status, or gender identity. Inmates at high risk for sexual victimization may be placed in segregated housing only as a last resort and then only until an alternative means of separation from likely abusers can be arranged. To the extent possible, risk of sexual victimization should not limit access to programs, education, and work opportunities.

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**Major Topic #11: Contract Modifications and/or Policy and Procedure Updates**

**Questions:**

- ✓ Do you contract with other agencies or facilities for the confinement of inmates?
  - If so, how many facilities?
  - What will it take to ensure these agencies/facilities are in compliance?
  - Will this require any contract modifications?
  - Do you think any contract modifications, as a result of PREA, would result in greater costs to you?

Contracting with other entities for the confinement of inmates (PP-2): If public correctional agencies contract for the confinement of their inmates, they do so only with private agencies or other entities, including other government agencies, committed to eliminating sexual abuse in their facilities, as evidenced by their adoption of and compliance with the PREA standards. Any new contracts or contract renewals include the entity’s obligation to adopt and comply with the PREA standards and specify that the public agency will monitor the entity’s compliance with these standards as part of its monitoring of the entity’s performance.

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**Questions:**

- ✓ Do you maintain or attempt to enter into memoranda of understanding (MOUs) or other agreements with an outside public entity or office that is able to 1) receive and immediately forward inmate reports of sexual abuse to facility heads, 2) provide inmates with confidential emotional support services related to sexual abuse, and 3) help victims of sexual abuse during their transition from incarceration to the community?
  - Who currently provides these services (if anyone)?
  - Do you have any MOUs with them?
    - If not, how much would it cost to develop these MOUs?
    - If not possible to establish a MOU, do you document the attempt to enter an agreement?

Agreements with outside public entities and community service providers (RP-2): The agency maintains or attempts to enter into memoranda of understanding (MOUs) or other agreements with an outside public entity or office that is able to receive and immediately forward inmate reports of sexual abuse to facility heads (RE-1). The agency also maintains or attempts to enter into MOUs or other agreements with community service providers that are able to: (1) provide inmates with confidential emotional support services related to sexual abuse and (2) help victims of sexual abuse during their transition from incarceration to the community (RE-3, MM-3). The agency maintains copies of agreements or documentation showing attempts to enter into agreements.

**Notes:**

**Questions:**

- ✓ Do you conduct your own criminal investigations or is it an outside legal authority?
  - If outside, who is it?
  - Do you have an MOU with them?
    - If not, how much would it cost to develop these MOUs?
    - If not possible to establish a MOU, do you document the attempt to enter an agreement?
    - If applicable, does it cover vulnerable persons (e.g., under 18 years of age)?

Agreements with outside law enforcement agencies (RP-3): If an agency does not have the legal authority to conduct criminal investigations or has elected to permit an outside agency to conduct criminal or administrative investigations of staff or inmates, the agency maintains or attempts to enter into a written MOU or other agreement specific to investigations of sexual abuse with the law enforcement agency responsible for conducting investigations. If the agency confines inmates under the age of 18 or other inmates who fall under State and local vulnerable persons statutes, the agency maintains or attempts to enter into an MOU with the designated State or local services agency with the jurisdiction and authority to conduct investigations related to the sexual abuse of vulnerable persons within confinement facilities. When the agency already has an existing agreement or long-standing policy covering responsibilities for all criminal investigations, including sexual abuse investigations, it does not need to enter into a new agreement. The agency maintains a copy of the agreement or documentation showing attempts to enter into an agreement.

**Notes:**

**Questions:**

- ✓ Who are the authorities that prosecute violations?
  - Do you have a MOU with them?
    - If not, how much would it cost to develop these MOUs?
    - If not possible to establish a MOU, do you document the attempt to enter an agreement?

Agreements with the prosecuting authority (RP-4): The agency maintains or attempts to enter into a written MOU or other agreement with the authority responsible for prosecuting violations of criminal law. The agency maintains a copy of the agreement or documentation showing attempts to enter into an agreement.

**Notes:**

**Major Topic #12: Accommodating Special Needs**

**Questions:**

- ✓ Do you ensure that inmates who are LEP, deaf, or disabled are able to report sexual abuse to staff directly through interpretive technology or through non-inmate interpreters?
  - What services and tools do you employ?
    - What interpretive technology do you use?
    - Do you provide services for the mentally disabled?

Accommodating inmates with special needs (PP-5): The agency ensures that inmates who are limited English proficient (LEP), deaf, or disabled are able to report sexual abuse to staff directly, through interpretive technology, or through non-inmate interpreters. Accommodations are made to convey all written information about sexual abuse policies, including how to report sexual abuse, verbally to inmates who have limited reading skills or who are visually impaired.

**Notes:**

**Minor Topic #1: Medical Exams**

**Questions:**

- ✓ Are Forensic medical exams provided free of charge to the victim?
  - Who provides the exams?
  - Who bears the cost?

**Notes:**

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Evidence protocol and forensic medical exams (RP-1): The agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. The protocol must be adapted from or otherwise based on the 2004 U.S. Department of Justice’s Office on Violence Against Women publication “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents,” subsequent updated editions, or similarly comprehensive and authoritative protocols developed after 2004. As part of the agency’s evidence collection protocol, all victims of inmate-on-inmate sexually abusive penetration or staff-on-inmate sexually abusive penetration are provided access to forensic medical exams performed by qualified forensic medical examiners. **Forensic medical exams are provided free of charge to the victim.** The facility makes available a victim advocate to accompany the victim through the forensic medical exam process.

**Minor Topic #2: Conducting Investigations**

**Questions:**

- ✓ Do you investigate all third-party reports of sexual abuse?

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Third-party reporting (RE-4): The facility receives and investigates all third-party reports of sexual abuse (IN-1). At the conclusion of the investigation, the facility notifies in writing the third-party individual who reported the abuse and the inmate named in the third-party report of the outcome of the investigation. The facility distributes publicly information on how to report sexual abuse on behalf of an inmate.

**Questions:**

- ✓ Do you notify victims and/or other complainants in writing of investigation outcomes and any disciplinary or criminal sanctions, regardless of the source of the allegation?
- ✓ Are all investigations carried through to completion, regardless of whether the alleged abuser or victim remains at the facility?

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Duty to investigate (IN-1): The facility investigates all allegations of sexual abuse, including third-party and anonymous reports, and notifies victims and/or other complainants in writing of investigation outcomes and any disciplinary or criminal sanctions, regardless of the source of the allegation. All investigations are carried through to completion, regardless of whether the alleged abuser or victim remains at the facility.

**Questions:**

- ✓ Are allegations of sexual abuse substantiated if supported by a preponderance of the evidence?

**Notes:**

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Evidence standard for administrative investigations (IN-3): Allegations of sexual abuse are substantiated if supported by a preponderance of the evidence.

**Minor Topic #3: Conducting Mental and Medical Health Evaluations and Providing Care**

**Questions:**

- ✓ Does the facility/jurisdiction provide ongoing medical and/or mental health evaluations and treatment to all known abusers of sexual abuse?

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Ongoing medical and mental health care for sexual abuse victims and abusers (MM-3): The facility provides ongoing medical and/or mental health evaluation and treatment to all known victims of sexual abuse. The evaluation and treatment of sexual abuse victims must include appropriate follow-up services, treatment plans, and, when necessary, referrals for continued care following their release from a community corrections facility. The level of medical and mental health care provided to defendant/offender victims must match the community level of care generally accepted by the medical and mental health professional communities. The facility conducts a mental health evaluation of all known abusers and provides treatment, as deemed necessary by qualified mental health practitioners.

**Minor Topic #4: Confidential Reporting**

**Questions:**

- ✓ How do victims confidentially report sexual abuse (in multiple ways)?
- ✓ Are there means to report sexual abuse to an outside public entity?
  - Who is it?
  - Does this entity charge a fee for such services?

**Notes:** \_\_\_\_\_  
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Inmate reporting (RE-1): The facility provides multiple internal ways for inmates to report easily, privately, and securely sexual abuse, retaliation by other inmates or staff for reporting sexual abuse, and staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse. The facility also provides at least one way for inmates to report the abuse to an outside public entity or office not affiliated with the agency that has agreed to receive reports and forward them to the facility head (RP-2), except when an inmate requests confidentiality. Staff accepts reports made verbally, in writing, anonymously, and from third parties and immediately puts into writing any verbal reports.

**Questions:**

- ✓ Please explain your policies/procedures for the exhaustion of administrative remedies available to an inmate.
  - Does it cover a 90 day period (unless you have made a final determination earlier)?
  - Does it cover a 48 hours requirement after an inmate has notified any agency staff member of his or her need for protection?

**Notes:** \_\_\_\_\_  
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Exhaustion of administrative remedies (RE-2): Under agency policy, an inmate has exhausted his or her administrative remedies with regard to a claim of sexual abuse either (1) when the agency makes a final decision on the merits of the report of abuse (regardless of whether the report was made by the inmate, made by a third party, or forwarded from an outside official or office) or (2) when 90 days have passed since the report was made, whichever occurs sooner. A report of sexual abuse triggers the 90-day exhaustion period regardless of the length of time that has passed between the abuse and the report. An inmate seeking immediate protection from imminent sexual abuse will be deemed to have exhausted his or her administrative remedies 48 hours after notifying any agency staff member of his or her need for protection.

Juvenile Facilities

Prison Rape Elimination Act (PREA) Cost Impact Analysis

Office of Justice Programs / Department of Justice

Site Visit Discussion Questionnaire

Version: Juvenile Facilities

During this study led by Booz Allen Hamilton, several standards published by the National Prison Rape Elimination Commission (NPREC) have led to increased attention and discussion whereas others have less of an impact. The objective of this data gathering effort is to quantify, in monetary terms, the impact of the standards that may result in the greatest impact on your operations, policies, and procedures. Responses gathered will inform the Attorney General of the Department of Justice as he makes a final decision on the implementation of guidelines and regulations due to be published in the summer of 2010. Please note that the data we gather will not be held to an expectation of confidentiality and that by contract, information will be provided to the Office of Justice Programs by name of organization.

The list below highlights twelve major topics followed by three minor topics as they relate to cost impacts or difficulties with implementing the NPREC standards.

Major Topic #1: Cross-gender Pat Down Searches

Questions:

- ✓ Except in the case of an emergency, does your jurisdiction/facility prohibit cross-gender pat downs?
  - If not, what are the major reasons? Such as:
    - A labor market that drives hiring opportunities?
    - State or Federal mandates for equal opportunity employment?
    - Union concerns?
  - How would male/female staffing levels need to be altered to prohibit cross-gender pat downs searches?
  - Would you consider adjusting your pat down policy to comply with this standard? Specifically how?
  - Are there other policies that you could employ to comply with this standard? How would you do this and what are the risks?

Limits to cross-gender viewing and searches (PP-4):  
 Except in the case of emergency, the facility prohibits cross-gender strip and visual body cavity searches. Except in the case of emergency or other extraordinary or unforeseen circumstances, the facility restricts nonmedical staff from viewing residents of the opposite gender who are nude or performing bodily functions and similarly restricts cross-gender pat down searches. Medical practitioners conduct examinations of transgender individuals to determine their genital status only in private settings and only when an individual's genital status is unknown.

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**Major Topic #2: Inmate/Resident Supervision - Physical Supervision**

**Questions:**

- ✓ Over the past few years have you seen a variation or significant increase in the number of sexual abuse allegations made, either resident-on-resident or staff-on-resident?
  - Are you able to provide historical data regarding sexual abuse statistics prevalent in your jurisdiction/facility (e.g., BJAs Survey on Sexual Violence, Form SSV-IA)?
    - Does your historical data suggest a decrease, increase, or flat rate of sexual abuse incidents?
    - If a problem is/was evident, what is the best method for reducing sexual abuse incidents in your facility?
    - Please explain how you would go about implementing these changes.

Resident supervision (PP-3): Direct care staff provides the resident supervision necessary to protect residents from sexual abuse. The facility administrators and supervisors responsible for reviewing critical incidents must examine areas in the facility where sexual abuse has occurred to assess whether physical barriers may have enabled the abuse, the adequacy of staffing levels in those areas during different shifts, and the need for monitoring technology to supplement direct care staff supervision (DC-1). When problems or needs are identified, the jurisdiction/facility takes corrective action (DC-3).

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**Major Topic #3: Inmate/Resident Supervision - Technical Supervision**

**Questions:**

- ✓ Does your jurisdiction/facility currently have video monitoring in place?
  - If so, do you believe your jurisdiction/facility is adequately suited to reduce sexual abuse incidents?
  - Please explain its coverage, review and archiving.
  - If it is not considered sufficient, what cost would you estimate for this technology?
- ✓ Do you employ other methods of technology supervision (e.g., Radio Frequency Identification bracelets)?
- ✓ Do you annually assess the feasibility of your currently technology, including developing a plan for securing new technology?
  - If not, do you anticipate a cost associated with conducting this assessment?

Assessment and Use of Monitoring Technology (PP-7): The agency uses video monitoring systems and other cost-effective and appropriate technology to supplement its sexual abuse prevention, detection, and response efforts. The agency assesses, at least annually, the feasibility of and need for new or additional monitoring technology and develops a plan for securing such technology.

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**Major Topic #4: PREA Coordinator**

**Questions:**

- ✓ Does your jurisdiction/facility have a PREA Coordinator to develop, implement, and oversee efforts to comply with the PREA standards?
  - Note: A PREA coordinator is a full-time position in the governing body of the State prison systems and agencies that operate large jails (more than 500 residents) but may be a part-time position in jurisdictions that operate medium (101-500 residents) and small jails (100 residents or fewer).
  - Have you considered the cost of the PREA coordinator including base salary plus benefits?

Zero tolerance of sexual abuse (PP-1): The agency has a written policy mandating zero tolerance toward all forms of sexual abuse and enforces that policy by ensuring all of its facilities comply with the PREA standards. The agency employs or designates a PREA coordinator to develop, implement, and oversee agency efforts to comply with the PREA standards.

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**Major Topic #5: Training and Education**

**Questions:**

- ✓ Do you provide training to *all employees* on sexual abuse prevention, detection, and response policies and procedures; the PREA standards; and relevant Federal, State, and local law?
  - What are the means of training? Class-room/ Computer based? What is the length?
  - Who provides the training? Employees or contractors?
- ✓ Do you provide periodic refresher information to all employees?
  - How frequently do you provide refresher training?

Employee training (TR-1): The agency trains all employees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures; the PREA standards; and relevant Federal, State, and local law. The agency trains all employees to communicate effectively and professionally with all residents. Additionally, the agency trains all employees on a resident’s right to be free from sexual abuse, the right of residents and employees to be free from retaliation for reporting sexual abuse, the dynamics of sexual abuse in confinement, and the common reactions of sexual abuse victims. Current employees are educated as soon as possible following the agency’s adoption of the PREA standards, and the agency provides periodic refresher information to all employees to ensure that they know the agency’s most current sexual abuse policies and procedures. The agency maintains written documentation showing employee signatures verifying that employees understand the training they have received.

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**Questions:**

- ✓ Do you provide training to *all volunteers and contractors* who have contact with residents on sexual abuse prevention, detection, and response policies and procedures; the PREA standards; and relevant Federal, State, and local law?
  - What are the means of training? Class-room/ Computer based? What is the length?
  - Who provides the training? Employees or contractors?

Volunteer and contractor training (TR-2): The agency ensures that all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency’s sexual abuse prevention, detection, and response policies and procedures; the PREA standards; and relevant Federal, State, and local law. The level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with residents, but all volunteers and contractors who have contact with residents must be notified of the agency’s zero-tolerance policy regarding sexual abuse. Volunteers must also be trained in how to report sexual abuse. The agency maintains written documentation showing volunteer and contractor signatures verifying that they understand the training they have received.

✓ **Notes:** \_\_\_\_\_  
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**Questions:**

- ✓ Following the intake process, do you *provide* comprehensive education to residents on sexual abuse?
  - What are the means of training? Class-room/ Computer based?
  - Who provides the training? Employees or contractors?
  - Is the training accessible to residents with disabilities?
- ✓ Do you provide periodic refresher information to all residents?
  - What are the means? (e.g., poster boards, handbooks, closed circuit TV)
  - How frequently do you provide refresher training?

Resident education (TR-3): During the intake process, staff informs residents of the agency’s zero-tolerance policy regarding sexual abuse and how to report incidents or suspicions of sexual abuse in an age appropriate fashion. Within a reasonably brief period of time following the intake process, the agency provides comprehensive, age appropriate education to residents regarding their right to be free from sexual abuse and to be free from retaliation for reporting abuse, the dynamics of sexual abuse in confinement, the common reactions of sexual abuse victims, and agency sexual abuse response policies and procedures. Current residents are educated as soon as possible following the agency’s adoption of the PREA standards, and the agency provides periodic refresher information to all residents to ensure that they know the agency’s most current sexual abuse policies and procedures. The agency provides resident education in formats accessible to all residents, including those who are LEP, deaf, visually impaired, or otherwise disabled as well as residents who have limited reading skills. The agency maintains written documentation of resident participation in these education sessions.

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**Questions:**

- ✓ Do you *ensure* sexual abuse training has been provided to investigators specifically conducting investigations in confinement settings?
  - Where do they get their training?
  - How do you ensure the training meets the PREA standard?

Specialized training: Investigations (TR-4): In addition to the general training provided to all employees (TR-1), the agency ensures that agency investigators conducting sexual abuse investigations have received comprehensive and up-to-date training in conducting such investigations in confinement settings. Specialized training must include techniques for interviewing sexual abuse victims, proper use of Miranda- and Garrity-type warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. The agency maintains written documentation that investigators have completed the required specialized training in conducting sexual abuse investigations.

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**Questions:**

- ✓ Do you *ensure* your full and part-time medical and mental health care practitioners have been trained on how to detect and assess signs of sexual abuse and that all medical practitioners are trained on how to preserve physical evidence of sexual abuse?
  - Where do they get their training?
  - How do you ensure the training meets the PREA standard?

Specialized training: Medical and mental health care (TR-5): The agency ensures that all full- and part-time medical and mental health care practitioners working in its facilities have been trained in how to detect and assess signs of sexual abuse and that all medical practitioners are trained in how to preserve physical evidence of sexual abuse. All medical and mental health care practitioners must be trained in how to respond effectively and professionally to young victims of sexual abuse and how and to whom to report allegations or suspicions of sexual abuse. The agency maintains documentation that medical and mental health practitioners have received this specialized training.

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**Major Topic #6: Victim Advocacy**

**Questions:**

- ✓ Do you provide a victim advocate to accompany the victim through the forensic medical exam process?
  - Who would provide this service? A current employee or outside entity?

Evidence protocol and forensic medical exams (RP-1): The agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. The protocol must be adapted from or otherwise based on the 2004 U.S. Department of Justice’s Office on Violence Against Women publication “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents,” subsequent updated editions, or similarly comprehensive and authoritative protocols developed after 2004. As part of the agency’s evidence collection protocol, all victims of resident-on-resident sexually abusive penetration or staff-on-resident sexually abusive penetration are provided access to forensic medical exams performed by qualified forensic medical examiners who are trained in the unique psychological and emotional conditions of younger victims of sexual abuse. Forensic medical exams are provided free of charge to the victim. **The facility makes available a victim advocate to accompany the victim through the forensic medical exam process.**

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**Questions:**

- ✓ Are residents provided access to outside victim advocate services?
  - Are there posters or pamphlets with this information around the facility/jurisdiction?
  - Who provides this outside victim advocacy support?
  - Do these services ensure entities receive and immediately forward inmate reports of sexual abuse to facility heads, provide inmates with confidential emotional support services, and help victims of sexual abuse during their transition from incarceration to the community?

Resident access to outside confidential support services (RE-3): In addition to providing on-site mental health care services, the facility provides residents with **access to outside victim advocates for emotional support services related to sexual abuse.** The facility provides such access by giving residents the current mailing addresses and telephone numbers, including toll-free hotline numbers, of local, State, and/or national victim advocacy or rape crisis organizations and enabling reasonable communication between residents and these organizations. The facility ensures that communications with such advocates are private, confidential, and privileged, to the extent allowable by Federal, State, and local law. The facility informs residents, prior to giving them access, of the extent to which such communications will be private, confidential, and/or privileged. The facility also provides residents with unimpeded access to their attorney or other legal representation and their families.



**Questions:**

- ✓ Do you review, analyze, and use all sexual abuse data to assess and improve the effectiveness of your sexual abuse prevention, detection, and response policies, practices, and training?
  - Does this review identify problem areas (including any racial dynamics, underlying patterns of sexual abuse, issues with particular physical locations or times of day), and take corrective action on an ongoing basis?
- ✓ Do you compare data from your annual report to data from the previous year?
  - Do you provide an assessment of your progress?
- ✓ Is your annual data available to the public or on line?

Data review for corrective action (DC-3): The agency reviews, analyzes, and uses all sexual abuse data, including incident-based and aggregated data, to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training. Using these data, the agency identifies problem areas, including any racial dynamics or other group dynamics underpinning patterns of sexual abuse, takes corrective action on an ongoing basis, and, at least annually, prepares a report of its findings and corrective actions for each facility as well as the agency as a whole. The annual report also includes a comparison of the current year’s data and corrective actions with those from prior years and provides an assessment of the agency’s progress in addressing sexual abuse. The agency’s report is approved by the agency head, submitted to the appropriate legislative body, and made readily available to the public through its Web site or, if it does not have one, through other means. 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 it must indicate the nature of the material redacted.

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**Questions:**

- ✓ Is your sexual abuse data properly stored, securely retained, and protected?
  - What medium (electronic or paper) and where is it stored?
  - Unless otherwise authorized by local or state law, do you retain it for at least 10 years?

Data storage, publication, and destruction (DC-4): The agency ensures that the collected sexual abuse data are properly stored, securely retained, and protected. The agency makes all aggregated sexual abuse data, from facilities under its direct control and those with which it contracts, readily available to the public at least annually through its Web site or, if it does not have one, through other means. Before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers from the data. The agency maintains sexual abuse data for at least 10 years after the date of its initial collection unless Federal, State, or local law allows for the disposal of official information in less than 10 years.

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**Major Topic #8: Background Checks for Hiring and Promotions**

**Questions:**

- ✓ Do you and your contractors contact all prior institutional employers for information on substantiated allegations of sexual abuse?
- ✓ Do you and your contractors run criminal background checks for all applicants and employees being considered for promotion?

Hiring and promotion decisions (PP-6): The agency does not hire or promote anyone who has engaged in sexual abuse in an institutional setting or who has engaged in sexual activity in the community facilitated by force, the threat of force, or coercion. Consistent with Federal, State, and local law, **the agency makes its best effort to contact all prior institutional employers for information on substantiated allegations of sexual abuse; must run criminal background checks for all applicants and employees being considered for promotion;** and must examine and carefully weigh any history of criminal activity at work or in the community, including convictions for domestic violence, stalking, child abuse and sex offenses. The agency also asks all applicants and employees directly about previous misconduct during interviews and reviews.

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**Major Topic #9: Triennial Auditing of the NPREC standards**

**Questions:**

- ✓ What types of audits and/or accreditations do you undergo on a periodic basis?
  - Would any of these be similar to what you would expect for a PREA audit?

Audits of standards (AU-1): The public agency ensures that all of its facilities, including contract facilities, are audited to measure compliance with the PREA standards. Audits must be conducted at least every three years by independent and qualified auditors. The public or contracted agency allows the auditor to enter and tour facilities, review documents, and interview staff and residents, as deemed appropriate by the auditor, to conduct comprehensive audits. The public agency ensures that the report of the auditor’s findings and the public or contracted agency’s plan for corrective action (DC-3) are published on the appropriate agency’s Web site if it has one or are otherwise made readily available to the public.

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**Major Topic #10: Screening for Risk of Sexual Victimization and Abusiveness**

**Questions:**

- ✓ Are all residents screened during intake (and at all subsequent classification reviews) to assess their risk of being sexually abused by other residents or having the potential to be sexually abusive towards other residents?
- ✓ Do you have medical and mental health practitioners available to talk with residents? If not, are residents provided the opportunity to discuss any safety concerns or sensitive issues privately with another employee?

Obtaining information about residents (AP-1): During intake and periodically throughout a resident’s confinement, employees obtain and use information about each resident’s personal history and behavior to keep all residents safe and free from sexual abuse. At a minimum, employees attempt to ascertain information about prior sexual victimization or abusiveness; sexual orientation and gender identity; current charges and offense history; age; level of emotional and cognitive development; physical size/stature; mental illness or mental disabilities; intellectual/developmental disabilities; physical disabilities; and any other specific information about individual residents that may indicate heightened needs for supervision, additional safety precautions, or separation from certain other residents. This information may be ascertained through conversations with residents at intake and medical and mental health screenings; during classification assessments; and by reviewing court records, case files, facility behavioral records, and other relevant documentation from the residents’ files. Medical and mental health practitioners are the only staff permitted to talk with residents to gather information about their sexual orientation or gender identity, prior sexual victimization, history of engaging in sexual abuse, mental health status, and mental or physical disabilities. If the facility does not have medical or mental health practitioners available, residents are given an opportunity to discuss any safety concerns or sensitive issues privately with another employee.

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**Questions:**

- ✓ Do you use the screening information to inform housing, bed, work, education, and program assignments with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive?
  - If yes, please explain.

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Placement of residents in housing, bed, program, education, and work assignments (AP-2): Employees use all information obtained about the resident at intake and subsequently to make placement decisions for each resident on an individualized basis with the goal of keeping all residents safe and free from sexual abuse. When determining housing, bed, program, education and work assignments for residents, employees must take into account a resident’s age; the nature of his or her offense; any mental or physical disability or mental illness; any history of sexual victimization or engaging in sexual abuse; his or her level of emotional and cognitive development; his or her identification as lesbian, gay, bisexual, or transgender; and any other information obtained about the resident (AP-1). Residents may be isolated from others only as a last resort when less restrictive measures are inadequate to keep them and other residents safe, and then only until an alternative means of keeping all residents safe can be arranged.

**Major Topic #11: Contract Modifications and/or Policy and Procedure Updates**

**Questions:**

- ✓ Do you contract with other agencies or facilities for the confinement of residents?
  - If so, how many facilities?
  - What will it take to ensure these agencies/facilities are in compliance?
  - Will this require any contract modifications?
  - Do you think any contract modifications, as a result of PREA, would result in greater costs to you?

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Contracting with other entities for the confinement of residents (PP-2): If public juvenile justice agencies contract for the confinement of their residents, they do so only with private agencies or other entities, including other government agencies, committed to eliminating sexual abuse in their facilities, as evidenced by their adoption of and compliance with the PREA standards. Any new contracts or contract renewals include the entity’s obligation to adopt and comply with the PREA standards and specify that the agency will monitor the entity’s compliance with these standards as part of its general monitoring of the entity’s performance.

**Questions:**

- ✓ Do you maintain or attempt to enter into memoranda of understanding (MOUs) or other agreements with an outside public entity or office that is able to 1) receive and immediately forward resident reports of sexual abuse to facility heads, 2) provide residents with confidential emotional support services related to sexual abuse, and 3) help victims of sexual abuse during their transition from incarceration to the community?
  - Who currently provides these services (if anyone)?
  - Do you have any MOUs with them?
    - If not, how much would it cost to develop these MOUs?
    - If not possible to establish a MOU, do you document the attempt to enter an agreement?

Agreements with outside public entities and community service providers (RP-2): The agency maintains or attempts to enter into memoranda of understanding (MOUs) or other agreements with an outside public entity or office that is able to receive and immediately forward resident reports of sexual abuse to facility heads (RE-1). The agency also maintains or attempts to enter into MOUs or other agreements with community service providers that are able to: (1) provide residents with emotional support services related to sexual abuse and (2) help victims of sexual abuse during their transition from incarceration to the community (RE-3, MM-3). The agency maintains copies of agreements or documentation showing attempts to enter into agreements.

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**Questions:**

- ✓ Do you conduct your own criminal investigations or is it an outside legal authority?
  - If outside, who is it?
  - Do you have an MOU with them?
    - If not, how much would it cost to develop these MOUs?
    - If not possible to establish a MOU, do you document the attempt to enter an agreement?
    - If applicable, does it cover vulnerable persons (e.g., under 18 years of age)?

Agreements with outside law enforcement agencies (RP-3): If an agency does not have the legal authority to conduct criminal investigations or has elected to permit an outside agency to conduct criminal or administrative investigations of staff or residents, the agency maintains or attempts to enter into a written MOU or other agreement specific to investigations of sexual abuse with the law enforcement agency responsible for conducting investigations. The agency also maintains or attempts to enter into an MOU with the designated State or local services agency with the jurisdiction and authority to conduct investigations related to the sexual abuse of children within confinement facilities. When the agency already has an existing agreement or long-standing policy covering responsibilities for all criminal investigations, including sexual abuse investigations and child abuse investigations conducted by a designated State or local services agency, it does not need to enter into new agreements. The agency maintains copies of its agreements or documentation showing attempts to enter into agreements.

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**Questions:**

- ✓ Who are the authorities that prosecute violations?
  - Do you have a MOU with them?
    - If not, how much would it cost to develop these MOUs?
    - If not possible to establish a MOU, do you document the attempt to enter an agreement?

Agreements with the prosecuting authority (RP-4): The agency maintains or attempts to enter into a written MOU or other agreement with the authority responsible for prosecuting violations of criminal law. The agency maintains a copy of the agreement or documentation showing attempts to enter into an agreement.

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**Major Topic #12: Accommodating Special Needs**

**Questions:**

- ✓ Do you ensure that residents who are LEP, deaf, or disabled are able to report sexual abuse to staff directly through interpretive technology or through non-resident interpreters?
  - What services and tools do you employ?
    - What interpretive technology do you use?
    - Do you provide services for the mentally disabled?

Accommodating residents with special needs (PP-5): The agency ensures that residents who are limited English proficient (LEP), deaf, or disabled are able to report sexual abuse to staff directly, through interpretive technology, or through non-resident interpreters. Accommodations are made to convey all written information about sexual abuse policies, including how to report sexual abuse, verbally to residents who have limited reading skills or who are visually impaired.

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**Minor Topic #1: Medical Exams**

**Questions:**

- ✓ Are Forensic medical exams provided free of charge to the victim?
  - Who provides the exams?
  - Who bears the cost?

Evidence protocol and forensic medical exams (RP-1): The agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. The protocol must be adapted from or otherwise based on the 2004 U.S. Department of Justice’s Office on Violence Against Women publication “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents,” subsequent updated editions, or similarly comprehensive and authoritative protocols developed after 2004. As part of the agency’s evidence collection protocol, all victims of resident-on-resident sexually abusive penetration or staff-on-resident sexually abusive penetration are provided access to forensic medical exams performed by qualified forensic medical examiners who are trained in the unique psychological and emotional conditions of younger victims of sexual abuse. **Forensic medical exams are provided free of charge to the victim.** The facility makes available a victim advocate to accompany the victim through the forensic medical exam process.

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**Minor Topic #2: Conducting Investigations**

**Questions:**

- ✓ Do you investigate all third-party reports of sexual abuse?

Third-party reporting (RE-4): The facility receives and investigates all third-party reports of sexual abuse and refers all third-party reports of abuse to the designated State or local services agency with the authority to conduct investigations into allegations of sexual abuse involving child victims (IN-1 and RP-4). At the conclusion of the investigation, the facility notifies in writing the third-party individual who reported the abuse and the resident named in the third-party report of the outcome of the investigation. The facility distributes information on how to report sexual abuse on behalf of a resident to residents’ parents or legal guardians, attorneys, and the public.

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**Questions:**

- ✓ Do you notify victims and/or other complainants in writing of investigation outcomes and any disciplinary or criminal sanctions, regardless of the source of the allegation?
- ✓ Are all investigations carried through to completion, regardless of whether the alleged abuser or victim remains at the facility?

Duty to investigate (IN-1): The facility investigates all allegations of sexual abuse, including third-party and anonymous reports, and notifies victims and/or other complainants in writing of investigation outcomes and any disciplinary or criminal sanctions, regardless of the source of the allegation. If additional parties were notified of the allegation (OR-1), the facility notifies those parties in writing of investigation outcomes. All investigations are carried through to completion, regardless of whether the alleged abuser or victim remains at the facility and regardless of whether the source of the allegation recants his or her allegation.

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**Questions:**

- ✓ Are allegations of sexual abuse substantiated if supported by a preponderance of the evidence?

Evidence standard for administrative investigations (IN-3): Allegations of sexual abuse are substantiated if supported by a preponderance of the evidence.

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**Minor Topic #3: Conducting Mental and Medical Health Evaluations and Providing Care**

**Questions:**

- ✓ Does the facility/jurisdiction provide ongoing medical and/or mental health evaluations and treatment to all known abusers of sexual abuse?

Ongoing medical and mental health care for sexual abuse victims and abusers (MM-3): The facility provides ongoing medical and/or mental health evaluation and treatment to all known victims of sexual abuse. The evaluation and treatment of sexual abuse victims must include appropriate follow-up services, treatment plans, and, when necessary, referrals for continued care following their release from custody. The level of medical and mental health care provided to resident victims must match the community level of care generally accepted by the medical and mental health professional communities. The facility conducts a mental health evaluation of all known abusers and provides treatment, as deemed necessary by qualified mental health

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**Minor Topic #4: Confidential Reporting**

**Questions:**

- ✓ How do victims confidentially report sexual abuse (in multiple ways)?
- ✓ Are there means to report sexual abuse to an outside public entity?
  - Who is it?
  - Does this entity charge a fee for such services?

Resident reporting (RE-1): The facility provides multiple internal ways for residents to report easily, privately, and securely sexual abuse, retaliation by other residents or staff for reporting sexual abuse, and staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse. The facility also provides at least one way for residents to report the abuse to an outside public entity or office not affiliated with the agency that has agreed to receive reports and forward them to the facility head (RP-3). Staff accepts reports made verbally, in writing, anonymously, and from third parties and immediately puts into writing any verbal reports.

**Notes:** \_\_\_\_\_  
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**Questions:**

- ✓ Please explain your policies/procedures for the exhaustion of administrative remedies available to a resident.
  - Does it cover a 90 day period (unless you have made a final determination earlier)?
  - Does it cover a 48 hours requirement after a resident has notified any agency staff member of his or her need for protection?

**Notes:** \_\_\_\_\_  
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Exhaustion of administrative remedies (RE-2): Under agency policy, a resident has exhausted his or her administrative remedies with regard to a claim of sexual abuse either (1) when the agency makes a final decision on the merits of the report of abuse (regardless of whether the report was made by the resident, made by a third party, or forwarded from an outside official or office) or (2) when 90 days have passed since the report was made, whichever occurs sooner. A report of sexual abuse triggers the 90-day exhaustion period regardless of the length of time that has passed between the abuse and the report. A resident seeking immediate protection from imminent sexual abuse will be deemed to have exhausted his or her administrative remedies 48 hours after notifying any agency staff member of his or her need for protection.

## Community Corrections

### Prison Rape Elimination Act (PREA) Cost Impact Analysis

Office of Justice Programs / Department of Justice

Site Visit Discussion Questionnaire

Version: Community Corrections

During this study led by Booz Allen Hamilton, several standards published by the National Prison Rape Elimination Commission (NPREC) have led to increased attention and discussion whereas others have less of an impact. The objective of this data gathering effort is to quantify, in monetary terms, the impact of the standards that may result in the greatest impact on your operations, policies, and procedures. Responses gathered will inform the Attorney General of the Department of Justice as he makes a final decision on the implementation of guidelines and regulations due to be published in the summer of 2010. Please note that the data we gather will not be held to an expectation of confidentiality and that by contract, information will be provided to the Office of Justice Programs by name of organization.

The list below highlights eleven major topics followed by four minor topics as they relate to cost impacts or difficulties with implementing the NPREC standards.

#### **Major Topic #1: Cross-gender Pat Down Searches**

**Questions:**

- ✓ Except in the case of an emergency, does your jurisdiction/facility prohibit cross-gender pat downs?
  - If not, what are the major reasons? Such as:
    - A labor market that drives hiring opportunities?
    - State or Federal mandates for equal opportunity employment?
    - Union concerns?
  - How would male/female staffing levels need to be altered to prohibit cross-gender pat downs searches?
  - Would you consider adjusting your pat down policy to comply with this standard? Specifically how?
  - Are there other policies that you could employ to comply with this standard? How would you do this and what are the risks?

Limits to cross-gender viewing and searches (PP-4):  
 Except in the case of emergency, the facility prohibits cross-gender strip and visual body cavity searches. Except in the case of emergency or other extraordinary or unforeseen circumstances, the facility restricts nonmedical staff from viewing defendants/offenders of the opposite gender who are nude or performing bodily functions and similarly restricts cross-gender pat down searches. Medical practitioners conduct examinations of transgender individuals to determine their genital status only in private settings and only when an individual's genital status is unknown.

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**Major Topic #2: Defendant/offender Supervision - Physical Supervision**

**Questions:**

- ✓ Over the past few years have you seen a variation or significant increase in the number of sexual abuse allegations made, either defendant/offender-on-defendant/offender or staff-on-defendant/offender?
  - Are you able to provide historical data regarding sexual abuse statistics prevalent in your jurisdiction/facility (e.g., BJSs Survey on Sexual Violence, Form SSV-IA)?
    - Does your historical data suggest a decrease, increase, or flat rate of sexual abuse incidents?
    - If a problem is/was evident, what is the best method for reducing sexual abuse incidents in your facility?
    - Please explain how you would go about implementing these changes.

Defendant/offender supervision (PP-3): Facility staff provides the defendant/offender supervision necessary to protect defendants/offenders from sexual abuse. The facility administrators and supervisors responsible for reviewing critical incidents must examine areas in the facility where sexual abuse has occurred or may be likely to occur to assess whether physical barriers may allow the abuse to go undetected, the adequacy of staffing levels in those areas during different shifts, and the need for monitoring technology to supplement facility staff supervision. When problems or needs are identified, facility administrators and supervisors take corrective action (DC-3).

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**Major Topic #3: PREA Coordinator**

**Questions:**

- ✓ Does your jurisdiction/facility have a PREA Coordinator to develop, implement, and oversee efforts to comply with the PREA standards?
  - Note: The PREA coordinator is a full-time position in all agencies that operate their own community corrections facilities housing more than 500 defendants/offenders in one location. The PREA coordinator may be a part-time position in agencies that operate their own community corrections facilities with less than 500 defendants/offenders in one location or those agencies that solely contract with community corrections providers for the placement of defendants/offenders. The PREA coordinator may also be a part-time position in probation, pretrial, and parole agencies.
  - Have you considered the cost of the PREA coordinator including base salary plus benefits?

Zero tolerance of sexual abuse (PP-1): The agency has a written policy mandating zero tolerance toward all forms of sexual abuse and enforces that policy by ensuring all of its facilities and community supervision functions comply with the PREA standards. The agency employs or designates a PREA coordinator to oversee agency efforts to comply with the PREA standards.

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**Major Topic #4: Training and Education**

 **Questions:**

- ✓ Do you provide training to *all employees* on sexual abuse prevention, detection, and response policies and procedures; the PREA standards; and relevant Federal, State, and local law?
  - What are the means of training? Class-room/ Computer based? What is the length?
  - Who provides the training? Employees or contractors?
- ✓ Do you provide periodic refresher information to all employees?
  - How frequently do you provide refresher training?

Employee training (TR-1): The agency or facility trains all employees to be able to fulfill their responsibilities under agency or facility sexual abuse prevention, detection, and response policies and procedures; the PREA standards; and under relevant Federal, State, and local law. The agency or facility trains all employees to communicate effectively and professionally with all defendants/offenders. Additionally, the agency or facility trains all employees on a defendant/offender’s right to be free from sexual abuse, the right of defendants/offenders and employees to be free from retaliation for reporting sexual abuse, the dynamics of sexual abuse, and the common reactions of sexual abuse victims. Current employees are educated as soon as possible following the agency’s or facility’s adoption of the PREA standards, and the agency or facility provides periodic refresher information to all employees to ensure that they know the agency’s or facility’s most current sexual abuse policies and procedures. The agency or facility maintains written documentation showing employee signatures verifying that employees understand the training they have received.

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 **Questions:**

- ✓ Do you provide training to *all volunteers and contractors* who have contact with defendant/offenders on sexual abuse prevention, detection, and response policies and procedures; the PREA standards; and relevant Federal, State, and local law?
  - What are the means of training? Class-room/ Computer based? What is the length?
  - Who provides the training? Employees or contractors?

Volunteer and contractor training (TR-2): The agency or facility ensures that all volunteers and contractors who have contact through the agency or facility with defendants/offenders have been trained on their responsibilities under the agency’s sexual abuse prevention, detection, and response policies and procedures; the PREA standards; and relevant Federal, State, and local law. The level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with defendants/offenders, but all volunteers and contractors who have contact with defendants/offenders must be notified of the agency’s or facility’s zero-tolerance policy regarding sexual abuse. Volunteers must also be trained in how to report sexual abuse. The agency or facility maintains written documentation showing volunteer and contractor signatures verifying that they understand the training they have received.

✓ **Notes:**

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 **Questions:**

- ✓ Following the intake process, do you *provide* comprehensive education to defendant/offenders on sexual abuse?
  - What are the means of training? Class-room/ Computer based?
  - Who provides the training? Employees or contractors?
  - Is the training accessible to defendant/offenders with disabilities?
- ✓ Do you provide periodic refresher information to all defendant/offenders?
  - What are the means? (e.g., poster boards, handbooks, closed circuit TV)
  - How frequently do you provide refresher training?

Defendant/offender education (TR-3): During the intake process into a facility or upon initial stages of supervision, staff informs defendants/offenders of the agency's or facility's zero-tolerance policy regarding sexual abuse and how to report incidents or suspicions of sexual abuse. Within a reasonably brief period of time, the agency or facility provides comprehensive education to defendants/offenders regarding their right to be free from sexual abuse and to be free from retaliation for reporting abuse, the dynamics of sexual abuse, the common reactions of sexual abuse victims, and agency or facility sexual abuse response policies and procedures. Current defendants/offenders are educated as soon as possible following the agency's or facility's adoption of the PREA standards, and the agency or facility provides periodic refresher information to all defendants/offenders to ensure that they know the agency's or facility's most current sexual abuse policies and procedures. Periodic refresher training may or may not be necessary in community corrections facilities given the shorter time period defendants/offenders may reside in these facilities. The agency or facility provides defendant/offender education in formats accessible to all defendants/offenders, including those who are LEP, deaf, visually impaired, or otherwise disabled as well as defendants/offenders who have limited reading skills. All information provided to defendants/offenders is communicated in a manner that is appropriate for the defendant/offender's age and level of cognitive and emotional development. The agency or facility maintains written documentation of defendant/offender participation in these education sessions.

Note: Periodic refresher training may or may not be necessary in community corrections facilities given the shorter time period defendants/offenders may reside in these facilities.

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 **Questions:**

- ✓ Do you *ensure* that investigators hired by your facility/agency receive sexual abuse training specifically in conducting investigations in community corrections settings?
  - Where do they get their training?
  - How do you ensure the training meets the PREA standard?

Specialized training: Investigations (TR-4): In addition to the general training provided to all employees (TR-1), the agency or facility ensures that investigators employed by the agency or facility and conducting sexual abuse investigations have received comprehensive and up-to-date training in conducting such investigations in community corrections settings. Specialized training must include population-appropriate techniques for interviewing sexual abuse victims, proper use of Miranda- and Garrity-type warnings, sexual abuse evidence collection in community corrections settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. The agency or facility maintains written documentation that investigators have completed the required specialized training in conducting sexual abuse investigations.

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 **Questions:**

- ✓ Do you *ensure* your full and part-time medical and mental health care practitioners (either employed or contracted) have been trained on how to detect and assess signs of sexual abuse and that all medical practitioners are trained on how to preserve physical evidence of sexual abuse?
  - Where do they get their training?
  - How do you ensure the training meets the PREA standard?

Specialized training: Medical and mental health care (TR-5): The agency or facility ensures that all medical and mental health care practitioners employed or contracted with by the community corrections or pretrial, probation, or parole agency have been trained in how to detect and assess signs of sexual abuse and how to preserve physical evidence of sexual abuse. All medical and mental health care practitioners must be trained in how to respond effectively and professionally to victims of sexual abuse and how and to whom to report allegations or suspicions of sexual abuse. The agency or facility maintains documentation that medical and mental health practitioners have received this specialized training.

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**Major Topic #5: Victim Advocacy**

**Questions:**

- ✓ Do you provide a victim advocate to accompany the victim through the forensic medical exam process?
  - Who would provide this service? A current employee or outside entity?

Evidence protocol and forensic medical exams (RP-1): The agency or facility follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. The protocol must be adapted from or otherwise based on the 2004 U.S. Department of Justice’s Office on Violence Against Women publication “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents,” subsequent updated editions, or similarly comprehensive and authoritative protocols developed after 2004. As part of the agency’s or facility’s evidence collection protocol, the agency or facility refers all victims of defendant/offender-on-defendant/offender sexually abusive penetration or staff-on-defendant/offender sexually abusive penetration to forensic medical exams performed by qualified forensic medical examiners. Forensic medical exams are provided free of charge to the victim. **The agency or facility makes available or provides referrals to a victim advocate to accompany the victim through the forensic medical exam process.**

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**Questions:**

- ✓ Are defendant/offenders provided access to outside victim advocate services?
  - Are there posters or pamphlets with this information around the facility/jurisdiction?
  - Who provides this outside victim advocacy support?
  - Do these services ensure entities receive and immediately forward inmate reports of sexual abuse to facility heads, provide inmates with confidential emotional support services, and help victims of sexual abuse during their transition from incarceration to the community?
  - Is there a fee borne by you for these services or is it provided by the state, county or other non-profit service (state-level sexual assault coalition or its local affiliates)?

Defendant/offender access to outside confidential support services (RE-3):  
 The facility provides defendants/offenders with **access to outside victim advocates for emotional support services related to sexual abuse**. The facility provides such access by giving defendants/offenders the current mailing addresses and telephone numbers, including toll-free hotline numbers, of local, State, and/or national victim advocacy or rape crisis organizations and enabling reasonable communication between defendants/offenders and these organizations. The facility ensures that communications with such advocates are private, confidential, and privileged, to the extent allowable by Federal, State, and local law. The facility informs defendants/offenders, prior to giving them access, of the extent to which such communications will be private, confidential, and/or privileged.

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**Major Topic #6: Gathering, Reviewing, and Reporting Sexual Abuse Data**

 **Questions:**

- ✓ Do you have a review team to evaluate each incident of sexual abuse?
  - Do you prepare a report for each sexual abuse incident?
  - Does the report consider whether incidents were motivated by racial or other group dynamics at the facility?
  - Does this report include recommendations for improvement?

Sexual abuse incident reviews (DC-1): The agency or facility treats all instances of sexual abuse as critical incidents to be examined by a team of upper management officials, with input from line supervisors, investigators, and medical/mental health practitioners. The review team evaluates each incident of sexual abuse to identify any policy, training, or other issues related to the incident that indicate a need to change policy or practice to better prevent, detect, and/or respond to incidents of sexual abuse. The review team also considers whether incidents were motivated by racial or other group dynamics. When incidents are determined to be motivated by racial or other group dynamics, upper management officials immediately notify the agency or facility head and begin taking steps to rectify those underlying problems. The sexual abuse incident review takes place at the conclusion of every sexual abuse investigation, unless the allegation was determined to be unfounded. The review team prepares a report of its findings and recommendations for improvement and submits it to the agency or facility head.

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**Questions:**

- ✓ Do you prepare an annual report on aggregated sexual abuse data using a standardized instrument and set of definitions (e.g., BJS survey on sexual violence)?
  - Does it include contracted facilities?

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Data collection (DC-2): The agency or facility collects accurate, uniform data for every reported incident of sexual abuse using a standardized instrument and set of definitions. The agency aggregates the incident-based sexual abuse data at least annually. The incident-based data collected includes, at a minimum, the data necessary to answer all questions from the most recent version of the BJS Survey on Sexual Violence. Data are obtained from multiple sources, including reports, investigation files, and sexual abuse incident reviews. The agency also obtains incident-based and aggregated data from every community corrections facility with which it contracts.



**Questions:**

- ✓ Do you review, analyze, and use all sexual abuse data to assess and improve the effectiveness of your sexual abuse prevention, detection, and response policies, practices, and training?
  - Does this review identify problem areas (including any racial dynamics, underlying patterns of sexual abuse, issues with particular physical locations or times of day), and take corrective action on an ongoing basis?
- ✓ Do you compare data from your annual report to data from the previous year?
  - Do you provide an assessment of your progress?
- ✓ Is your annual data available to the public or on line?

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Data review for corrective action (DC-3): The agency reviews, analyzes, and uses all sexual abuse data, including incident-based and aggregated data, to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training. Using these data, the agency identifies problem areas, including any racial dynamics underpinning patterns of sexual abuse, takes corrective action on an ongoing basis, and, at least annually, prepares a report of its findings and corrective actions for each facility as well as the agency as a whole. The annual report also includes a comparison of the current year's data and corrective actions with those from prior years and provides an assessment of the agency's progress in addressing sexual abuse. The agency's report is approved by the agency head, submitted to the appropriate governing body, and made readily available to the public through its Web site or, if it does not have one, through other means. 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 it must indicate the nature of the material redacted.

**Questions:**



- ✓ Is your sexual abuse data properly stored, securely retained, and protected?
  - What medium (electronic or paper) and where is it stored?
  - Unless otherwise authorized by local or state law, do you retain it for at least 10 years?

**Notes:** \_\_\_\_\_  
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Data storage, publication, and destruction (DC-4): The agency ensures that the collected sexual abuse data are properly stored, securely retained, and protected. The agency makes all aggregated sexual abuse data, including from facilities under its direct control and those with which it contracts, readily available to the public at least annually through its Web site or, if it does not have one, through other means. Before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers from the data. The agency maintains sexual abuse data for at least 10 years after the date of its initial collection unless Federal, State, or local law allows for the disposal of official information in less than 10 years.

**Major Topic #7: Background Checks for Hiring and Promotions**

**Questions:**



- ✓ Do you and your contractors contact all prior institutional employers for information on substantiated allegations of sexual abuse?
- ✓ Do you and your contractors run criminal background checks for all applicants and employees being considered for promotion?

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Hiring and promotion decisions (PP-6): The agency or facility does not hire or promote anyone who has engaged in sexual abuse in an institutional setting or who has engaged in sexual activity in the community facilitated by force, the threat of force, or coercion. Consistent with Federal, State, and local law, the **agency or facility makes its best effort to contact all prior institutional employers for information on substantiated allegations of sexual abuse and must run criminal background checks for all applicants and employees being considered for promotion** and examine and carefully weigh any history of criminal activity at work or in the community, including convictions or adjudications for domestic violence, stalking, and sex offenses. The agency or facility also asks all applicants and employees directly about previous misconduct during interviews and reviews.

**Major Topic #8: Triennial Auditing of the NPREC standards**

**Questions:**



- ✓ What types of audits and/or accreditations do you undergo on a periodic basis?
  - Would any of these be similar to what you would expect for a PREA audit?

**Notes:** \_\_\_\_\_  
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Audits of standards (AU-1): The public agency ensures that all community corrections facilities, including contract facilities and pretrial, probation, and parole agencies are audited to measure compliance with the PREA standards. Audits must be conducted at least every three years by independent and qualified auditors. The public or contracted agency allows the auditor to enter and tour facilities, review documents, and interview staff and defendants/offenders, as deemed appropriate by the auditor, to conduct comprehensive audits. The public agency ensures that the report of the auditor's findings and the public or contracted agency's plan for corrective action (DC-3) are published on the appropriate agency's Web site if it has one or are otherwise made readily available to the public.

**Major Topic #9: Screening for Risk of Sexual Victimization and Abusiveness**

**Questions:**

- ✓ Are all defendant/offenders screened during intake to assess their risk of being sexually abused by other defendant/offenders or having the potential to be sexually abusive towards other defendant/offenders?
- ✓ Do you have a written screening instrument tailored to the gender of the population being screened?
- ✓ For defendants/offenders under the age of 18, are screenings conducted by medical or mental health practitioners?

Screening for risk of victimization and abusiveness (SC-1): All defendants/offenders are screened during intake to assess their risk of being sexually abused by other defendants/offenders or sexually abusive toward other defendants/offenders. Employees must review information received with the defendant/offender as well as discussions with the defendant/offender. Employees must conduct this screening using a written screening instrument tailored to the gender of the population being screened. Although additional factors may be considered, particularly to account for emerging research and the agency’s or facility’s own data analysis, screening instruments must contain the criteria described below. For defendants/offenders under the age of 18 or applicable age of majority within that jurisdiction, screening must be conducted by medical or mental health practitioners. If the facility does not have medical or mental health practitioners available, these young defendants/offenders are given an opportunity to participate in screenings in private.

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**Questions:**

- ✓ Do you use the screening information to inform housing, bed, work, education, and program assignments with the goal of keeping separate those defendant/offenders at high risk of being sexually victimized from those at high risk of being sexually abusive?
  - If yes, please explain.
- ✓ In Community Corrections facilities, it may be difficult, if not impossible, to separate defendants/offenders. In this event, does your facility provide vulnerable defendants/offenders with increased supervision and/or more frequent contact with staff?

Use of screening information (SC-2): Employees use information from the risk screening (SC-1) to inform housing, bed, work, education, and program assignments. In many community corrections facilities, it is difficult, if not impossible, to keep defendants/offenders totally separate or segregated from each other. However, the facility can determine, based on the screening information, whether a particular defendant/offender should receive greater supervision, should have more frequent contact with staff, or is more appropriately housed in some alternative type of placement. The facility makes individualized determinations about how to ensure the safety of each defendant/offender. Lesbian, gay, bisexual, transgender, or other gender-nonconforming defendants/offenders are not placed in particular housing assignments solely on the basis of their sexual orientation, genital status, or gender identity.

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**Major Topic #10: Contract Modifications and/or Policy and Procedure Updates**

**Questions:**

- ✓ Do you contract with other agencies or facilities for the housing or supervision of defendants/offenders?
  - If so, how many facilities?
  - What will it take to ensure these agencies/facilities are in compliance?
  - Will this require any contract modifications?
  - Do you think any contract modifications, as a result of PREA, would result in greater costs to you?

Contracting with other entities for the confinement of defendant/offenders (PP-2): If public community corrections agencies contract for housing or supervision of their defendants/offenders, they do so only with private agencies or other entities, including nonprofit or other government agencies, committed to eliminating sexual abuse, as evidenced by their adoption of and compliance with the PREA standards. Any new contracts or contract renewals include the entity’s obligation to adopt and comply with the PREA standards and specify that the public agency will monitor the entity’s compliance with these standards as part of its monitoring of the entity’s performance. Only in emergency circumstances, in which all reasonable attempts to find a private agency or other entity in compliance with the PREA standards have failed, should a contract be entered into with an entity that fails to comply with these standards. The public agency must document these efforts.

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**Questions:**

- Do you maintain or attempt to enter into memoranda of understanding (MOUs) or other agreements with an outside public entity or office that is able to 1) receive and immediately forward inmate reports of sexual abuse to facility heads, 2) provide inmates with confidential emotional support services related to sexual abuse, and 3) help victims of sexual abuse during their transition from incarceration to the community?
- Who currently provides these services (if anyone)?
- Do you have any MOUs with them?
  - If not, how much would it cost to develop these MOUs?
  - If not possible to establish a MOU, do you document the attempt to enter an agreement?

Agreements with outside public entities and community service providers (RP-2): The agency or facility maintains or attempts to enter into written memoranda of understanding (MOUs) or other agreements with an outside public entity or office that is able to receive and immediately forward defendant/offender reports of sexual abuse to agency or facility heads (RE-1). The agency also maintains or attempts to enter into MOUs or other agreements with community service providers that are able to: (1) provide defendants/offenders with confidential emotional support services related to sexual abuse and (2) help victims of sexual abuse during their transition from a community corrections facility into the community. The agency or facility maintains copies of written agreements or documentation showing attempts to enter into agreements.

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**Questions:**

- ✓ Do you conduct your own criminal investigations or is it an outside legal authority?
  - If outside, who is it?
  - Do you have a written agreement or an MOU with them?
    - If not, how much would it cost to develop these MOUs?
    - If not possible to establish a MOU, do you document the attempt to enter an agreement?
    - If applicable, does it cover vulnerable persons (e.g., under 18 years of age)?

Agreements with outside law enforcement agencies (RP-3): If an agency or facility does not have the legal authority to conduct criminal investigations or has elected to permit an outside agency to conduct criminal or administrative investigations of staff or defendants/offenders, the agency or facility maintains or attempts to enter into a written MOU or other agreement specific to investigations of sexual abuse with the law enforcement agency responsible for conducting investigations. If the agency or facility confines defendants/offenders under the age of 18 or applicable age of majority within that jurisdiction, or other defendants/offenders who fall under State and local vulnerable persons statutes, the agency or facility maintains or attempts to enter into an MOU with the designated State or local services agency with the jurisdiction and authority to conduct investigations related to the sexual abuse of vulnerable persons within community corrections facilities. When the agency or facility already has an existing agreement or long-standing policy covering responsibilities for all criminal investigations, including sexual abuse investigations, it does not need to enter into a new agreement. The agency or facility maintains a copy of the written agreement or documentation showing attempts to enter into an agreement.

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**Questions:**

- ✓ Who are the authorities that prosecute violations?
  - Do you have a MOU with them?
    - If not, how much would it cost to develop these MOUs?
    - If not possible to establish a MOU, do you document the attempt to enter an agreement?

Agreements with the prosecuting authority (RP-4): The agency or facility maintains or attempts to enter into a written MOU or other agreement with the authority responsible for prosecuting violations of criminal law. The agency or facility maintains a copy of the written agreement or documentation showing attempts to enter into an agreement.

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**Major Topic #11: Accommodating Special Needs**

**Questions:**

- ✓ Do you ensure that defendant/offenders who are LEP, deaf, or disabled are able to report sexual abuse to staff directly through interpretive technology or through non-defendant/offender interpreters?
  - What services and tools do you employ?
    - What interpretive technology do you use?
    - Do you provide services for the mentally disabled?

Accommodating defendant/offenders with special needs (PP-5): The agency or facility ensures that defendants/offenders who are limited English proficient (LEP), deaf, or disabled are able to report sexual abuse to staff directly, through interpretive technology, or through nondefendant/offender interpreters. Accommodations are made to convey all writ-ten information about sexual abuse policies, including how to report sexual abuse, verbally to defendants/offenders who have limited reading skills or who are visually impaired.

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**Minor Topic #1: Medical Exams**

**Questions:**

- ✓ Are Forensic medical exams provided free of charge to the victim?
  - Who provides the exams?
  - Who bears the cost?

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Evidence protocol and forensic medical exams (RP-1): The agency or facility follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. The protocol must be adapted from or otherwise based on the 2004 U.S. Department of Justice’s Office on Violence Against Women publication “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents,” subsequent updated editions, or similarly comprehensive and authoritative protocols developed after 2004. As part of the agency’s or facility’s evidence collection protocol, the agency or facility refers all victims of defendant/offender-on-defendant/offender sexually abusive penetration or staff-on-defendant/offender sexually abusive penetration to forensic medical exams performed by qualified forensic medical examiners. **Forensic medical exams are provided free of charge to the victim.** The agency or facility makes available or provides referrals to a victim advocate to accompany the victim through the forensic medical exam process.

**Minor Topic #2: Conducting Investigations**

**Questions:**

- ✓ Do you investigate all third-party reports of sexual abuse?

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Third-party reporting (RE-4): The agency or facility receives and investigates all third-party reports of sexual abuse (IN-1). At the conclusion of the investigation, the agency or facility notifies in writing the third-party individual who reported the abuse and the defendant/offender named in the third-party report of the outcome of the investigation. The agency or facility distributes publicly information on how to report sexual abuse on behalf of a defendant/offender.

**Questions:**

- ✓ Do you notify victims and/or other complainants in writing of investigation outcomes and any disciplinary or criminal sanctions, regardless of the source of the allegation?
- ✓ Are all investigations carried through to completion, regardless of whether the alleged abuser or victim remains at the facility?

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Duty to investigate (IN-1): The agency or facility investigates all allegations of sexual abuse, including third-party and anonymous reports, and notifies victims and/or other complainants in writing of investigation outcomes and any disciplinary or criminal sanctions, regardless of the source of the allegation. All investigations are carried through to completion, regardless of whether the alleged abuser or victim remains at the facility or under supervision.

-  **Questions:**
- ✓ Are allegations of sexual abuse substantiated if supported by a preponderance of the evidence?

Evidence standard for administrative investigations (IN-3): Allegations of sexual abuse are substantiated if supported by a preponderance of the evidence or a lesser standard if allowed under agency or facility policy or State law.

**Notes:** \_\_\_\_\_  
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**Minor Topic #3: Conducting Mental and Medical Health Evaluations and Providing Care**

- Questions:**
- ✓ Does the facility/jurisdiction provide ongoing medical and/or mental health evaluations and treatment to all known abusers of sexual abuse?

Ongoing medical and mental health care for sexual abuse victims and abusers (MM-2): The facility provides ongoing medical and/or mental health evaluation and treatment to all known victims of sexual abuse. The evaluation and treatment of sexual abuse victims must include appropriate follow-up services, treatment plans, and, when necessary, referrals for continued care following their release from a community corrections facility. The level of medical and mental health care provided to defendant/offender victims must match the community level of care generally accepted by the medical and mental health professional communities. The facility conducts a mental health evaluation of all known abusers and provides treatment, as deemed necessary by qualified mental health practitioners.

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**Minor Topic #4: Confidential Reporting**

-  **Questions:**
- ✓ How do victims confidentially report sexual abuse (in multiple ways)?
  - ✓ Are there means to report sexual abuse to an outside public entity?
    - Who is it?
    - Does this entity charge a fee for such services?

Defendant/offender reporting (RE-1): The agency or facility provides multiple internal ways for defendants/offenders to report easily, privately, and securely sexual abuse, retaliation by other defendants/offenders or staff for reporting sexual abuse, and staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse. The agency or facility also provides at least one way for defendants/offenders to report the abuse to an outside public entity or office not affiliated with the agency that has agreed to receive reports and forward them to the agency or facility head (RP-2), except when a defendant/offender requests confidentiality. Staff accepts reports made verbally, in writing, anonymously, and from third parties and immediately puts into writing any verbal reports.

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**Questions:**

- ✓ Please explain your policies/procedures for the exhaustion of administrative remedies available to an defendant/offender.
  - Does it cover a 90 day period (unless you have made a final determination earlier)?
  - Does it cover a 48 hours requirement after an defendant/offender has notified any agency staff member of his or her need for protection?

Exhaustion of administrative remedies (RE-2): Under agency or facility policy, a defendant/offender has exhausted his or her administrative remedies with regard to a claim of sexual abuse either (1) when the agency or facility makes a final decision on the merits of the report of abuse (regardless of whether the report was made by the defendant/offender, made by a third party, or forwarded from an outside official or office) or (2) when 90 days have passed since the report was made, whichever occurs sooner. A report of sexual abuse triggers the 90-day exhaustion period regardless of the length of time that has passed between the abuse and the report. A defendant/offender seeking immediate protection from imminent sexual abuse will be deemed to have exhausted his or her administrative remedies 48 hours after notifying any agency or facility staff member of his or her need for protection.

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Lockups

Prison Rape Elimination Act (PREA) Cost Impact Analysis

Office of Justice Programs / Department of Justice

Site Visit Discussion Questionnaire

Version: Lockups

During this study led by Booz Allen Hamilton, several standards published by the National Prison Rape Elimination Commission (NPREC) have led to increased attention and discussion whereas others have less of an impact. The objective of this data gathering effort is to quantify, in monetary terms, the impact of the standards that may result in the greatest impact on your operations, policies, and procedures. Responses gathered will inform the Attorney General of the Department of Justice as he makes a final decision on the implementation of guidelines and regulations due to be published in the summer of 2010. Please note that the data we gather will not be held to an expectation of confidentiality and that by contract, information will be provided to the Office of Justice Programs by name of organization.

The list below highlights twelve major topics followed by three minor topics as they relate to cost impacts or difficulties with implementing the NPREC standards.

Major Topic #1: Cross-gender Pat Down Searches

Questions:

- ✓ Except in the case of an emergency, does your jurisdiction/facility prohibit cross-gender pat downs?
o If not, what are the major reasons? Such as:
- A labor market that drives hiring opportunities?
- State or Federal mandates for equal opportunity employment?
- Union concerns?
o How would male/female staffing levels need to be altered to prohibit cross-gender pat downs searches?
o Would you consider adjusting your pat down policy to comply with this standard? Specifically how?
o Are there other policies that you could employ to comply with this standard? How would you do this and what are the risks?

Limits to cross-gender viewing and searches (PP-5): Except in the case of emergency, the agency prohibits cross-gender strip and visual body cavity searches. Except in the case of emergency or other extraordinary or unforeseen circumstances, the agency restricts law enforcement staff from viewing detainees of the opposite gender who are nude or performing bodily functions and similarly restricts cross-gender pat down searches. Any examination to determine the genital status of a detainee must be conducted in a private setting by a medical practitioner and only when the genital status is unknown to the agency.

Notes:

Major Topic #2: Inmate/Resident Supervision -

Physical Supervision

Questions:

- ✓ Over the past few years have you seen a variation or significant increase in the number of sexual abuse allegations made, either detainee-on-detainee or staff-on-detainee?
o Are you able to provide historical data regarding sexual abuse statistics prevalent in your

Detainee supervision (PP-3): Law enforcement staff provides the detainee supervision necessary to protect detainees from sexual abuse. The upper management officials responsible for reviewing critical incidents must examine areas in the lockup where sexual abuse has occurred to assess whether physical barriers may have enabled the abuse, the adequacy of staffing levels in those areas during different shifts, and the need for monitoring technology to supplement law enforcement staff supervision (DC-1). When problems or needs are identified, the agency takes corrective action (DC-3).

jurisdiction/facility (e.g., BJSs Survey on Sexual Violence, Form SSV-IA)?

- Does your historical data suggest a decrease, increase, or flat rate of sexual abuse incidents?
- If a problem is/was evident, what is the best method for reducing sexual abuse incidents in your facility?
- Please explain how you would go about implementing these changes.

**Notes:**

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**Major Topic #3: Inmate/Resident Supervision - Technical Supervision**

**Questions:**

- ✓ Does your jurisdiction/facility currently have video monitoring in place?
  - If so, do you believe your jurisdiction/facility is adequately suited to reduce sexual abuse incidents?
  - Please explain its coverage, review and archiving.
  - If it is not considered sufficient, what cost would you estimate for this technology?
- ✓ Do you employ other methods of technology supervision (e.g., Radio Frequency Identification bracelets)?
- ✓ Do you annually assess the feasibility of your currently technology, including developing a plan for securing new technology?
  - If not, do you anticipate a cost associated with conducting this assessment?

Assessment and Use of Monitoring Technology (PP-8): The agency uses video monitoring systems and other cost-effective and appropriate technology to supplement its sexual abuse prevention, detection, and response efforts. The agency assesses, at least annually, the feasibility of and need for new or additional monitoring technology and develops a plan for securing such technology.

**Notes:**

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**Major Topic #4: PREA Coordinator**

**Questions:**

- ✓ Does your jurisdiction/facility have a PREA Coordinator to develop, implement, and oversee efforts to comply with the PREA standards?
  - Note: The PREA coordinator may be a full or part-time position.
  - Have you considered the cost of the PREA coordinator including base salary plus benefits?

Zero tolerance of sexual abuse (PP-1): The agency has a written policy mandating zero tolerance toward all forms of sexual abuse and enforces that policy by ensuring all of its facilities comply with the PREA standards. The agency employs or designates a PREA coordinator to develop, implement, and oversee agency efforts to comply with the PREA standards.

**Notes:**

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**Major Topic #5: Training and Education**

**Questions:**

- ✓ Do you provide training to *all employees and volunteers* on sexual abuse prevention, detection, and response policies and procedures; the PREA standards; and relevant Federal, State, and local law?
  - What are the means of training? Class-room/ Computer based? What is the length?
  - Who provides the training? Employees or contractors?
- ✓ Do you provide periodic refresher information to all employees?
  - How frequently do you provide refresher training?

Employee and volunteer training (TR-1): The agency trains all lockup employees and any volunteers who have contact with detainees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures; the PREA standards; and under relevant Federal, State, and local law. The agency trains all lockup employees and volunteers who have contact with detainees to communicate effectively and professionally with all detainees. Current lockup employees and volunteers are educated as soon as possible following the agency’s adoption of the PREA standards, and the agency provides periodic refresher information to all lockup employees and volunteers to ensure that they know the agency’s most current sexual abuse policies and procedures. The agency maintains written documentation showing lockup employee and volunteer signatures verifying that they understand the training they have received.

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**Questions:**

- ✓ Do employees notify all detainees of the agency’s zero-tolerance policy?
  - Does the facility ensure that attorneys, contractors, and inmate workers are informed of the agency’s zero-tolerance policy upon entering the lockup?

Detainee, attorney, contractor, and inmate worker notification of the agency’s zero-tolerance policy (TR-2): Employees notify all detainees of the agency’s zero-tolerance policy regarding sexual abuse during intake. The agency ensures that attorneys, contractors, and inmate workers are informed of the agency’s zero-tolerance policy regarding sexual abuse upon entering the lockup.

**Notes:**

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**Questions:**

- ✓ Do you *ensure* sexual abuse training has been provided to investigators specifically conducting investigations in confinement settings?
  - Where do they get their training?
  - How do you ensure the training meets the PREA standard?

Specialized training: Investigations (TR-3): In addition to the general training provided to all employees and volunteers (TR-1), the agency ensures that law enforcement staff who investigate sexual abuse in lockups have received comprehensive and up-to-date training in conducting such investigations in confinement settings. Specialized training must include techniques for interviewing sexual abuse victims, proper use of *Miranda-* and *Garrity-*type warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. The agency maintains written documentation that investigators have completed the required specialized training in conducting sexual abuse investigations.

Notes:

**Major Topic #6: Victim Advocacy**

**Questions:**

- ✓ Do you provide a victim advocate to accompany the victim through the forensic medical exam process?
  - Who would provide this service? A current employee or outside entity?

Notes:

**Evidence protocol and forensic medical exams (RP-1):** When investigating allegations of sexual abuse in a lockup, the agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. The protocol must be adapted from or otherwise based on the 2004 U.S. Department of Justice’s Office on Violence Against Women publication “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents,” subsequent updated editions, or similarly comprehensive and authoritative protocols developed after 2004. As part of the agency’s evidence collection protocol, all victims of detainee-on-detainee sexually abusive penetration or staff-on-detainee sexually abusive penetration are provided with access and transportation to a community medical provider served by qualified forensic medical examiners. Forensic medical exams are provided free of charge to the victim. **The agency makes available a victim advocate to accompany the victim through the forensic medical exam process.**

**Major Topic #7: Gathering, Reviewing, and Reporting Sexual Abuse Data**

**Questions:**

- ✓ Do you have a review team to evaluate each incident of sexual abuse?
  - Do you prepare a report for each sexual abuse incident?
  - Does the report consider whether incidents were motivated by racial or other group dynamics at the facility?
  - Does this report include recommendations for improvement?

Notes:

**Sexual abuse incident reviews (DC-1):** The agency treats all instances of sexual abuse as critical incidents to be examined by a group of upper management officials, with input from line supervisors and investigators. The review team evaluates each incident of sexual abuse to identify any policy, training, or other issues related to the incident that indicate a need to change policy or practice to better prevent, detect, and/or respond to incidents of sexual abuse. The review team also considers whether incidents were motivated by racial or other group dynamics at the lockup. When incidents are determined to be motivated by racial or other group dynamics, upper management officials immediately notify the agency head and begin taking steps to rectify those underlying problems. The sexual abuse incident review takes place at the conclusion of every sexual abuse investigation, unless the allegation was determined to be unfounded. The review team prepares a report of its findings and recommendations for improvement and submits it to the agency head.

**Questions:**

- ✓ Do you prepare an annual report on aggregated sexual abuse data using a standardized instrument and set of definitions (e.g., BJS survey on sexual violence)?
  - Does it include contracted facilities?

Data collection (DC-2):  
 The agency collects accurate, uniform data for every reported incident of sexual abuse using a standardized instrument and set of definitions. The agency aggregates the incident-based sexual abuse data at least annually. The incident-based data collected includes, at a minimum, the data necessary to answer all questions from the most recent version of the BJS Survey on Sexual Violence. Data are obtained from multiple sources, including reports, investigation files, and sexual abuse incident reviews. The agency also obtains incident-based and aggregated data from every agency with which it contracts for the confinement of its detainees.

**Notes:** \_\_\_\_\_  
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**Questions:**

- ✓ Do you review, analyze, and use all sexual abuse data to assess and improve the effectiveness of your sexual abuse prevention, detection, and response policies, practices, and training?
  - Does this review identify problem areas (including any racial dynamics, underlying patterns of sexual abuse, issues with particular physical locations or times of day), and take corrective action on an ongoing basis?
- ✓ Do you compare data from your annual report to data from the previous year?
  - Do you provide an assessment of your progress?
- ✓ Is your annual data available to the public or on line?

Data review for corrective action (DC-3):  
 The agency reviews, analyzes, and uses all sexual abuse data, including incident-based and aggregated data, to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training. Using these data, the agency identifies problem areas, including any racial or other group dynamics underpinning patterns of sexual abuse, takes corrective action on an ongoing basis, and, at least annually, prepares a report of its findings and corrective actions for each lockup as well as the agency as a whole. The annual report also includes a comparison of the current year’s data and corrective actions with those from prior years and provides an assessment of the agency’s progress in addressing sexual abuse. The agency’s report is approved by the agency head, submitted to the appropriate legislative body, and made readily available to the public through its Web site or, if it does not have one, through other means. The agency may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of an agency, but it must indicate the nature of the material redacted.

**Notes:** \_\_\_\_\_  
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**Questions:**

- ✓ Is your sexual abuse data properly stored, securely retained, and protected?
  - What medium (electronic or paper) and where is it stored?
  - Unless otherwise authorized by local or state law, do you retain it for at least 10 years?

Data storage, publication, and destruction (DC-4): The agency ensures that the collected sexual abuse data are properly stored, securely retained, and protected. The agency makes all aggregated sexual abuse data, from lockups under its direct control and those entities with which it contracts, readily available to the public at least annually through its Web site or, if it does not have one, through other means. Before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers from the data. The agency maintains sexual abuse data for at least 10 years after the date of its initial collection unless Federal, State, or local law allows for the disposal of official information in less than 10 years.

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**Major Topic #8: Background Checks for Hiring and Promotions**

**Questions:**

- ✓ Do you and your contractors contact all prior institutional employers for information on substantiated allegations of sexual abuse?
- ✓ Do you and your contractors run criminal background checks for all applicants and employees being considered for promotion?

Hiring and promotion decisions (PP-7): The agency does not hire or promote anyone who has engaged in sexual abuse in an institutional setting or who has engaged in sexual activity in the community facilitated by force, the threat of force, or coercion. Consistent with Federal, State, and local law, **the agency makes its best effort to contact all prior institutional employers for information on substantiated allegations of sexual abuse; must run criminal background checks for all applicants and employees being considered for promotion;** and must examine and carefully weigh any history of criminal activity at work or in the community, including convictions for domestic violence, stalking, and sex offenses. The agency also asks all applicants and employees directly about previous misconduct during interviews

**Notes:** \_\_\_\_\_  
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**Major Topic #9: Triennial Auditing of the NPREC standards**

**Questions:**

- ✓ What types of audits and/or accreditations do you undergo on a periodic basis?
  - Would any of these be similar to what you would expect for a PREA audit?

Audits of standards (AU-1): The public agency ensures that all of its lockups, including contract facilities, are audited to measure compliance with the PREA standards. Audits must be conducted at least every three years by independent and qualified auditors. The public or contracted agency allows the auditor to enter and tour lockups, review documents, and interview staff and detainees, as deemed appropriate by the auditor, to conduct comprehensive audits. The public agency ensures that the report of the auditor’s findings and the public or contracted agency’s plan for corrective action (DC-3) are published on the appropriate agency’s Web site if it has one or are otherwise made readily available to the public.

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**Major Topic #10: Screening for Risk of Sexual Victimization and Abusiveness**

**Questions:**

- ✓ Are all detainees screened during intake (and at all subsequent classification reviews) to assess their risk of being sexually abused by other inmates or having the potential to be sexually abusive towards other inmates?
- ✓ Absent intake screenings or assessments, do staff members provide sufficient protection to a detainee that is observed to have any physical or behavioral characteristics that suggest he or she may be vulnerable to sexual abuse?

Heightened protection for vulnerable detainees (PP-4): Any intake screening or assessment includes consideration of a detainee’s potential vulnerability to sexual abuse. When vulnerabilities are identified, law enforcement staff provides heightened protection to vulnerable detainees, which may require continuous direct sight and sound supervision or single-cell housing. Absent intake screenings or assessments, any time a law enforcement staff member observes any physical or behavioral characteristics of a detainee that suggest he or she may be vulnerable to sexual abuse, the staff member provides sufficient protection to that detainee to prevent sexual abuse.

**Notes:**

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**Major Topic #11: Contract Modifications and/or Policy and Procedure Updates**

**Questions:**

- ✓ Do you contract with other agencies or facilities for the confinement of detainees?
  - If so, how many facilities?
  - What will it take to ensure these agencies/facilities are in compliance?
  - Will this require any contract modifications?
  - Do you think any contract modifications, as a result of PREA, would result in greater costs to you?

Contracting with other entities for the confinement of detainees (PP-2): If law enforcement agencies contract for the confinement of their detainees, they do so only with private agencies or other entities, including other government agencies, committed to eliminating sexual abuse in their lockups, as evidenced by their adoption of and compliance with the PREA standards. Any new contracts or contract renewals include the entity’s obligation to adopt and comply with the PREA standards and specify that the law enforcement agency will monitor the entity’s compliance with these standards as part of its monitoring of the entity’s performance.

**Notes:**

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**Questions:**

- ✓ Do you conduct your own criminal investigations or is it an outside legal authority?
  - If outside, who is it?
  - Do you have an MOU with them?
    - If not, how much would it cost to develop these MOUs?
    - If not possible to establish a MOU, do you document the attempt to enter an agreement?
    - If applicable, does it cover vulnerable persons (e.g., under 18 years of age)?

Agreements with outside law enforcement agencies (RP-2):

If an agency has elected to permit another law enforcement agency to conduct criminal or administrative investigations of allegations of sexual abuse in its lockups, the agency maintains or attempts to enter into a written memorandum of understanding (MOU) or other agreement specific to investigations of sexual abuse in lockups with the outside law enforcement agency responsible for conducting investigations. If the agency confines detainees under the age of 18 or other detainees who fall under State and local vulnerable persons statutes, the agency maintains or attempts to enter into an MOU with the designated State or local services agency with the jurisdiction and authority to conduct investigations related to the sexual abuse of vulnerable persons within confinement facilities. When the agency already has an existing agreement or long-standing policy covering responsibilities for all criminal investigations, including sexual abuse investigations, it does not need to enter into a new agreement. The agency maintains a copy of the agreement or documentation showing attempts to enter into an agreement.

**Notes:**

**Questions:**

- ✓ Who are the authorities that prosecute violations?
  - Do you have a MOU with them?
    - If not, how much would it cost to develop these MOUs?
    - If not possible to establish a MOU, do you document the attempt to enter an agreement?

Agreements with the prosecuting authority (RP-3):

The agency maintains or attempts to enter into a written MOU or other agreement with the authority responsible for prosecuting violations of criminal law. The agency maintains a copy of the agreement or documentation showing attempts to enter into an agreement.

**Notes:**

**Major Topic #12: Accommodating Special Needs**

**Questions:**

- ✓ Do you ensure that detainees who are LEP, deaf, or disabled are able to report sexual abuse to staff directly through interpretive technology or through non-detainee interpreters?
  - What services and tools do you employ?
    - What interpretive technology do you use?
    - Do you provide services for the mentally disabled?

Accommodating inmates with special needs (PP-6):

The agency ensures that detainees who are LEP, deaf, or disabled are able to report sexual abuse to staff directly, through interpretive technology, or through non-detainee interpreters. Accommodations are made to convey all written information about sexual abuse policies, including how to report sexual abuse, verbally to detainees who have limited reading skills or who are visually impaired.

**Notes:**





**Questions:**

- ✓ Are allegations of sexual abuse substantiated if supported by a preponderance of the evidence?

Evidence standard for administrative investigations (IN-3): Allegations of sexual abuse are substantiated if supported by a preponderance of the evidence.

**Notes:**

**Minor Topic #3: Confidential Reporting**

**Questions:**

- ✓ How do victims confidentially report sexual abuse (in multiple ways)?
- ✓ Are there means to report sexual abuse to an outside public entity?
  - Who is it?
  - Does this entity charge a fee for such services?

Detainee reporting (RE-1): The agency provides multiple ways for detainees to report easily, privately, and securely sexual abuse, retaliation by other detainees or staff for reporting sexual abuse, and staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse. Staff accepts reports made verbally, in writing, anonymously, and from third parties and immediately puts into writing any verbal reports.

**Notes:**

**Questions:**

- ✓ Please explain your policies/procedures for the exhaustion of administrative remedies available to a detainee.
  - Does it cover a 90 day period (unless you have made a final determination earlier)?
  - Does it cover a 48 hours requirement after a detainee has notified any agency staff member of his or her need for protection?

Exhaustion of administrative remedies (RE-2): Under agency policy, a detainee has exhausted his or her administrative remedies with regard to a claim of sexual abuse either (1) when the agency makes a final decision on the merits of the report of abuse (regardless of whether the report was made by the detainee, made by a third party, or forwarded from an outside official or office) or (2) when 90 days has passed since the report was made, whichever occurs sooner. A report of sexual abuse triggers the 90-day exhaustion period regardless of the length of time that has passed between the abuse and the report. A detainee seeking immediate protection from imminent sexual abuse will be deemed to have exhausted his or her administrative remedies 48 hours after notifying any agency staff member of his or her need for protection.

**Notes:**

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Appendix E – Data Reports

Jails and Prisons



# Cost Impact Study Questionnaire

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[Adult Prisons and Jails]

BOOZ ALLEN HAMILTON

[The following questionnaire consists of two parts. Part I identifies Nation Prison Rape Elimination Commission (NPREC) standards that require an estimated cost impact (if any), accompanied by a detailed explanation of that cost impact or reason for being in compliance. Part II identifies

the remaining standards outlined by NPREC to gauge a level of compliance and a detailed reason for those standards that the jurisdiction may find to be noncompliant with.]

**Part I.** The objective of Part I is to obtain quantifiable cost data for each standard that impacts your day-to-day operations. Before providing a response to each question below, please reference the Standard column and review the definition of each standard (found in the questionnaire and the NPREC Standards Prevention, Detection, Response, and Monitoring of Sexual Abuse in Adult Prisons and Jails). This form has been pre-populated using the information we gathered during our site visit to your facility/jurisdiction. Each standard is labeled as compliant "Y" or noncompliant "N." For quality control purposes, please review and validate the explanation provided for both "Y" and "N" standards. For those standards with an "N", please provide a cost estimate in the "Cost Impact" column with an explanation supporting your cost estimate and assumptions. If there are multiple costs for one standard, please itemize your costs. All cost estimates should be best guesses and do not have to be supported with detailed documentation but should adhere to a test of reasonability.

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
1	PP-4	<p>Except in the case of an emergency, does your jurisdiction/facility prohibit cross-gender pat downs?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ How would male/female staffing levels need to be altered to prohibit cross-gender pat down searches?</li> <li>✓ Would this require an increased level of effort (LOE)?</li> <li>✓ Are there other policies, besides altering staffing levels, that could be employed?</li> </ul>			
2	PP-3	<p>If a problem of sexual abuse is evident in your jurisdiction/facility, what is the best method for reducing the number of incidents through physical supervision?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Would an increased LOE be necessary in order to provide adequate physical supervision?</li> <li>✓ Can you get by with a workforce realignment to meet the same objective?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
3	PP-7	<p>Does your jurisdiction/facility currently have video monitoring in place? If you feel this technology is not adequately suited to reduce sexual abuse incidents, what is the associated cost?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ What would it cost to purchase and install monitoring technology in trouble areas?</li> <li>✓ Is this enhanced technology directly related to reducing the incidence of sexual abuse?</li> <li>✓ Would you consider employing other methods of technology supervision (e.g., Radio Frequency Identification Bracelets)? If so, what would be the cost impact of such technology?</li> </ul>			
4	PP-7	<p>Do you annually assess the feasibility of your current technology, including developing a plan for securing new technology?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Is there a cost associated with the LOE necessary for management to meet yearly and assess and develop a plan for securing new technology?</li> <li>✓ Would you contract out for this assessment?</li> </ul>			
5	PP-1	<p>Does your jurisdiction/facility have a PREA coordinator to comply with the PREA standards?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ A PREA coordinator is a full-time position in the governing body of the State prison systems and agencies that operate large jails (more than 500 inmates) but may be a part-time position in jurisdictions that operate medium (101-500) and small jails (100 inmates or fewer).</li> <li>✓ Have you considered the cost of the PREA coordinator including base salary plus benefits?</li> </ul>			
6	TR-1	<p>Do you provide training to all employees on sexual abuse prevention, detection, and response policies and procedures; the PREA standards; and relevant Federal, State, and local law?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ What are the means of training? Class-room/computer based? Consider the LOE of an instructor and materials or the cost associated with the implementation of a web-based module.</li> <li>✓ Have you reviewed appendix B of the NPREC standards that lays out the training requirements</li> <li>✓ Are all employees (including office administrators) included in your training?</li> <li>✓ Do you provide periodic refresher training to employees? How frequently? What's the cost impact associated with this recurring training?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
7	TR-2	<p>Do you provide training to all volunteers and contractors who have contact with inmates on sexual abuse prevention, detection, and response policies and procedures; the PREA standards; and relevant Federal, State, and local law?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Will the training be provided by the employees or contractors?</li> <li>✓ What are the means of training? Class-room/computer based? Consider the LOE of an instructor, cost of materials, and/or the cost associated with a web-based module.</li> <li>✓ Is periodic refresher training provided to volunteers and contractors? What’s the cost impact?</li> </ul>			
8	TR-3	<p>Within a reasonably brief period of time following the intake process, does your agency provide comprehensive education to inmates regarding their right to be free from sexual abuse, from retaliation for reporting abuse, the dynamics of sexual abuse in confinement, the common reactions of sexual abuse victims, and agency sexual abuse response policies and procedures?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ What is the cost of educating current inmates on the agency’s adoption of PREA standards? Have you considered the cost of materials and LOE of an instructor or web-based development?</li> <li>✓ How do you deliver training and/or education? Class room? Computer? Handbook?</li> <li>✓ What is the cost of providing refresher training?</li> <li>✓ How do you deliver refresher training and how frequently? Do you have TV monitors that provide video loops of educational material in common areas?</li> <li>✓ Have you considered the size of the population when estimating a cost to educate all inmates?</li> <li>✓ Is education provided to all inmates, including LEP, deaf, visual, or otherwise disabled?</li> </ul>			
9	TR-4	<p>Do you ensure sexual abuse training has been provided to investigators specifically conducting investigations in confinement settings?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Where do they get their training? Does it cover confinement settings?</li> <li>✓ If you are responsible for training your own investigators, have you considered the cost of materials and LOE of an instructor or web-based development?</li> <li>✓ Does your training for investigators include techniques for interviewing sexual abuse victims, proper use of Miranda- and Garrity-type warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
10	TR-5	<p>Do you ensure your full and part-time medical and mental health care practitioners have been trained on how to detect and assess signs of sexual abuse and that all medical practitioners are trained on how to preserve physical evidence of sexual abuse?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Where do they get their training?</li> <li>✓ If you are responsible for training your own investigators, have you considered the cost of materials and LOE of an instructor or web-based development?</li> </ul>			
11	RP-1	<p>Do you provide a victim advocate to accompany the victim through the forensic medical exam process?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Who would provide this service? A current employee or outside entity?</li> <li>✓ What services are located in your town, county or state? Does it include non-profits, religious organizations, or community service providers?</li> <li>✓ Have you considered hiring staff or contracting out on a per incident basis?</li> </ul>			
12	RE-3	<p>Are inmates provided access to outside victim advocate services?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Are there posters or pamphlets with this information around the facility jurisdiction?</li> <li>✓ Who provides this outside victim advocacy support? What services are located in your town, county or state? Non-profits, religious organizations, or community service providers?</li> <li>✓ Is there a fee borne by you for these services or is it provided by the state, county, or other non-profit service (state-level sexual assault coalition or its local affiliates)?</li> <li>✓ Does your facility ensure that communications with such advocates are private, confidential, and privileged, to the extent allowable by Federal, State, and local law and are inmates informed, prior to giving them access, of the extent to which these communications will be kept private, confidential, and privileged?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
13	DC-1	<p>Do you have a review team to evaluate each incident of sexual abuse?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Do you prepare a report for each incident and include recommendations for improvement?</li> <li>✓ What is the LOE cost required to assemble a review team and evaluate each incident?</li> </ul>			
14	DC-2	<p>Do you prepare an annual report on aggregated sexual abuse data using a standardized instrument and set of definitions (e.g., BJS survey on sexual violence)?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Does it include contracted facilities?</li> <li>✓ Is an increased LOE necessary to aggregate, compare year-over-year, and standardize data?</li> </ul>			
15	DC-3	<p>Do you review, analyze, and use all sexual abuse data to assess and improve the effectiveness of your sexual abuse prevention, detection, and response policies, practices, and training?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Is your annual data available to the public (e.g., when requested or through FOIA) or online? If posting data online, how much effort would it require of your staff?</li> <li>✓ Based on the volume of incidents, is it necessary to increase the LOE to review incident data?</li> <li>✓ Does this review identify problem areas (including any racial dynamics) and take action?</li> <li>✓ Do you provide an assessment of your progress?</li> </ul>			
16	DC-4	<p>Is your sexual abuse data properly stored, securely retained, and protected?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Is it (electronic or paper) and where is it stored? In a locked container or password protected?</li> <li>✓ Have you considered the cost associated with server maintenance and potential upgrades to your IT system to ensure data is stored securely for a minimum of 10 years?</li> </ul>			



#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
17	PP-6	<p>Do you and your contractors contact all prior institutional employers for information on substantiated allegations of sexual abuse?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Have you considered costs associated with the LOE required to comply with the standard?</li> <li>✓ Would you offer contingency hires followed up by phone calls to previous institutional employers (to ease the burden of this standard)?</li> <li>✓ How many phone calls would you need to make?</li> </ul>			
18	PP-6	<p>Do you and your contractors run criminal background checks for all applicants and employees being considered for promotion?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Large staffing populations serve as a cost driver for conducting background checks.</li> <li>✓ Have you considered the cost of a background check on a per incident basis?</li> <li>✓ How many promotions/new-hires are estimated per year?</li> <li>✓ Who conducts your background investigations? Is there a cost?</li> </ul>			
19	AU-1	<p>What would be the cost impact of conducting an audit to measure compliance with the PREA standards at least every three years at every facility, including contracted facilities?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Is there a cost associated with the LOE necessary for auditors to conduct their assessment?</li> <li>✓ Is there a cost associated with conducting audits such as the ACA audit or PbS audit?</li> <li>✓ Does your state or any other higher authority perform routine audits of your facility/jurisdiction? Do you pay for them?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
20	SC-1	<p>Are all inmates screened during intake (and at all subsequent classification reviews) to assess their risk of being sexually abused by other inmates or having the potential to be sexually abusive towards other inmates?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Do you have a written screening instrument tailored to the gender of the population being screened? Is there a cost associated with developing or modifying a tool to include PREA-related questions?</li> <li>✓ Have you considered the LOE necessary to develop a screening process if your jurisdiction/facility has yet to formalize a process on par with the NPREC standards?</li> </ul>			
21	SC-2	<p>Do you use the screening information to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Does this require an increased LOE?</li> <li>✓ Who would perform this assessment?</li> </ul>			
22	PP-2	<p>Do you contract with other agencies or facilities for the confinement of inmates? If so, do you ensure these contracted agencies or facilities adhere to PREA guidelines?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ If so, how many facilities?</li> <li>✓ Will this require any contract modifications, and if so, will it result in a greater cost to you?</li> <li>✓ Are these entities private or public? If public, would they be subject to PREA compliance also?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
23	RP-2	<p>Do you maintain or attempt to enter into memoranda of understanding (MOUs) or other agreements with an outside public entity or office that is able to 1) receive and immediately forward inmate reports of sexual abuse to facility heads, 2) provide inmates with confidential emotional support services related to sexual abuse, and 3) help victims of sexual abuse during their transition from incarceration to the community?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Who currently provides these services (if anyone)?</li> <li>✓ Do you have any MOU’s with them? If not, how much would it cost to develop these MOUs?</li> <li>✓ If not possible to establish a MOU, do you document the attempt to enter an agreement? Is there a cost impact associated with the LOE required to document this attempt?</li> </ul>			
24	RP-3	<p>Do you conduct your own criminal investigations or is it an outside legal authority?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ If outside, who is it?</li> <li>✓ Do you have a MOU with them? If not, how much would it cost to develop a MOU?</li> <li>✓ If not possible to establish a MOU, do you document the attempt to enter an agreement? Is there a cost impact associated with the LOE required to document this attempt?</li> <li>✓ If applicable, does it cover vulnerable persons (e.g., under 18 years of age)?</li> </ul>			
25	RP-4	<p>Who are the authorities that prosecute violations?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ If prosecutions are conducted by state agencies, is there a statute that authorizes this service?</li> <li>✓ Do you have a MOU with them? If not, how much would it cost to develop a MOU?</li> <li>✓ If not possible to establish a MOU, do you document the attempt to enter an agreement? Is there a cost impact associated with the LOE required to document this attempt?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
26	PP-5	<p>Do you ensure that inmates who are LEP, deaf, or disabled are able to report sexual abuse to staff directly through interpretive technology or through non-inmate interpreters?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ What services and tools do you employ? Is there a LOE cost?</li> <li>✓ What interpretive technology will you use? Is there a cost impact?</li> <li>✓ Do you provide services for the mentally disabled? Do you have a medical or mental health staff that would provide these services? Is there a LOE cost for these services?</li> </ul>			
27	RP-1	<p>Are forensic medical exams provided free of charge to the victim?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Who provides the exams?</li> <li>✓ Who bears the cost associated with giving these exams?</li> </ul>			
28	RE-4	<p>Do you investigate all third-party reports of sexual abuse?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Based on the number of incidents investigated in the past, is there a LOE cost?</li> <li>✓ Should this LOE be based on a case-by-case basis or in terms of a staff increase?</li> </ul>			
29	IN-1	<p>Do you investigate all allegations of sexual abuse and notify victims and/or other complaints in writing of investigation outcomes and any disciplinary or criminal sanctions, regardless of the source of the allegation? Are these investigations carried through to completion, regardless of whether the alleged abuser or victim remains at the facility?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Based on the number of incidents investigated in the past, is an increased LOE necessary to ensure that an investigation is conducted for all allegations of sexual abuse?</li> <li>✓ Should this LOE be based on a case-by-case basis or in terms of a staff increase?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
30	IN-3	<p>Are allegations of sexual abuse substantiated if supported by a preponderance of the evidence?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Is an increased LOE necessary in order to substantiate claims of abuse?</li> </ul>			
31	MM-3	<p>Does the facility/jurisdiction conduct a mental health evaluation and provide ongoing medical and/or mental health evaluations and treatment to all known users of sexual abuse?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ What would be the cost associated with a mental health evaluation?</li> <li>✓ Would an increased LOE be necessary in order to provide medical and mental health practitioners that would conduct these evaluations?</li> </ul>			
32	RE-1	<p>How do victims confidentially report sexual abuse (in multiple ways)? Are there means to report sexual abuse to an outside public entity?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ What means are available to report sexual abuse (e.g., drop boxes, toll free numbers, talking with an officer, contacting an outside entity)?</li> <li>✓ Are any verbal reports immediately put into writing?</li> <li>✓ If an outside entity, who would provide this service and is there a fee for providing such a service?</li> <li>✓ Would this cost be charged on a per incident basis?</li> </ul>			
33	RE-2	<p>What is your policy/procedure for the exhaustion of administrative remedies available to an inmate? Do you ensure that this covers a 90-day period (unless you have made a final determination earlier) and does it cover a 48 hours requirement after an inmate has notified any agency staff member of his or her need for protection?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ A cost associated with creating or revising a policy and/or procedure to include attorney fees or additional litigation costs (if quantifiable)?</li> </ul>			

Source: Standards for the Prevention, Detection, Response, and Monitoring of Sexual Abuse in Adult Prisons and Jails, the National Prison Rape Elimination Commission.

**Part II.** For each standard/question below, please provide a response to whether or not your jurisdiction is compliant and provide an explanation of the reason for answering compliant or noncompliant. For further information on each standard, please reference the NPREC Standards Prevention, Detection, Response, and Monitoring of Sexual Abuse in Adult Prisons and Jails.

#	Standard	Question	Compliant? (Y/N)	Explanation of reason for being compliant or noncompliant
1	PP-1	Does your agency have a written policy mandating zero tolerance towards all forms of sexual abuse and enforces that policy by ensuring all its facilities comply with the PREA standards?		
2	PP-4	At your agency, do medical practitioners conduct examinations of transgender individuals to determine their genital status only in private settings and only when an individual’s genital status is unknown?		
3	PP-4	Does your facility prohibit cross-gender strips and visual body cavity searches?		
4	PP-6	Does your agency intentionally not hire or promote anyone who has engaged in sexual abuse in an institutional setting or in the community facilitated by force, the threat of force, or coercion?		
5	PP-6	Does your agency examine and carefully weigh any history of criminal activity at work or in the community, including convictions for domestic violence, stalking, and sex offenses?		
6	RP-1	Does your facility follow an evidence protocol adapted from the 2004 U.S. Department of Justice’s Office on Violence Against Women publication “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents”, subsequent updated editions, or similarly comprehensive and authoritative protocols developed after 2004? <a href="http://www.ncjrs.gov/pdffiles1/ovw/206554.pdf">http://www.ncjrs.gov/pdffiles1/ovw/206554.pdf</a>		
7	RP-3	Do you have legal authority to conduct investigations within your facility?		
8	SC-2	Does your facility make individualized determinations about how to ensure the safety of each inmate. Including whether lesbian, gay, bisexual, transgender, or other gender-nonconforming inmates are placed in particular facilities, units, or wings solely on the basis of their sexual orientation, genital status, or gender identity.		
9	SC-2	Are inmates at high risk for sexual victimization placed in segregated housing only as a last resort and then only until an alternative means of separation from likely abusers can be arranged?		

#	Standard	Question	Compliant? (Y/N)	Explanation of reason for being compliant or noncompliant
10	SC-2	In your facility, does risk of sexual victimization limit access to programs, education, and work opportunities?		
11	RE-4	At the conclusion of an investigation, does your facility notify in writing the third-party individual who reported the abuse and the inmate named in the report of the outcome of the investigation?		
12	RE-4	Does your facility publicly distribute information on how to report sexual abuse on behalf of an inmate?		
13	OR-1	Does your agency policy require that all staff members immediately report any knowledge, suspicion, or information they receive regarding an incident of sexual abuse, retaliation against inmates or staff who reported abuse; and any staff neglect related to an incident of sexual abuse or retaliation?		
14	OR-1	Does your agency policy require that staff not reveal any information related to a sexual abuse report to anyone other than those who need to know, to make treatment, investigation, and other security and management decisions?		
15	OR-1	At your agency, are medical and mental health practitioners required to report sexual abuse and inform inmates of their duty to report the abuse at the initiation of services, unless otherwise precluded by Federal, State, or local law?		
16	OR-1	At your agency, is it required that the facility head report an incident involving a victim less than 18 years of age to the designated State or local services agency under applicable mandatory reporting laws?		
17	OR-2	When your facility receives an allegation that an inmate was sexually abused while confined at another facility, does the head of your facility notify in writing the head of the facility where the alleged abuse occurred and ensure that the allegation is or was investigated?		
18	OR-3	At your agency, when a sexual abuse incident has occurred and the collection of physical evidence is still possible, do the first security staff to the scene conduct the following:  1) separate the alleged victim and abuser 2) seal and preserve any crime scene(s) 3) instruct the victim not to take any actions that could destroy physical evidence, including washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating?		
19	OR-3	At your agency, if the first staff responder is a non-security staff member, is he or she required to instruct the victim not to take any actions that could destroy physical evidence and then notify security staff?		

#	Standard	Question	Compliant? (Y/N)	Explanation of reason for being compliant or noncompliant
20	OR-4	Does your agency ensure the coordination of all actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership?		
21	OR-4	Does your facility’s coordinated response ensure that victims receive all necessary immediate and ongoing medical, mental health, and support services and that investigators are able to obtain usable evidence to substantiate allegations and hold perpetrators accountable?		
22	OR-5	Does your agency protect all inmates and staff who report sexual abuse or cooperate with sexual abuse investigations from retaliation by other inmates or staff, including housing changes or transfers, the removal of any contact between the alleged abuser and victim, and/or the offering of emotional support services?		
23	OR-5	Does your agency monitor, for at least 90 days, the conduct and/or treatment of inmates or staff that have reported sexual abuse or cooperated with investigations, and identify and discuss with inmates and staff any changes that may suggest possible retaliation by inmates or staff?		
24	DI-1	At your agency, is staff subject to disciplinary sanctions up to and including termination when sexual abuse policies have been violated?		
25	DI-1	At your agency, is termination the presumptive disciplinary sanction for staff members who have engaged in sexually abusive contact or penetration?		
26	DI-2	At your agency, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative ruling that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for such sexual abuse?		
27	DI-2	At your agency, do sanctions commensurate with the nature and circumstances of the abuse committed, the inmate’s disciplinary history, and comparable offenses by other inmates with similar histories?		
28	DI-2	Does your agency’s disciplinary process consider whether an inmate’s mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed?		



#	Standard	Question	Compliant? (Y/N)	Explanation of reason for being compliant or noncompliant
29	DI-2	At your agency, do possible sanctions include interventions designed to address and correct underlying reasons or motivation for the abuse, such as requiring the offending inmate to participate in therapy, counseling, or other programs?		
30	MM-1	Does your agency have qualified medical or mental health practitioners to ask inmates about prior sexual victimization and abusiveness during medical and mental health reception and intake screenings?		
31	MM-1	If an inmate discloses any prior sexual victimization or abusiveness during a medical or mental health reception or intake screening, does the practitioner provide the appropriate referral for treatment?		
32	MM-1	Does your agency strictly limit any information related to sexual victimization or abusiveness that occurred in an institutional setting to medical and mental health practitioners and other staff, as required by agency policy and Federal, State, or local law, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments?		
33	MM-1	At your agency, do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?		
34	MM-2	Do victims of sexual abuse have timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment. And, if so, are these services free to the victim?		
35	MM-2	Do staff first responders take preliminary steps to protect a victim and notify appropriate staff or community medical and mental health practitioners if your facility does not have medical or mental health practitioners or they are not on duty at the time a report of recent abuse is made?		
36	DC-1	Does the report consider whether incidents were motivated by racial or other group dynamics at the facility?		
37	IDFF	Does your agency treat immigrant inmates the same as citizen inmates?		

Source: Standards for the Prevention, Detection, Response, and Monitoring of Sexual Abuse in Adult Prisons and Jails, the National Prison Rape Elimination Commission.

Juvenile Facilities



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# Cost Impact Study Questionnaire

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[Juvenile Facilities]

BOOZ ALLEN HAMILTON

[The following questionnaire consists of two parts. Part I identifies Nation Prison Rape Elimination Commission (NPREC) standards that require an estimated cost impact (if any), accompanied by a detailed explanation of that cost impact or reason for being in compliance. Part II identifies the remaining standards outlined by NPREC to gauge a level of compliance and a detailed reason for those standards that the jurisdiction may find to be noncompliant with.]



**Part I.** For each question below, please reference the *Standard* column and review the standard(s) definition (found in the NPREC Standards Prevention, Detection, Response, and Monitoring of Sexual Abuse in Juvenile Facilities) before offering a response. If your jurisdiction/facility is compliant, please respond with a “Y” in the *Compliant?* column and provide a detailed explanation of reason for being compliant in the last column. **(Please note: You do not need to provide a cost impact if you find your jurisdiction/facility to be in compliance.)** Otherwise, please respond with a “N” in the *Compliant?* column and provide an estimated cost impact accompanied by a detailed explanation of the projected cost after considering points made in the *Question* column.

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
1	PP-4	<p>Except in the case of an emergency, does your jurisdiction/facility prohibit cross-gender pat downs?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ How would male/female staffing levels need to be altered to prohibit cross-gender pat down searches?</li> <li>✓ Would this require an increased level of effort (LOE)?</li> <li>✓ Are there other policies, besides altering staffing levels, that could be employed?</li> </ul>			
2	PP-3	<p>If a problem of sexual abuse is evident in your jurisdiction/facility, what is the best method for reducing the number of incidents through physical supervision?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Would an increased LOE be necessary in order to provide adequate physical supervision?</li> <li>✓ Can you get by with a workforce realignment to meet the same objective?</li> </ul>			
3	PP-7	<p>Does your jurisdiction/facility currently have video monitoring in place? If you feel this technology is not adequately suited to reduce sexual abuse incidents, what is the associated cost?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ What would it cost to purchase and install monitoring technology in trouble areas?</li> <li>✓ Is this enhanced technology directly related to reducing the incidence of sexual abuse?</li> <li>✓ Would you consider employing other methods of technology supervision (e.g., Radio Frequency Identification Bracelets)? If so, what would be the cost impact of such technology?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
4	PP-7	<p>Do you annually assess the feasibility of your current technology, including developing a plan for securing new technology?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Is there a cost associated with the LOE necessary for management to meet yearly and assess and develop a plan for securing new technology?</li> <li>✓ Would you contract out for this assessment?</li> </ul>			
5	PP-1	<p>Does your jurisdiction/facility have a PREA coordinator to comply with the PREA standards?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ A PREA coordinator is a full-time position in the governing body of the State prison systems and agencies that operate large jails (more than 500 residents) but may be a part-time position in jurisdictions that operate medium (101-500) and small jails (100 residents or fewer).</li> <li>✓ Have you considered the cost of the PREA coordinator including base salary plus benefits?</li> </ul>			
6	TR-1	<p>Do you provide training to all employees on sexual abuse prevention, detection, and response policies and procedures; the PREA standards; and relevant Federal, State, and local law?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ What are the means of training? Class-room/computer based? Consider the LOE of an instructor and materials or the cost associated with the implementation of a web-based module.</li> <li>✓ Have you reviewed appendix B of the NPREC standards that lays out the training requirements?</li> <li>✓ Are all employees (including office administrators) included in your training?</li> <li>✓ Do you provide periodic refresher training to employees? How frequently? What's the cost impact associated with this recurring training?</li> </ul>			
7	TR-2	<p>Do you provide training to all volunteers and contractors who have contact with residents on sexual abuse prevention, detection, and response policies and procedures; the PREA standards; and relevant Federal, State, and local law?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Will the training be provided by the employees or contractors?</li> <li>✓ What are the means of training? Class-room/computer based? Consider the LOE of an instructor, cost of materials, or the cost associated with a web-based module.</li> <li>✓ Is periodic refresher training provided to volunteers and contractors? What's the cost impact?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
8	TR-3	<p>Within a reasonably brief period of time following the intake process, does your agency provide comprehensive education to residents regarding their right to be free from sexual abuse and to be free from retaliation for reporting abuse, the dynamics of sexual abuse in confinement, the common reactions of sexual abuse victims, and agency sexual abuse response policies and procedures?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ What is the cost of educating current residents on the agency’s adoption of PREA standards? Have you considered the cost of materials and LOE of an instructor or web-based development?</li> <li>✓ How do you deliver training and/or education? Class-room? Computer? Handbook?</li> <li>✓ What is the cost of providing refresher training?</li> <li>✓ How do you deliver refresher training and how frequently? Do you have TV monitors that provide video loops of educational material in common areas?</li> <li>✓ Have you considered the size of the population when estimating a cost to educate all residents?</li> <li>✓ Is education provided to all residents, including LEP, deaf, visual, or otherwise disabled?</li> </ul>			
9	TR-4	<p>Do you ensure sexual abuse training has been provided to investigators specifically conducting investigations in confinement settings?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Where do they get their training? Does it cover confinement settings?</li> <li>✓ If you are responsible for training your own investigators, have you considered the cost of materials and LOE of an instructor or web-based development?</li> <li>✓ Does your training for investigators include techniques for interviewing sexual abuse victims, proper use of Miranda or Garrity-type warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral?</li> </ul>			
10	TR-5	<p>Do you ensure your full and part-time medical and mental health care practitioners have been trained on how to detect and assess signs of sexual abuse and that all medical practitioners are trained on how to preserve physical evidence of sexual abuse?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Where do they get their training?</li> <li>✓ If you are responsible for training your own investigators, have you considered the cost of materials and LOE of an instructor or web-based development?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
11	RP-1	<p>Do you provide a victim advocate to accompany the victim through the forensic medical exam process?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Who would provide this service? A current employee or outside entity?</li> <li>✓ What services are located in your town, county, or state? Does it include non-profits, religious organizations, or community-services providers?</li> <li>✓ Have you considered hiring staff or contracting out on a per incident basis?</li> </ul>			
12	RE-3	<p>Are residents provided access to outside victim advocate services?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Are there posters or pamphlets with this information around the facility jurisdiction?</li> <li>✓ Who provides this outside victim advocacy support? What services are located in your town, county or state? Non-profits, religious organizations, or community service providers?</li> <li>✓ Is there a fee borne by you for these services or is it provided by the state, county, or other non-profit service (state-level sexual assault coalition or its local affiliates)?</li> <li>✓ Does your facility ensure that communications with such advocates are private, confidential, and privileged, to the extent allowable by Federal, State, and local law and are inmates informed, prior to giving them access, of the extent to which these communications will be kept private, confidential, and privileged?</li> </ul>			
13	DC-1	<p>Do you have a review team to evaluate each incident of sexual abuse?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Do you prepare a report for each incident and include recommendations for improvement?</li> <li>✓ What is the LOE cost required to assemble a review team and evaluate each incident?</li> </ul>			
14	DC-2	<p>Do you prepare an annual report on aggregated sexual abuse data using a standardized instrument and set of definitions (e.g., BJS survey on sexual violence)?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Does it include contracted facilities?</li> <li>✓ Is an increased LOE necessary to aggregate, compare year-over-year, and standardize data?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
15	DC-3	<p>Do you review, analyze, and use all sexual abuse data to assess and improve the effectiveness of your sexual abuse prevention, detection, and response policies, practices, and training?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Is your annual data available to the public (e.g., when requested or through FOIA) or online? If posting data online, how much effort would it require of your staff?</li> <li>✓ Based on the volume of incidents, is it necessary to increase the LOE to review incident data?</li> <li>✓ Does this review identify problem areas (including any racial dynamics) and take action?</li> <li>✓ Do you provide an assessment of your progress?</li> </ul>			
16	DC-4	<p>Is your sexual abuse data properly stored, securely retained, and protected?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Is it electronic or paper and where is it stored? In a locked container or password protected?</li> <li>✓ Have you considered the cost associated with server maintenance and potential upgrades to your IT system to ensure data is stored securely for a minimum of 10 years?</li> </ul>			
17	PP-6	<p>Do you and your contractors contact all prior institutional employers for information on substantiated allegations of sexual abuse?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Have you considered costs associated with the LOE required to comply with the standard?</li> <li>✓ Would you offer contingency hires followed up by phone calls to previous institutional employers (to ease the burden of this standard)?</li> <li>✓ How many phone calls would you need to make?</li> </ul>			
18	PP-6	<p>Do you and your contractors run criminal background checks for all applicants and employees being considered for promotion?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Large staffing populations serve as a cost driver for conducting background checks.</li> <li>✓ Have you considered the cost of a background check on a per incident basis?</li> <li>✓ How many promotions/new-hires are estimated per year?</li> <li>✓ Who conducts your background investigations? Is there a cost?</li> </ul>			



#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
19	AU-1	<p>What would be the cost impact of conducting an audit to measure compliance with the PREA standards at least every three years at every facility, including contracted facilities?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Is there a cost associated with the LOE necessary for auditors to conduct their assessment?</li> <li>✓ Is there a cost associated with conducting audits such as the ACA audit or PbS audit?</li> <li>✓ Does your state or any other higher authority perform routine audits of your facility/jurisdiction? Do you pay for them?</li> </ul>			
20	AP-1	<p>Are all residents screened during intake (and at all subsequent classification reviews) to assess their risk of being sexually abused by other residents or having the potential to be sexually abusive towards other residents?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Do you have a written screening instrument tailored to the gender of the population being screened? Is there a cost associated with developing or modifying a tool to include PREA-related questions?</li> <li>✓ Have you considered the LOE necessary to develop a screening process if your jurisdiction/facility has yet to formalize a process on par with the NPREC standards?</li> </ul>			
21	AP-2	<p>Do you use the screening information to inform housing, bed, work, education, and program assignments with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Does this require an increased LOE?</li> <li>✓ Who would perform this assessment?</li> </ul>			
22	PP-2	<p>Do you contract with other agencies or facilities for the confinement of inmates? If so, do you ensure these contracted agencies or facilities adhere to PREA guidelines?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ If so, how many facilities?</li> <li>✓ Will this require any contract modifications, and if so, will it result in a greater cost to you?</li> <li>✓ Are these entities private or public? If public, would they be subject to PREA compliance also?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
23	RP-2	<p>Do you maintain or attempt to enter into memoranda of understanding (MOUs) or other agreements with an outside public entity or office that is able to 1) receive and immediately forward resident reports of sexual abuse to facility heads, 2) provide residents with confidential emotional support services related to sexual abuse, and 3) help victims of sexual abuse during their transition from incarceration to the community?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Who currently provides these services (if anyone)?</li> <li>✓ Do you have any MOU's with them? If not, how much would it cost to develop these MOUs?</li> <li>✓ If not possible to establish a MOU, do you document the attempt to enter an agreement? Is there a cost impact associated with the LOE required to document this attempt?</li> </ul>			
24	RP-3	<p>Do you conduct your own criminal investigations or is it an outside legal authority?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ If outside, who is it?</li> <li>✓ Do you have a MOU with them? If not, how much would it cost to develop a MOU?</li> <li>✓ If not possible to establish a MOU, do you document the attempt to enter an agreement? Is there a cost impact associated with the LOE required to document this attempt?</li> <li>✓ If applicable, does it cover vulnerable persons (e.g., under 18 years of age)?</li> </ul>			
25	RP-4	<p>Who are the authorities that prosecute violations?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ If prosecutions are conducted by state agencies, is there a statute that authorizes this service?</li> <li>✓ Do you have a MOU with them? If not, how much would it cost to develop a MOU?</li> <li>✓ If not possible to establish a MOU, do you document the attempt to enter an agreement? Is there a cost impact associated with the LOE required to document this attempt?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
26	PP-5	<p>Do you ensure that residents who are LEP, deaf, or disabled are able to report sexual abuse to staff directly through interpretive technology or through non-resident interpreters?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ What services and tools do you employ? Is there a LOE cost?</li> <li>✓ What interpretive technology will you use? Is there a cost?</li> <li>✓ Do you provide services for the mentally disabled? Do you have medical or mental health staff that would provide these services? Is there a LOE cost for these services?</li> </ul>			
27	RP-1	<p>Are forensic medical exams provided free of charge to the victim?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Who provides the exams?</li> <li>✓ Who bears the cost associated with giving these exams?</li> </ul>			
28	RE-4	<p>Do you investigate all third-party reports of sexual abuse?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Based on the number of incidents investigated in the past, is there a LOE cost?</li> <li>✓ Should this LOE be based on a case-by-case basis or in terms of a staff increase?</li> </ul>			
29	IN-1	<p>Do you investigate all allegations of sexual abuse and notify victims and/or other complaints in writing of investigation outcomes and any disciplinary or criminal sanctions, regardless of the source of the allegation? Are these investigations carried through to completion, regardless of whether the alleged abuser or victim remains at the facility?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Based on the number of incidents investigated in the past, is an increased LOE necessary to ensure that an investigation is conducted for all allegations of sexual abuse?</li> <li>✓ Should this LOE be based on a case-by-case basis or in terms of a staff increase?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
30	IN-3	<p>Are allegations of sexual abuse substantiated if supported by a preponderance of the evidence?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Is an increased LOE necessary in order to substantiate claims of abuse?</li> </ul>			
31	MM-3	<p>Does the facility/jurisdiction provide ongoing medical and/or mental health evaluations and treatment to all known users of sexual abuse?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ What would be the cost associated with a mental health evaluation?</li> <li>✓ Would an increased LOE be necessary in order to provide medical and mental health practitioners that would conduct these evaluations?</li> </ul>			
32	RE-1	<p>How do victims confidentially report sexual abuse (in multiple ways)? Are there means to report sexual abuse to an outside public entity?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ What means are available to report sexual abuse (e.g., drop boxes, toll-free numbers, talking with an officer, contacting an outside entity)?</li> <li>✓ Are any verbal reports immediately put into writing?</li> <li>✓ If an outside entity, who would provide this service and is there a fee for providing such a service?</li> <li>✓ Would this cost be charged on a per incident basis?</li> </ul>			
33	RE-2	<p>What is your policy/procedure for the exhaustion of administrative remedies available to a resident? Do you ensure that this covers a 90-day period (unless you have made a final determination earlier) and does it cover a 48 hours requirement after a resident has notified any agency staff member of his or her need for protection?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ A cost associated with creating or revising a policy and/or procedure to include attorney fees or additional litigation costs (if quantifiable)?</li> </ul>			

Source: Standards for the Prevention, Detection, Response, and Monitoring of Sexual Abuse in Juvenile Facilities, the National Prison Rape Elimination Commission.

**Part II.** For each standard/question below, please provide a response to whether or not your jurisdiction is compliant and provide an explanation of the reason for answering compliant or noncompliant. For further information on each standard, please reference the NPREC Standards Prevention, Detection, Response, and Monitoring of Sexual Abuse in Adult Prisons and Jails.

#	Standard	Question	Compliant? (Y/N)	Explanation of reason for being compliant or noncompliant
1	PP-1	Does your agency have a written policy mandating zero tolerance towards all forms of sexual abuse and enforces that policy by ensuring all its facilities comply with the PREA standards?		
2	PP-4	At your agency, do medical practitioners conduct examinations of transgender individuals to determine their genital status only in private settings and only when an individual’s genital status is unknown?		

#	Standard	Question	Compliant? (Y/N)	Explanation of reason for being compliant or noncompliant
3	PP-4	Does your facility prohibit cross-gender strips and visual body cavity searches?		
4	PP-6	Does your agency intentionally not hire or promote anyone who has engaged in sexual abuse in an institutional setting or in the community facilitated by force, the threat of force, or coercion?		
5	PP-6	Does your agency directly inquire about, during interviews and reviews, and examine and carefully weigh any history of criminal activity at work or in the community, including convictions for domestic violence, stalking, and sex offenses?		
6	RP-1	Does your facility follow an evidence protocol adapted from the 2004 U.S. Department of Justice’s Office on Violence Against Women publication “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents”, subsequent updated editions, or similarly comprehensive and authoritative protocols developed after 2004? <a href="http://www.ncjrs.gov/pdffiles1/ovw/206554.pdf">http://www.ncjrs.gov/pdffiles1/ovw/206554.pdf</a>		
7	RP-3	Do you have legal authority to conduct investigations within your facility?		
8	AP-2	Does your facility make individualized determinations about how to ensure the safety of each resident, including whether lesbian, gay, bisexual, transgender, or other gender-nonconforming residents are placed in particular facilities, units, or wings, solely on the basis of their sexual orientation, genital status, or gender identity?		
9	AP-2	Are residents at high risk for sexual victimization placed in segregated housing only as a last resort and then only until an alternative means of separation from likely abusers can be arranged?		
10	AP-2	In your facility, does risk of sexual victimization limit access to programs, education, and work opportunities?		
11	RE-4	At the conclusion of an investigation, does your facility notify, in writing, the third-party individual who reported the abuse and the inmate named in the report of the outcome of the investigation?		
12	RE-4	Does your facility publicly distribute information on how to report sexual abuse on behalf of an inmate?		
13	OR-1	Does your agency policy require that all staff members immediately report any knowledge, suspicion, or information they receive regarding an incident of sexual abuse, retaliation against residents or staff who reported abuse; and any staff neglect related to an incident of sexual abuse or retaliation?		

#	Standard	Question	Compliant? (Y/N)	Explanation of reason for being compliant or noncompliant
14	OR-1	Does your agency policy require that staff not reveal any information related to a sexual abuse report to anyone other than those who need to know, to make treatment, investigation, and other security and management decisions?		
15	OR-1	At your agency, are medical and mental health practitioners required to report sexual abuse and inform residents of their duty to report the abuse at the initiation of services, unless otherwise precluded by Federal, State, or local law?		
16	OR-1	At your agency, is it required that the facility head report an incident involving a victim younger than 18 years of age to the designated State or local services agency under applicable mandatory reporting laws?		
17	OR-2	When your facility receives an allegation that a resident was sexually abused while confined at another facility, does the head of the facility where the report was made notify in writing the head of the facility where the alleged abuse occurred, and ensure that the allegation is or was investigated?		
18	OR-3	At your agency, when a sexual abuse incident has occurred and the collection of physical evidence is still possible, do the first security staff to the scene conduct the following:  <ul style="list-style-type: none"> <li>4) separate the alleged victim and abuser</li> <li>5) seal and preserve any crime scene(s)</li> <li>6) instruct the victim not to take any actions that could destroy physical evidence, including washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating?</li> </ul>		
19	OR-3	At your agency, if the first staff responder is a non-security staff member, is he or she required to instruct the victim not to take any actions that could destroy physical evidence and then notify security staff?		
20	OR-4	Does your agency ensure the coordination of all actions taken in response to an incident of sexual abuse are coordinated among staff first responders, medical and mental health practitioners, investigators, and facility leadership?		
21	OR-4	Does your facility’s coordinated response ensure that victims receive all necessary immediate and ongoing medical, mental health, and support services and that investigators are able to obtain usable evidence to substantiate allegations and hold perpetrators accountable?		
22	OR-5	Does your agency protect all residents and staff who report sexual abuse or cooperate with sexual abuse investigations from retaliation by other residents or staff, including housing charges or transfers, the removal of any contact between the alleged abuser and victim, and the offering of emotional support services?		

#	Standard	Question	Compliant? (Y/N)	Explanation of reason for being compliant or noncompliant
23	OR-5	Does your agency monitor, for at least 90 days, the conduct and/or treatment of residents or staff that have reported sexual abuse or cooperated with investigations, and identify and discuss with inmates and staff any changes that may suggest possible retaliation, and if necessary, take immediate steps to protect the inmate or staff?		
24	DI-1	At your agency, is staff subject to disciplinary sanctions up to and including termination when sexual abuse policies have been violated?		
25	DI-1	At your agency, is termination the presumptive disciplinary sanction for staff members who have engaged in sexually abusive contact or penetration?		
26	DI-2	At your agency, are residents subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative ruling that the resident engaged in resident-on-resident sexual abuse or following a criminal finding of guilt for such sexual abuse?		
27	DI-2	At your agency, do sanctions commensurate with the nature and circumstances of the abuse committed, the resident’s disciplinary history, and comparable offenses by other residents with similar histories?		
28	DI-2	Does your agency’s disciplinary process consider whether an resident’s mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed?		
29	DI-2	At your agency, do possible sanctions include interventions designed to address and correct underlying reasons or motivation for the abuse, such as requiring the offending resident to participate in therapy, counseling, or other programs?		
30	MM-1	Does your agency have qualified medical or mental health practitioners to ask residents about prior sexual victimization and abusiveness during medical and mental health reception and intake screenings?		
31	MM-1	If a resident discloses any prior sexual victimization or abusiveness during a medical or mental health reception or intake screening, does the practitioner provide the appropriate referral for treatment?		
32	MM-1	Does your agency strictly limit any information related to sexual victimization or abusiveness that occurred in an institutional setting to medical and mental health practitioners and other staff, as required by agency policy and Federal, State, or local law, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments?		



#	Standard	Question	Compliant? (Y/N)	Explanation of reason for being compliant or noncompliant
33	MM-1	At your agency, do medical and mental health practitioners obtain informed consent from residents before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the resident is under the age of 18?		
34	MM-2	Do victims of sexual abuse have timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment, and, if so, are these services free to the victim?.		
35	MM-2	Do staff first responders take preliminary steps to protect the victim and notify appropriate staff or community medical and mental health practitioners, if your facility does not have medical or mental health practitioners or they are not on duty at the time a report of recent abuse is made?		
36	DC-1	Does the report consider whether incidents were motivated by racial or other group dynamics at the facility?		

*Source:* Standards for the Prevention, Detection, Response, and Monitoring of Sexual Abuse in Juvenile Facilities, the National Prison Rape Elimination Commission.

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Community Corrections



# Cost Impact Study Questionnaire

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[Community Corrections]

BOOZ ALLEN HAMILTON

[The following questionnaire consists of two parts. Part I identifies Nation Prison Rape Elimination Commission (NPREC) standards that require an estimated cost impact (if any), accompanied by a detailed explanation of that cost impact or reason for being in compliance. Part II identifies the remaining standards outlined by NPREC to gauge a level of compliance and a detailed reason for those standards that the jurisdiction may find to be noncompliant with.]



**Part I.** For each question below, please reference the *Standard* column and review the standard(s) definition (found in the NPREC Standards Prevention, Detection, Response, and Monitoring of Sexual Abuse in Community Corrections) before offering a response. If your jurisdiction/facility is compliant, please respond with a “Y” in the *Compliant?* column and provide a detailed explanation of reason for being compliant in the last column. **(Please note: You do not need to provide a cost impact if you find your jurisdiction/facility to be in compliance.)** Otherwise, please respond with a “N” in the *Compliant?* column and provide an estimated cost impact accompanied by a detailed explanation of the projected cost after considering points made in the *Question* column.

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
1	PP-4	<p>Except in the case of an emergency, does your jurisdiction/facility prohibit cross-gender pat downs?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ How would male/female staffing levels need to be altered to prohibit cross-gender pat down searches?</li> <li>✓ Would this require an increased level of effort (LOE)?</li> <li>✓ Are there other policies, besides altering staffing levels, that could be employed?</li> </ul>			
2	PP-3	<p>If a problem of sexual abuse is evident in your jurisdiction/facility, what is the best method for reducing the number of incidents through physical supervision?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Would an increased LOE be necessary in order to provide adequate physical supervision?</li> <li>✓ Can you get by with a workforce realignment to meet the same objective?</li> </ul>			
3	PP-1	<p>Does your jurisdiction/facility have a PREA coordinator to comply with the PREA standards?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ A PREA coordinator is a full-time position in the governing body of the State prison systems and agencies that operate large jails (more than 500 offenders) but may be a part-time position in jurisdictions that operate medium (101-500) and small jails (100 offenders or fewer).</li> <li>✓ Have you considered the cost of the PREA coordinator including base salary plus benefits?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
4	TR-1	<p>Do you provide training to all employees on sexual abuse prevention, detection, and response policies and procedures; the PREA standards; and relevant Federal, State, and local law?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ What are the means of training? Class-room/computer based? Consider the LOE of an instructor and materials or the cost associated with the implementation of a web-based module.</li> <li>✓ Have you reviewed Appendix B of the NPREC standards that lays out the training requirements?</li> <li>✓ Are all employees (including office administrators) included in your training?</li> <li>✓ Do you provide periodic refresher training to employees? How frequently? What’s the cost impact associated with this recurring training?</li> </ul>			
5	TR-2	<p>Do you provide training to all volunteers and contractors who have contact with offenders on sexual abuse prevention, detection, and response policies and procedures; the PREA standards; and relevant Federal, State, and local law?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Will the training be provided by the employees or contractors?</li> <li>✓ What are the means of training? Class-room/computer based? Consider the LOE of an instructor, cost of materials, or the cost associated with a web-based module.</li> <li>✓ Is periodic refresher training provided to volunteers and contractors? What’s the cost impact?</li> </ul>			
6	TR-3	<p>Within a reasonably brief period of time following the intake process, does your agency provide comprehensive education to offenders regarding their right to be free from sexual abuse, from retaliation for reporting abuse, the dynamics of sexual abuse in confinement, the common reactions of sexual abuse victims, and agency sexual abuse response policies and procedures?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ What is the cost of educating current offenders on the agency’s adoption of PREA standards? Have you considered the cost of materials and LOE of an instructor or web-based development?</li> <li>✓ How do you deliver training and/or education? Class room? Computer? Handbook?</li> <li>✓ What is the cost of providing refresher training?</li> <li>✓ How do you deliver refresher training and how frequently?</li> <li>✓ Do you have TV monitors that provide video loops of educational material in common areas?</li> <li>✓ Have you considered the size of the population when estimating a cost to educate all offenders?</li> <li>✓ Is education provided to all offenders, including LEP, deaf, visual, or otherwise disabled?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
7	TR-4	<p>Do you ensure sexual abuse training has been provided to investigators specifically conducting investigations in confinement settings?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Where do they get their training? Does it cover confinement settings?</li> <li>✓ If you are responsible for training your own investigators, have you considered the cost of materials and LOE of an instructor or web-based development?</li> <li>✓ Does your training for investigators include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity-type warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral?</li> </ul>			
8	TR-5	<p>Do you ensure your full and part-time medical and mental health care practitioners have been trained on how to detect and assess signs of sexual abuse and that all medical practitioners are trained on how to preserve physical evidence of sexual abuse?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Where do they get their training?</li> <li>✓ If you are responsible for training your own investigators, have you considered the cost of materials and LOE of an instructor or web-based development?</li> </ul>			
9	RP-1	<p>Do you provide a victim advocate to accompany the victim through the forensic medical exam process?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Who would provide this service? A current employee or outside entity?</li> <li>✓ What services are located in your town, county, or state? Does it include non-profits, religious organizations, or community services providers?</li> <li>✓ Have you considered hiring staff or contracting out on a per incident basis?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
10	RE-3	<p>Are offenders provided access to outside victim advocate services?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Are there posters or pamphlets with this information around the facility jurisdiction?</li> <li>✓ Who provides this outside victim advocacy support? What services are located in your town, county, or state? Non-profits, religious organizations, or community service providers?</li> <li>✓ Is there a fee borne by you for these services or is it provided by the state, county, or other non-profit service (state-level sexual assault coalition or its local affiliates)?</li> <li>✓ Does your facility ensure that communications with such advocates are private, confidential, and privileged, to the extent allowable by Federal, State, and local law and are offenders informed, prior to giving them access, of the extent to which these communications will be kept private, confidential, and privileged?</li> </ul>			
11	DC-1	<p>Do you have a review team to evaluate each incident of sexual abuse?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Do you prepare a report for each incident and include recommendations for improvement?</li> <li>✓ What is the LOE cost required to assemble a review team and evaluate each incident?</li> </ul>			
12	DC-2	<p>Do you prepare an annual report on aggregated sexual abuse data using a standardized instrument and set of definitions (e.g., BJS survey on sexual violence)?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Does it include contracted facilities? Is an increased LOE necessary to aggregate and standardize data?</li> </ul>			
13	DC-3	<p>Do you review, analyze, and use all sexual abuse data to assess and improve the effectiveness of your sexual abuse prevention, detection, and response policies, practices, and training?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Is your annual data available to the public (e.g., when requested or through FOIA) or online? If posting data online, how much effort would it require of your staff?</li> <li>✓ Based on the volume of incidents, is it necessary to increase the LOE to review incident data?</li> <li>✓ Does this review identify problem areas (including any racial dynamics) and take action?</li> <li>✓ Do you provide an assessment of your progress?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
14	DC-4	<p>Is your sexual abuse data properly stored, securely retained, and protected?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Is it electronic or paper and where is it stored? In a locked container or password protected?</li> <li>✓ Have you considered the cost associated with server maintenance and potential upgrades to your IT system to ensure data is stored securely for a minimum of 10 years?</li> </ul>			
15	PP-6	<p>Do you and your contractors contact all prior institutional employers for information on substantiated allegations of sexual abuse?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Have you considered costs associated with the LOE required to comply with the standard?</li> <li>✓ Would you offer contingency hires followed up by phone calls to previous institutional employers (to ease the burden of this standard)?</li> <li>✓ How many phone calls would you need to make?</li> </ul>			
16	PP-6	<p>Do you and your contractors run criminal background checks for all applicants and employees being considered for promotion?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Large staffing populations serve as a cost driver for conducting background checks.</li> <li>✓ Have you considered the cost of a background check on a per incident basis?</li> <li>✓ How many promotions/new-hires are estimated per year?</li> <li>✓ Who conducts your background investigations? Is there a cost?</li> </ul>			
17	AU-1	<p>What would be the cost impact of conducting an audit to measure compliance with the PREA standards at least every three years at every facility, including contracted facilities?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Is there a cost associated with the LOE necessary for auditors to conduct their assessment?</li> <li>✓ Is there a cost associated with conducting audits such as the ACA audit or Pbs audit?</li> <li>✓ Does your state or any other higher authority perform routine audits of your facility/jurisdiction? Do you pay for them?</li> </ul>			



#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
18	SC-1	<p>Are all offenders screened during intake (and at all subsequent classification reviews) to assess their risk of being sexually abused by other offenders or having the potential to be sexually abusive towards other offenders?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Do you have a written screening instrument tailored to the gender of the population being screened? Is there a cost associated with developing or modifying a tool to include PREA-related questions?</li> <li>✓ Have you considered the LOE necessary to develop a screening process if your jurisdiction/facility has yet to formalize a process on par with the NPREC standards?</li> </ul>			
19	SC-2	<p>Do you use the screening information to inform housing, bed, work, education, and program assignments with the goal of keeping separate those offenders at high risk of being sexually victimized from those at high risk of being sexually abusive?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Does this require an increased LOE?</li> <li>✓ Who would perform this assessment?</li> </ul>			
20	PP-2	<p>Do you contract with other agencies or facilities for the confinement of offenders? If so, do you ensure these contracted agencies or facilities adhere to PREA guidelines?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ If so, how many facilities?</li> <li>✓ Will this require any contract modifications, and if so, will it result in a greater cost to you?</li> <li>✓ Are these entities private or public? If public, would they be subject to PREA compliance also?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
21	RP-2	<p>Do you maintain or attempt to enter into memoranda of understanding (MOUs) or other agreements with an outside public entity or office that is able to 1) receive and immediately forward offender reports of sexual abuse to facility heads, 2) provide offenders with confidential emotional support services related to sexual abuse, and 3) help victims of sexual abuse during their transition from incarceration to the community?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Who currently provides these services (if anyone)?</li> <li>✓ Do you have any MOU's with them? If not, how much would it cost to develop these MOUs?</li> <li>✓ If not possible to establish a MOU, do you document the attempt to enter an agreement? Is there a cost impact associated with the LOE required to document this attempt?</li> </ul>			
22	RP-3	<p>Do you conduct your own criminal investigations or is it an outside legal authority?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ If outside, who is it?</li> <li>✓ Do you have a MOU with them? If not, how much would it cost to develop a MOU?</li> <li>✓ If not possible to establish a MOU, do you document the attempt to enter an agreement? Is there a cost impact associated with the LOE required to document this attempt?</li> <li>✓ If applicable, does it cover vulnerable persons (e.g., under 18 years of age)?</li> </ul>			
23	RP-4	<p>Who are the authorities that prosecute violations?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ If prosecutions are conducted by state agencies, is there a statute that authorizes this service?</li> <li>✓ Do you have a MOU with them? If not, how much would it cost to develop a MOU?</li> <li>✓ If not possible to establish a MOU, do you document the attempt to enter an agreement? Is there a cost impact associated with the LOE required to document this attempt?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
24	PP-5	<p>Do you ensure that offenders who are LEP, deaf, or disabled are able to report sexual abuse to staff directly through interpretive technology or through non-offender interpreters?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ What services and tools do you employ? Is there a LOE cost?</li> <li>✓ What interpretive technology will you use? Is there a cost?</li> <li>✓ Do you provide services for the mentally disabled? Do you have a medical or mental health staff that would provide these services? Is there a LOE cost for these services?</li> </ul>			
25	RP-1	<p>Are forensic medical exams provided free of charge to the victim?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Who provides the exams?</li> <li>✓ Who bears the cost associated with giving these exams?</li> </ul>			
26	RE-4	<p>Do you investigate all third-party reports of sexual abuse?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Based on the number of incidents investigated in the past, is there a LOE cost?</li> <li>✓ Should this LOE be based on a case-by-case basis or in terms of a staff increase?</li> </ul>			
27	IN-1	<p>Do you investigate all allegations of sexual abuse and notify victims and/or other complaints in writing of investigation outcomes and any disciplinary or criminal sanctions, regardless of the source of the allegation? Are these investigations carried through to completion, regardless of whether the alleged abuser or victim remains at the facility?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Based on the number of incidents investigated in the past, is an increased LOE necessary to ensure that an investigation is conducted for all allegations of sexual abuse?</li> <li>✓ Should this LOE be based on a case-by-case basis or in terms of a staff increase?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
28	IN-3	<p>Are allegations of sexual abuse substantiated if supported by a preponderance of the evidence?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Is an increased LOE necessary in order to substantiate claims of abuse?</li> </ul>			
29	MM-2	<p>Does the facility/jurisdiction provide ongoing medical and/or mental health evaluations and treatment to all known users of sexual abuse?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ What would be the cost associated with a mental health evaluation?</li> <li>✓ Would an increased LOE be necessary in order to provide medical and mental health practitioners that would conduct these evaluations?</li> </ul>			
30	RE-1	<p>How do victims confidentially report sexual abuse (in multiple ways)?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ What means are available to report sexual abuse (e.g., drop boxes, toll-free numbers, talking with an officer, contacting an outside entity)?</li> <li>✓ Are any verbal reports immediately put into writing?</li> <li>✓ If an outside entity, who would provide this service and is there a fee for providing such a service?</li> <li>✓ Would this cost be charged on a per incident basis?</li> </ul>			
31	RE-2	<p>What is your policy/procedure for the exhaustion of administrative remedies available to an offender? Do you ensure that this covers a 90-day period (unless you have made a final determination earlier) and does it cover a 48 hours requirement after an offender has notified any agency staff member of his or her need for protection?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ A cost associated with creating or revising a policy and/or procedure to include attorney fees or additional litigation costs (if quantifiable)?</li> </ul>			

Source: Standards for the Prevention, Detection, Response, and Monitoring of Sexual Abuse in Community Corrections, the National Prison Rape Elimination Commission.

**Part II.** For each standard/question below, please provide a response to whether or not your jurisdiction is compliant and provide an explanation of the reason for answering compliant or noncompliant. For further information on each standard, please reference the NPREC Standards Prevention, Detection, Response, and Monitoring of Sexual Abuse in Adult Prisons and Jails.

#	Standard	Question	Compliant? (Y/N)	Explanation of reason for being compliant or noncompliant
1	PP-1	Does your agency have a written policy mandating zero tolerance towards all forms of sexual abuse and enforces that policy by ensuring all its facilities comply with the PREA standards?		
2	PP-4	At your agency, do medical practitioners conduct examinations of transgender individuals to determine their genital status only in private settings and only when an individual’s genital status is unknown?		
3	PP-4	Does your facility prohibit cross-gender strips and visual body cavity searches?		
4	PP-6	Does your agency intentionally not hire or promote anyone who has engaged in sexual abuse in an institutional setting or in the community facilitated by force, the threat of force, or coercion?		
5	PP-6	Does your agency directly inquire about, during interviews and reviews, and examine and carefully weigh any history of criminal activity at work or in the community, including convictions for domestic violence, stalking, and sex offenses?		
6	RP-1	Does your facility follow an evidence protocol adapted from the 2004 U.S. Department of Justice’s Office on Violence Against Women publication “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents”, or subsequent updated editions, or similarly comprehensive and authoritative protocols developed after 2004? <a href="http://www.ncjrs.gov/pdffiles1/ovw/206554.pdf">http://www.ncjrs.gov/pdffiles1/ovw/206554.pdf</a>		
7	RP-3	Do you have the legal authority to conduct investigations within your facility?		
8	SC-2	Does your facility make individualized determinations about how to ensure the safety of each offender, including whether lesbian, gay, bisexual, transgender, or other gender-nonconforming inmates are placed in particular facilities, units, or wings solely on the basis of their sexual orientation, genital status, or gender identity.		
9	SC-2	Are offenders at high risk for sexual victimization placed in segregated housing only as a last resort and then only until an alternative means of separation from likely abusers can be arranged?		

#	Standard	Question	Compliant? (Y/N)	Explanation of reason for being compliant or noncompliant
10	SC-2	In your facility, does risk of sexual victimization limit access to programs, education, and work opportunities?		
11	RE-4	At the conclusion of an investigation, does your facility notify in writing the third-party individual who reported the abuse and the offender named in the report of the outcome of the investigation?		
12	RE-4	Does your facility publicly distribute information on how to report sexual abuse on behalf of an offender?		
13	OR-1	Does your agency policy require that all staff members immediately report any knowledge, suspicion, or information they receive regarding an incident of sexual abuse, retaliation against offenders, or staff who reported abuse; and any staff neglect related to an incident of sexual abuse or retaliation?		
14	OR-1	Does your agency policy require that staff not reveal any information related to a sexual abuse report to anyone other than those who need to know, to make treatment, investigation, and other security and management decisions?		
15	OR-1	At your agency, are medical and mental health practitioners required to report sexual abuse and inform offenders of their duty to report the abuse at the initiation of services, unless otherwise precluded by Federal, State, or local law?		
16	OR-1	At your agency, is it required that the facility head report an incident involving a victim less than 18 years of age to the designated State or local services agency under applicable mandatory reporting laws?		
17	OR-2	When your facility receives an allegation that an offender was sexually abused while confined at another facility, does the head of your facility notify in writing the head of the facility where the alleged abuse occurred, and ensure that the allegation is or was investigated?		
18	OR-3	At your agency, when a sexual abuse incident has occurred and the collection of physical evidence is still possible, do the first security staff to the scene conduct the following:  <ul style="list-style-type: none"> <li>7) separate the alleged victim and abuser</li> <li>8) seal and preserve any crime scene(s)</li> <li>9) instruct the victim not to take any actions that could destroy physical evidence, including washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating?</li> </ul>		

#	Standard	Question	Compliant? (Y/N)	Explanation of reason for being compliant or noncompliant
19	OR-3	At your agency, if the first staff responder is a non-security staff member, is he or she required to instruct the victim not to take any actions that could destroy physical evidence and then notify security staff?		
20	OR-4	Does your agency ensure the coordination of all actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership?		
21	OR-4	Does your facility’s coordinated response ensure that victims receive all necessary immediate and ongoing medical, mental health, and support services and that investigators are able to obtain usable evidence to substantiate allegations and hold perpetrators accountable?		
22	OR-5	Does your agency protect all offenders and staff who report sexual abuse or cooperate with sexual abuse investigations from retaliation by other offenders or staff, including housing changes or transfers, the removal of any contact between the alleged abuser and victim, and the offering of emotional support services?		
23	OR-5	Does your agency monitor, for at least 90 days, the conduct and/or treatment of offenders or staff that have reported sexual abuse or cooperated with investigations, and identify and discuss with inmates and staff any changes that may suggest possible retaliation, and if necessary, take immediate steps to protect the offender or staff member?		
24	DI-1	At your agency, is staff subject to disciplinary sanctions up to and including termination when sexual abuse policies have been violated?		
25	DI-1	At your agency, is termination the presumptive disciplinary sanction for staff members who have engaged in sexually abusive contact or penetration?		
26	DI-2	At your agency, are offenders subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative ruling that the offender engaged in offender-on-offender sexual abuse or following a criminal finding of guilt for such sexual abuse?		
27	DI-2	At your agency, do sanctions commensurate with the nature and circumstances of the abuse committed, the offender’s disciplinary history, and comparable offenses by other offenders with similar histories?		



#	Standard	Question	Compliant? (Y/N)	Explanation of reason for being compliant or noncompliant
28	DI-2	Does your agency’s disciplinary process consider whether an offender’s mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed?		
29	DI-2	At your agency, do possible sanctions include interventions designed to address and correct underlying reasons or motivation for the abuse, such as requiring the offending offender to participate in therapy, counseling, or other programs?		
30	MM-1	Do victims of sexual abuse have timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment, and, if so, are these services free to the victim and regardless of whether the victim names the abuser?		
31	MM-1	If the community corrections facility does not have medical or mental health practitioners or they are not on duty at the time a report of recent abuse is made, staff first responders take preliminary steps to protect the victim (OR-3) and immediately notify appropriate staff or community medical and mental health practitioners.		

*Source:* Standards for the Prevention, Detection, Response, and Monitoring of Sexual Abuse in Community Corrections, the National Prison Rape Elimination Commission.



# Cost Impact Study Questionnaire

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[Lockups]

BOOZ ALLEN HAMILTON

[The following questionnaire consists of two parts. Part I identifies Nation Prison Rape Elimination Commission (NPREC) standards that require an estimated cost impact (if any), accompanied by a detailed explanation of that cost impact or reason for being in compliance. Part II identifies the remaining standards outlined by NPREC to gauge a level of compliance and a detailed reason for those standards that the jurisdiction may find to be noncompliant with.]



**Part I.** For each question below, please reference the *Standard* column and review the standard(s) definition (found in the NPREC Standards Prevention, Detection, Response, and Monitoring of Sexual Abuse in Lockups) before offering a response. If your jurisdiction/facility is compliant, please respond with a “Y” in the *Compliant?* column and provide a detailed explanation of reason for being compliant in the last column. **(Please note: You do not need to provide a cost impact if you find your jurisdiction/facility to be in compliance.)** Otherwise, please respond with a “N” in the *Compliant?* column and provide an estimated cost impact accompanied by a detailed explanation of the projected cost after considering points made in the *Question?* column.

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
1	PP-5	<p>Except in the case of an emergency, does your jurisdiction/facility prohibit cross-gender pat downs?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ How would male/female staffing levels need to be altered to prohibit cross-gender pat down searches?</li> <li>✓ Would this require an increased level of effort (LOE)?</li> <li>✓ Are there other policies, besides altering staffing levels, that could be employed?</li> </ul>			
2	PP-3	<p>If a problem of sexual abuse is evident in your jurisdiction/facility, what is the best method for reducing the number of incidents through physical supervision?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Would an increased LOE be necessary in order to provide adequate physical supervision?</li> <li>✓ Can you get by with a workforce realignment to meet the same objective?</li> </ul>			
3	PP-8	<p>Does your jurisdiction/facility currently have video monitoring in place? If you feel this technology is not adequately suited to reduce sexual abuse incidents, what is the associated cost?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ What would it cost to purchase and install monitoring technology in trouble areas?</li> <li>✓ Is this enhanced technology directly related to reducing the incidence of sexual abuse?</li> <li>✓ Would you consider employing other methods of technology supervision (e.g., Radio Frequency Identification Bracelets)? If so, what would be the cost impact of such technology?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
4	PP-8	<p>Do you annually assess the feasibility of your current technology, including developing a plan for securing new technology?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Is there a cost associated with the LOE necessary for management to meet yearly and assess and develop a plan for securing new technology?</li> <li>✓ Would you contract out for this assessment?</li> </ul>			
5	PP-1	<p>Does your jurisdiction/facility have a PREA coordinator to comply with the PREA standards?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ A PREA coordinator is a full-time position in the governing body of the State prison systems and agencies that operate large jails (more than 500 detainees) but may be a part-time position in jurisdictions that operate medium (101-500) and small jails (100 detainees or fewer).</li> <li>✓ Have you considered the cost of the PREA coordinator including base salary plus benefits?</li> </ul>			
6	TR-1	<p>Do you provide training to all employees and volunteers on sexual abuse prevention, detection, and response policies and procedures; the PREA standards; and relevant Federal, State, and local law?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ What are the means of training? Class-room/computer based? Consider the LOE of an instructor and materials or the cost associated with the implementation of a web-based module.</li> <li>✓ Have you reviewed appendix A of the NPREC standards that lays out the training requirements?</li> <li>✓ Are all employees (including office administrators) included in your training?</li> <li>✓ Do you provide periodic refresher training to employees and volunteers? How frequently? What's the cost impact associated with this recurring training?</li> </ul>			
7	TR-2	<p>Do employees notify all detainees of the agency's zero-tolerance policy regarding sexual abuse during intake?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ The agency ensures that attorneys, contractors, and inmate workers are informed of the agency's zero-tolerance policy regarding sexual abuse upon entering the lockup. Is there a cost associated with this increased LOE?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
8	TR-3	<p>Do you ensure sexual abuse training has been provided to investigators specifically conducting investigations in confinement settings?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Where do they get their training? Does it cover confinement settings?</li> <li>✓ If you are responsible for training your own investigators, have you considered the cost of materials and LOE of an instructor or web-based development?</li> <li>✓ Does your training for investigators include techniques for interviewing sexual abuse victims, proper use of Miranda- and Garrity-type warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral?</li> </ul>			
9	RP-1	<p>Do you provide a victim advocate to accompany the victim through the forensic medical exam process?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Who would provide this service? A current employee or outside entity?</li> <li>✓ What services are located in your town, county, or state? Does it include non-profits, religious organizations, or community service providers?</li> <li>✓ Have you considered hiring staff or contracting out on a per incident basis?</li> </ul>			
10	DC-1	<p>Do you have a review team to evaluate each incident of sexual abuse?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Do you prepare a report for each incident and include recommendations for improvement?</li> <li>✓ What is the LOE cost required to assemble a review team and evaluate each incident?</li> </ul>			
11	DC-2	<p>Do you prepare an annual report on aggregated sexual abuse data using a standardized instrument and set of definitions (e.g., BJS survey on sexual violence)?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Does it include contracted facilities?</li> <li>✓ Is an increased LOE necessary to aggregate and standardize sexual abuse data?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
12	DC-3	<p>Do you review, analyze, and use all sexual abuse data to assess and improve the effectiveness of your sexual abuse prevention, detection, and response policies, practices, and training?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Is your annual data available to the public (e.g., when requested or through FOIA) or online? If posting data online, how much effort would it require of your staff?</li> <li>✓ Based on the volume of incidents, is it necessary to increase the LOE to review each incident?</li> <li>✓ Does this review identify problem areas (including any racial dynamics) and take action?</li> <li>✓ Do you provide an assessment of your progress?</li> </ul>			
13	DC-4	<p>Is your sexual abuse data properly stored, securely retained, and protected?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Is it electronic or paper and where is it stored? In a locked container or password protected?</li> <li>✓ Have you considered the cost associated with server maintenance and potential upgrades to your IT system to ensure data is stored securely for a minimum of 10 years?</li> </ul>			
14	PP-7	<p>Do you and your contractors contact all prior institutional employers for information on substantiated allegations of sexual abuse?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Have you considered costs associated with the LOE required to comply with the standard?</li> <li>✓ Would you offer contingency hires followed up by phone calls to previous institutional employers (to ease the burden of this standard)?</li> <li>✓ How many phone calls would you need to make?</li> </ul>			
15	PP-7	<p>Do you and your contractors run criminal background checks for all applicants and employees being considered for promotion?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Large staffing populations serve as a cost driver for conducting background checks.</li> <li>✓ Have you considered the cost of a background check on a per incident basis?</li> <li>✓ How many promotions/new-hires are estimated per year?</li> <li>✓ Who conducts your background investigations? Is there a cost?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
16	AU-1	<p>What would be the cost impact of conducting an audit to measure compliance with the PREA standards at least every three years at every facility, including contracted facilities?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Is there a cost associated with the LOE necessary for auditors to conduct their assessment?</li> <li>✓ Is there a cost associated with conducting audits such as the ACA audit or PbS audit?</li> <li>✓ Does your state or any other higher authority perform routine audits of your facility/jurisdiction? Do you pay for them?</li> </ul>			
17	PP-4	<p>Are all detainees screened during intake (and at all subsequent classification reviews) to assess their risk of being sexually abused by other detainees or having the potential to be sexually abusive towards other detainees?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Do you have a written screening instrument tailored to the gender of the population being screened? Is there a cost associated with developing or modifying a tool to include PREA-related questions?</li> <li>✓ Have you considered the LOE necessary to develop a screening process if your jurisdiction/facility has yet to formalize a process on par with the NPREC standards?</li> </ul>			
18	PP-2	<p>Do you contract with other agencies or facilities for the confinement of inmates? If so, do you ensure these contracted agencies or facilities adhere to PREA guidelines?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ If so, how many facilities?</li> <li>✓ Will this require any contract modifications, and if so, will it result in a greater cost to you?</li> <li>✓ Are these entities private or public? If public, would they be subject to PREA compliance also?</li> </ul>			



#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
19	RP-2	<p>Do you conduct your own criminal investigations or is it an outside legal authority?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ If outside, who is it?</li> <li>✓ Do you have a MOU with them? If not, how much would it cost to develop a MOU?</li> <li>✓ If not possible to establish a MOU, do you document the attempt to enter an agreement? Is there a cost impact associated with the LOE required to document this attempt?</li> <li>✓ If applicable, does it cover vulnerable persons (e.g., under 18 years of age)?</li> </ul>			
20	RP-3	<p>Who are the authorities that prosecute violations?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ If prosecutions are conducted by state agencies, is there a statute that authorizes this service?</li> <li>✓ Do you have a MOU with them? If not, how much would it cost to develop?</li> <li>✓ If not possible to establish a MOU, do you document the attempt to enter an agreement? Is there a cost impact associated with the LOE required to document this attempt?</li> </ul>			
21	PP-6	<p>Do you ensure that detainees who are LEP, deaf, or disabled are able to report sexual abuse to staff directly through interpretive technology or through non-detainee interpreters?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ What services and tools do you employ? Is there a LOE cost?</li> <li>✓ What interpretive technology will you use? Is there a cost?</li> <li>✓ Do you provide services for the mentally disabled? Do you have a medical or mental health staff that would provide these services? Is there a LOE cost for these services?</li> </ul>			
22	RP-1	<p>Are forensic medical exams provided free of charge to the victim?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Who provides the exams?</li> <li>✓ Who bears the cost associated with giving these exams?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
23	RE-3	<p>Do you investigate all third-party reports of sexual abuse?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Based on the number of incidents investigated in the past, is there a LOE cost?</li> <li>✓ Should this LOE be based on a case-by-case basis or in terms of a staff increase?</li> </ul>			
24	IN-1	<p>Do you investigate all allegations of sexual abuse and notify victims and/or other complaints in writing of investigation outcomes and any disciplinary or criminal sanctions, regardless of the source of the allegation? Are these investigations carried through to completion, regardless of whether the alleged abuser or victim remains at the facility?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Based on the number of incidents investigated in the past, is an increased LOE necessary to ensure that an investigation is conducted for all allegations of sexual abuse?</li> <li>✓ Should this LOE be based on a case-by-case basis or in terms of a staff increase?</li> </ul>			
25	IN-3	<p>Are allegations of sexual abuse substantiated if supported by a preponderance of the evidence?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ Is an increased LOE necessary in order to substantiate claims of abuse?</li> </ul>			
26	RE-1	<p>How do victims confidentially report sexual abuse (in multiple ways)?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ What means are available to report sexual abuse (e.g., drop boxes, toll-free numbers, talking with an officer, contacting an outside entity)?</li> <li>✓ Are any verbal reports immediately put into writing?</li> <li>✓ If an outside entity, who would provide this service and is there a fee?</li> <li>✓ Would this cost be charged on a per incident basis?</li> </ul>			

#	Standard	Question	Compliant? (Y/N)	Cost Impact (\$)	Detailed explanation of cost impact or reason for being compliant
27	RE-2	<p>What is your policy/procedure for the exhaustion of administrative remedies available to a detainee? Do you ensure that this covers a 90-day period (unless you have made a final determination earlier) and does it cover a 48 hours requirement after an inmate has notified any agency staff member of his or her need for protection?</p> <p>Have you considered:</p> <ul style="list-style-type: none"> <li>✓ A cost associated with creating or revising a policy and/or procedure to include attorney fees?</li> </ul>			

*Source:* Standards for the Prevention, Detection, Response, and Monitoring of Sexual Abuse in Lockups, the National Prison Rape Elimination Commission.

**Part II.** For each standard/question below, please provide a response to whether or not your jurisdiction is compliant and provide an explanation of the reason for answering compliant or noncompliant. For further information on each standard, please reference the NPREC Standards Prevention, Detection, Response, and Monitoring of Sexual Abuse in Adult Prisons and Jails.

#	Standard	Question	Compliant? (Y/N)	Explanation of reason for being compliant or noncompliant
1	PP-1	Does your agency have a written policy mandating zero tolerance towards all forms of sexual abuse and enforces that policy by ensuring all its facilities comply with the PREA standards?		
2	PP-7	Does your agency intentionally not hire or promote anyone who has engaged in sexual abuse in an institutional setting or in the community facilitated by force, the threat of force, or coercion?		

#	Standard	Question	Compliant? (Y/N)	Explanation of reason for being compliant or noncompliant
3	PP-7	Does your agency directly inquire about, during interviews and reviews, and examine and carefully weight any history of criminal activity at work or in the community, including convictions for domestic violence, stalking, and sex offenses?		
4	RP-1	Does your facility follow an evidence protocol adapted from the 2004 U.S. Department of Justice’s Office on Violence Against Women publication “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents”, subsequent updated editions, or similarly comprehensive and authoritative protocols developed after 2004? <a href="http://www.ncjrs.gov/pdffiles1/ovw/206554.pdf">http://www.ncjrs.gov/pdffiles1/ovw/206554.pdf</a>		
5	RP-3	Do you have legal authority to conduct investigations within your facility?		
6	RE-3	At the conclusion of an investigation, does your facility notify in writing the third-party individual who reported the abuse and the inmate named in the report of the outcome of the investigation?		
7	RE-3	Does your facility publicly distribute information on how to report sexual abuse on behalf of an inmate?		
8	OR-1	Does your agency policy require that all staff members immediately report, according to agency policy, any knowledge, suspicion, or information they receive regarding an incident of sexual abuse, retaliation against detainees or staff who reported abuse; and any staff neglect related to an incident of sexual abuse or retaliation?		
9	OR-1	Does your agency policy require that staff not reveal any information related to a sexual abuse report to anyone other than those who need to know, to make treatment, investigation, and other security and management decisions?		
10	OR-1	At your agency, is it required that the facility head report an incident involving a victim under 18 years of age to the designated State or local services agency under applicable mandatory reporting laws?		
11	OR-2	When your facility receives an allegation that a detainee was sexually abused while confined at another facility, does the head of the facility where the report was made notify in writing the head of the facility where the alleged abuse occurred, and ensure that the allegation is or was investigated?		

#	Standard	Question	Compliant? (Y/N)	Explanation of reason for being compliant or noncompliant
12	OR-3	At your agency, when a sexual abuse incident has occurred and the collection of physical evidence is still possible, do the first security staff to the scene conduct the following:  10) separate the alleged victim and abuser 11) seal and preserve any crime scene(s) 12) instruct the victim not to take any actions that could destroy physical evidence, including washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating?		
13	OR-3	At your agency, if the first staff responder is a non-security staff member, is he or she required to instruct the victim not to take any actions that could destroy physical evidence and then notify security staff?		
14	OR-4	Does your agency ensure the coordination of all actions taken in response to an incident of sexual abuse among staff first responders, medical and mental health practitioners, investigators, and facility leadership?		
15	OR-4	Does your facility’s coordinated response ensure that victims receive all necessary immediate and ongoing medical, mental health, and support services and that investigators are able to obtain usable evidence to substantiate allegations and hold perpetrators accountable?		
16	OR-5	Does your agency protect all detainees and staff who report sexual abuse or cooperate with sexual abuse investigations from retaliation by other detainees or staff, including housing changes or transfers, the removal of any contact between the alleged abuser and victim, and the offering of emotional support services?		
17	OR-5	Does your agency monitor, for at least 90 days, the conduct and/or treatment of detainees or staff that have reported sexual abuse or cooperated with investigations, and identify and discuss with detainees and staff any changes that may suggest possible retaliation, and if necessary, take immediate steps to protect the detainee or staff?		
18	DI-1	At your agency, is staff subject to disciplinary sanctions up to and including termination when sexual abuse policies have been violated?		
19	DI-1	At your agency, is termination the presumptive disciplinary sanction for staff members who have engaged in sexually abusive contact or penetration?		

#	Standard	Question	Compliant? (Y/N)	Explanation of reason for being compliant or noncompliant
20	DI-2	At your agency, are detainees subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative ruling that the detainee engaged in detainee-on-detainee sexual abuse or following a criminal finding of guilt for such sexual abuse?		
21	DI-2	At your agency, do sanctions commensurate with the nature and circumstances of the abuse committed, the detainee’s disciplinary history, and comparable offenses by other detainees with similar histories?		
22	DI-2	Does your agency’s disciplinary process consider whether a detainee’s mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed?		
23	DI-2	At your agency, do possible sanctions include interventions designed to address and correct underlying reasons or motivation for the abuse, such as requiring the offending detainee to participate in therapy, counseling, or other programs?		
24	MM-1	Do victims of sexual abuse have timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment.		
25	MM-1	Are treatment services provided free of charge to the victim and regardless of whether the victim names the abuser?		
26	MM-1	If the community corrections facility does not have medical or mental health practitioners or they are not on duty at the time a report of recent abuse is made, staff first responders take preliminary steps to protect the victim (OR-3) and immediately notify appropriate staff or community medical and mental health practitioners.		
27	DC-1	Does the report consider whether incidents were motivated by racial or other group dynamics at the facility?		

Source: Standards for the Prevention, Detection, Response, and Monitoring of Sexual Abuse in Lockups, the National Prison Rape Elimination Commission.

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## Appendix F - Standards Summary

### Adult Prisons and Jails



## National Standards

### Adult Prisons and Jails

#### I. PREVENTION AND RESPONSE PLANNING

##### Prevention Planning (PP)

###### PP1 - Zero tolerance of sexual abuse

The agency has a written policy mandating zero tolerance toward all forms of sexual abuse and enforces that policy by ensuring all of its facilities comply with the NPREC standards. The agency employs or designates a PREA coordinator to develop, implement, and oversee agency efforts to comply with the NPREC standards.

###### PP2 - Contracting with other entities for the confinement of inmates

If public correctional agencies contract for the confinement of their inmates, they do so only with private agencies or other entities, including other government agencies, committed to eliminating sexual abuse in their facilities, as evidenced by their adoption of and compliance with the NPREC standards. Any new contracts or contract renewals include the entity's obligation to adopt and comply with the NPREC standards and specify that the public agency will monitor the entity's compliance with these standards as part of its monitoring of the entity's performance.

###### PP3 - Inmate supervision

Security staff provides the inmate supervision necessary to protect inmates from sexual abuse. The upper management officials responsible for reviewing critical incidents must examine areas in the facility where sexual abuse has occurred to assess whether physical barriers may have enabled the abuse, the adequacy of staffing levels in those areas during different shifts, and the need for monitoring technology to supplement security staff supervision (DC1). When problems or needs are identified, the agency takes corrective action (DC3).



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**PP4 - Limits to Cross-Gender Viewing and Searches**

Except in the case of emergency, the facility prohibits cross-gender strip and visual body cavity searches. Except in the case of emergency or other extraordinary or unforeseen circumstances, the facility restricts non-medical staff from viewing inmates of the opposite gender who are nude or performing bodily functions and similarly restricts cross-gender pat down searches. Medical practitioners conduct examinations of transgender individuals to determine their genital status only in private settings and only when an individual's genital status is unknown.

**PP5 - Accommodating inmates with special needs**

The agency ensures that inmates who are limited English proficient (LEP), deaf, or disabled are able to report sexual abuse to staff directly, through interpretive technology, or through non-inmate interpreters. Accommodations are made to convey all written information about sexual abuse policies, including how to report sexual abuse, verbally to inmates who have limited reading skills or who are visually impaired.

**PP6- Hiring and promotion decisions**

The agency does not hire or promote anyone who has engaged in sexual abuse in an institutional setting or who has engaged in sexual activity in the community facilitated by force, the threat of force, or coercion. Consistent with Federal, State, and local law, the agency makes its best effort to contact all prior institutional employers for information on substantiated allegations of sexual abuse; must run criminal background checks for all applicants and employees being considered for promotion; and must examine and carefully weigh any history of criminal activity at work or in the community, including convictions for domestic violence, stalking, and sex offenses. The agency also asks all applicants and employees directly about previous misconduct during interviews and reviews.

**PP7 - Assessment and Use of Monitoring Technology**

The agency uses video monitoring systems and other cost-effective and appropriate technology to supplement its sexual abuse prevention, detection, and response efforts. The agency assesses, at least annually, the feasibility of and need for new or additional monitoring technology and develops a plan for securing such technology.

**Response Planning (RP)****RP1 - Evidence protocol and forensic medical exams**

The agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. The protocol must be adapted from or otherwise based on the 2004 U.S. Department of Justice's Office on Violence Against Women publication "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," subsequent updated editions, or similarly comprehensive and authoritative protocols developed after 2004. As part of the agency's evidence collection protocol, all victims of inmate-on-inmate sexually abusive penetration or

staff-on-inmate sexually abusive penetration are provided access to forensic medical exams performed by qualified forensic medical examiners. Forensic medical exams are provided free of charge to the victim. The facility makes available a victim advocate to accompany the victim through the forensic medical exam process.

#### **RP2 - Agreements with outside public entities and community service providers**

The agency maintains or attempts to enter into memoranda of understanding (MOUs) or other agreements with an outside public entity or office that is able to receive and immediately forward inmate reports of sexual abuse to facility heads (RE-1). The agency also maintains or attempts to enter into MOUs or other agreements with community service providers that are able to: (1) provide inmates with confidential emotional support services related to sexual abuse and (2) help victims of sexual abuse during their transition from incarceration to the community (RE3, MM3). The agency maintains copies of agreements or documentation showing attempts to enter into agreements.

#### **RP3 - Agreements with outside law enforcement agencies**

If an agency does not have the legal authority to conduct criminal investigations or has elected to permit an outside agency to conduct criminal or administrative investigations of staff or inmates, the agency maintains or attempts to enter into a written MOU or other agreement specific to investigations of sexual abuse with the law enforcement agency responsible for conducting investigations. If the agency confines inmates under the age of 18 or other inmates who fall under State and local vulnerable persons statutes, the agency maintains or attempts to enter into an MOU with the designated State or local services agency with the jurisdiction and authority to conduct investigations related to the sexual abuse of vulnerable persons within confinement facilities. When the agency already has an existing agreement or long-standing policy covering responsibilities for all criminal investigations, including sexual abuse investigations, it does not need to enter into a new agreement. The agency maintains a copy of the agreement or documentation showing attempts to enter into an agreement.

#### **RP4- Agreements with the prosecuting authority**

The agency maintains or attempts to enter into a written MOU or other agreement with the authority responsible for prosecuting violations of criminal law. The agency maintains a copy of the agreement or documentation showing attempts to enter into an agreement.

## **II. PREVENTION**

### **Training and Education (TR)**

#### **TR1 - Employee training**

The agency trains all employees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures; the NPREC standards; and relevant Federal, State, and local law. The agency trains all employees to communicate effectively and professionally with all inmates. Additionally, the agency trains all employees on

an inmate's right to be free from sexual abuse, the right of inmates and employees to be free from retaliation for reporting sexual abuse, the dynamics of sexual abuse in confinement, and the common reactions of sexual abuse victims. Current employees are educated as soon as possible following the agency's adoption of the NPREC standards, and the agency provides periodic refresher information to all employees to ensure that they know the agency's most current sexual abuse policies and procedures. The agency maintains written documentation showing employee signatures verifying that employees understand the training they have received.

**TR2 - Volunteer and contractor training**

The agency ensures that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse prevention, detection, and response policies and procedures; the NPREC standards; and relevant Federal, State, and local law. The level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with inmates, but all volunteers and contractors who have contact with inmates must be notified of the agency's zero-tolerance policy regarding sexual abuse. Volunteers must also be trained in how to report sexual abuse. The agency maintains written documentation showing volunteer and contractor signatures verifying that they understand the training they have received.

**TR3 - Inmate education**

During the intake process, staff informs inmates of the agency's zero-tolerance policy regarding sexual abuse and how to report incidents or suspicions of sexual abuse. Within a reasonably brief period of time following the intake process, the agency provides comprehensive education to inmates regarding their right to be free from sexual abuse and to be free from retaliation for reporting abuse, the dynamics of sexual abuse in confinement, the common reactions of sexual abuse victims, and agency sexual abuse response policies and procedures. Current inmates are educated as soon as possible following the agency's adoption of the NPREC standards, and the agency provides periodic refresher information to all inmates to ensure that they know the agency's most current sexual abuse policies and procedures. The agency provides inmate education in formats accessible to all inmates, including those who are LEP, deaf, visually impaired, or otherwise disabled as well as inmates who have limited reading skills. The agency maintains written documentation of inmate participation in these education sessions.

**TR4 - Specialized training: Investigations**

In addition to the general training provided to all employees (TR1), the agency ensures that agency investigators conducting sexual abuse investigations have received comprehensive and up-to-date training in conducting such investigations in confinement settings. Specialized training must include techniques for interviewing sexual abuse victims, proper use of Miranda- and Garrity-type warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. The agency maintains written documentation that investigators have completed the required specialized training in conducting sexual abuse investigations.

**TR5 - Specialized training: Medical and mental health care**

The agency ensures that all full- and part-time medical and mental health care practitioners working in its facilities have been trained in how to detect and assess signs of sexual abuse and that all medical practitioners are trained in how to preserve physical evidence of sexual abuse. All medical and mental health care practitioners must be trained in how to respond effectively and professionally to victims of sexual abuse and how and to whom to report allegations or suspicions of sexual abuse. The agency maintains documentation that medical and mental health practitioners have received this specialized training.

**Screening for Risk of Sexual Victimization and Abusiveness (SC)****SC1 - Screening for risk of victimization and abusiveness**

All inmates are screened during intake, during the initial classification process, and at all subsequent classification reviews to assess their risk of being sexually abused by other inmates or sexually abusive toward other inmates. Employees must conduct this screening using a written screening instrument tailored to the gender of the population being screened. Although additional factors may be considered, particularly to account for emerging research and the agency's own data analysis, screening instruments must contain the criteria described below. All screening instruments must be made available to the public upon request.

**SC2 - Use of screening information**

Employees use information from the risk screening (SC1) to inform housing, bed, work, education, and program assignments with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive. The facility makes individualized determinations about how to ensure the safety of each inmate. Lesbian, gay, bisexual, transgender, or other gender-nonconforming inmates are not placed in particular facilities, units, or wings solely on the basis of their sexual orientation, genital status, or gender identity. Inmates at high risk for sexual victimization may be placed in segregated housing only as a last resort and then only until an alternative means of separation from likely abusers can be arranged. To the extent possible, risk of sexual victimization should not limit access to programs, education, and work opportunities.

**III. DETECTION AND RESPONSE****Reporting (RE)****RE1 - Inmate reporting**

The facility provides multiple internal ways for inmates to report easily, privately, and securely sexual abuse, retaliation by other inmates or staff for reporting sexual abuse, and staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse. The facility also provides at least one way for inmates to report the abuse to an outside public entity or office not affiliated with the agency that has agreed to receive reports and forward them to the facility head (RP2), except when an inmate requests confidentiality. Staff accepts reports made

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verbally, in writing, anonymously, and from third parties and immediately puts into writing any verbal reports.

**RE2 - Exhaustion of administrative remedies**

Under agency policy, an inmate has exhausted his or her administrative remedies with regard to a claim of sexual abuse either (1) when the agency makes a final decision on the merits of the report of abuse (regardless of whether the report was made by the inmate, made by a third party, or forwarded from an outside official or office) or (2) when 90 days have passed since the report was made, whichever occurs sooner. A report of sexual abuse triggers the 90-day exhaustion period regardless of the length of time that has passed between the abuse and the report. An inmate seeking immediate protection from imminent sexual abuse will be deemed to have exhausted his or her administrative remedies 48 hours after notifying any agency staff member of his or her need for protection.

**RE3 - Inmate access to outside confidential support services**

In addition to providing on-site mental health care services, the facility provides inmates with access to outside victim advocates for emotional support services related to sexual abuse. The facility provides such access by giving inmates the current mailing addresses and telephone numbers, including toll-free hotline numbers, of local, State, and/or national victim advocacy or rape crisis organizations and enabling reasonable communication between inmates and these organizations. The facility ensures that communications with such advocates are private, confidential, and privileged, to the extent allowable by Federal, State, and local law. The facility informs inmates, prior to giving them access, of the extent to which such communications will be private, confidential, and/or privileged.

**RE4 - Third-party reporting**

The facility receives and investigates all third-party reports of sexual abuse (IN1). At the conclusion of the investigation, the facility notifies in writing the third-party individual who reported the abuse and the inmate named in the third-party report of the outcome of the investigation. The facility distributes publicly information on how to report sexual abuse on behalf of an inmate.

**Official Response Following an Inmate Report (OR)****OR1 - Staff and facility head reporting duties**

All staff members are required to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse that occurred in an institutional setting; retaliation against inmates or staff who reported abuse; and any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or retaliation. Apart from reporting to designated supervisors or officials, staff must not reveal any information related to a sexual abuse report to anyone other than those who need to know, as specified in agency policy, to make treatment, investigation, and other security and management decisions. Unless otherwise precluded by Federal, State, or local law, medical

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and mental health practitioners are required to report sexual abuse and must inform inmates of their duty to report at the initiation of services. If the victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, the facility head must report the allegation to the designated State or local services agency under applicable mandatory reporting laws.

**OR2 - Reporting to other confinement facilities**

When the facility receives an allegation that an inmate was sexually abused while confined at another facility, the head of the facility where the report was made notifies in writing the head of the facility where the alleged abuse occurred. The head of the facility where the alleged abuse occurred ensures the allegation is investigated.

**OR3 - Staff first responder duties**

Upon learning that an inmate was sexually abused within a time period that still allows for the collection of physical evidence, the first security staff member to respond to the report is required to (1) separate the alleged victim and abuser; (2) seal and preserve any crime scene(s); and (3) instruct the victim not to take any actions that could destroy physical evidence, including washing, brushing his or her teeth, changing his or her clothes, urinating, defecating, smoking, drinking, or eating. If the first staff responder is a non-security staff member, he or she is required to instruct the victim not to take any actions that could destroy physical evidence and then notify security staff.

**OR4 - Coordinated response**

All actions taken in response to an incident of sexual abuse are coordinated among staff first responders, medical and mental health practitioners, investigators, and facility leadership. The facility's coordinated response ensures that victims receive all necessary immediate and ongoing medical, mental health, and support services and that investigators are able to obtain usable evidence to substantiate allegations and hold perpetrators accountable.

**OR5 - Agency protection against retaliation**

The agency protects all inmates and staff who report sexual abuse or cooperate with sexual abuse investigations from retaliation by other inmates or staff. The agency employs multiple protection measures, including housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or cooperating with investigations. The agency monitors the conduct and/or treatment of inmates or staff who have reported sexual abuse or cooperated with investigations, including any inmate disciplinary reports, housing, or program changes, for at least 90 days following their report or cooperation to see if there are changes that may suggest possible retaliation by inmates or staff. The agency discusses any changes with the appropriate inmate or staff member as part of its efforts to determine if retaliation is taking place and, when confirmed, immediately takes steps to protect the inmate or staff member.

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**Investigations (IN)****IN1 - Duty to investigate**

The facility investigates all allegations of sexual abuse, including third-party and anonymous reports, and notifies victims and/or other complainants in writing of investigation outcomes and any disciplinary or criminal sanctions, regardless of the source of the allegation. All investigations are carried through to completion, regardless of whether the alleged abuser or victim remains at the facility.

**IN2 - Criminal and administrative agency investigations**

Agency investigations into allegations of sexual abuse are prompt, thorough, objective, and conducted by investigators who have received special training in sexual abuse investigations (TR4). When outside agencies investigate sexual abuse, the facility has a duty to keep abreast of the investigation and cooperate with outside investigators (RP3).

**IN3 - Evidence standard for administrative investigations**

Allegations of sexual abuse are substantiated if supported by a preponderance of the evidence.

**Discipline (DI)****DI1 - Disciplinary sanctions for staff**

Staff is subject to disciplinary sanctions up to and including termination when staff has violated agency sexual abuse policies. The presumptive disciplinary sanction for staff members who have engaged in sexually abusive contact or penetration is termination. This presumption does not limit agency discretion to impose termination for other sexual abuse policy violations. All terminations for violations of agency sexual abuse policies are to be reported to law enforcement agencies and any relevant licensing bodies.

**DI2 - Disciplinary sanctions for inmates**

Inmates are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative ruling that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse. Sanctions are commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions meted out for comparable offenses by other inmates with similar histories. The

disciplinary process must consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed. Possible sanctions also include interventions designed to address and correct underlying reasons or motivation for the abuse, such as requiring the offending inmate to participate in therapy, counseling, or other programs.

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**Medical and Mental Health Care (MM)****MM1 - Medical and mental health screenings—history of sexual abuse**

Qualified medical or mental health practitioners ask inmates about prior sexual victimization and abusiveness during medical and mental health reception and intake screenings. If an inmate discloses prior sexual victimization or abusiveness, whether it occurred in an institutional

setting or in the community, during a medical or mental health reception or intake screening, the practitioner provides the appropriate referral for treatment, based on his or her professional judgment. Any information related to sexual victimization or abusiveness that occurred in an institutional setting must be strictly limited to medical and mental health practitioners and other staff, as required by agency policy and Federal, State, or local law, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments. Medical and mental health practitioners must obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18.

**MM2 - Access to emergency medical and mental health services**

Victims of sexual abuse have timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment. Treatment services must be provided free of charge to the victim and regardless of whether the victim names the abuser. If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders take preliminary steps to protect the victim (OR3) and immediately notify the appropriate medical and mental health practitioners.

**MM3 - Ongoing medical and mental health care for sexual abuse victims and abusers**

The facility provides ongoing medical and/or mental health evaluation and treatment to all known victims of sexual abuse. The evaluation and treatment of sexual abuse victims must include appropriate follow-up services, treatment plans, and, when necessary, referrals for continued care following their release from custody. The level of medical and mental health care provided to inmate victims must match the community level of care generally accepted by the medical and mental health professional communities. The facility conducts a mental health evaluation of all known abusers and provides treatment, as deemed necessary by qualified mental health practitioners.

**IV. MONITORING****Data Collection and Review (DC)****DC1 - Sexual abuse incident reviews**

The facility treats all instances of sexual abuse as critical incidents to be examined by a team of upper management officials, with input from line supervisors, investigators, and medical/mental health practitioners. The review team evaluates each incident of sexual abuse to identify any



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policy, training, or other issues related to the incident that indicate a need to change policy or practice to better prevent, detect, and/or respond to incidents of sexual abuse. The review team also considers whether incidents were motivated by racial or other group dynamics at the facility. When incidents are determined to be motivated by racial or other group dynamics, upper management officials immediately notify the agency head and begin taking steps to rectify those underlying problems. The sexual abuse incident review takes place at the conclusion of every sexual abuse investigation, unless the allegation was determined to be unfounded. The review team prepares a report of its findings and recommendations for improvement and submits it to the facility head.

#### **DC2 - Data collection**

The agency collects accurate, uniform data for every reported incident of sexual abuse using a standardized instrument and set of definitions. The agency aggregates the incident-based sexual abuse data at least annually. The incident-based data collected includes, at a minimum, the data necessary to answer all questions from the most recent version of the BJS Survey on Sexual Violence. Data are obtained from multiple sources, including reports, investigation files, and sexual abuse incident reviews. The agency also obtains incident-based and aggregated data from every facility with which it contracts for the confinement of its inmates.

#### **DC3 - Data review for corrective action**

The agency reviews, analyzes, and uses all sexual abuse data, including incident-based and aggregated data, to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training. Using these data, the agency identifies problem areas, including any racial dynamics underpinning patterns of sexual abuse, takes corrective action on an ongoing basis, and, at least annually, prepares a report of its findings and corrective actions for each facility as well as the agency as a whole. The annual report also includes a comparison of the current year's data and corrective actions with those from prior years and provides an assessment of the agency's progress in addressing sexual abuse. The agency's report is approved by the agency head, submitted to the appropriate legislative body, and made readily available to the public through its Web site or, if it does not have one, through other means. 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 it must indicate the nature of the material redacted.

#### **DC4 - Data storage, publication, and destruction**

The agency ensures that the collected sexual abuse data are properly stored, securely retained, and protected. The agency makes all aggregated sexual abuse data, from facilities under its direct control and those with which it contracts, readily available to the public at least annually through its Web site or, if it does not have one, through other means. Before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers from the data. The agency maintains sexual abuse data for at least 10 years after the date of its initial collection unless Federal, State, or local law allows for the disposal of official information in less than 10 years.

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**Audits (AU)****AU1 - Audits of standards**

The public agency ensures that all of its facilities, including contract facilities, are audited to measure compliance with the NPREC standards. Audits must be conducted at least every three years by independent and qualified auditors. The public or contracted agency allows the auditor to enter and tour facilities, review documents, and interview staff and inmates, as deemed appropriate by the auditor, to conduct comprehensive audits. The public agency ensures that the report of the auditor's findings and the public or contracted agency's plan for corrective action (DC3) are published on the appropriate agency's Web site if it has one or are otherwise made readily available to the public.

## V. SUPPLEMENTAL STANDARDS FOR FACILITIES WITH IMMIGRATION DETAINEES

**Supplemental Standards (ID)****ID1 - Supplement to RP2: Agreements with outside public entities and community service providers**

Any facility that houses immigration detainees maintains or attempts to enter into memoranda of understanding (MOUs) or other agreements with one or more local or, if not available, national organizations that provide legal advocacy and confidential emotional support services for immigrant victims of crime (RE3, MM3). The agency maintains copies of agreements or documentation showing attempts to enter into agreements.

**ID2 - Supplement to TR1, TR4, and TR-5: Employee training and specialized**

Any facility that holds immigration detainees provides special additional training to employees, including medical and mental health practitioners and investigators. This additional training includes the following topics: cultural sensitivity toward diverse understandings of acceptable and unacceptable sexual behavior, appropriate terms and concepts to use when discussing sex and sexual abuse with a culturally diverse population, sensitivity and awareness regarding past trauma that may have been experienced by immigration detainees, and knowledge of all existing resources for immigration detainees both inside and outside the facility that provide treatment and counseling for trauma and legal advocacy for victims.

**ID3 - Supplement to TR-3: Inmate education**

Sexual abuse education (TR-3) for immigration detainees is provided at a time and in a manner that is separate from information provided about their immigration cases, in detainees' own languages and in terms that are culturally appropriate, and is conducted by a qualified individual with experience communicating about these issues with a diverse population.

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**ID4 - Detainee handbook**

Every detainee is provided with an ICE Detainee Handbook upon admission to the facility, and a replacement is provided whenever a detainee's handbook is lost or damaged. The Detainee Handbook contains notice of the agency's zero-tolerance policy toward sexual abuse and contains all the agency's policies related to sexual abuse, including information about how to report an incident of sexual abuse and the detainees' rights and responsibilities related to sexual abuse. The Detainee Handbook will inform immigration detainees how to contact organizations in the community that provide sexual abuse counseling and legal advocacy for detainee victims of sexual abuse. The Detainee Handbook will also inform detainees how to contact the Office for Civil Rights and Civil Liberties, the Office of the Inspector General (OIG) for the Department of Homeland Security (DHS), and diplomatic or consular personnel.

**ID5 - Supplement to SC1: Screening for risk of victimization and abusiveness**

The facility makes every reasonable effort to obtain institutional and criminal records of immigration detainees in its custody prior to screening for risk of victimization and abusiveness. Screening of immigration detainees is conducted by employees who are culturally competent.

**ID6 - Supplement to SC2: Use of screening information**

Any facility that houses both inmates and immigration detainees houses all immigration detainees separately from other inmates in the facility and provides heightened protection for immigration detainees who are identified as particularly vulnerable to sexual abuse by other detainees through the screening process (SC1). To the extent possible, immigration detainees have full access to programs, education, and work opportunities.

**ID7 - Supplement to RE-1: Inmate reporting**

The agency provides immigration detainees with access to telephones with free, preprogrammed numbers to ICE's Office for Civil Rights and Civil Liberties and the DHS OIG. In addition, the agency must provide immigration detainees with a list of phone numbers for diplomatic or consular personnel from their countries of citizenship and access to telephones to contact such personnel.

**ID8 - Supplement to RE3: Inmate access to outside confidential support services**

All immigration detainees have access to outside victim advocates who have experience working with immigration detainees or immigrant victims of crime for emotional support services related to sexual abuse. The facility provides such access by giving immigration detainees the current mailing addresses and telephone numbers, including toll-free hotline numbers, of local, State, and/or national organizations that provide these services and enabling reasonable communication between immigration detainees and these organizations. The facility ensures that communications with such advocates is private, confidential, and privileged to the extent allowable by Federal, State, and local law. The facility informs immigration detainees, prior to giving them access, of the extent to which such communications will be private, confidential, and/or privileged.

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**ID9 - Protection of detainee victims and witnesses**

ICE never removes from the country or transfers to another facility immigration detainees who report sexual abuse before the investigation of that abuse is completed, except at the detainee victim's request. ICE considers releasing detainees who are victims of or witnesses to abuse and monitoring them in the community to protect them from retaliation or further abuse during the course of the investigation.

**ID10 - Supplement to MM3: Ongoing medical and mental health care for sexual abuse victims and abusers**

All immigration detainees are counseled about the immigration consequences of a positive HIV test at the time they are offered HIV testing.

**ID11 - Supplement to DC-2: Data collection**

The facility collects additional data whenever an immigration detainee is the victim or perpetrator of an incident of sexual abuse in custody. The additional incident-based data collected indicate whether the victim and/or perpetrator was an immigration detainee, his or her status at the initiation of the investigation, and his or her status at the conclusion of the investigation.

**Supplemental Standards for Family Facilities (IDFF) - The following standards must be followed in ICE family facilities.****IDFF1 - Screening of immigration detainees in family facilities (This standard replaces rather than supplements SC1 and SC2)**

Family facilities develop screening criteria to identify those families and family members who may be at risk of being sexually victimized that will not lead to the separation of families. Housing, program, educational, and work assignments are made in a manner that protects families and in all cases prioritizes keeping families together.

**IDFF2 - Screening of immigration detainees in family facilities (This standard replaces rather than supplements SC1 and SC2)**

Family facilities develop screening criteria to identify those families and family members who may be at risk of being sexually victimized that will not lead to the separation of families. Housing, program, educational, and work assignments are made in a manner that protects families and in all cases prioritizes keeping families together.

**IDFF3 - Investigations in family facilities**

Parents are questioned confidentially by investigators about any incident of sexual abuse, away from their children. A parent or parents are present when a child is questioned by investigators about any incident of sexual abuse, unless (1) the child has alleged abuse by the parent or (2) staff suspects abuse by the parent. The decision to exclude a parent from an interview based on staff suspicion of abuse by that parent is always made by a qualified mental health practitioner.

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**IDFF4 - Access to medical and mental health care in family facilities**

All family members are offered mental health counseling (as required in MM-2 and MM3) when one family member is a victim of sexual abuse in the facility. Following an incident of sexual abuse, parents and adult family members are examined confidentially by medical and mental health practitioners and away from children. Following an incident of sexual abuse, a parent or parents are allowed to be present during all medical and mental health examinations of a minor child, unless (1) that child has alleged sexual abuse by the parent or (2) staff suspects abuse by the parent. The decision to exclude a parent from an examination based on staff suspicion of abuse by that parent is always made by a qualified mental health practitioner. In the event that a child is sexually abused, a qualified mental health practitioner interviews the child to determine whether either parent was present or aware of the abuse and whether the parent or

## Community Corrections



# National Standards

## Community Corrections

### I. PREVENTION AND RESPONSE PLANNING

#### Prevention Planning (PP)

##### PP1 - Zero tolerance of sexual abuse

The agency has a written policy mandating zero tolerance toward all forms of sexual abuse and enforces that policy by ensuring all of its facilities comply with the NPREC standards. The agency employs or designates a PREA coordinator to develop, implement, and oversee agency efforts to comply with the NPREC standards.

##### PP2 - Contracting to house or supervise defendants/offenders under community corrections authority

If public correctional agencies contract for housing or supervision of their defendants/offenders, they do so only with private agencies or other entities, including other government agencies, committed to eliminating sexual abuse in their facilities, as evidenced by their adoption of and compliance with the NPREC standards. Any new contracts or contract renewals include the entity's obligation to adopt and comply with the NPREC standards and specify that the public agency will monitor the entity's compliance with these standards as part of its monitoring of the entity's performance.

##### PP3 - Defendant/offender supervision

Facility staff provides the defendant/offender supervision necessary to protect defendants/offenders from sexual abuse. The facility administrators and supervisors responsible for reviewing critical incidents must examine areas in the facility where sexual abuse has occurred or may be likely to occur to assess whether physical barriers may allow the abuse to go undetected, the adequacy of staffing levels in those areas during different shifts, and the need for monitoring technology to supplement facility staff supervision. When problems or needs are identified, facility administrators and supervisors take corrective action (DC3).

##### PP4 - Limits to Cross-Gender Viewing and Searches

Except in the case of emergency, the facility prohibits cross-gender strip and visual body cavity searches. Except in the case of emergency or other extraordinary or unforeseen circumstances, the facility restricts nonmedical staff from viewing defendants/offenders of the opposite gender

who are nude or performing bodily functions and similarly restricts cross-gender pat down searches. Medical practitioners conduct examinations of transgender individuals to determine their genital status only in private settings and only when an individual's genital status is unknown.

**PP5 - Accommodating defendants/offenders with special needs**

The agency or facility ensures that defendants/offenders who are limited English proficient (LEP), deaf, or disabled are able to report sexual abuse to staff directly, through interpretive technology, or through nondefendant/offender interpreters. Accommodations are made to convey all written information about sexual abuse policies, including how to report sexual abuse, verbally to defendants/offenders who have limited reading skills or who are visually impaired.

**PP6- Hiring and promotion decisions**

The agency or facility does not hire or promote anyone who has engaged in sexual abuse in an institutional setting or who has engaged in sexual activity in the community facilitated by force, the threat of force, or coercion. Consistent with Federal, State, and local law, the agency or facility makes its best effort to contact all prior institutional employers for information on substantiated allegations of sexual abuse and must run criminal background checks for all applicants and employees being considered for promotion and examine and carefully weigh any history of criminal activity at work or in the community, including convictions or adjudications for domestic violence, stalking, and sex offenses. The agency or facility also asks all applicants and employees directly about previous misconduct during interviews and reviews.

**Response Planning (RP)****RP1 - Evidence protocol and forensic medical exams**

The agency or facility follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. The protocol must be adapted from or otherwise based on the 2004 U.S. Department of Justice's Office on Violence Against Women publication "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," subsequent updated editions, or similarly comprehensive and authoritative protocols developed after 2004. As part of the agency's or facility's evidence collection protocol, the agency or facility refers all victims of defendant/offender-on-defendant/offender sexually abusive penetration or staff-on-defendant/offender sexually abusive penetration to forensic medical exams performed by qualified forensic medical examiners. Forensic medical exams are provided free of charge to the victim. The agency or facility makes available or provides referrals to a victim advocate to accompany the victim through the forensic medical exam process.

**RP2 - Agreements with outside public entities and community service providers**

The agency or facility maintains or attempts to enter into written memoranda of understanding (MOUs) or other agreements with an outside public entity or office that is able to receive and

immediately forward defendant/offender reports of sexual abuse to agency or facility heads (RE-1). The agency also maintains or attempts to enter into MOUs or other agreements with community service providers that are able to: (1) provide defendants/offenders with confidential emotional support services related to sexual abuse and (2) help victims of sexual abuse during their transition from a community corrections facility into the community. The agency or facility maintains copies of written agreements or documentation showing attempts to enter into agreements.

### **RP3 - Agreements with outside law enforcement agencies**

If an agency or facility does not have the legal authority to conduct criminal investigations or has elected to permit an outside agency to conduct criminal or administrative investigations of staff or defendants/offenders, the agency or facility maintains or attempts to enter into a written MOU or other agreement specific to investigations of sexual abuse with the law enforcement agency responsible for conducting investigations. If the agency or facility confines defendants/offenders under the age of 18 or applicable age of majority within that jurisdiction, or other defendants/offenders who fall under State and local vulnerable persons statutes, the agency or facility maintains or attempts to enter into an MOU with the designated State or local services agency with the jurisdiction and authority to conduct investigations related to the sexual abuse of vulnerable persons within community corrections facilities. When the agency or facility already has an existing agreement or long-standing policy covering responsibilities for all criminal investigations, including sexual abuse investigations, it does not need to enter into a new agreement. The agency or facility maintains a copy of the written agreement or documentation showing attempts to enter into an agreement.

### **RP4- Agreements with the prosecuting authority**

The agency or facility maintains or attempts to enter into a written MOU or other agreement with the authority responsible for prosecuting violations of criminal law. The agency or facility maintains a copy of the written agreement or documentation showing attempts to enter into an agreement.

## **II. PREVENTION**

### **Training and Education (TR)**

#### **TR1 - Employee training**

The agency or facility trains all employees to be able to fulfill their responsibilities under agency or facility sexual abuse prevention, detection, and response policies and procedures; the NPREC standards; and under relevant Federal, State, and local law. The agency or facility trains all employees to communicate effectively and professionally with all defendants/offenders. Additionally, the agency or facility trains all employees on a defendant/offender's right to be free from sexual abuse, the right of defendants/offenders and employees to be free from retaliation for reporting sexual abuse, the dynamics of sexual abuse, and the common reactions of sexual abuse victims. Current employees are educated as soon as possible following the



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agency's or facility's adoption of the NPREC standards, and the agency or facility provides periodic refresher information to all employees to ensure that they know the agency's or facility's most current sexual abuse policies and procedures. The agency or facility maintains written documentation showing employee signatures verifying that employees understand the training they have received.

#### **TR2 - Volunteer and contractor training**

The agency or facility ensures that all volunteers and contractors who have contact through the agency or facility with defendants/offenders have been trained on their responsibilities under the agency's sexual abuse prevention, detection, and response policies and procedures; the NPREC standards; and relevant Federal, State, and local law. The level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with defendants/offenders, but all volunteers and contractors who have contact with defendants/offenders must be notified of the agency's or facility's zero-tolerance policy regarding sexual abuse. Volunteers must also be trained in how to report sexual abuse. The agency or facility maintains written documentation showing volunteer and contractor signatures verifying that they understand the training they have received.

#### **TR3 - Defendant/offender education**

During the intake process into a facility or upon initial stages of supervision, staff informs defendants/offenders of the agency's or facility's zero-tolerance policy regarding sexual abuse and how to report incidents or suspicions of sexual abuse. Within a reasonably brief period of time, the agency or facility provides comprehensive education to defendants/offenders regarding their right to be free from sexual abuse and to be free from retaliation for reporting abuse, the dynamics of sexual abuse, the common reactions of sexual abuse victims, and agency or facility sexual abuse response policies and procedures. Current defendants/offenders are educated as soon as possible following the agency's or facility's adoption of the NPREC standards, and the agency or facility provides periodic refresher information to all defendants/offenders to ensure that they know the agency's or facility's most current sexual abuse policies and procedures. Periodic refresher training may or may not be necessary in community corrections facilities given the shorter time period defendants/offenders may reside in these facilities. The agency or facility provides defendant/offender education in formats accessible to all defendants/offenders, including those who are LEP, deaf, visually impaired, or otherwise disabled as well as defendants/offenders who have limited reading skills. All information provided to defendants/offenders is communicated in a manner that is appropriate for the defendant/offender's age and level of cognitive and emotional development. The agency or facility maintains written documentation of defendant/offender participation in these education sessions.

#### **TR4 - Specialized training: Investigations**

In addition to the general training provided to all employees (TR1), the agency or facility ensures that investigators employed by the agency or facility and conducting sexual abuse investigations have received comprehensive and up-to-date training in conducting such

investigations in community corrections settings. Specialized training must include population-appropriate techniques for interviewing sexual abuse victims, proper use of Miranda- and Garrity-type warnings, sexual abuse evidence collection in community corrections settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. The agency or facility maintains written documentation that investigators have completed the required specialized training in conducting sexual abuse investigations.

**TR5 - Specialized training: Medical and mental health care**

The agency or facility ensures that all medical and mental health care practitioners employed or contracted with by the community corrections or pretrial, probation, or parole agency have been trained in how to detect and assess signs of sexual abuse and how to preserve physical evidence of sexual abuse. All medical and mental health care practitioners must be trained in how to respond effectively and professionally to victims of sexual abuse and how and to whom to report allegations or suspicions of sexual abuse. The agency or facility maintains documentation that medical and mental health practitioners have received this specialized training.

**Screening for Risk of Sexual Victimization and Abusiveness (SC)****SC1 - Screening for risk of victimization and abusiveness**

All defendants/offenders are screened during intake to assess their risk of being sexually abused by other defendants/offenders or sexually abusive toward other defendants/offenders. Employees must review information received with the defendant/offender as well as discussions with the defendant/offender. Employees must conduct this screening using a written screening instrument tailored to the gender of the population being screened. Although additional factors may be considered, particularly to account for emerging research and the agency's or facility's own data analysis, screening instruments must contain the criteria described below. For defendants/offenders under the age of 18 or applicable age of majority within that jurisdiction, screening must be conducted by medical or mental health practitioners. If the facility does not have medical or mental health practitioners available, these young defendants/offenders are given an opportunity to participate in screenings in private. All screening instruments must be made available to the public upon request.

**SC2 - Use of screening information**

Employees use information from the risk screening (SC1) to inform housing, bed, work, education, and program assignments. In many community corrections facilities, it is difficult, if not impossible, to keep defendants/offenders totally separate or segregated from each other. However, the facility can determine, based on the screening information, whether a particular defendant/offender should receive greater supervision, should have more frequent contact with staff, or is more appropriately housed in some alternative type of placement. The facility makes individualized determinations about how to ensure the safety of each defendant/offender. Lesbian, gay, bisexual, transgender, or other gender-nonconforming defendants/offenders are not placed in particular housing assignments solely on the basis of their sexual orientation, genital status, or gender identity.

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**III. DETECTION AND RESPONSE**

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**Reporting (RE)****RE1 - Defendant/offender reporting**

The agency or facility provides multiple internal ways for defendants/offenders to report easily, privately, and securely sexual abuse, retaliation by other defendants/offenders or staff for reporting sexual abuse, and staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse. The agency or facility also provides at least one way for defendants/offenders to report the abuse to an outside public entity or office not affiliated with the agency that has agreed to receive reports and forward them to the agency or facility head (RP2), except when a defendant/offender requests confidentiality. Staff accepts reports made verbally, in writing, anonymously, and from third parties and immediately puts into writing any verbal reports.

**RE2 - Exhaustion of administrative remedies**

Under agency or facility policy, a defendant/offender has exhausted his or her administrative remedies with regard to a claim of sexual abuse either (1) when the agency or facility makes a final decision on the merits of the report of abuse (regardless of whether the report was made by the defendant/offender, made by a third party, or forwarded from an outside official or office) or (2) when 90 days have passed since the report was made, whichever occurs sooner. A report of sexual abuse triggers the 90-day exhaustion period regardless of the length of time that has passed between the abuse and the report. A defendant/offender seeking immediate protection from imminent sexual abuse will be deemed to have exhausted his or her administrative remedies 48 hours after notifying any agency or facility staff member of his or her need for protection.

**RE3 - Defendant/offender access to outside confidential support services**

The facility provides defendants/offenders with access to outside victim advocates for emotional support services related to sexual abuse. The facility provides such access by giving defendants/offenders the current mailing addresses and telephone numbers, including toll-free hotline numbers, of local, State, and/or national victim advocacy or rape crisis organizations and enabling reasonable communication between defendants/offenders and these organizations. The facility ensures that communications with such advocates are private, confidential, and privileged, to the extent allowable by Federal, State, and local law. The facility informs defendants/offenders, prior to giving them access, of the extent to which such communications will be private, confidential, and/or privileged.

**RE4 - Third-party reporting**

The agency or facility receives and investigates all third-party reports of sexual abuse (IN1). At the conclusion of the investigation, the agency or facility notifies in writing the third-party individual who reported the abuse and the defendant/offender named in the third-party report of

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the outcome of the investigation. The agency or facility distributes publicly information on how to report sexual abuse on behalf of a defendant/offender.

### **Official Response Following an Defendant/offender Report (OR)**

#### **OR1 - Staff and facility head reporting duties**

All staff members are required to report immediately and according to agency or facility policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse that occurred in a facility setting or while under supervision; retaliation against defendants/offenders or staff who reported abuse; and any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or retaliation. Apart from reporting to designated supervisors or officials, staff must not reveal any information related to a sexual abuse report to anyone other than those who need to know, as specified in agency or facility policy, to make treatment, investigation, and other security and management decisions. Unless otherwise precluded by Federal, State, or local law, staff medical and mental health practitioners are required to report sexual abuse and must inform defendants/offenders of their duty to report at the initiation of services. If the victim is under the age of 18 or applicable age of majority within that jurisdiction, or considered a vulnerable adult under a State or local vulnerable persons statute, staff must report the allegation to the designated State or local services agency under applicable mandatory reporting laws.

#### **OR2 - Reporting to other agencies or facilities**

When the agency or facility receives an allegation that a defendant/offender was sexually abused while in a community corrections facility or while under supervision, the head of the agency or facility where the report was made notifies in writing the head of the agency or facility where the alleged abuse occurred. The head of the agency or facility where the alleged abuse occurred ensures the allegation is investigated.

#### **OR3 - Staff first responder duties**

Upon learning that a defendant/offender has alleged sexual abuse within a time period that still allows for the collection of physical evidence, the first facility staff member to respond to the report is required to (1) separate the alleged victim and abuser; (2) seal and preserve any crime scene(s); and (3) instruct the victim not to take any actions that could destroy physical evidence, including washing, brushing his or her teeth, changing his or her clothes, urinating, defecating, smoking, drinking, or eating.

#### **OR4 - Coordinated response**

All actions taken in response to an allegation of sexual abuse are coordinated among staff first responders, medical and mental health practitioners, investigators, and agency or facility leadership. The agency's or facility's coordinated response ensures that victims receive all necessary immediate and ongoing medical, mental health, and support services and that investigators are able to obtain usable evidence to substantiate allegations and hold perpetrators accountable.

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**OR5 – Agency or facility protection against retaliation**

The agency or facility protects all defendants/offenders and staff who report sexual abuse or cooperate with sexual abuse investigations from retaliation by other defendants/offenders or staff. The agency or facility employs multiple protection measures, including housing changes or transfers for defendant/offender victims or abusers, removal of alleged staff or defendant/offender abusers from contact with victims, and emotional support services for defendants/offenders or staff who fear retaliation for reporting sexual abuse or cooperating with investigations. The agency or facility monitors the conduct and/or treatment of defendants/offenders or staff who have reported sexual abuse or cooperated with investigations, including any defendant/offender disciplinary reports, housing changes, or program changes, for at least 90 days following their report or cooperation to assess changes that may suggest possible retaliation by defendants/offenders or staff. The agency or facility discusses any changes with the appropriate defendant/offender or staff member as part of its efforts to determine if retaliation is taking place and, when confirmed, immediately takes steps to protect the defendant/offender or staff member.

**Investigations (IN)****IN1 - Duty to investigate**

The agency or facility investigates all allegations of sexual abuse, including third-party and anonymous reports, and notifies victims and/or other complainants in writing of investigation outcomes and any disciplinary or criminal sanctions, regardless of the source of the allegation. All investigations are carried through to completion, regardless of whether the alleged abuser or victim remains at the facility or under supervision.

**IN2 - Criminal and administrative agency investigations**

Agency or facility investigations into allegations of sexual abuse are prompt, thorough, objective, and conducted by investigators who have received special training in sexual abuse investigations (TR4). When outside agencies investigate sexual abuse, the agency or facility has a duty to keep abreast of the investigation and cooperate with outside investigators (RP3). Investigations include the following elements:

**IN3 - Evidence standard for administrative investigations**

Allegations of sexual abuse are substantiated if supported by a preponderance of the evidence or a lesser standard if allowed under agency or facility policy or State law.

**Discipline (DI)****DI1 - Disciplinary sanctions for staff**

Staff is subject to disciplinary sanctions up to and including termination when staff has violated agency or facility sexual abuse policies. The presumptive disciplinary sanction for staff members who have engaged in sexually abusive contact or penetration is termination. This presumption does not limit agency or facility discretion to impose termination for other sexual

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abuse policy violations. All terminations for violations of agency or facility sexual abuse policies are to be reported to law enforcement agencies and any relevant licensing bodies.

### **DI2 - Disciplinary sanctions for defendants/offenders**

Defendants/offenders are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative ruling that the defendant/offender engaged in defendant/offender-on-defendant/offender sexual abuse or following a criminal finding of guilt for defendant/offender-on-defendant/offender sexual abuse. Sanctions are commensurate with the nature and circumstances of the abuse committed, the defendant/offender's disciplinary history, and the sanctions meted out for comparable offenses by other defendants/offenders with similar histories. The disciplinary process must consider whether a defendant/offender's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed. Possible sanctions can include discipline within the community corrections facility, new criminal charges, or referral to authorities who may change conditions of a defendant/offender's release status in the community. Sanctions may also include interventions designed to address and correct underlying reasons or motivation for the abuse, such as requiring the offending defendant/offender to participate in therapy, counseling, or other programs. Sanctions and/or interventions for young defendants/offenders must also take into account the social, sexual, emotional, and cognitive development of the defendant/offender.

## **Medical and Mental Health Care (MM)**

### **MM1 - Access to emergency medical and mental health services**

Victims of sexual abuse have timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment. Treatment services must be provided free of charge to the victim and regardless of whether the victim names the abuser. If the community corrections facility does not have medical or mental health practitioners or they are not on duty at the time a report of recent abuse is made, staff first responders take preliminary steps to protect the victim (OR3) and immediately notify appropriate staff or community medical and mental health practitioners.

### **MM2 - Ongoing medical and mental health care for sexual abuse victims and abusers**

The facility provides ongoing medical and/or mental health evaluation and treatment to all known victims of sexual abuse. The evaluation and treatment of sexual abuse victims must include appropriate follow-up services, treatment plans, and, when necessary, referrals for continued care following their release from a community corrections facility. The level of medical and mental health care provided to defendant/offender victims must match the community level of care generally accepted by the medical and mental health professional communities. The facility conducts a mental health evaluation of all known abusers and provides treatment, as deemed necessary by qualified mental health practitioners.

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**IV. MONITORING****Data Collection and Review (DC)****DC1 - Sexual abuse incident reviews**

The agency or facility treats all instances of sexual abuse as critical incidents to be examined by a team of upper management officials, with input from line supervisors, investigators, and medical/mental health practitioners. The review team evaluates each incident of sexual abuse to identify any policy, training, or other issues related to the incident that indicate a need to change policy or practice to better prevent, detect, and/or respond to incidents of sexual abuse. The review team also considers whether incidents were motivated by racial or other group dynamics. When incidents are determined to be motivated by racial or other group dynamics, upper management officials immediately notify the agency or facility head and begin taking steps to rectify those underlying problems. The sexual abuse incident review takes place at the conclusion of every sexual abuse investigation, unless the allegation was determined to be unfounded. The review team prepares a report of its findings and recommendations for improvement and submits it to the agency or facility head.

**DC2 - Data collection**

The agency or facility collects accurate, uniform data for every reported incident of sexual abuse using a standardized instrument and set of definitions. The agency aggregates the incident-based sexual abuse data at least annually. The incident-based data collected includes, at a minimum, the data necessary to answer all questions from the most recent version of the BJS Survey on Sexual Violence. Data are obtained from multiple sources, including reports, investigation files, and sexual abuse incident reviews. The agency also obtains incident-based and aggregated data from every community corrections facility with which it contracts.

**DC3 - Data review for corrective action**

The agency reviews, analyzes, and uses all sexual abuse data, including incident-based and aggregated data, to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training. Using these data, the agency identifies problem areas, including any racial dynamics underpinning patterns of sexual abuse, takes corrective action on an ongoing basis, and, at least annually, prepares a report of its findings and corrective actions for each facility as well as the agency as a whole. The annual report also includes a comparison of the current year's data and corrective actions with those from prior years and provides an assessment of the agency's progress in addressing sexual abuse. The agency's report is approved by the agency head, submitted to the appropriate governing body, and made readily available to the public through its Web site or, if it does not have one, through other means. 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 it must indicate the nature of the material redacted.

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**DC4 - Data storage, publication, and destruction**

The agency ensures that the collected sexual abuse data are properly stored, securely retained, and protected. The agency makes all aggregated sexual abuse data, including from facilities under its direct control and those with which it contracts, readily available to the public at least annually through its Web site or, if it does not have one, through other means. Before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers from the data. The agency maintains sexual abuse data for at least 10 years after the date of its initial collection unless Federal, State, or local law allows for the disposal of official information in less than 10 years.

**Audits (AU)****AU1 - Audits of standards**

The public agency ensures that all community corrections facilities, including contract facilities and pretrial, probation, and parole agencies are audited to measure compliance with the NPREC standards. Audits must be conducted at least every three years by independent and qualified auditors. The public or contracted agency allows the auditor to enter and tour facilities, review documents, and interview staff and defendants/offenders, as deemed appropriate by the auditor, to conduct comprehensive audits. The public agency ensures that the report of the auditor's findings and the public or contracted agency's plan for corrective action (DC3) are published on the appropriate agency's Web site if it has one or are otherwise made readily available to the public.



## Juvenile Facilities



# National Standards

## Juvenile Facilities

### I. PREVENTION AND RESPONSE PLANNING

#### Prevention Planning (PP)

##### PP1 - Zero tolerance of sexual abuse

The agency has a written policy mandating zero tolerance toward all forms of sexual abuse and enforces that policy by ensuring all of its facilities comply with the NPREC standards. The agency employs or designates a PREA coordinator to develop, implement, and oversee agency efforts to comply with the NPREC standards.

##### PP2 - Contracting with facilities for the confinement of residents

If public correctional agencies contract for the confinement of their residents, they do so only with private agencies or other entities, including other government agencies, committed to eliminating sexual abuse in their facilities, as evidenced by their adoption of and compliance with the NPREC standards. Any new contracts or contract renewals include the entity's obligation to adopt and comply with the NPREC standards and specify that the public agency will monitor the entity's compliance with these standards as part of its monitoring of the entity's performance.

##### PP3 - Resident supervision

Security staff provides the resident supervision necessary to protect residents from sexual abuse. The upper management officials responsible for reviewing critical incidents must examine areas in the facility where sexual abuse has occurred to assess whether physical barriers may have enabled the abuse, the adequacy of staffing levels in those areas during different shifts, and the need for monitoring technology to supplement security staff supervision (DC1). When problems or needs are identified, the agency takes corrective action (DC3).

##### PP4 - Limits to Cross-Gender Viewing and Searches

Except in the case of emergency, the facility prohibits cross-gender strip and visual body cavity searches. Except in the case of emergency or other extraordinary or unforeseen circumstances, the facility restricts non-medical staff from viewing residents of the opposite gender who are nude or performing bodily functions and similarly restricts cross-gender pat down searches.

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Medical practitioners conduct examinations of transgender individuals to determine their genital status only in private settings and only when an individual's genital status is unknown.

**PP5 - Accommodating residents with special needs**

The agency ensures that residents who are limited English proficient (LEP), deaf, or disabled are able to report sexual abuse to staff directly, through interpretive technology, or through non-resident interpreters. Accommodations are made to convey all written information about sexual abuse policies, including how to report sexual abuse, verbally to residents who have limited reading skills or who are visually impaired.

**PP6- Hiring and promotion decisions**

The agency does not hire or promote anyone who has engaged in sexual abuse in an institutional setting or who has engaged in sexual activity in the community facilitated by force, the threat of force, or coercion. Consistent with Federal, State, and local law, the agency makes its best effort to contact all prior institutional employers for information on substantiated allegations of sexual abuse; must run criminal background checks for all applicants and employees being considered for promotion; and must examine and carefully weigh any history of criminal activity at work or in the community, including convictions for domestic violence, stalking, and sex offenses. The agency also asks all applicants and employees directly about previous misconduct during interviews and reviews.

**PP7 - Assessment and Use of Monitoring Technology**

The agency uses video monitoring systems and other cost-effective and appropriate technology to supplement its sexual abuse prevention, detection, and response efforts. The agency assesses, at least annually, the feasibility of and need for new or additional monitoring technology and develops a plan for securing such technology.

**Response Planning (RP)****RP1 - Evidence protocol and forensic medical exams**

The agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. The protocol must be adapted from or otherwise based on the 2004 U.S. Department of Justice's Office on Violence Against Women publication "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," subsequent updated editions, or similarly comprehensive and authoritative protocols developed after 2004. As part of the agency's evidence collection protocol, all victims of resident-on-resident sexually abusive penetration or staff-on-resident sexually abusive penetration are provided access to forensic medical exams performed by qualified forensic medical examiners. Forensic medical exams are provided free of charge to the victim. The facility makes available a victim advocate to accompany the victim through the forensic medical exam process.

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**RP2 - Agreements with outside public entities and community service providers**

The agency maintains or attempts to enter into memoranda of understanding (MOUs) or other agreements with an outside public entity or office that is able to receive and immediately forward resident reports of sexual abuse to facility heads (RE-1). The agency also maintains or attempts to enter into MOUs or other agreements with community service providers that are able to: (1) provide residents with confidential emotional support services related to sexual abuse and (2) help victims of sexual abuse during their transition from incarceration to the community (RE3, MM3). The agency maintains copies of agreements or documentation showing attempts to enter into agreements.

**RP3 - Agreements with outside law enforcement agencies**

If an agency does not have the legal authority to conduct criminal investigations or has elected to permit an outside agency to conduct criminal or administrative investigations of staff or residents, the agency maintains or attempts to enter into a written MOU or other agreement specific to investigations of sexual abuse with the law enforcement agency responsible for conducting investigations. If the agency confines residents under the age of 18 or other residents who fall under State and local vulnerable persons statutes, the agency maintains or attempts to enter into an MOU with the designated State or local services agency with the jurisdiction and authority to conduct investigations related to the sexual abuse of vulnerable persons within confinement facilities. When the agency already has an existing agreement or long-standing policy covering responsibilities for all criminal investigations, including sexual abuse investigations, it does not need to enter into a new agreement. The agency maintains a copy of the agreement or documentation showing attempts to enter into an agreement.

**RP4- Agreements with the prosecuting authority**

The agency maintains or attempts to enter into a written MOU or other agreement with the authority responsible for prosecuting violations of criminal law. The agency maintains a copy of the agreement or documentation showing attempts to enter into an agreement.

## II. PREVENTION

**Training and Education (TR)****TR1 - Employee training**

The agency trains all employees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures; the NPREC standards; and relevant Federal, State, and local law. The agency trains all employees to communicate effectively and professionally with all residents. Additionally, the agency trains all employees on an resident's right to be free from sexual abuse, the right of residents and employees to be free from retaliation for reporting sexual abuse, the dynamics of sexual abuse in confinement, and the common reactions of sexual abuse victims. Current employees are educated as soon as possible following the agency's adoption of the NPREC standards, and the agency provides periodic refresher information to all employees to ensure that they know the agency's most

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current sexual abuse policies and procedures. The agency maintains written documentation showing employee signatures verifying that employees understand the training they have received.

**TR2 - Volunteer and contractor training**

The agency ensures that all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency's sexual abuse prevention, detection, and response policies and procedures; the NPREC standards; and relevant Federal, State, and local law. The level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with residents, but all volunteers and contractors who have contact with residents must be notified of the agency's zero-tolerance policy regarding sexual abuse. Volunteers must also be trained in how to report sexual abuse. The agency maintains written documentation showing volunteer and contractor signatures verifying that they understand the training they have received.

**TR3 - Resident education**

During the intake process, staff informs residents of the agency's zero-tolerance policy regarding sexual abuse and how to report incidents or suspicions of sexual abuse. Within a reasonably brief period of time following the intake process, the agency provides comprehensive education to residents regarding their right to be free from sexual abuse and to be free from retaliation for reporting abuse, the dynamics of sexual abuse in confinement, the common reactions of sexual abuse victims, and agency sexual abuse response policies and procedures. Current residents are educated as soon as possible following the agency's adoption of the NPREC standards, and the agency provides periodic refresher information to all residents to ensure that they know the agency's most current sexual abuse policies and procedures. The agency provides resident education in formats accessible to all residents, including those who are LEP, deaf, visually impaired, or otherwise disabled as well as residents who have limited reading skills. The agency maintains written documentation of resident participation in these education sessions.

**TR4 - Specialized training: Investigations**

In addition to the general training provided to all employees (TR1), the agency ensures that agency investigators conducting sexual abuse investigations have received comprehensive and up-to-date training in conducting such investigations in confinement settings. Specialized training must include techniques for interviewing sexual abuse victims, proper use of Miranda- and Garrity-type warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. The agency maintains written documentation that investigators have completed the required specialized training in conducting sexual abuse investigations.

**TR5 - Specialized training: Medical and mental health care**

The agency ensures that all full- and part-time medical and mental health care practitioners working in its facilities have been trained in how to detect and assess signs of sexual abuse and

that all medical practitioners are trained in how to preserve physical evidence of sexual abuse. All medical and mental health care practitioners must be trained in how to respond effectively and professionally to victims of sexual abuse and how and to whom to report allegations or suspicions of sexual abuse. The agency maintains documentation that medical and mental health practitioners have received this specialized training.

### **Screening for Risk of Sexual Victimization and Abusiveness (SC)**

#### **AP1 - Obtaining information about residents**

During intake and periodically throughout a resident's confinement, employees obtain and use information about each resident's personal history and behavior to keep all residents safe and free from sexual abuse. At a minimum, employees attempt to ascertain information about prior sexual victimization or abusiveness; sexual orientation and gender identity; current charges and offense history; age; level of emotional and cognitive development; physical size/stature; mental illness or mental disabilities; intellectual/developmental disabilities; physical disabilities; and any other specific information about individual residents that may indicate heightened needs for supervision, additional safety precautions, or separation from certain other residents. This information may be ascertained through conversations with residents at intake and medical and mental health screenings; during classification assessments; and by reviewing court records, case files, facility behavioral records, and other relevant documentation from the residents' files. Medical and mental health practitioners are the only staff permitted to talk with residents to gather information about their sexual orientation or gender identity, prior sexual victimization, history of engaging in sexual abuse, mental health status, and mental or physical disabilities. If the facility does not have medical or mental health practitioners available, residents are given an opportunity to discuss any safety concerns or sensitive issues privately with another employee.

#### **AP2 - Placement of residents in housing, bed, program, education, and work assignments**

Employees use all information obtained about the resident at intake and subsequently to make placement decisions for each resident on an individualized basis with the goal of keeping all residents safe and free from sexual abuse. When determining housing, bed, program, education and work assignments for residents, employees must take into account a resident's age; the nature of his or her offense; any mental or physical disability or mental illness; any history of sexual victimization or engaging in sexual abuse; his or her level of emotional and cognitive development; his or her identification as lesbian, gay, bisexual, or transgender; and any other information obtained about the resident (AP1). Residents may be isolated from others only as a last resort when less restrictive measures are inadequate to keep them and other residents safe, and then only until an alternative means of keeping all residents safe can be arranged.

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**III. DETECTION AND RESPONSE**

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**Reporting (RE)****RE1 - Resident reporting**

The facility provides multiple internal ways for residents to report easily, privately, and securely sexual abuse, retaliation by other residents or staff for reporting sexual abuse, and staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse. The facility also provides at least one way for residents to report the abuse to an outside public entity or office not affiliated with the agency that has agreed to receive reports and forward them to the facility head (RP2), except when an resident requests confidentiality. Staff accepts reports made verbally, in writing, anonymously, and from third parties and immediately puts into writing any verbal reports.

**RE2 - Exhaustion of administrative remedies**

Under agency policy, an resident has exhausted his or her administrative remedies with regard to a claim of sexual abuse either (1) when the agency makes a final decision on the merits of the report of abuse (regardless of whether the report was made by the resident, made by a third party, or forwarded from an outside official or office) or (2) when 90 days have passed since the report was made, whichever occurs sooner. A report of sexual abuse triggers the 90-day exhaustion period regardless of the length of time that has passed between the abuse and the report. An resident seeking immediate protection from imminent sexual abuse will be deemed to have exhausted his or her administrative remedies 48 hours after notifying any agency staff member of his or her need for protection.

**RE3 - Resident access to outside confidential support services**

In addition to providing on-site mental health care services, the facility provides residents with access to outside victim advocates for emotional support services related to sexual abuse. The facility provides such access by giving residents the current mailing addresses and telephone numbers, including toll-free hotline numbers, of local, State, and/or national victim advocacy or rape crisis organizations and enabling reasonable communication between residents and these organizations. The facility ensures that communications with such advocates are private, to the extent allowable by Federal, State, and local law. The facility informs residents, prior to giving them access, of the extent to which such communications will be private, confidential, and/or privileged. The facility also provides residents with unimpeded access to their attorney or other legal representation and their families.

**RE4 - Third-party reporting**

The facility receives and investigates all third-party reports of sexual abuse and refers all third-party reports of abuse to the designated State or local services agency with the authority to conduct investigations into allegations of sexual abuse involving child victims (IN1 and RP4). At the conclusion of the investigation, the facility notifies in writing the third-party individual who reported the abuse and the resident named in the third-party report of the outcome of the

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investigation. The facility distributes information on how to report sexual abuse on behalf of a resident to residents' parents or legal guardians, attorneys, and the public.

### **Official Response Following an Resident Report (OR)**

#### **OR1 - Staff and facility head reporting duties**

All staff members are required to report immediately and according to agency policy and relevant State or local mandatory child abuse reporting laws any knowledge, suspicion, or information they receive regarding an incident of sexual abuse that occurred in an institutional setting; retaliation against residents or staff who reported abuse; and any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or retaliation. Apart from reporting to designated supervisors or officials and designated State or local services agencies, staff must not reveal any information related to a sexual abuse report to anyone other than those who need to know, as specified in agency policy, to make treatment, investigation, and other security and management decisions. Medical and mental health practitioners are required to report sexual abuse to designated supervisors and officials as well as the designated State or local services agency and must inform residents of their duty to report at the initiation of services. Upon receiving any allegation of sexual abuse, the facility head must immediately report the allegation to the agency head, the juvenile court that handled the victim's case or the victim's judge of record, and the victim's parents or legal guardians, unless the facility has official documentation showing the parents or legal guardians should not be notified. If the victim is involved in the child welfare system, the facility head reports to the victim's caseworker instead of the victim's parents or legal guardians.

#### **OR2 - Reporting to other confinement facilities**

When the facility receives an allegation that an resident was sexually abused while confined at another facility, the head of the facility where the report was made notifies in writing the head of the facility where the alleged abuse occurred. The head of the facility where the alleged abuse occurred ensures the allegation is investigated.

#### **OR3 - Staff first responder duties**

Upon learning that a resident was sexually abused within a time period that still allows for the collection of physical evidence, the first direct care staff member to respond to the report is required to 1) separate the alleged victim and abuser; (2) seal and preserve any crime scene(s); and (3) instruct the victim not to take any actions that could destroy physical evidence, including washing, brushing his or her teeth, changing his or her clothes, urinating, defecating, smoking, drinking, or eating. If the first staff responder is a non-direct care staff member, he or she is required to instruct the victim not to take any actions that could destroy physical evidence and then notify direct care staff.

#### **OR4 - Coordinated response**

All actions taken in response to an incident of sexual abuse are coordinated among staff first responders, medical and mental health practitioners, investigators, and facility leadership. The

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facility's coordinated response ensures that victims receive all necessary immediate and ongoing medical, mental health, and support services and that investigators are able to obtain usable evidence to substantiate allegations and hold perpetrators accountable.

#### **OR5 - Agency protection against retaliation**

The agency protects all residents and staff who report sexual abuse or cooperate with sexual abuse investigations from retaliation by other residents or staff. The agency employs multiple protection measures, including housing changes or transfers for resident victims or abusers, removal of alleged staff or resident abusers from contact with victims, and emotional support services for residents or staff who fear retaliation for reporting sexual abuse or cooperating with investigations. The agency monitors the conduct and/or treatment of residents or staff who have reported sexual abuse or cooperated with investigations, including any resident disciplinary reports, housing, or program changes, for at least 90 days following their report or cooperation to see if there are changes that may suggest possible retaliation by residents or staff. The agency discusses any changes with the appropriate resident or staff member as part of its efforts to determine if retaliation is taking place and, when confirmed, immediately takes steps to protect the resident or staff member.

### **Investigations (IN)**

#### **IN1 - Duty to investigate**

The facility investigates all allegations of sexual abuse, including third-party and anonymous reports, and notifies victims and/or other complainants in writing of investigation outcomes and any disciplinary or criminal sanctions, regardless of the source of the allegation. If additional parties were notified of the allegation (OR1), the facility notifies those parties in writing of investigation outcomes. All investigations are carried through to completion, regardless of whether the alleged abuser or victim remains at the facility and regardless of whether the source of the allegation recants his or her allegation.

#### **IN2 - Criminal and administrative agency investigations**

Agency investigations into allegations of sexual abuse are prompt, thorough, objective, and conducted by investigators who have received special training in sexual abuse investigations involving young victims (TR4). When outside agencies investigate sexual abuse, the facility has a duty to keep abreast of the investigation and cooperate with outside investigators (RP4).

#### **IN3 - Evidence standard for administrative investigations**

Allegations of sexual abuse are substantiated if supported by a preponderance of the evidence.

### **Discipline (DI)**

#### **DI1 - Disciplinary sanctions for staff**

Staff is subject to disciplinary sanctions up to and including termination when staff has violated agency sexual abuse policies. The presumptive disciplinary sanction for staff members who



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have engaged in sexually abusive contact or penetration is termination. This presumption does not limit agency discretion to impose termination for other sexual abuse policy violations. All terminations for violations of agency sexual abuse policies are to be reported to law enforcement agencies and any relevant licensing bodies.

## **DI2 - Disciplinary sanctions for residents**

Residents receive appropriate interventions if they engage in resident-on-resident sexual abuse. Decisions regarding which types of interventions to use in particular cases, including treatment, counseling, educational programs, or disciplinary sanctions, are made with the goal of promoting improved behavior by the resident and ensuring the safety of other residents and staff. When imposing disciplinary sanctions in lieu of or in addition to other interventions, the facility informs residents of their rights and responsibilities during the disciplinary process, including how to appeal sanctions, and only imposes sanctions commensurate with the type of violation committed and the resident's disciplinary history. Intervention decisions must take into account the social, sexual, emotional, and cognitive development of the resident and the resident's mental health status.

## **Medical and Mental Health Care (MM)**

### **MM1 - Medical and mental health intake screenings**

During medical and mental health reception and intake screenings, qualified medical or mental health practitioners talk with residents to ascertain information regarding the resident's sexual orientation, gender identity, prior sexual victimization or history of engaging in sexual abuse (whether it occurred in an institutional setting or in the community), mental health status, and mental or physical disabilities. Such conversations are conducted in the manner that the medical or mental health practitioner deems appropriate for each resident in light of the resident's age and developmental status according to the practitioner's professional judgment and use inclusive language that avoids implicit assumptions about a young person's sexual orientation. The information obtained during these screenings is strictly limited to medical and mental health practitioners, with information provided to appropriate staff on a need to know basis to the extent needed to inform all housing, bed, program, education, and work assignments for the resident (AP2). If a resident discloses prior sexual victimization or abusiveness during a medical or mental health reception or intake screening, the practitioner reports the abuse according to agency policy and relevant State or local mandatory child abuse reporting laws (OR1) and provides the appropriate treatment or referral for treatment, based on his or her professional judgment.

### **MM2 - Access to emergency medical and mental health services**

Victims of sexual abuse have timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment. Treatment services must be provided free of charge to the victim and regardless of whether the victim names the abuser. If

no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders take preliminary steps to protect the victim (OR3) and immediately notify the appropriate medical and mental health practitioners.

### **MM3 - Ongoing medical and mental health care for sexual abuse victims and abusers**

The facility provides ongoing medical and/or mental health evaluation and treatment to all known victims of sexual abuse. The evaluation and treatment of sexual abuse victims must include appropriate follow-up services, treatment plans, and, when necessary, referrals for continued care following their release from custody. The level of medical and mental health care provided to resident victims must match the community level of care generally accepted by the medical and mental health professional communities. The facility conducts a mental health evaluation of all known abusers and provides treatment, as deemed necessary by qualified mental health practitioners.

## **IV. MONITORING**

### **Data Collection and Review (DC)**

#### **DC1 - Sexual abuse incident reviews**

The facility treats all instances of sexual abuse as critical incidents to be examined by a team of upper management officials, with input from line supervisors, investigators, and medical/mental health practitioners. The review team evaluates each incident of sexual abuse to identify any policy, training, or other issues related to the incident that indicate a need to change policy or practice to better prevent, detect, and/or respond to incidents of sexual abuse. The review team also considers whether incidents were motivated by racial or other group dynamics at the facility. When incidents are determined to be motivated by racial or other group dynamics, upper management officials immediately notify the agency head and begin taking steps to rectify those underlying problems. The sexual abuse incident review takes place at the conclusion of every sexual abuse investigation, unless the allegation was determined to be unfounded. The review team prepares a report of its findings and recommendations for improvement and submits it to the facility head.

#### **DC2 - Data collection**

The agency collects accurate, uniform data for every reported incident of sexual abuse using a standardized instrument and set of definitions. The agency aggregates the incident-based sexual abuse data at least annually. The incident-based data collected includes, at a minimum, the data necessary to answer all questions from the most recent version of the BJS Survey on Sexual Violence. Data are obtained from multiple sources, including reports, investigation files, and sexual abuse incident reviews. The agency also obtains incident-based and aggregated data from every facility with which it contracts for the confinement of its residents.

#### **DC3 - Data review for corrective action**

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The agency reviews, analyzes, and uses all sexual abuse data, including incident-based and aggregated data, to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training. Using these data, the agency identifies problem areas, including any racial dynamics underpinning patterns of sexual abuse, takes corrective action on an ongoing basis, and, at least annually, prepares a report of its findings and corrective actions for each facility as well as the agency as a whole. The annual report also includes a comparison of the current year's data and corrective actions with those from prior years and provides an assessment of the agency's progress in addressing sexual abuse. The agency's report is approved by the agency head, submitted to the appropriate legislative body, and made readily available to the public through its Web site or, if it does not have one, through other means. 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 it must indicate the nature of the material redacted.

#### **DC4 - Data storage, publication, and destruction**

The agency ensures that the collected sexual abuse data are properly stored, securely retained, and protected. The agency makes all aggregated sexual abuse data, from facilities under its direct control and those with which it contracts, readily available to the public at least annually through its Web site or, if it does not have one, through other means. Before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers from the data. The agency maintains sexual abuse data for at least 10 years after the date of its initial collection unless Federal, State, or local law allows for the disposal of official information in less than 10 years.

#### **Audits (AU)**

##### **AU1 - Audits of standards**

The public agency ensures that all of its facilities, including contract facilities, are audited to measure compliance with the NPREC standards. Audits must be conducted at least every three years by independent and qualified auditors. The public or contracted agency allows the auditor to enter and tour facilities, review documents, and interview staff and residents, as deemed appropriate by the auditor, to conduct comprehensive audits. The public agency ensures that the report of the auditor's findings and the public or contracted agency's plan for corrective action (DC3) are published on the appropriate agency's Web site if it has one or are otherwise made readily available to the public.

## Lockups



# National Standards

## Lockups

### I. PREVENTION AND RESPONSE PLANNING

#### Prevention Planning (PP)

##### PP1 - Zero tolerance of sexual abuse

The agency has a written policy mandating zero tolerance toward all forms of sexual abuse and enforces that policy by ensuring all of its facilities comply with the NPREC standards. The agency employs or designates a PREA coordinator to develop, implement, and oversee agency efforts to comply with the NPREC standards.

##### PP2 - Contracting with other entities for the confinement of detainees

If law enforcement agencies contract for the confinement of their detainees, they do so only with private agencies or other entities, including other government agencies, committed to eliminating sexual abuse in their lockups, as evidenced by their adoption of and compliance with the NPREC standards. Any new contracts or contract renewals include the entity's obligation to adopt and comply with the NPREC standards and specify that the law enforcement agency will monitor the entity's compliance with these standards as part of its monitoring of the entity's performance.

##### PP3 - Detainee supervision

Law enforcement staff provides the detainee supervision necessary to protect detainees from sexual abuse. The upper management officials responsible for reviewing critical incidents must examine areas in the lockup where sexual abuse has occurred to assess whether physical barriers may have enabled the abuse, the adequacy of staffing levels in those areas during different shifts, and the need for monitoring technology to supplement law enforcement staff supervision (DC1). When problems or needs are identified, the agency takes corrective action (DC3).

##### PP4 – Heightened protection of vulnerable inmates

Any intake screening or assessment includes consideration of a detainee's potential vulnerability to sexual abuse. When vulnerabilities are identified, law enforcement staff provides heightened protection to vulnerable detainees, which may require continuous direct sight and sound supervision or single-cell housing. Absent intake screenings or assessments, any time a law enforcement staff member observes any physical or behavioral characteristics of a detainee that suggest

he or she may be vulnerable to sexual abuse, the staff member provides sufficient protection to that detainee to prevent sexual abuse.

**PP5 - Limits to Cross-Gender Viewing and Searches**

Except in the case of emergency, the agency prohibits cross-gender strip and visual body cavity searches. Except in the case of emergency or other extraordinary or unforeseen circumstances, the agency restricts law enforcement staff from viewing detainees of the opposite gender who are nude or performing bodily functions and similarly restricts cross-gender pat down searches. Any examination to determine the genital status of a detainee must be conducted in a private setting by a medical practitioner and only when the genital status is unknown to the agency.

**PP6 - Accommodating detainees with special needs**

The agency ensures that detainees who are LEP, deaf, or disabled are able to report sexual abuse to staff directly, through interpretive technology, or through non-detainee interpreters. Accommodations are made to convey all written information about sexual abuse policies, including how to report sexual abuse, verbally to detainees who have limited reading skills or who are visually impaired.

**PP7 - Hiring and promotion decisions**

The agency does not hire or promote anyone who has engaged in sexual abuse in an institutional setting or who has engaged in sexual activity in the community facilitated by force, the threat of force, or coercion. Consistent with Federal, State, and local law, the agency makes its best effort to contact all prior institutional employers for information on substantiated allegations of sexual abuse; must run criminal background checks for all applicants and employees being considered for promotion; and must examine and carefully weigh any history of criminal activity at work or in the community, including convictions for domestic violence, stalking, and sex offenses. The agency also asks all applicants and employees directly about previous misconduct during interviews and reviews.

**PP-8 - Assessment and Use of Monitoring Technology**

The agency uses video monitoring systems and other cost-effective and appropriate technology to supplement its sexual abuse prevention, detection, and response efforts. The agency assesses, at least annually, the feasibility of and need for new or additional monitoring technology and develops a plan for securing such technology.

**Response Planning (RP)****RP1 - Evidence protocol and forensic medical exams**

When investigating allegations of sexual abuse in a lockup, the agency follows a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for

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administrative proceedings and criminal prosecutions. The protocol must be adapted from or otherwise based on the 2004 U.S. Department of Justice's Office on Violence Against Women publication "A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents," subsequent updated editions, or similarly comprehensive and authoritative protocols developed after 2004. As part of the agency's evidence collection protocol, all victims of detainee-on-detainee sexually abusive penetration or staff-on-detainee sexually abusive penetration are provided with access and transportation to a community medical provider served by qualified forensic medical examiners. Forensic medical exams are provided free of charge to the victim. The agency makes available a victim advocate to accompany the victim through the forensic medical exam process.

#### **RP2 - Agreements with outside law enforcement agencies**

If an agency does not have the legal authority to conduct criminal investigations or has elected to permit an outside agency to conduct criminal or administrative investigations of staff or inmates, the agency maintains or attempts to enter into a written MOU or other agreement specific to investigations of sexual abuse with the law enforcement agency responsible for conducting investigations. If the agency confines inmates under the age of 18 or other inmates who fall under State and local vulnerable persons statutes, the agency maintains or attempts to enter into an MOU with the designated State or local services agency with the jurisdiction and authority to conduct investigations related to the sexual abuse of vulnerable persons within confinement facilities. When the agency already has an existing agreement or long-standing policy covering responsibilities for all criminal investigations, including sexual abuse investigations, it does not need to enter into a new agreement. The agency maintains a copy of the agreement or documentation showing attempts to enter into an agreement.

#### **RP4- Agreements with the prosecuting authority**

The agency maintains or attempts to enter into a written MOU or other agreement with the authority responsible for prosecuting violations of criminal law. The agency maintains a copy of the agreement or documentation showing attempts to enter into an agreement.

## II. PREVENTION

### Training and Education (TR)

#### TR1 – Employee and volunteer training

The agency trains all lockup employees and any volunteers who have contact with detainees to be able to fulfill their responsibilities under agency sexual abuse prevention, detection, and response policies and procedures; the NPREC standards; and under relevant Federal, State, and local law. The agency trains all lockup employees and volunteers who have contact with detainees to communicate effectively and professionally with all detainees. Current lockup employees and volunteers are educated as soon as possible following the agency's adoption of the NPREC standards, and the agency provides periodic refresher information to all lockup employees and volunteers to ensure that they know the agency's most current sexual abuse policies and procedures. The agency maintains written documentation showing lockup employee and volunteer signatures verifying that they understand the training they have received.

#### TR2 - Detainee, attorney, contractor, and inmate worker notification of the agency's zero-tolerance policy

Employees notify all detainees of the agency's zero-tolerance policy regarding sexual abuse during intake. The agency ensures that attorneys, contractors, and inmate workers are informed of the agency's zero-tolerance policy regarding sexual abuse upon entering the lockup.

#### TR3 - Specialized training: Investigations

In addition to the general training provided to all employees (TR1), the agency ensures that agency investigators conducting sexual abuse investigations have received comprehensive and up-to-date training in conducting such investigations in confinement settings. Specialized training must include techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity-type warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. The agency maintains written documentation that investigators have completed the required specialized training in conducting sexual abuse investigations.

## III. DETECTION AND RESPONSE

### Reporting (RE)

#### RE1 - Detainee reporting

The agency provides multiple ways for detainees to report easily, privately, and securely sexual abuse, retaliation by other detainees or staff for reporting sexual abuse, and staff neglect or violation of responsibilities that may have contributed to an incident of sexual

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abuse. Staff accepts reports made verbally, in writing, anonymously, and from third parties and immediately puts into writing any verbal reports.

**RE2 - Exhaustion of administrative remedies**

Under agency policy, a detainee has exhausted his or her administrative remedies with regard to a claim of sexual abuse either (1) when the agency makes a final decision on the merits of the report of abuse (regardless of whether the report was made by the detainee, made by a third party, or forwarded from an outside official or office) or (2) when 90 days has passed since the report was made, whichever occurs sooner. A report of sexual abuse triggers the 90-day exhaustion period regardless of the length of time that has passed between the abuse and the report. A detainee seeking immediate protection from imminent sexual abuse will be deemed to have exhausted his or her administrative remedies 48 hours after notifying any agency staff member of his or her need for protection.

**RE3 - Third-party reporting**

The agency receives and investigates all third-party reports of sexual abuse (IN1). At the conclusion of the investigation, the agency notifies in writing the third-party individual who reported the abuse and the detainee named in the third-party report of the outcome of the investigation. The agency publicly distributes or posts information on how to report sexual abuse on behalf of a detainee.

**Official Response Following an Inmate Report (OR)****OR1 - Staff and agency head reporting duties**

All staff members are required to report immediately and according to agency policy any knowledge, suspicion, or information they receive regarding an incident of sexual abuse that occurred in an institutional setting; retaliation against detainees or staff who reported abuse; and any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or retaliation. Apart from reporting to designated supervisors or officials, staff must not reveal any information related to a sexual abuse report to anyone other than those who need to know, as specified in agency policy, to make treatment and investigation decisions. If the victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, the agency head must report the allegation to the designated State or local services agency under applicable mandatory reporting laws.

**OR2 - Reporting to other confinement facilities**

When the facility receives an allegation that an inmate was sexually abused while confined at another facility, the head of the facility where the report was made notifies in writing the head of the facility where the alleged abuse occurred. The head of the facility where the alleged abuse occurred ensures the allegation is investigated.

**OR3 - Staff first responder duties**



Upon learning that an inmate was sexually abused within a time period that still allows for the collection of physical evidence, the first security staff member to respond to the report is required to (1) separate the alleged victim and abuser; (2) seal and preserve any crime scene(s); and (3) instruct the victim not to take any actions that could destroy physical evidence, including washing, brushing his or her teeth, changing his or her clothes, urinating, defecating, smoking, drinking, or eating. If the first staff responder is a non-security staff member, he or she is required to instruct the victim not to take any actions that could destroy physical evidence and then notify security staff.

#### **OR4 - Coordinated response**

All actions taken in response to an incident of sexual abuse are coordinated among staff first responders, medical and mental health practitioners, investigators, and facility leadership. The facility's coordinated response ensures that victims receive all necessary immediate and ongoing medical, mental health, and support services and that investigators are able to obtain usable evidence to substantiate allegations and hold perpetrators accountable.

#### **OR5 - Agency protection against retaliation**

The agency protects all detainees and staff who report sexual abuse or cooperate with sexual abuse investigations from retaliation by other detainees or staff. The agency employs multiple protection measures, including housing changes or transfers for detainee victims or abusers, removal of alleged staff or detainee abusers from contact with victims, and emotional support services for staff members who fear retaliation for reporting sexual abuse or cooperating with investigations. The agency monitors the conduct and/or treatment of staff who have reported sexual abuse or cooperated with investigations. When retaliation is determined to be taking place, the agency takes immediate steps to protect the detainee or staff member.

### **Investigations (IN)**

#### **IN1 - Duty to investigate**

The facility investigates all allegations of sexual abuse, including third-party and anonymous reports, and notifies victims and/or other complainants in writing of investigation outcomes and any disciplinary or criminal sanctions, regardless of the source of the allegation. All investigations are carried through to completion, regardless of whether the alleged abuser or victim remains at the lockup.

#### **IN2 - Criminal and administrative agency investigations**

Agency investigations into allegations of sexual abuse are prompt, thorough, objective, and conducted by investigators who have received special training in sexual abuse investigations (TR-3). When outside agencies investigate sexual abuse, the agency has a duty to keep abreast of the investigation and cooperate with outside investigators (RP2).

#### **IN3 - Evidence standard for administrative investigations**

Allegations of sexual abuse are substantiated if supported by a preponderance of the evidence.

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**Discipline (DI)****DI1 - Disciplinary sanctions for staff**

Staff is subject to disciplinary sanctions up to and including termination when staff has violated agency sexual abuse policies. The presumptive disciplinary sanction for staff members who have engaged in sexually abusive contact or penetration is termination. This presumption does not limit agency discretion to impose termination for other sexual abuse policy violations. All terminations for violations of agency sexual abuse policies are to be reported to appropriate law enforcement agencies and any relevant licensing bodies.

**DI2 - Referrals for prosecution for detainee-on-detainee sexual abuse**

When there is probable cause to believe that a detainee sexually abused another detainee, the agency refers the matter to the appropriate prosecuting authority.

**Medical and Mental Health Care (MM)****MM1 - Access to emergency medical and mental health services**

Victims of sexual abuse have timely, unimpeded access to emergency medical services following an incident of sexual abuse, regardless of whether they name an abuser. Treatment services must be provided free of charge to the victim. The agency is responsible for ensuring their safe and timely transportation to community medical providers and for referring victims to appropriate community mental health services.

**IV. MONITORING****Data Collection and Review (DC)****DC1 - Sexual abuse incident reviews**

The agency treats all instances of sexual abuse as critical incidents to be examined by a group of upper management officials, with input from line supervisors and investigators. The review team evaluates each incident of sexual abuse to identify any policy, training, or other issues related to the incident that indicate a need to change policy or practice to better prevent, detect, and/or respond to incidents of sexual abuse. The review team also considers whether incidents were motivated by racial or other group dynamics at the lockup. When incidents are determined to be motivated by racial or other group dynamics, upper management officials immediately notify the agency head and begin taking steps to rectify those underlying problems. The sexual abuse incident review takes place at the conclusion of every sexual abuse investigation, unless the allegation was determined to be unfounded. The review team prepares a report of its findings and recommendations for improvement and submits it to the agency head.

**DC2 - Data collection**

The agency collects accurate, uniform data for every reported incident of sexual abuse using a standardized instrument and set of definitions. The agency aggregates the incident-based sexual

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abuse data at least annually. The incident-based data collected includes, at a minimum, the data necessary to answer all questions from the most recent version of the BJS Survey on Sexual Violence. Data are obtained from multiple sources, including reports, investigation files, and sexual abuse incident reviews. The agency also obtains incident-based and aggregated data from every agency with which it contracts for the confinement of its detainees.

**DC3 - Data review for corrective action**

The agency reviews, analyzes, and uses all sexual abuse data, including incident-based and aggregated data, to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training. Using these data, the agency identifies problem areas, including any racial or other group dynamics underpinning patterns of sexual abuse, takes corrective action on an ongoing basis, and, at least annually, prepares a report of its findings and corrective actions for each lockup as well as the agency as a whole. The annual report also includes a comparison of the current year's data and corrective actions with those from prior years and provides an assessment of the agency's progress in addressing sexual abuse. The agency's report is approved by the agency head, submitted to the appropriate legislative body, and made readily available to the public through its Web site or, if it does not have one, through other means. The agency may redact specific material from the reports when publication would present a clear and specific threat to the safety and security of an agency, but it must indicate the nature of the material redacted.

**DC4 - Data storage, publication, and destruction**

The agency ensures that the collected sexual abuse data are properly stored, securely retained, and protected. The agency makes all aggregated sexual abuse data, from lockups under its direct control and those entities with which it contracts, readily available to the public at least annually through its Web site or, if it does not have one, through other means. Before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers from the data. The agency maintains sexual abuse data for at least 10 years after the date of its initial collection unless Federal, State, or local law allows for the disposal of official information in less than 10 years.

**Audits (AU)****AU1 - Audits of standards**

The public agency ensures that all of its lockups, including contract facilities, are audited to measure compliance with the NPREC standards. Audits must be conducted at least every three years by independent and qualified auditors. The public or contracted agency allows the auditor to enter and tour lockups, review documents, and interview staff and detainees, as deemed appropriate by the auditor, to conduct comprehensive audits. The public agency ensures that the report of the auditor's findings and the public or contracted agency's plan for corrective action (DC3) are published on the appropriate agency's Web site if it has one or are otherwise made readily available to the public.