

PREA AUDIT REPORT  INTERIM  FINAL

JUVENILE FACILITIES

Date of report: 08/13/17

<b>Auditor Information</b>			
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Telephone number: (813) 918-1088			
Date of facility visit: July 11-12, 2017			
<b>Facility Information</b>			
Facility name: Guilford County Juvenile Detention Center			
Facility physical address: 15 Lockheed Court, Greensboro, North Carolina 27409			
Facility mailing address: (if different from above)			
Facility telephone number: (336) 641-2600			
The facility is:	<input type="checkbox"/> Federal	<input type="checkbox"/> State	<input checked="" type="checkbox"/> County
	<input type="checkbox"/> Military	<input type="checkbox"/> Municipal	<input type="checkbox"/> Private for profit
	<input type="checkbox"/> Private not for profit		
Facility type:	<input type="checkbox"/> Correctional	<input checked="" type="checkbox"/> Detention	<input type="checkbox"/> Other
Name of facility's Chief Executive Officer: Doug Logan			
Number of staff assigned to the facility in the last 12 months: 25			
Designed facility capacity: 44			
Current population of facility: 27			
Facility security levels/inmate custody levels: Detention Center			
Age range of the population: 9-18			
Name of PREA Compliance Manager: Teresa Cuthbertson		Title: Program Manager	
Email address: tcuthbe@myguilford.com		Telephone number: (336) 641-2600	
<b>Agency Information</b>			
Name of agency: Court Alternatives Department/Guilford County Juvenile Detention			
Governing authority or parent agency: (if applicable)			
Physical address: 15 Lockheed Court, Greensboro, North Carolina 27409			
Mailing address: (if different from above)			
Telephone number: (336) 641-2600			
<b>Agency Chief Executive Officer</b>			
Name: Doug Logan		Title: Facility Director	
Email address: dlogan@myguilford.com		Telephone number: (336) 641-2600	
<b>Agency-Wide PREA Coordinator</b>			
Name: Teresa Cuthbertson		Title: Program Manager	
Email address: tcuthbe@myguilford.com		Telephone number: (336) 641-2600	

## AUDIT FINDINGS

### NARRATIVE

Guilford County Juvenile Detention Center (Guilford County JDC) is a forty-four (44) bed secure detention facility for male and female residents governed by the Court Alternatives Department located in Greensboro, North Carolina. The department's mission is to protect the community from those residents placed in the detention center's custody in a safe, secure and humane environment according to the principles of Direct Supervision. The department is committed to creating and maintaining alternatives to detention through community supervision programs that promote education, healthy lifestyles and positive choices for residents and their families. The detention center provides short term care for juveniles pending adjudication and/or disposition and commitment by the court or who are pending committed placements to a youth development center or transfer to another jurisdiction or agency. Guilford County JDC's vision is to be an organization of well-trained professionals dedicated to the positive development of residents by providing a wide range of services which support the resident's physical, emotional, educational and social development. The average age is between 9-18 years old although juvenile jurisdiction could remain until the age of 21 and the average length of stay is twenty (20) days. There were twenty-seven (27) male and female residents at the detention center at the time of the review.

The detention center is staffed with thirty-one (31) full-time and part-time employees. The certified staff consisted of: Facility Director, Program Manager, (3) Supervisors, Administrative Officer, (19) Counselor Technicians and six (6) vacancies. Also, the food service staff are contracted through Aramark. There are six (6) religious groups that regularly volunteer at the detention center besides the Greensboro Symphony who sends ten (10) volunteers four (4) times a year, Daystar Church sends fifteen (15) volunteers for an annual service and Save Our Kids sends four (4) volunteers twice a year.

The medical services consists of contracted medical staff (Correct Care Solutions) providing nursing services seven (7) days per week, available 24/7 and a physician once per week. The detention center has contracts with the local hospital for 24 hour emergency services. Also, psychiatric services are provided with a licensed adolescent psychiatrist in addition to the nurses providing health education and counseling about a variety of health topics. The medical staff provides medical care to include: completing the initial intake assessment, review intake referrals, physical examination within 72 hours of admission, sick call, routine and additional lab work as ordered, STD testing and treatment as indicated, updating immunization records, seasonal flu vaccinations, routine eye exams, dietary services and referrals, administration of medications/treatments as prescribed, assessments of resident injuries and treatment as required, medical assessments and monitoring with any restraint or seclusion, assessments of somatic health complaints with treatment as indicated, develop treatment plans and provide medical discharge plans. Dental and Optometry services are provided off-site by the Health Department on an as needed basis. Several on-site medical clinics occur including a weekly medical clinic, a weekly mental health clinic, and participation in weekly treatment planning meetings. There are contracted licensed mental health clinicians (Correct Care Solutions) that come to the detention center to provide crisis intervention counseling, assessment appropriate referrals, emergency and non-emergency mental health assessments. Also, the mental health staff provide consultations as it relates to the juvenile's custody in detention, and after-hours and weekend emergency mental health services. The Alcohol and Drug Services of Guilford, Inc. (ADS) has allocated one (1) staff member to provide substance abuse services (assessments, group and individuals counseling) at the detention center.

Guilford County JDC has partnered with the Guilford County Schools to provide educational services to the residents. The educational department consists of three (3) certified teachers providing educational services licensed by the N.C. Department of Public Instruction. Following required State law all educational staff in "licensed" positions holds the appropriate licensure for their subject(s), grade level(s) or professional assignment(s). Upon arrival to the detention center each resident under goes a series of pre-tests to determine their level of performance and then given assignments based on the results of the pre-tests. The residents participate in an individual education program that is designed for them. The detention facility provides an educational program during the week in order for residents to maintain their grades and the continuity of care upon return to their community schools. The program is designed for residents to have the opportunity to learn at the highest level possible. The instructional program encourages the residents to explore their abilities to learn, understand their cultural backgrounds, and enhance their future. Residents receive instruction in life skills, English, mathematics, social studies and science. Special Education services are offered to residents who qualify and counseling services are offered to all residents. One (1) of the teachers assigned to the detention center is an Exceptional Children's Services teacher who works with residents that have an IEP (Individualized Educational Plan). Also, there are two (2) school transition coordinators whose responsibility is to maintain communication and the reporting of grades to the resident's assigned home school. Both transition coordinators attend court hearings and provide follow-up tracking once residents are released from the detention center.

Guilford County JDC takes pride in engaging with community outreach activities. They have two (2) G.R.E.A.T. (Gang Resistance Education and Training) Officers that teach the G.R.E.A.T. curriculum in the detention center and select Guilford County Middle Schools. The G.R.E.A.T. Program provides participants an opportunity to engage in activities such as role playing, small-group work, brainstorming and large-group discussions. These activities are designed to assist the participants learn the skills and behaviors that make it easier to resist and avoid negative influences in their life. Also, a Wellness Program as mandated by the Federal Child Nutrition Program is offered at the detention center. The program ensures that every resident is taught how to live a healthy lifestyle through proper eating habits and exercise. The detention center offers facility tours for organizations and families as a community service to assist with early interventions and preventions with unruly and misguided residents.

## DESCRIPTION OF FACILITY CHARACTERISTICS

Guilford County Juvenile Detention Center (Guilford County JDC) is located in Greenboro, North Carolina. The detention center is approximately 25,000 square feet, is situated on ten (10) acres of land, and it was designed with a capacity of forty-four (44) male and female residents. The detention center's physical plant is a single story building with a fenced secured area and an outdoor recreation area. There is a secure entrance/lobby area with administrative offices, kitchen and storage area, gymnasium/visitation area, control room, three (3) housing units with six (6) pods of seven (7) to eight (8) single cells each. Each single cell has an intercom, a bunk and a sink and toilet combination unit. Each single cell opens directly into the day room where there are two (2) stationary tables and chairs, where the residents eat their meals. Adjacent to the tables are a set of modular couches for leisure time seating. Also, the pods are equipped with speakers whereby residents are allowed to listen to music at specified times of the day. Each pod has a main shower room that is equipped with a sink and toilet combination unit and is handicap accessible.

The detention center is video monitored and recorded to ensure safety and security of all residents. The intake area has a gated vehicle sally port for secure entry of transporting officials into the detention center. There is one (1) holding single cell, a padded room equipped with a camera and a separate shower for the processing of new admissions. Also, there is a video arraignment room on-site, where some of the detainees have scheduled court hearings instead of being transported to court. The detention center has an indoor multi-purpose room (gymnasium) that is utilized for gym and other recreational activities. Adjacent to the gymnasium is a visitation room for residents and their families two (2) days out of the week. The residents utilize the outdoor recreation area year round for basketball, football, volleyball and soccer. The food personnel staff at the detention center provides each resident with hot home cooked meals and plenty of snacks on a daily basis. Daily physical and mental activities are implemented. Programs and activities are offered to stimulate the residents to think, listen, learn and act responsible. Also, the detention staff provide individual and group counseling on a weekly basis in addition to providing life skills, coping skills, and setting goals as key tools to get the resident back on track.

The detention center's garden is situated within the fenced in recreation area. All residents have the opportunity each year to participate in the cultivating and planting of a variety of fruits, vegetables and herbs in our "Karma Garden". The "Karma Garden" was established to teach residents how to utilize gardening tools and equipment to prepare and set up a garden. The residents have the opportunity to eat the fruits and vegetables once the harvest is ready and donate portions of the harvest to a local shelter.

## SUMMARY OF AUDIT FINDINGS

The notification of the on-site audit was posted by May 30, 2017, six weeks prior to the date of the on-site audit. The posting of the notices was verified during the tour and verified by photographs received in an email from Guilford County JDC's Program Manager. The photographs indicated notices were posted in various locations throughout the detention center including the front entrance/lobby to the facility, several doors leading into the gymnasium, kitchen, detention staff breakroom area, and three (3) housing units. This auditor did not receive any communications from the detention staff or the residents as a result of the posted notices. The Pre-Audit Questionnaire, policies, procedures, and supporting documentation were received by June 13, 2017. The documents, which were uploaded to a USB flash drive, were not organized nor easy to navigate. The initial review revealed the need for additional information in regard to the Pre-Audit Questionnaire and supporting documentation which did not sufficiently address some of the standards. Also, the flash drive was updated to include additional supporting documentation. After a discussion (conference call) with the Facility Director and Program Manager/PREA Coordinator and providing a list of noted concerns, the Program Manager sent the documentation prior to arrival to the detention center. Also several documents were provided during the on-site visit. Specific corrective actions during the on-site visit taken to address some of the deficiencies are summarized in this report under the related standards.

The on-site audit was conducted on July 11-12, 2017. An entrance briefing was conducted with the Facility Director and Program Manager/PREA Coordinator. During the briefing, it was explained the audit process and a tentative schedule for the two (2) days to include conducting interviews with the detention staff and residents and reviewing the documentation. A complete guided tour of the detention center was conducted including the secure lobby area, administrative area with several offices, kitchen and storage area, gymnasium/visitation area, control room, three (3) housing units with six (6) pods of seven (7) to eight (8) single cells each, laundry/storage area, receiving area, three (3) classrooms, medical area, two (2) other offices (mental health/substance abuse) and outdoor recreation area. During the tour, residents were observed to be under constant supervision of the detention staff while involved in various activities. The detention center was clean well maintained and it was obvious staff took pride in their working area. Notification of the PREA audit was posted in all locations throughout the detention center as well as postings informing residents of the telephone numbers for reporting against sexual abuse and harassment and to call for victim advocate services. Cameras and video surveillance system enhance their capabilities to assist in monitoring blind spots and the review of incidents. There are cameras and mirrors installed in several areas throughout the detention center. There were no cameras installed in the resident's rooms or shower/toileting area so residents are not seen on the surveillance system while showering or toileting, but can be viewed by same sex staff as they supervise the shower area. During the tour, it was observed in all three (3) housing units, the single cells in each pod have a bed and sink/toilet combination unit that did not allow for privacy. This was corrected and verified with photographs sent to this auditor by the Guilford County JDC's Program Manager. Each resident's bedroom now has a privacy flap for their window that allows for privacy.

During the two (2) day on-site visit, there were a total of twenty-seven (27) residents in the facility. Ten (10) residents were randomly selected for the interview process. Residents were well informed of their right to be free from sexual abuse and harassment and how to report sexual abuse and harassment using several ways of communication such as trusted staff, administrative staff, family member, and the hotline. Also, the community victims' advocacy service, telephone number and pamphlet is available to the residents. There is evidence of the Guilford County JDC's Program Manager's efforts to obtain Memorandum of Understanding from the Family Services of the Piedmont to provide confidential emotional support to residents who are victims of sexual abuse. Moses Cone Hospital (SAFE and SANE certified) provides the emergency & forensic medical examinations at no financial cost to the victim. Additionally, the detention center has identified two (2) mental health professionals will serve as an advocate to link services and provide confidential emotional support to residents who are victims and/or report sexual abuse and sexual harassment by another resident, staff member, contractor or volunteer. These individuals are screened for appropriateness to serve as a victim advocate and receive specialized training. Twenty (20) staff including those from both shifts, supervisory staff, contracted staff (teacher), medical, mental health and substance abuse staff on both days of the audit and the Facility Director and Program Manager/PREA Coordinator were interviewed several days after the on-site visit. Overall, the interviews revealed the staff is knowledgeable of the PREA standards and were able to articulate their responsibilities and their mandated duty to report.

At the end of two (2) days, an exit briefing with a summary of the findings was conducted with the Facility Director and Program Manager. At the exit debriefing, it was discussed additional documentation was required for eight (8) standards and it was determined this information would be sent to this auditor within the next three (3) weeks to be in compliance with all the PREA standards. The requested information was sent to this auditor by Guilford County JDC's Program Manager prior to the submission of this report. This auditor reviewed all requested information and this facility is in full compliance with the PREA Standards.

Number of standards exceeded: 0

Number of standards met: 39

Number of standards not met: 0

Number of standards not applicable: 2

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

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)) revised 8/3/17 outlines how the detention center implements its approach to preventing, detecting and responding to all approaches of sexual abuse and harassment, including the definitions of prohibited behaviors as well as sanctions for staff, contractors, volunteers and residents who had violated those prohibitions. Additionally, the policy provided comprehensive guidelines and a training foundation for implementing the detention center's approach to include the zero tolerance towards reducing and preventing sexual abuse and harassment of residents. Court Alternatives Department/Guilford County JDC has a designated PREA Coordinator/PREA Compliance Manager, her official title is Program Manager and reports directly to the Guilford County JDC Facility Director. She is responsible to implement the PREA Standards and indicated she has sufficient time and authority to develop, implement and oversee the detention center's efforts toward PREA compliance with all the PREA standards. It was evident during the staff interviews, staff had been trained and were knowledgeable of Guilford County JDC's PREA Policy including all aspects of sexual abuse, sexual harassment and sexual misconduct in accordance with the requirements.

Standard 115.312 Contracting with other entities for the confinement of residents

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

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

The documentation reviewed indicated that the Guilford County Juvenile Detention Center does not contract for the confinement of residents with private entities or other entities, including other government agencies, therefore this standard is not applicable to this detention center.

Standard 115.313 Supervision and monitoring

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

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion

must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)) revised 8/3/17 and Policy JDS 17.7 (Residential Life) revised 8/2/08 contained the required information identifying the detention center to develop a staffing plan to provide for adequate staffing levels to ensure the safety and custody of residents, account for departmental resident to staff ratios, physical plant, video monitoring (if applicable) and federal standards. Additionally, the policies contained information identifying the detention center shall comply with staffing requirements including exigent circumstances and supervisory staff conducting unannounced rounds during all shifts. During the initial documentation review, Guilford County JDC's staff-to-youth ratios is identified as 1:8 during the resident waking and 1:16 during sleeping hours. The Guilford County JDC's staffing plan was developed, approved, and implemented in 2016. Their staffing plan's annual review was conducted in 2017 and was found to be in compliance with this standard.

During the initial documentation review, the detention center did not report deviations from the staffing plan during the past twelve (12) months. The staff-to-youth ratios of 1:8 during the resident waking and 1:16 during sleeping hours is always maintained, the facility has a mechanism in place for call outs and staff volunteer to stay over if needed. Guilford County JDC is a secure detention center and utilizes detention staff monitoring to protect the residents from sexual abuse and sexual harassment. The Facility Director, Program Manager and Supervisors conduct and document unannounced rounds on all shifts and in all areas of the detention center to monitor and deter staff sexual abuse and harassment on a daily basis. All unannounced rounds are documented in the logbooks and daily shift notes, a Supervisor and detention staff interviews confirmed the process takes place in the detention center.

#### Standard 115.315 Limits to cross-gender viewing and searches

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)) revised 8/3/17 and Policy JDS 9.2 (Searches) requires the detention center to maintain protocols on limited pat-down searches to same gender staff absent exigent circumstances, shower procedures, opposite gender announcing when entering dorm areas, and prohibiting the search of a transgender or intersex resident solely for the purpose of determining the resident's genital status. All Guilford County JDC's detention staff have completed the North Carolina Department Public Safety (NCDPS) extensive staff training in addition to the detention center's training. A review of the training documentation and detention staff interviews confirmed training on pat down searches, cross-gender pat searches and searches of transgender and intersex residents are conducted in a respectful and professional manner and prohibiting cross-gender strip or cross-gender visual body cavity searches of residents. Most detention staff interviews were able to describe what an exigent circumstance would be and were knowledgeable of the procedures for securing authorization to conduct such a search as well as the requirements for justifying and documenting those searches. Most residents stated that they had never been searched by a staff member of the opposite sex nor had they ever seen a staff conduct a cross gender pat down search. Most detention staff and resident interviews indicated that staff of the opposite gender entering their pod area consistently announce themselves.

Detention staff and resident interviews confirmed residents are able to shower, perform bodily functions and change clothing without non-medical staff of the opposite gender viewing them and could identify the detention center's policy on prohibiting staff from searching or physically examining a transgender or intersex inmate for purpose of determining that resident's genital status. In addition, most detention staff and resident interviews indicated that staff of the opposite gender are prohibited from entering the shower area while residents are showering. During the tour, it was observed in all three (3) housing units, the single cells in each pod have a bunk and sink/toilet combination unit that did not allow for privacy. This was corrected and verified with photographs sent to this auditor by the Guilford County JDC's Program Manager. There have been no cross-gender pat down searches, cross-gender strip or cross-gender visual body cavity searches of residents in the past twelve (12) months. Also, there have been no exigent circumstances of cross-gender pat down, strip or visual body cavity searches conducted of residents in the past twelve (12) months.

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

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)) revised 8/3/17 and Policy JDS 11.0 (Rules and Regulations) contained procedures to be taken to ensure residents with disabilities or who are limited English proficient have an equal opportunity and are provided meaningful access to all aspects of the detention center's efforts to prevent, protect and respond to sexual abuse and harassment. Additionally, the policy indicates the detention center will not rely on resident interpreters, resident readers or any kind of resident assistants except when a delay in obtaining interpreters services could jeopardize a resident's safety. Guilford County JDC has established a contract with Linguistica International, Inc. to provide residents with disabilities and residents who are limited English proficient with various interpreter services on an as needed basis. Guilford County JDC's "Juvenile Orientation Guide" and "Juvenile PREA Orientation" is provided to all residents upon admission to the detention center and is available in both English and Spanish. The teacher could provide residents with disabilities with various services on an as needed basis.

Detention staff training documentation including the Juvenile Orientation Guide and Juvenile PREA Orientation contained information on providing appropriate explanations regarding PREA to residents based upon the individual needs of the youth. Some detention staff and resident interviews confirmed the detention center does not use resident assistants and there were no instances of resident interpreters or readers being used in the past 12 months to report sexual abuse or sexual harassment. After the on-site visit, all detention staff were re-trained on interpreter services provided at the detention center and the process on how to obtain these services. The Guilford County JDC's Program Manager sent the documentation to this auditor prior to the submission of this report. The information was reviewed by this auditor and the detention center is in full compliance with this standard.

Standard 115.317 Hiring and promotion decisions

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)) revised 8/3/17 contained all the elements required by this standard and all background checks are conducted initially on new employees, current and promotion decisions of employees, volunteers, and contractors. Guilford County JDC has extensive initial background screening requirements that include the screening for criminal record checks (SBI & FBI), possible checks on criminal convictions and pending criminal charges, access to local, state and federal criminal databases to conduct background checks, psychological, driving records check, child abuse registry, credit history, state & national sex offender registry checks, and best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse and any resignation during a pending investigation or an allegation of sexual abuse. The agency conducts annual background checks for all employees and volunteers. Background checks for

contractors are conducted through their own company and the information is provided to the HR staff. A sampled review of detention staff's and volunteer's HR files had documentation on staff completing varied forms containing the questions regarding past misconduct (Applicant Verification form, Disclosure of PREA Employment Standards, and Professional Reference Check) that are completed during the hiring process. The HR staff send the criminal background information to their central office and receive an email on whether an individual is approved or disqualified. Once an individual is approved for hire, the new employee begins the LMS training and orientation process. The Administrative Officer's interview and documentation confirmed the detention staff hired had documented criminal background checks and the questions regarding past conduct were asked and responded to during the hiring process. Additionally, volunteers who have contact with residents have documented criminal background checks.

#### Standard 115.318 Upgrades to facilities and technologies

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

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

Guilford County Juvenile Detention Center (Guilford County JDC) has not been newly designed or had a substantial expansion or modification since August 20, 2012. The initial documentation review contained information dated March 2015 requesting a communications system that provides automated intercom emergency messaging, event scheduling, clock control, electric lock control and IP video management system to be installed at the detention center. Also, the installation of IP Vandal Dome Cameras and to convert existing cameras to the new IP video management system. During the tour, the video monitoring system, electronic surveillance system and mirrors were observed, this will enhance their capabilities to assist in monitoring blind spots and the review of incidents. Also, this enables the detention staff to monitor inmates more efficiently throughout the physical plant of the detention center. Interviews with the Facility Director and Program Manager confirmed the installation of the IP video management system to provide the continued prevention of sexual abuse and sexual harassment at the detention center.

#### Standard 115.321 Evidence protocol and forensic medical examinations

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA))] revised 8/3/17 contained the elements of the standard and identified that all allegations of sexual abuse and sexual harassment be referred to the appropriate investigative agency based upon the victim's age. Additionally, policy requires protocols for informed consent, confidentiality, reporting to law enforcement, and reporting to child abuse investigative agencies. Documentation and staff interviews confirmed Greensboro Police Department (GPD) and Department of Social Services (DSS) conducts the criminal investigations and administrative investigations of allegations of sexual abuse and sexual harassment for residents under the age of 18 and they receive reports through their hotline. Residents 18 years of age are referred to the appropriate law enforcement agency to investigate allegations of sexual abuse and sexual harassment. There is evidence of the Guilford County JDC's Program Manager attempts to obtain a Memorandum of

Understanding from Family Services of the Piedmont to provide confidential emotional support to residents who are victims of sexual abuse at the detention center. Moses Cone Hospital (SAFE/SANE) provides the emergency and forensic medical examinations at no financial cost to the victim. Additionally, the detention center has identified two (2) mental health professionals that will serve as an advocate to link services and provide confidential emotional support to residents who are victims and/or report sexual abuse and sexual harassment by another resident, staff member, contractor or volunteer. These individuals are screened for appropriateness to serve as a victim advocate and receive specialized training.

#### Standard 115.322 Policies to ensure referrals of allegations for investigations

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)] revised 8/3/17 requires an administrative and/or criminal investigation for all allegations of sexual abuse or sexual harassment. All staff are required to report all allegations, knowledge and suspicions of sexual abuse, sexual harassment, retaliation, staff neglect and/or violations of responsibilities that may have contributed to an incident or retaliation. All detention staff are required to refer all alleged incidents of sexual abuse or sexual harassment to Department of Social Services (DSS) for investigation and determination of child abuse and Greensboro Police Department (GPD) for the determination of criminal charges. The Guilford County JDC's Facility Director assigns an investigator who conducts an internal investigation and completes a PREA Investigation form. The Guilford County JDC PREA policy can be found at the county's website and information can be found in their Juvenile PREA Orientation that is available in English and Spanish. The parent/guardian is provided with an information packet identifying the zero tolerance to sexual abuse or sexual harassment and the hotline information on how to report.

Guilford County JDC had received two (2) allegations of sexual abuse and sexual harassment resulting in a criminal investigation and/or an administrative investigation in the past twelve (12) months. All detention staff interviews reflected and confirmed their knowledge on the reporting and referral process and policy's requirements but did not know the agency who conducts the administrative and criminal investigation in response to an allegation of sexual abuse and sexual harassment. After the on-site visit, all staff were re-trained on who conducts the administrative and criminal investigations in response to an allegation of sexual abuse, sexual harassment and sexual misconduct. The Guilford County JDC's Program Manager sent the documentation to this auditor prior to the submission of this report. The information was reviewed by this auditor and the detention center is in full compliance with this standard.

#### Standard 115.331 Employee training

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA))] revised 8/3/17 and Policy JDS 12.3 (Reporting Suspected Child Abuse) revised 8/2/08 training modules requires an indepth PREA Training upon initially becoming an employee (entry level training) as well as refresher training annually. All the PREA training provided to employees at the detention center contains all eleven (11) topics consistent with this standard's requirements and is tailored to this detention center with the gender of their resident populations. All detention staff receive the NCDPS training besides the detention center's training. Also, the staff receive training on professional and ethical boundaries (Daily Dozen) relating not only to PREA but to their role as an employee. The staff training documentation and staff interviews confirmed staff receives PREA training during initial training and during refresher training. All employees are trained as new hires regardless of their previous experience. All new employees receive the NCDPS Employee PREA brochure and sign the "Field Training Orientation" form indicating they received the training and understand their responsibilities for all the different training modules and tested upon completion of the initial PREA training. A review of all detention staff and training education forms as well as detention staff interviews confirmed that detention staff are receiving their required PREA training during initial and refresher training. The detention staff interviews confirmed their comprehension of the PREA training and their obligation to report any allegation of the sexual abuse and/or sexual harassment. Additionally, all employees receive training during monthly staff meetings. Employee training records are maintained in their personnel file.

#### Standard 115.332 Volunteer and contractor training

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA))] revised 8/3/17 and Policy JDS 12.3 (Reporting Suspected Child Abuse) revised 8/2/08 requires volunteers, interns and contractors who have contact with residents to receive indepth PREA training. All volunteers, interns and contractors receive the PREA training and sign the "PREA Sexual Abuse and Harassment Training Form" upon completion of the PREA training they received. Documentation confirmed they are aware of the detention center's requirement for confidentiality and their duty to report any incidents of sexual abuse and/or sexual harassment. An interview with a contracted substance abuse counselor confirmed his knowledge of the PREA training.

#### Standard 115.333 Resident education

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA))] revised 8/3/17 requires residents to receive comprehensive age appropriate education information regarding safety, their rights to be free from sexual abuse, sexual harassment, retaliation, reporting and the agency's response to allegations within 10 days upon arrival. However, the assigned detention staff provides the residents with this information immediately upon arrival during their initial intake and orientation process. During the initial intake, the assigned detention staff utilizes the "Juvenile Orientation Guide" and "Juvenile PREA

Orientation” to review detailed information verbally with the resident and the resident signs the “PREA Juvenile Acknowledgement Form” verifying receipt for all information regarding orientation to the detention center. Documentation of resident’s signatures were reviewed and confirmed during resident interviews. Residents are provided information on prevention/intervention, self-protection, reporting and treatment/counseling and is available in Spanish for future reference. Most residents interviewed stated they received this information the same day they arrived at the detention center and identified signing a form. The detention staff presents PREA information in a manner that is accessible to all residents and provides education on an ongoing basis individually or in a group session. The parent/guardian is provided a packet with detailed information on PREA and the resident’s orientation to the detention center.

#### Standard 115.334 Specialized training: Investigations

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)) revised 8/3/17 ) requires an administrative and/or criminal investigation for all allegations of sexual abuse or sexual harassment and requires staff to refer all alleged incidents of sexual abuse or sexual harassment to Greensboro Police Department (GPD) for criminal investigations and Department of Social Services (DSS) for administrative investigations. All investigators under go an extensive training prior to conducting administrative investigations which includes the NCDPS PREA Specialized Training: Investigating Sexual Abuse and Sexual Harassment. The detention center’s PREA investigators when assigned conduct administrative investigations. There are two (2) staff at the detention center who have completed the NCDPS PREA Specialized Training: Investigating Sexual Abuse and Sexual Harassment. Documentation was reviewed and in compliance with the PREA requirements for specialized training for investigators who investigate allegations of sexual abuse and sexual harassment in confinement.

#### Standard 115.335 Specialized training: Medical and mental health care

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)) revised 8/3/17 requires PREA training and specialized training for medical and mental health staff. It was evident through the medical and mental health staff interviews they had received the basic PREA training provided to all staff and the specialized training offered by NCDPS (Preventing, Detecting, and Responding to Sexual Abuse of Youth in Confinement: The Role of the Mental Health Clinician). All six (6) medical and mental health/substance abuse staff signed the “PREA Sexual Abuse and Harassment Training Form” and the “Court Alternatives Department/Guilford County JDC Training Course Record” to acknowledge they received both trainings and understand their responsibilities in the event of an incident. The medical staff do not conduct forensic examinations. During the initial document review, most of the medical and mental health/substance abuse staff did not complete the required specialized training. However the medical and mental health/substance abuse staff completed the required specialized medical and mental health training and Guilford

County JDC's Program Manager sent the documentation to this auditor prior to the submission of this report. The information was reviewed by this auditor and the detention center is in full compliance with this standard.

#### Standard 115.341 Screening for risk of victimization and abusiveness

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)) revised 8/3/17 requires prior to placement as part of the screening process each resident is screened upon admission with an objective screening instrument for risk of victimization and sexual abusiveness within 72 hours. All residents are screened within twenty-four hours upon arrival at the detention center to determine placement and their special needs. Those residents who score vulnerable to victim or sexually aggressive are included into their alert tracking system, as well as receiving further assessments, as identified. A "Receiving Screening" form, medical and mental health assessment and various other forms are used in combination with information about personal history, medical and mental health screenings, conversations, classification assessments as well as reviewed court records and case files. Residents are reassessed within three (3) days of their arrival and throughout their stay at the detention center. If the resident remains in the detention center beyond thirty (30) days, he or she will be reassessed again. The detention center's policies limits staff access to this information on a "need to know basis". Detention staff interviews confirmed a screening is completed on each resident upon admission to the detention center. Residents reporting prior victimization, according to detention staff, are referred immediately for a follow-up with medical or mental health personnel. Although there have been no transgender or intersex residents admitted to the detention center within the past twelve (12) months, detention staff were aware of giving consideration for the resident's own views of their safety in placement and programming assignments. Resident interviews indicated limited knowledge of being asked specific questions (i.e. whether you had ever been sexually abused, whether you think you might be in danger of sexual abuse here etc.) during the admission process. After the on-site visit, it was determined to provide the detention center's intake staff with a refresher training on the updated resident admission and orientation process on how to review the PREA information verbally to the residents. Guilford County JDC's Program Manager sent the documentation to this auditor prior to the submission of this report. The information was reviewed by this auditor and the detention center is in full compliance with this standard.

#### Standard 115.342 Use of screening information

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)) revised 8/3/17 prohibits gay, bi-sexual, transgender and intersex residents being placed in a dorm area, bed or other assignments based solely on their identification or status. In addition, the policy describes the screening and assessment process and how the information, along with information derived from medical and mental health screening and assessments, records reviews, database checks, conversations

and observations, is used to determine a resident's appropriate placement, housing and bed assignments, as well as work, education, and program assignments with the goal of keeping all residents safe and free from sexual abuse. The assigned medical and mental health/substance abuse staff utilize various forms, the "Receiving Screening" form, Mental Health Status form to name a few and any other pertinent information during the resident's admission process. Also, the detention staff determine placement of residents in a specific sleeping assignment according to their risk level (low, medium or high). The detention, medical and mental health/substance abuse staff interviews described how information is derived from the various forms and the initial medical and mental health/substance abuse screening forms to determine placement and risk level. There are three (3) housing units located in this detention center. Each housing unit has two (2) pods with seven (7) to eight (8) single cells with a shower area, dayroom with correctional table and chairs, bulletin boards with PREA and detention center information and telephone. One of the housing units is for female residents. Isolation is not utilized at the detention center as a means of protective custody.

#### Standard 115.351 Resident reporting

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)) revised 8/3/17; Policy JDS 12.0 (Rights and Responsibilities of Juveniles); Policy JDS 12.1 (Access to Legal Representation); Policy JDS 18.0 (Correspondence and Mail); Policy JDS 18.1 (Visitation) and Policy JDS 18.2 (Telephone) revised 8/2/08 provides multiple internal ways for residents to report sexual abuse and harassment retaliation, staff neglect or violation of responsibilities that may have contributed to such incidents. Residents are informed verbally and in writing on how to report sexual abuse and sexual harassment. These various ways of reporting include advising an administrator, a staff member, telephoning the hotline number, placing a written complaint in the PREA/grievance box and third party.

While touring the detention center, there were postings of the PREA information with reporting information and a locked PREA/grievance box (black box) with forms located in all three (3) classrooms. Resident interviews indicated several ways to report sexual abuse and sexual harassment by telephoning the hotline, speak with a staff they trust, third party but did not know about the anonymous reporting capability. Most residents identified the PREA/grievance box (black box) as a means to report sexual abuse and sexual harassment. Also, detention staff interviews along with the Juvenile Orientation Guide, postings, and supporting documentation confirmed multiple internal ways for residents to report sexual abuse and sexual harassment. After the on-site visit, it was determined to provide the detention center's intake staff with a refresher training on the updated resident admission and orientation process on how to review the PREA information verbally to the residents. Guilford County JDC's Program Manager sent the documentation to this auditor prior to the submission of this report. The information was reviewed by this auditor and the detention center is in full compliance with this standard.

#### Standard 115.352 Exhaustion of administrative remedies

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

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

corrective actions taken by the facility.

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA))] revised 8/3/17 describes the orientation residents receive explaining how to use the grievance process to report allegations of abuse and has administrative procedures/appeal process for dealing with resident's grievances regarding sexual abuse or harassment. Residents may place a written grievance or complaint in the locked PREA/grievance box (black box) located in all three (3) classrooms of the detention center. The detention center has a multi-layered grievance process enabling timely response and layers of review. The policies and procedures describe an unimpeded process. Residents are not required to utilize an informal process for reporting allegations of sexual abuse or sexual harassment nor are they required to submit it to the staff member involved in the allegation. Some resident interviews and documentation confirmed there is a grievance process relating to sexual abuse or sexual harassment and a written complaint can be placed in the PREA/ grievance box (black box). Residents indicated they would contact a trusted detention staff or telephone the hotline in relation to sexual abuse or sexual harassment complaints. There have been no grievances relating to sexual abuse or sexual harassment received in the past twelve (12) months.

#### Standard 115.353 Resident access to outside confidential support services

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA))] revised 8/3/17 ensures that residents are provided access to outside confidential support services, legal counsel and parent/guardian. There is evidence of the Guilford County JDC's Program Manager attempts to obtain a Memorandum of Understanding from Family Services of the Piedmont to provide confidential emotional support to residents who are victims of sexual abuse at the detention center. Moses Cone Hospital (SAFE/SANE) provides the emergency and forensic medical examinations at no financial cost to the victim. There have been no calls from residents to outside services in the past twelve (12) months. Most resident interviews confirmed they have reasonable and confidential access to their attorneys and reasonable access to their parent/guardian either through visitation, correspondence or by telephone. The detention center provides weekly calls to parents/legal guardians, provides for the toll free hotline to report sexual abuse, permits parental/legal guardians visitation, and letter writing to parents/ legal guardians. The detention center's postings contained the information of the outside services and it was readily available. Resident interviews revealed knowledge of how to access outside services but limited knowledge of what kind of services are provided to them. The detention staff will be providing additional education to future residents on victim advocate services during their orientation process and during their group session while at the detention center. Guilford County JDC's Program Manager sent the documentation to this auditor prior to the submission of this report. The information was reviewed by this auditor and the detention center is in full compliance with this standard.

#### Standard 115.354 Third-party reporting

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

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

corrective actions taken by the facility.

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA))] revised 8/3/17 identifies the Court Alternative Department/Guilford County's third party reporting process and instruct staff to accept third party reports. The county's website provides the public with information regarding third-party reporting of sexual abuse or sexual harassment on behalf of a resident. The detention staff provides the parent/guardian with a packet containing varied forms, victim advocate services and third-party reporting information. Resident interviews confirmed their awareness of reporting sexual abuse or harassment to others outside of the detention center including access to their parent(s)/legal guardian(s) and attorney. Additionally, they are instructed to report allegations of sexual abuse and sexual harassment to a trusted adult, parent/legal guardian, and/or attorney. Most detention staff interviews were able to describe how reports may be made by third parties.

#### Standard 115.361 Staff and agency reporting duties

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA))] revised 8/3/17 and Policy JDS 12.3 (Reporting Suspected Child Abuse) revised 8/2/08 identified the reporting process for all staff to immediately report any knowledge, suspicion or information they receive regarding sexual abuse and harassment, retaliation against residents or staff who report any incidents or any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. All detention staff are mandated reporters and random staff interviews confirmed the detention center's compliance with this standard. All detention staff receive information on clear steps on how to report sexual abuse, sexual harassment and to maintain confidentiality through the detention center protocol and/or training. The detention staff would complete an incident report with the details of any incidents that would occur in the detention center in compliance with this standard. Additionally, interviews with medical and mental health/substance abuse staff confirmed their responsibility to inform residents under 18 years old of their duty to report and limitations of confidentiality.

#### Standard 115.362 Agency protection duties

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA))] revised 8/3/17 requires that immediate action to be taken upon learning that a resident is subject to a substantial risk of imminent sexual abuse. There were no residents determined to be subject to substantial risk of imminent sexual abuse in the past twelve (12) months. Documentation and interviews with the Director and other random selected detention staff were able to articulate, without hesitation, the expectations and requirements of the policies and PREA Standards, upon becoming aware that a resident may be subject to a substantial risk

of imminent sexual abuse. Detention staff indicated if a resident was in danger of sexual abuse or at substantial risk of imminent sexual abuse, they would act immediately to ensure the safety of the resident, separate from the alleged perpetrator and contact their immediate supervisor. Additionally, the resident would be referred for mental health services. All resident interviews reported they feel safe at this detention center and none had ever reported to staff that they were at substantial risk of imminent sexual abuse.

#### Standard 115.363 Reporting to other confinement facilities

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)) revised 8/3/17 requires the Director, upon receiving an allegation that a resident was sexually abused while confined at another facility, to notify the head of the other facility where the alleged abuse occurred and to report it in accordance with detention center's policies and procedures. The Director has received no allegations that a resident was abused while confined at another facility nor were there any allegations received from another facility during the past twelve (12) months.

#### Standard 115.364 Staff first responder duties

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)) revised 8/3/17 and Guilford County JDC Coordinated Response to Sexual Abuse or Assault requires detention staff to take specific steps to respond to a report of sexual abuse including; separating the alleged victim from the abuser; preserving any crime scene within a period that still allows for the collection of physical evidence; request that the alleged victim not take any action that could destroy physical evidence; and ensure that the alleged abuser does not take any action to destroy physical evidence, if the abuse took place within a time period that still allows for the collection of physical evidence. There were two (2) allegations of sexual abuse during the past twelve (12) months. First responder interview validated his technical knowledge of actions to be taken upon learning that a resident was sexually abused, however most staff interviews had difficulty in providing the action steps identified in the Guilford County JDC policies and procedures, had limited knowledge of their responsibilities as first responders and unaware of why they do these duties. All staff were re-trained on first responder duties consistent with Guilford County JDC policies and procedures. Guilford County JDC's Program Manager sent the documentation to this auditor prior to the submission of this report. The information was reviewed by this auditor and the detention center is in full compliance with this standard.

#### Standard 115.365 Coordinated response

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)) revised 8/3/17 and Guilford County JDC Coordinated Response to Sexual Abuse or Assault provides a written coordinated response system to coordinate actions taken in response to an incident of sexual abuse among staff first responders, administration, executive staff and contacting medical and mental health outside sources. Guilford County JDC's detention staff have a system in place providing the staff with clear actions to be taken by each discipline for accessing, contacting administrative staff, medical and mental health staff, contacting DSS and law enforcement, victim advocate services, & parent/guardian and a number of other individuals. Interviews with the Director and other detention staff validated their technical knowledgeable of their duties in response to a sexual abuse.

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

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

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

Court Alternatives Department/Guilford County JDC does not engage in the collective bargaining process regarding any violation of departmental policy regarding PREA, therefore this standard is not applicable.

#### Standard 115.367 Agency protection against retaliation

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA))] revised 8/3/17 requires the protection and monitoring of residents and staff who have reported sexual abuse and sexual harassment or who have cooperated in a sexual abuse or harassment investigation. Guilford County JDC policies and procedures prohibits retaliation against any staff or resident for making a report of sexual abuse as well as retaliation against a victim who has suffered from abuse. The monitoring at a minimum will take place for a period of 90 days or longer, as needed. This monitoring would include resident disciplinary reports, bedroom and program changes, negative performance reports as well as reassignments of detention staff. Guilford County JDC's Program Manager is responsible with overseeing the monitoring of the conduct or treatment of residents or detention staff who reported the sexual abuse and of residents who were reported to have suffered sexual abuse to determine if changes that may suggest possible retaliation exist. She is responsible for assigning staff that will assist her with the monitoring and support to residents who report sexual abuse and sexual harassment by another resident, staff member, contractor or volunteer. There were no incidents of retaliation in the past twelve (12) months.

#### Standard 115.368 Post-allegation protective custody

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA))] revised 8/3/17 contained information on post-allegation protective custody or guidelines for moving a resident to another facility as a last measure to keep residents who alleged sexual abuse safe and only until an alternative means for keeping the resident safe can be arranged. The detention center restricts any isolation placement, however, Guilford County JDC has the capabilities to provide protective housing for a resident as a last resort. No residents who have alleged sexual abuse in the past twelve (12) months were secluded or isolated from the other residents. The residents would be placed in another facility or detention staff would be placed on "no contact with resident."

#### Standard 115.371 Criminal and administrative agency investigations

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA))] revised 8/3/17 require staff to refer all alleged incidents of sexual abuse or sexual harassment to the Department of Social Services (DSS) for investigation and determination of child abuse and Greensboro Police Department (GPD) for the determination of criminal charges. Detention staff refer all allegations of sexual abuse and harassment to the Facility Director for completion of an internal administrative investigation. The Guilford County JDC's Facility Director assigns an investigator who conducts an internal administrative investigation and completes a PREA Investigation form of the findings. There have been no reported investigations that appeared to be criminal and referred for prosecution of alleged detention staff's or residents inappropriate sexual behavior that occurred in this detention center in the past twelve (12) months. It was evident, the detention staff reported incidents as required and reports are maintained for as long

as the alleged abuser is incarcerated or employed by the detention center, plus 5 years unless the abuse was committed by a juvenile and applicable laws require a shorter period of retention.

#### Standard 115.372 Evidentiary standard for administrative investigations

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)) revised 8/3/17] contains all the elements of the standard and indicates a standard of a preponderance of the evidence or a lower standard of proof for determining if allegations are substantiated. The staff from the Department of Social Services (DSS) and Greensboro Police Department (GPD) investigate the allegation and indicates a standard of a preponderance of the evidence or a lower standard of proof for determining if allegations are substantiated. An interview with the Director indicated that they conduct fact finding investigations, make conclusions following the investigation and provide the information to the detention center and to the County's Central Office for consultation with legal and human resources to determine disciplinary actions.

#### Standard 115.373 Reporting to residents

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)) revised 8/3/17] requires that any resident who makes an allegation that he or she suffered sexual abuse is informed in writing contains the process for notifying residents whether the allegation proves substantiated, unsubstantiated or unfounded following an investigation. The Guilford County JDC's Program Manager has a process to notify the resident. A "Resident Notification" form is completed and provided to the resident. The policies further requires that following a resident's allegation that a staff member who has committed sexual abuse against the resident, the facility informs the resident unless the allegations are "unfounded" whenever the staff member is no longer posted within the resident's housing area; the staff member is no longer employed at the facility; Greensboro Police Department (GPD) notifies that the staff member has been indicted or convicted on a charge related to sexual abuse within the detention center. With regard to investigations involving resident-on-resident allegations of sexual abuse, Greensboro Police Department (GPD) notifies the Director who will then inform the resident whenever the detention center learns that the alleged abuser has been indicted or convicted on a charge related to sexual abuse within the detention center. There have been two (2) reported investigations of alleged detention staff or resident's inappropriate sexual behavior that occurred in this detention center during the past twelve (12) months. The Facility Director validated his technical knowledge of the reporting process during his interview.

#### Standard 115.376 Disciplinary sanctions for staff

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)) revised 8/3/17 disciplinary sanctions up to and including termination for violating the facility's sexual abuse or harassment policies. The policy also mandates that the violation be reported to the County's Central Office and law enforcement if criminal in nature. All disciplinary sanctions are maintained in the employees HR file in accordance with Guilford County JDC policy and procedures. Termination is the presumptive sanction for staff who have engaged in sexual abuse. Additionally, staff may not escape sanctions by resigning. Staff who resign because they would have been terminated, are reported to the local law enforcement, unless the activities were not clearly criminal. There have been no employees terminated in the past twelve (12) months for violation of the detention center's sexual abuse or harassment policies. The Facility Director's interview validated his technical knowledge of the reporting process was consistent with Guilford County JDC policy and procedures.

#### Standard 115.377 Corrective action for contractors and volunteers

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)) revised 8/3/17 requires that volunteers and contractors in violation of the facility's policies and procedures regarding sexual abuse and harassment of residents will be reported to DSS and local law enforcement unless the activity was clearly not criminal and to relevant licensing bodies. Additionally, the policies requires the detention staff to take remedial measures and prohibit future contact with residents in the case of any violation of the detention center's sexual abuse and harassment policies by contractors or volunteers. This was verified during an interview with the Facility Director. There have been no volunteers or contractors reported in the past twelve (12) months for engaging in sexual abuse or harassment of a resident.

#### Standard 115.378 Disciplinary sanctions for residents

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA))] revised 8/3/17; Policy JDS 11.2 (Major Rule Violations) and Policy JDS 11.3 (Criminal Prosecution) any resident found to have violated any of the agency's sexual abuse or sexual harassment policies will be subject to sanctions pursuant to the behavior management program. Guilford County JDC's detention staff provides each resident with information that includes their rights and responsibilities, a disciplinary list of violations, disciplinary procedures and transfers. Residents will be offered therapy, counseling or other interventions designed to address and correct the underlining reasons for their conduct. There have been no administrative or criminal findings of guilt for resident-on-resident sexual abuse that have occurred at the detention center in the past twelve (12) months. The Facility Director indicated that residents may also be referred for prosecution if the allegations were criminal.

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

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA))] revised 8/3/17 require medical and mental health/substance abuse evaluations and as appropriate, treatment is offered to all residents victimized by sexual abuse and ensure confidentiality of information. Residents who report prior sexual victimization or disclose prior incidents of perpetrating sexual abuse, either in an institution or in the community, are required to be offered a follow-up with a medical or mental health practitioner within 14 days of admission/ screening. Medical and mental health staff complete various admission screening forms (i.e. Receiving Screening, MAYSI, Medical History & Physical Assessment, Initial Mental Health Evaluation and Alcohol & Drug Services Screening Assessment Report) during the initial intake process including informed consent disclosures. There were no residents who disclosed prior victimization during their initial screening process. Medical and mental health/substance abuse staff interviews confirmed that although there were no disclosures the past twelve (12) months, all residents were offered follow-up meetings with medical and mental health providers.

#### Standard 115.382 Access to emergency medical and mental health services

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)) revised 8/3/17 requires resident victims of sexual abuse are offered timely information about and timely access to emergency contraception and sexually transmitted disease prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate and unimpeded access to emergency medical treatment and crisis intervention services. The medical staff have a protocol in place to assist in expediting a resident to the emergency room with specific documentation (Staff Referral Form) for the detention staff. Additionally, documentation provided confirmed treatment services are provided to every victim without financial cost. There is evidence of the Guilford County JDC's Program Manager attempts to obtain a Memorandum of Understanding from Family Services of the Piedmont to provide confidential emotional support to residents who are victims of sexual abuse at the detention center. Moses Cone Hospital (SAFE/SANE) provides the emergency and forensic medical examinations at no financial cost to the victim. Additionally, the detention center has identified two (2) mental health professionals that will serve as an advocate to link services and provide confidential emotional support to residents who are victims and/or report sexual abuse and sexual harassment by another resident, staff member, contractor or volunteer. These individuals are screened for appropriateness to serve as a victim advocate and receive specialized training.

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

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)) revised 8/3/17 requires ongoing medical and mental health care for sexual abuse victims and abusers. Additionally, the policy requires the facility to offer medical and mental health evaluations and appropriate follow-up treatment. Victims of sexual abuse will be transported to Moses Cone Hospital where they will receive treatment and where physical evidence can be gathered by a certified SAFE/SANE medical examiner. There have been two (2) investigations of alleged resident's sexual abuse that occurred in this detention center in the past twelve (12) months. There is a process in place to ensure medical and mental health staff track on-going medical and mental health services for victims who may have been sexually abused. The medical and mental health staff have a protocol (Staff Referral form, Mental Health Special Needs Progress Note and Medical/Mental Health Discharge Summary) in place to assist residents and their families upon discharge from the detention center to continue services if needed.

Standard 115.386 Sexual abuse incident reviews

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)) revised 8/3/17 requires a PREA Post Incident Review of every sexual abuse allegation at the conclusion of all investigations, except those determined to be unfounded within thirty (30) days. Guilford County JDC's Sexual Abuse Team consists of the Facility Director, Program Manager, PREA investigators, medical and mental health representatives. There have been two (2) investigations of

alleged detention staff's or resident's sexual abuse that occurred in this detention center in the past twelve (12) months. The detention staff interviews confirmed they would document their review on the "PREA Post Incident Review Team Form" that captures all aspects of an incident.

#### Standard 115.387 Data collection

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)) revised 8/3/17 requires the collection of accurate, uniform data for every allegation of sexual abuse. The Facility Director inputs information into the NC JOIN system and the NCDPS PREA Director obtains the data from this system relating to PREA. The NCDPS PREA Director has a data collection instrument to answer all questions for the U.S. Department of Justice Survey of Sexual Abuse Violence. A review of the 2015 annual report revealed it was completed and in accordance with this standard.

#### Standard 115.388 Data review for corrective action

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)) revised 8/3/17 requires the review of data for corrective action to improve the effectiveness of its prevention, protection and response policies, practices and training. A review of the 2015 Annual Report indicated compliance with the standard and included all of the required elements. The NCDPS 2015 Annual Report is posted on the NCDPS Website for public review. The Facility Director monitors collected data to determine and assess the need for any corrective actions.

#### Standard 115.389 Data storage, publication, and destruction

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

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

The initial review of the Guilford County Juvenile Detention Center (Guilford County JDC) Policy JDS 12.6 [(Prison Rape Elimination Act (PREA)] revised 8/3/17 requires that data is collected and securely retained for 10 years. The aggregated sexual abuse data was reviewed and all personal identifiers are removed.

#### AUDITOR CERTIFICATION

I certify that:

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

Dorothy Xanos

August 13, 2017

Auditor Signature

Date